

COUNTY OF RIVERSIDE
GENERAL PLAN AMENDMENT 1122
CHANGE OF ZONE CZ No. 7902

STATE CLEARINGHOUSE NO. 2015061083

FINAL ENVIRONMENTAL IMPACT REPORT NO. 548

Prepared for:

COUNTY OF RIVERSIDE
4080 LEMON STREET
RIVERSIDE, CA 92502

Prepared by:

Michael Baker
INTERNATIONAL

9755 CLAIREMONT MESA, SUITE 100
SAN DIEGO, CA 92124

JULY 2016

**COUNTY OF RIVERSIDE
GENERAL PLAN AMENDMENT 1122
CHANGE OF ZONE CZ No. 7902**

STATE CLEARINGHOUSE NO. 2015061083

FINAL ENVIRONMENTAL IMPACT REPORT NO. 548

Prepared for:

COUNTY OF RIVERSIDE

RIVERSIDE, CA

Prepared by:

MICHAEL BAKER INTERNATIONAL
9755 CLAIREMONT MESA, SUITE 100
SAN DIEGO, CA 92124

JULY 2016

TABLE OF CONTENTS

1.0 INTRODUCTION

1.1	Introduction	1.0-1
1.2	CEQA Requirements for the Final EIR Document	1.0-1
1.3	Background	1.0-2

2.0 COMMENTS AND RESPONSES

3.0 ERRATA

3.1	Introduction	3.0-1
-----	--------------------	-------

1.0 INTRODUCTION

1.1 INTRODUCTION

The following table lists all persons, organizations, and public agencies that provided comments or recommendation to the County of Riverside regarding the Draft EIR (refer to Responses to Comments, Section 2, for copies of the comment letters and responses). Refer to Table 1, *Draft EIR No. 548 Comment Submissions*, for a full listing of those who submitted comments during the Recirculated Draft EIR public review period.

1.2 CEQA REQUIREMENTS FOR THE FINAL EIR DOCUMENT

The Final Environmental Impact Report (Final EIR) for the proposed Riverside County General Plan Update has been prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines and the County of Riverside policies for implementing CEQA.

The following is an excerpt from CEQA Guidelines Section 15132 that states:

The Final EIR shall consist of:

- a) The Draft EIR or a version of the draft.
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

The Final EIR includes all of these required components. The Draft EIR has been provided to the public and decision-makers and to individuals and organizations that have requested the Draft EIR, and it is available on the County's website. Section 2.0 includes the comments received on the Draft EIR. A list of the public agencies and members of the public who commented on the Draft EIR is included in the Table of Contents. Section 2 includes each comment letter, followed by the corresponding response(s), consistent with the requirements of State CEQA Guidelines Section 15088. A response is provided for each written comment identifying significant environmental issues, as received by the County during the Draft EIR public review period.

It should be noted that responses to comments also resulted in various editorial clarifications and corrections to the text of the original Draft EIR. In order to clearly display all of the changes that have been made during the General Plan update process, text has been formatted to show changes made in each step of the process. Text is formatted as follows:

- *Black Text: General Plan text prior to GPA No. 1122 is noted in black text.*
- *Red Text: Textual changes proposed as part of GPA No. 1122, prior to the release of the Draft EIR in April 2016.*
- *Green Text: Textual changes made to the documents after the completion of the Draft EIR's 45-day public review period.*

The color coding of the edits allows the reader to distinguish more clearly between the original General Plan text, the proposed General Plan revisions (red), and the proposed revisions after the release of the public review document. Added or modified text is shown in italics (*example*), while deleted text is shown in strikeout (~~example~~). The additional information, corrections, and clarifications are not considered to substantively affect the conclusions in the Draft EIR.

1.3 BACKGROUND

The County of Riverside issued a Notice of Preparation (NOP) for the proposed project to identify the potential environmental impacts of the project, to solicit comments from public agencies and interested parties, and to identify issues that should be considered in the Draft EIR. The NOP for the proposed project was sent to trustee and responsible agencies, members of the public, other interested parties, the California Office of Planning and Research, and the State Clearinghouse on June 26, 2015. This began the NOP public review period, which ended on August 10, 2015. The project was subsequently revised, and a revised NOP was issued on October 9, 2015. The second NOP public comment period closed on November 8, 2015. During the review period, public agencies and members of the public had the opportunity to respond to the NOP to identify issues of special concern and to suggest additional issues to be considered in the Draft EIR.

In addition, the County held public scoping meetings in western Riverside County on April 10, 2015, and in eastern Riverside County on October 19, 2015, to discuss characteristics of the proposed project, its planning status, the nature of its potential environmental effects, and the scope (i.e., the specific issues) of the EIR analysis. The scoping meeting provided further opportunities for public input regarding environmental concerns and issues that should be addressed in the EIR.

The Draft EIR for the proposed project was distributed to trustee and responsible agencies, members of the public, other interested parties, the California Office of Planning and Research, and the State Clearinghouse on April 12, 2016. The Draft EIR was released to the public for a 45-day comment period from April 14, 2016, through May 30, 2016.

Comments received on the Draft EIR and the subsequent errata have been incorporated into the Final EIR document. GPA No. 1122, CZ No. 7902, along with Draft EIR 548, will be considered by the Riverside County Board of Supervisors. However, prior to Board consideration, the Riverside County Planning Commission will evaluate the documents and make a recommendation for the consideration of the Board. The following discretionary actions will be considered by both the Planning Commission and the Board of Supervisors:

- Adoption of General Plan Amendment No. 1122 amending various General Plan maps, elements, policies, and appendices
- Adoption of Change of Zone No. 7902
- Certification of Program Environmental Impact Report No. 548 pursuant to CEQA.

TABLE 1: DRAFT EIR NO. 548 COMMENT SUBMISSIONS

Comment Letter	Name
Federal/State Agency Comments	
1	Federal Emergency Management Agency (FEMA)
Local Agency Comments	
2	Hemet Unified School District
3	Jurupa Community Services District
4	Metropolitan Water District of Southern California
5	Mojave Desert Air Quality Management District
6	Moreno Valley, City of
7	Pechanga Band of Luiseño Mission Indians, Office of the General Counsel
8	Riverside County Airport Land Use Commission
9	San Bernardino County, Department of Public Works
Group/Organization Comment Letters	
10	Friends of the Northern San Jacinto Valley
11	Highgrove Municipal Advisory Council
12	Sierra Club, San Geronio Chapter, Moreno Valley Group
13	SoCal Environmental Justice Alliance (SEJA) via Blum Collins LLP
14	Winchester Town Association
Letters Received after the Close of the EIR Public Review Period	
15	Hague, George
16	Coachella Valley Water District
17	California Department of Transportation (Caltrans)
18	Leadership Council for Justice and Accountability, California Rural Legal Assistance, Public Interest Law Project, and Center for Community Action and Environmental Justice

This page was intentionally left blank.

2.0 COMMENTS AND RESPONSES

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



April 27, 2016

William Gauk, Project Manager
Riverside County/Planning Department
4080 Lemon Street, 12th Floor
Riverside, California 92502-1409

Dear Mr. Gauk:

This is in response to your request for comments regarding the Notice of Availability of Draft Environmental Impact Report (EIR) – 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and change of Zone No 7902, EIR No 548/SCVH No 2015061083.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Riverside (Community Number 060245), Maps revised August 18, 2014. Please note that Riverside County, 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.

1.1

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.

1.2

William Gauk, Project Manager

Page 2

April 27, 2016

- 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>.

1.2

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 Deborah de Chambeau, Senior Civil Engineer, at (951) 955-1265.

1.3

If you have any questions or concerns, please do not hesitate to call Frank Mansell of the Mitigation staff at (510) 627-7191.

Sincerely,



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

cc:

Deborah de Chambeau, Senior Civil Engineer, Riverside County

Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources,
Southern Region Office

Frank Mansell, NFIP Planner, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

COMMENT LETTER NO. 1: FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)

- Response 1.1** The County compiles flood hazard maps using the Riverside County Special Flood Hazard Area database. The flood zone database is maintained by the Riverside County Flood Control and Water Conservation District (RCFWCD), as stipulated in Riverside County Ordinance No. 458. The flood areas identified using the Riverside County Special Flood Hazard Area database include FEMA 100-year flood areas and select US Army Corps of Engineers inundation boundaries, as well as a number of boundaries for County inundation zones, as enumerated in Ordinance No. 458. The RCFWCD updates the database quarterly and incorporates new flood zones as necessary. Flood hazard zones are supported by numerous policies in order to ensure the safety of development in the county.
- Response 1.2** The County thanks FEMA for taking the time to provide information regarding the National Flood Insurance Program (NFIP) policies. This comment is duly noted. The General Plan Safety Element outlines several policies that support the NFIP floodplain management building requirements policies outlined by the commenter.
- Response 1.3** This comment does not identify any specific concern with the adequacy of EIR No. 548 or any environmental issues.



Dr. Barry L. Kayrell
Superintendent

Dr. LaFaye Platter
Deputy Superintendent

Dr. David Horton
Assistant Superintendent

Vince Christakos
Assistant Superintendent

Professional Development
Service Center

1791 W. Acacia Avenue
Hemet, CA 92545
(951) 765-5100
Fax: (951) 765-5115

Professional Development
Academy

2085 W. Acacia Avenue
Hemet, CA 92545
(951) 765-5100
Fax: (951) 765-6421

www.hemetusd.org

Governing Board

Marilyn Forst
Megan Haley
Vic Scavarda
Patrick Searl
James Smith
Ross Valenzuela
Joe Wojcik

May 27, 2016

William Gayk
TLMA Planning Department
County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92501
(951) 955-3200
bgayk@rctlma.org

Re: Draft EIR for GPA No. 1122 and CZ No. 7902 (5th Cycle Housing Element Update)

Dear Mr. Gayk:

Hemet Unified School District (HUSD) is in receipt of and has reviewed the Notice of Availability of a Draft Environmental Impact Report and supporting documents for the above-referenced Project, dated April 14, 2016. Two communities within the proposed Project are in the boundaries of the Harvest Valley-Winchester Area Plan and HUSD: the Winchester Town Center and Winchester Community (Western Area). The two communities are comprised of 10 neighborhoods and total approximately 537.9 net acres.

The parcels within the Project currently have a General Plan Land Use (GPLU) designation of Commercial Retail, Low Density Residential or Medium Density Residential and the allowable number of dwelling units (DUs) per acre of these parcels range from 0 – 5. The current actual land use of these parcels is primarily vacant, with the remainder being agriculture, commercial or residential.

Following are general comments on the proposed Project:

The community of Winchester has historically been identified as a rural farming and ranching town. The Project proposes to change the GPLU to Highest Density Residential (HHDR), Mixed Use Area (25% HHDR), Mixed Use Area (35% HHDR) or Mixed Use Area (50% HHDR). This would increase the number of allowable DUs per acre to a range of 5 – 30 and would dramatically alter the community's identity and vision.

Based on the Project's current GPLU and acreage, a total number of DUs at build out could be in the range of 1,003 to 2,490 single-family detached DUs. The Project's proposed change to the GPLU would increase the number of DUs at build out to between 3,957 and 5,936. Not only is this an increase of 2,954 to 3,446 DUs (on average, nearly three times the currently allowed), but the type of housing would also

2.1

2.2

become more intense, as the majority of the DUs would be multi-family attached, such as apartments. This increase in the number of and intensity of DUs and the resulting increase of the number of students would have a significant impact on the school facilities of HUSD.

2.2

Following are comments specific to section 4.5 Harvest Valley-Winchester Area Plan of the DEIR:

Figure 4.5-1b shows one neighborhood for the Winchester Community. However, figures 4.5-2b and 4.5-3b show two neighborhoods for the Winchester Community. It appears the written text, tables and calculations include only one neighborhood. Is Neighborhood 2 shown on figures 4.2-2b and 4.5-3b included in the Project or not?

2.3

Table 4.5-1 on page 4.5-21 shows enrollment and capacity for HUSD schools that serve the Project from 2012-13. Current enrollment and capacity (from 2015-16) are as follows:

Winchester Elementary: enrollment = 559, capacity = 723

Rancho Viejo Middle: enrollment = 1,240, capacity = 1,280

Tahquitz High: enrollment = 1,671, capacity = 2,355

2.4

Page 4.5-59 refers to Hemet *Union* School District. *Union* should be *Unified*.

2.5

Table 4.5-4 on page 4.5-59 shows student generation rates from HUSD's 2015 School Facilities Needs Analysis (SFNA). A newer SFNA was approved by the Governing Board on April 20, 2016. The updated student generation rates for multi-family attached DUs from the new report are as follows:

Grades K-5 = 0.5003

Grades 6-8 = 0.1778

Grades 9-12 = 0.2089

2.6

Also, how many DUs are used for the calculation of student generation from the Project? And do those dwelling units include the total number of DUs for the Project or just the increase from current to proposed GPLU?

Table 4.5-5 on page 4.5-59 shows the Project resulting in the need of approximately five new elementary schools, one new middle school and half of a high school. Pages 4.5-59 and 4.5-60 state that with payment of school fees for new development "anticipated impacts to schools would be considered less than significant". However, per HUSD's Facilities Master Plan, new elementary schools require 12 acres, middle schools require 24 acres and high schools require 60 acres. Based on Table 4.5-5, a total of 114 acres would be needed within the Project to build school facilities to house the students from the Project. The Project area comprises 537.9 acres, thus approximately 21% of the Project area would be required for schools alone.

2.7

In summary, the large increase in DUs within the small Project area would create a significant impact on HUSD's school facilities. HUSD respectfully requests that Alternative 1 – No Project Alternative is chosen, or that the Project is revised to exclude the Winchester Town Center and Winchester Community from the Project. If you have any questions or comments please contact me at (951) 765-5100 ext. 5465 or jbridwell@hemetUSD.org. Thank you for the opportunity to provide comments on the Project.

2.8

Hemet Unified School District
May 27, 2016

Sincerely,

A handwritten signature in blue ink, appearing to read "Jesse Bridwell", with a stylized, cursive script.

Jesse Bridwell
Facilities Planner

COMMENT LETTER NO. 2: HEMET UNIFIED SCHOOL DISTRICT

- Response 2.1** The County appreciates and values the school district's comments during the Housing Element update and EIR process. This comment provides general introductory and background information. Responses to specific comments are included below; no further response is required.
- Response 2.2** As outlined under the analysis of Impact 4.5.16, it is anticipated that the proposed project would require the development of future school facilities, specifically five elementary schools, one middle school, and the expansion of the high school (Table 4.5-5). While development could occur under the proposed project, this development would occur over an extended period of time and all future developments would be required to pay development impact fees to support the development of new school facilities. Further responses to specific comments have been provided below.
- Response 2.3** Two neighborhood sites within the Harvest Valley/Winchester Area Plan have been proposed (Winchester Town Center and Winchester Community). Figures 4.5-1A and 4.5-1B are detailed views of the two communities. The proposed land use designation changes for these communities are shown and analyzed throughout the EIR No. 548 document.
- Response 2.4** The initial Notice of Preparation (NOP) for the EIR was released on June 26, 2015, and serves as the baseline for EIR No. 548 [the time of publication of the NOP], pursuant to State CEQA Guidelines Section 15125. The NOP establishes the baseline for purposes of the EIR. The updated enrollment counts are noted for the record. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted per State CEQA Guidelines Section 15088(a), which requires that a lead agency respond to environmental comments.
- Response 2.5** EIR No. 548 has been updated on page 4.5-59 to reflect the suggested edits. This change is reflected below and in the Errata section of the EIR document. Furthermore, other instances of the error have been identified and updated. This comment does not express a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Page 4.5-59:

If fully developed, the proposed project could result in new student enrollment at Hemet ~~Union~~ Unified School District (HUSD) schools serving the neighborhood sites.

- Response 2.6** As noted above, the baseline for EIR No. 548 is June 2015. As such, the generation rates approved in April 2016 were not incorporated. As noted on page 4.5-59 of EIR No. 548, the potential future student generation estimate considers the additional students in the HUSD service area as a result of the proposed project. This calculation was completed by evaluating the existing conditions on the neighborhood sites and calculating the potential increase as

a result of the proposed project. The proposed project could result in an increase of up to 6,427 additional students in attendance at HUSD schools beyond what was anticipated for the buildout of the sites under the current land use designations.

Response 2.7 The project area denotes areas where updated land use designations and rezoning will occur; however, infrastructure for these areas (including schools, water treatment, fire stations, etc.) could be located outside of the project area. It is not anticipated that all infrastructure required to support future development would be included in the project area, as substantial existing infrastructure exists outside of the project area.

Response 2.8 The proposed update to the General Plan Housing Element is being completed in order to accommodate the California Department of Housing and Community Development's Regional Housing Needs Assessment. These housing needs are required to be accommodated throughout the county. As noted in Section 5.0, Alternatives of EIR No. 548, an alternative location, fewer sites, and a no project alternative were all considered. The site selection process included an extensive review of existing infrastructure and facilities in order to ensure future development would have access to adequate facilities and services. Furthermore, the No Project Alternative was rejected due to its lack of attainment of the project objectives, which includes compliance with state housing requirements, as noted above.

Minegar, Peter

From: Gayk, Bill <BGAYK@rctlma.org>
Sent: Monday, May 16, 2016 1:15 PM
To: Minegar, Peter
Subject: FW: Draft EIR for the County of Riverside 5th Cycle Housing Element Update

From: Nickie Hamic [mailto:nhamic@jcsd.us]
Sent: Thursday, May 12, 2016 5:29 PM
To: Gayk, Bill; Sam Gershon; 'Bill Malone'; Saul Martinez; Eddie Rhee; Robert Tock; flo.smith@webbassociates.com
Subject: Draft EIR for the County of Riverside 5th Cycle Housing Element Update

Mr. Gayk,

The Jurupa Community Services District (JCSD) has reviewed the Notice of Availability of the DEIR for the 5th Cycle Housing Element Update (GPA No. 1122 and CZ NO. 7902). JCSD is responsible for providing water and sewer service to the city of Eastvale and a portion of the city of Jurupa Valley. Unincorporated areas within Riverside County are outside of JCSD's service area. Thank you.

Sincerely,
Nickie Hamic
Development Engineering Representative



11201 Harrel Street
Jurupa Valley, CA 91752
Tel: (951) 685-7434 ext. 141
Email: nhamic@jcsd.us

3.1

COMMENT LETTER NO. 3: JURUPA COMMUNITY SERVICES DISTRICT

Response 3.1 The Jurupa Community Services District indicates that it has reviewed the Notice of Availability for the project and that the project is located outside of the district. **This comment is duly noted.** This comment does not identify any specific concern with the adequacy of EIR No. 548 or any environmental issues.

This page intentionally left blank



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

May 26, 2016

Via Electronic Mail and Federal Express

William Gayk, Project Manager
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1147

Dear Mt. Gayk:

Notice of Availability of a Draft Environmental Impact Report
for the 5th Cycle Housing Element Update (General Plan Amendment
No. 1122 and Change of Zone 7902)(EIR No. 548 / SCH No. 2015061083)

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (DEIR) for the 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone 7902)(EIR No. 548 / SCH No. 2015061083) (Project). The proposed Project updates the General County General Plan Housing Element, as well as provides minor updates to related elements in order to maintain consistency between the updated Housing Element and the General Plan. Ordinance No. 348 establishes regulations and zone classifications to implement the General Plan land use policies and Change of Zone No. 7902 (SZ No. 7902) proposes to Update Ordinance No. 348 with new zone classifications.

4.1

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member agencies serving about 19 million people in portions of six counties in Southern California, including Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties. Metropolitan's mission is to provide its 5,200 square-mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan's comments on the proposed project as a potentially affected public agency include:

Section 3.0 describes water allocation scenarios applicable to the Project. New State Water Project allocations have been recently released. Suggest updating the Table 3.17-1 with 2016 projections.

4.2

William Gayk
Page 2
May 26, 2016

Five of the communities proposed in the Project, which are listed below, fall on or near Metropolitan pipelines or rights-of-way.

- Mead Valley Plan (Section 4.2):
Planned Mead Valley communities located near of Souder and Elwood Streets lies just north of the Colorado River Aqueduct.
- Southwest Area Plan (Section 4.6):
Planned Leon Road – Allen Road Southeast Neighborhood and Leon Road East – Tualota Creek Neighborhood communities are located directly east of two Metropolitan owned pipelines.
- Western Coachella Valley Area Plan (Section 4.7):
Planned Rushmore Kimdale Neighborhood borders the Colorado River Aqueduct along the south eastern edge of the planned development.
- Lakeview Town Center Plan (Section 4.9):
Planned neighborhoods 6 and 7 are directly adjacent to our Inland Feeder and planned neighborhoods 1, 2, and 4 of this development border the Colorado River Aqueduct both too the north and south of the aqueduct and Metropolitan right-of-way.
- The Pass Area Plan (Section 4.10):
Planned neighborhoods 3, 4, and 7 abut a utility easement held by Metropolitan.

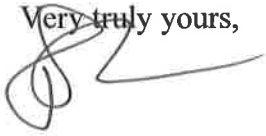
Metropolitan's rights-of-way and facilities are for the purpose of water supply and any proposed use for this property should be consistent with this use and must be approved by Metropolitan in writing. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines, canals, or facilities be submitted for our review and written approval. Design plans should be submitted to the attention of Metropolitan's Substructures Team. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mw2o.com. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of the Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

William Gayk
Page 3
May 26, 2016

Metropolitan appreciates the opportunity to provide input to your planning. If we can be of further assistance, please contact Ms. Malinda Stalvey of the Environmental Planning Team at (213) 217-5545.

4.4

Very truly yours,




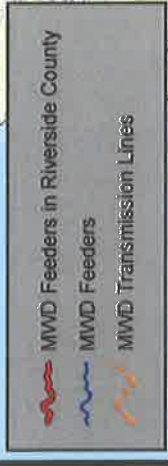
For Deirdre West
Team Manager, Environmental Planning Team

MKS/mks

(J:\Environmental-Planning & Compliance\COMPLETED JOBS\May 2016\Job No. 20160501EXT)

Enclosures: Planning Guidelines and Map of Metropolitan's Facilities in Project Vicinity

Z:\Projects\Special Requests\Malinda Staley\GIS\Barramundi County_Feders.mxd [Printed 5/26/2016] Photography Date: Eng Prepared by: Tom Bleicher (Geodetic & Mapping Team) Checked by: Malinda Staley Job#: GIS 16-05-28



The Metropolitan Water District of Southern California
Engineering Services Group



Guidelines for Developments in the
Area of Facilities, Fee Properties, and/or Easements
of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alignment as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of-way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assist others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

1. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

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

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-_____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must be restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

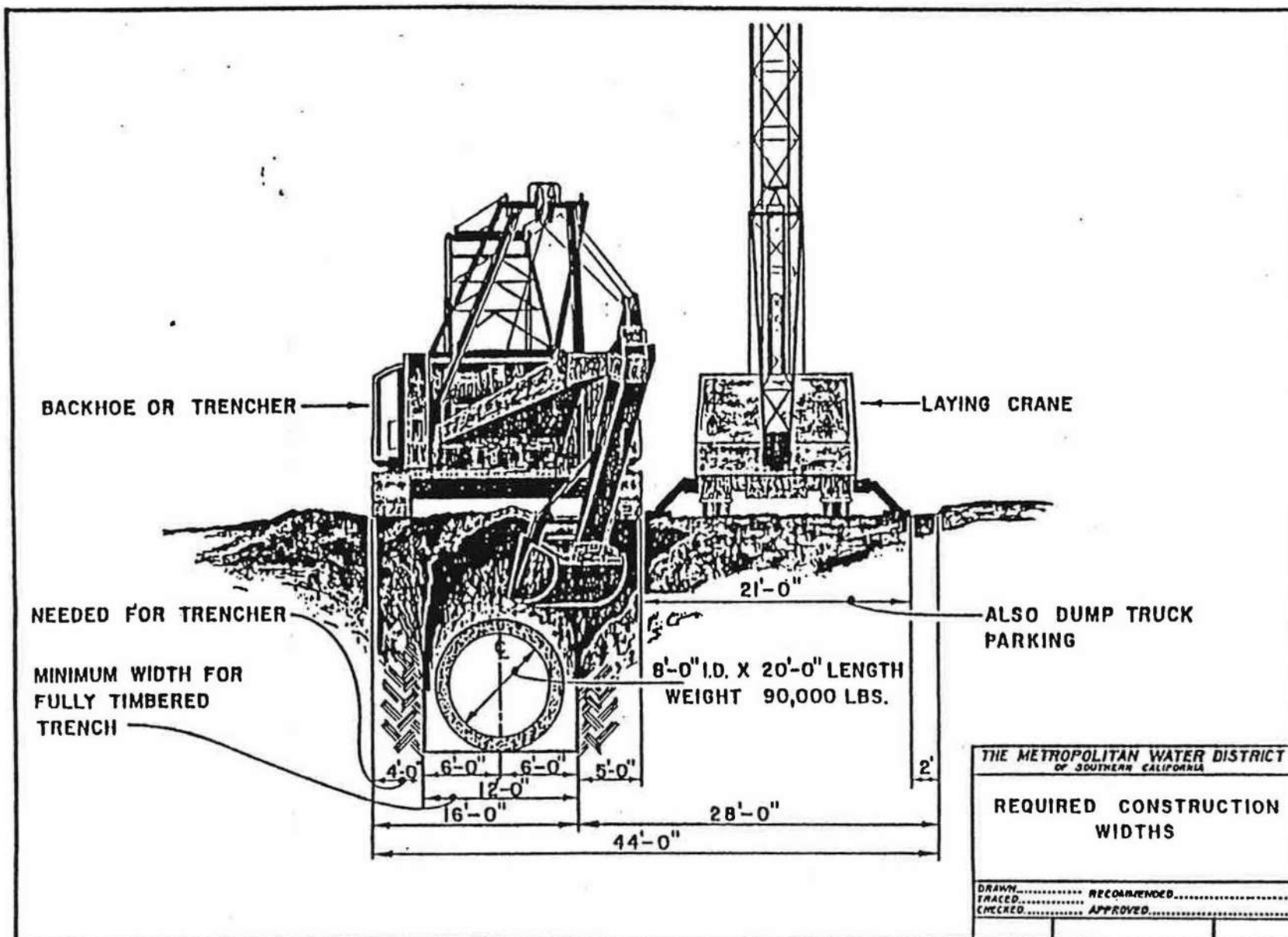


FIGURE 1

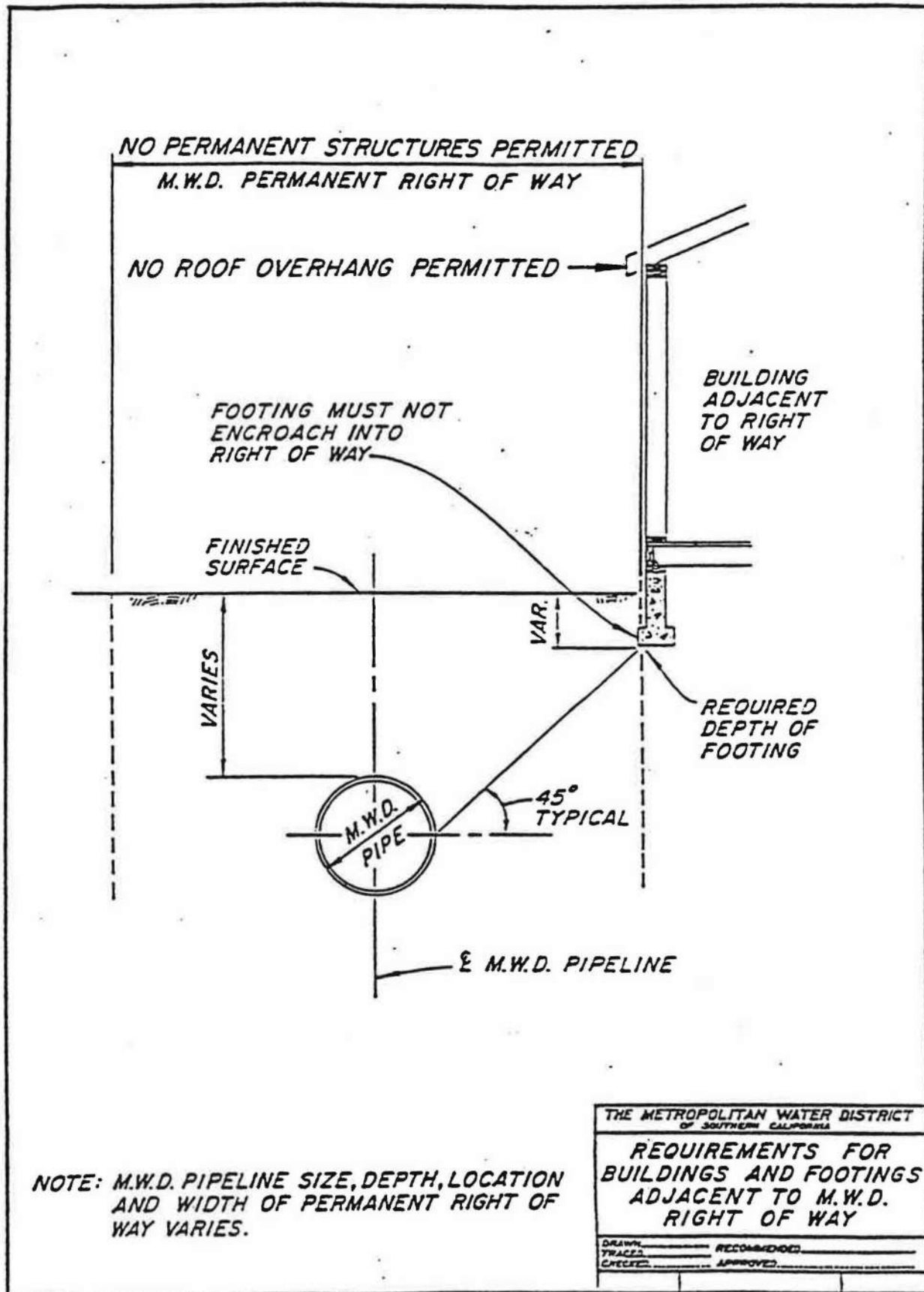


FIGURE 2

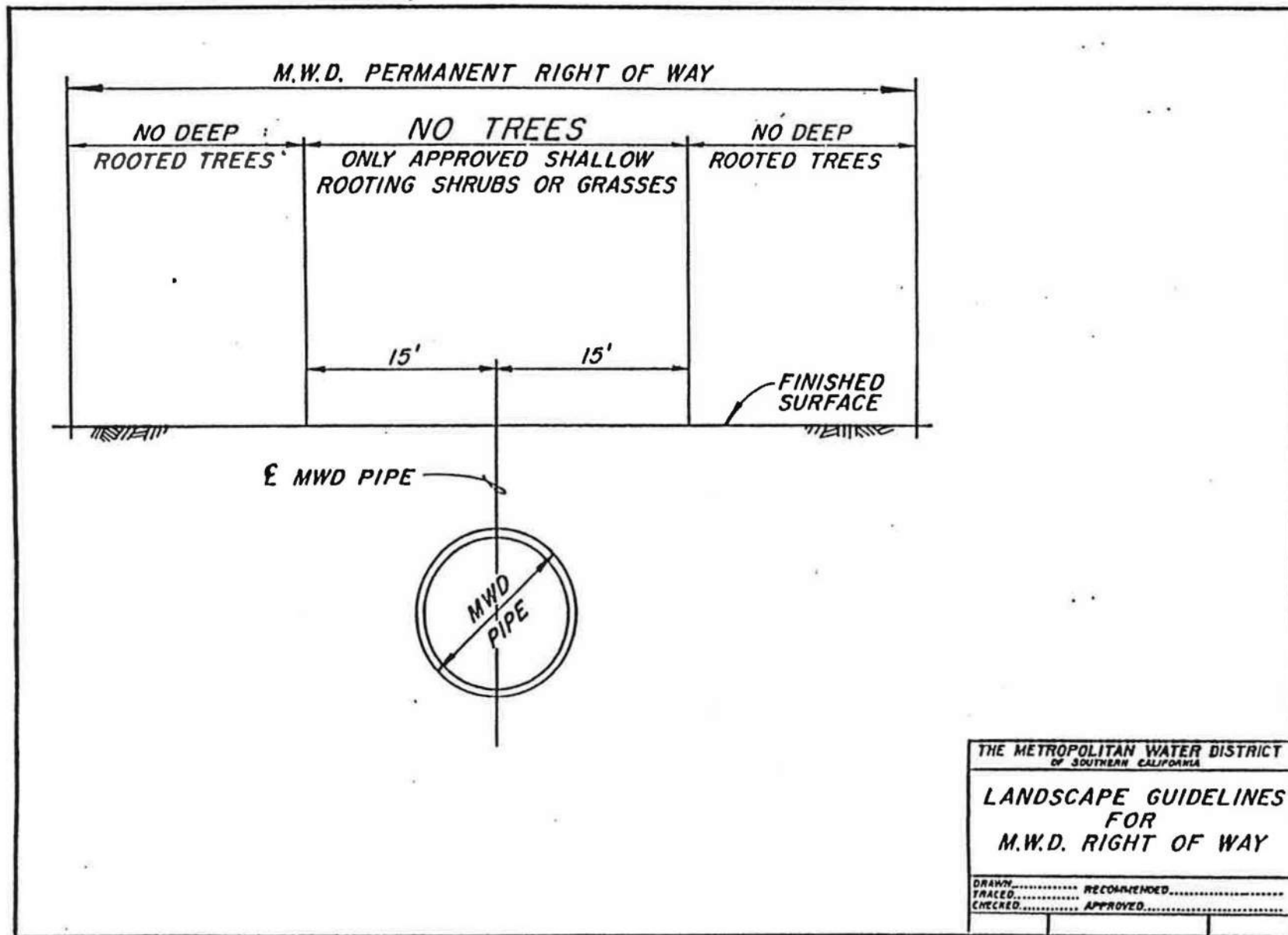


FIGURE 3

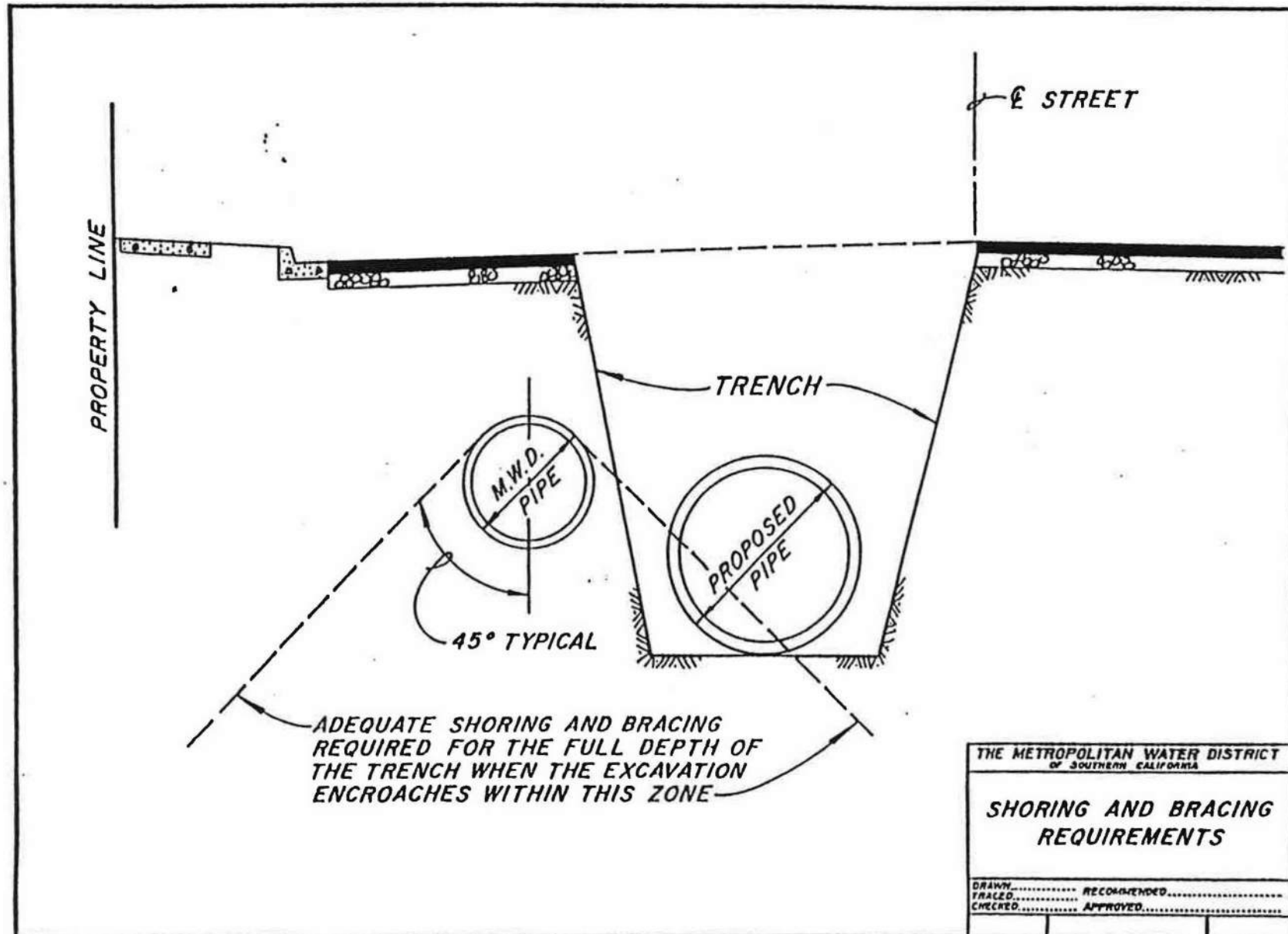
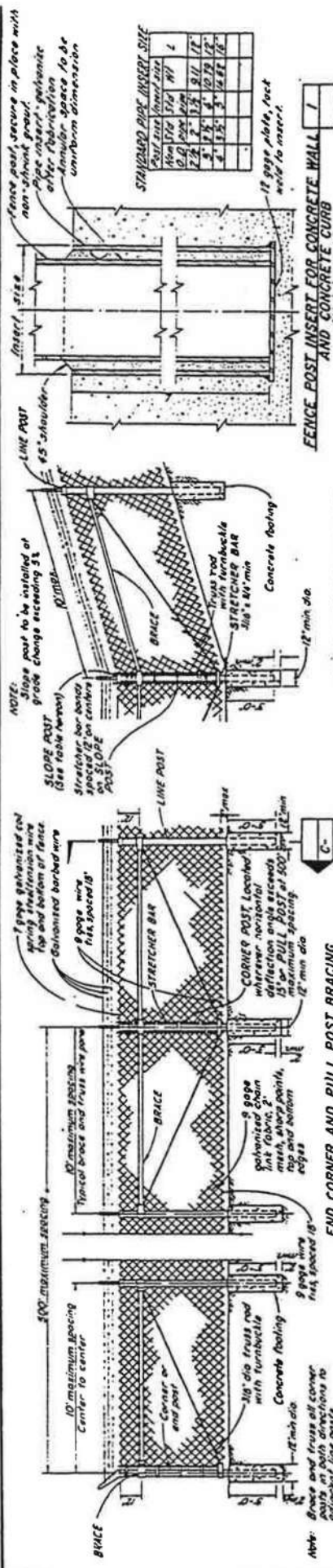
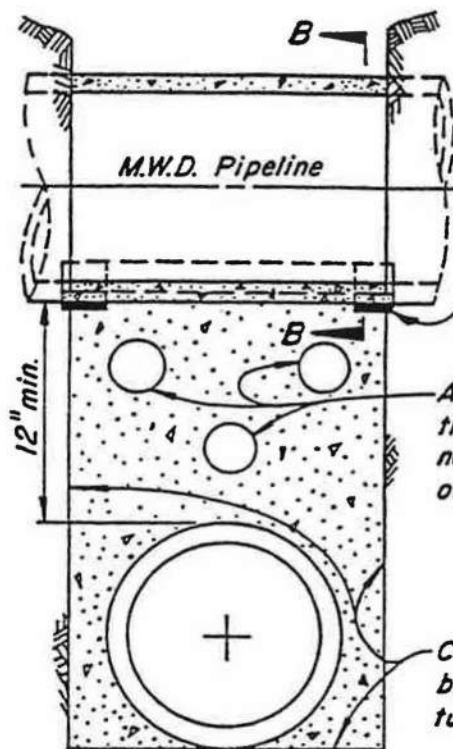


FIGURE 4



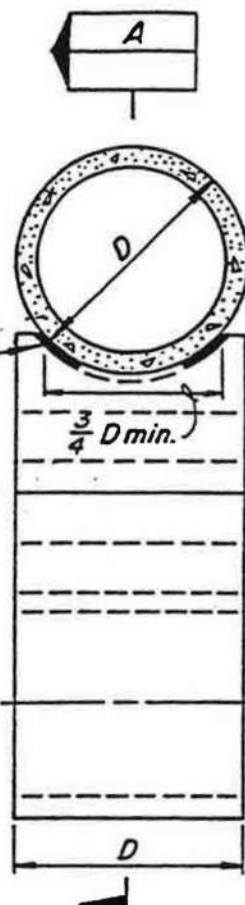


SECTION "A-A"

$\frac{3}{4}$ " x 6" premolded expansion joint filler

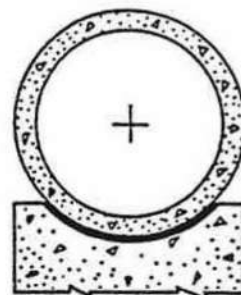
Apertures as directed by the Engineer, total volume not to exceed $\frac{1}{2}$ the volume of the supporting wall

Concrete support wall to be placed against undisturbed ground



CROSS SECTION

1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



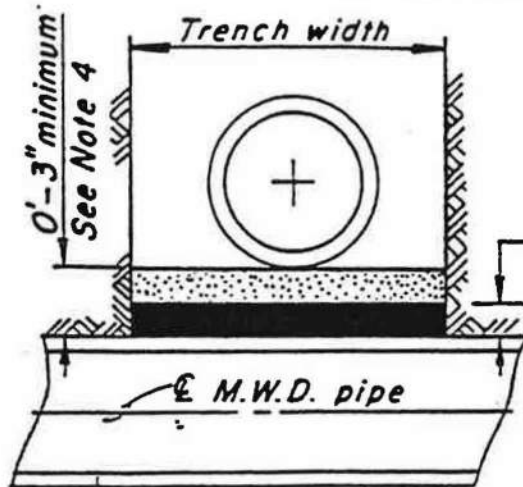
SECTION "B-B"

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR
M.W.D. PIPELINE

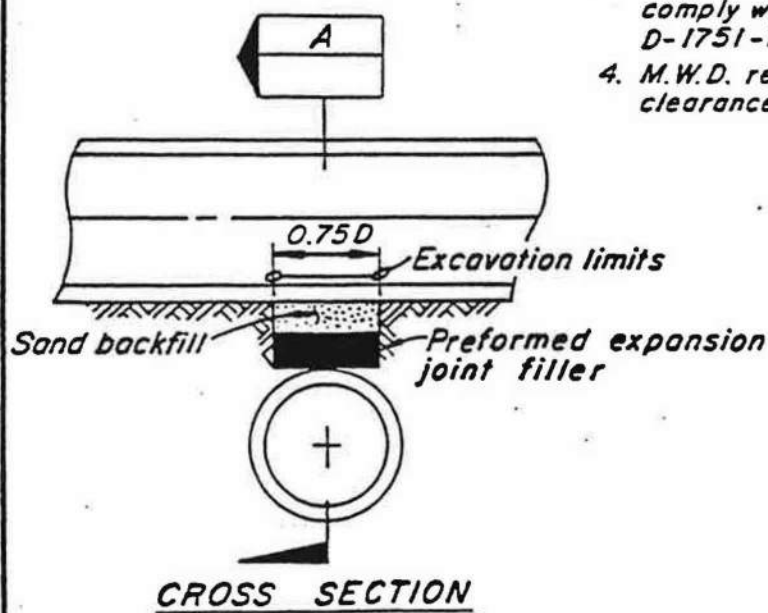
DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

C-9547



SECTION

A



CROSS SECTION

3" Preformed expansion joint filler

NOTES

1. This method to be used where the utility line is 24" or greater in diameter and the clearance between the utility line and M.W.D. pipe is 12" or less.
2. Special protection may be required if the utility line diameter is greater than M.W.D. pipe or if the cover over the utility line to the street surface is minimal and there is 12" or less clearance between M.W.D. pipe and the utility line.
3. Preformed expansion joint filler to comply with ASTM designation D-1751-73.
4. M.W.D. requests 12" minimum clearance whenever possible.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA	
TYPICAL EXPANSION JOINT FILLER PROTECTION FOR OVERCROSSING OF M.W.D. PIPELINE	
DRAWN _____	RECOMMENDED _____
TRACED _____	APPROVED _____
CHECKED _____	C-11632

COMMENT LETTER NO. 4: METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

- Response 4.1** The County appreciates and values the district's comments during the Housing Element update and EIR participation process. This comment provides general introductory and background information. Responses to specific comments are included below; no further response is required.
- Response 4.2** The initial Notice of Preparation (NOP) for the EIR was released on June 26, 2015, and serves as the baseline for EIR No. 548, pursuant to State CEQA Guidelines Section 15125. The NOP establishes the baseline for purposes of the EIR. As such, the recently adopted 2016 State Water Project Projections, which were released in late 2015, were incorporated into the EIR document. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted, per State CEQA Guidelines Section 15088(a), which requires that a lead agency respond to environmental comments.
- Response 4.3** All future development accommodated by the proposed project would be required to undergo the County design review process, which is required prior to the commencement of development. In areas under the jurisdiction of the Metropolitan Water District of Southern California, projects would be required to undergo review by the district prior to construction, as outlined in the materials appended to the comment letter.
- Response 4.4** This comment serves as the conclusion to the letter. The County appreciates and values the district's comments during the Housing Element update and EIR participation process. Responses to specific comments are included above; no further response is required.

This page intentionally left blank



Mojave Desert Air Quality Management District

14306 Park Avenue, Victorville, CA 92392-2310

760.245.1661 • fax 760.245.2699

Visit our web site: <http://www.mdaqmd.ca.gov>

Eldon Heaston, Executive Director

April 20, 2016

William Gayk, Senior Planner
County of Riverside
TLMA Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Project Title: 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone No. 7902)

Dear Mr. Gayk:

The Mojave Desert Air Quality Management District (District) has received the Notice of Availability of a Draft Environmental Impact Report for the 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone No. 7902).

The District has reviewed the Housing Element update. This update does not propose to instigate new residential development on lands under the air quality regulatory jurisdiction of the MDAQMD; therefore, MDAQMD thresholds and compliance are not addressed in the impact analysis. The District has no comments on the Housing Element Update at this time.

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan J. De Salvio".

Alan J. De Salvio

Deputy Director – Mojave Desert Operations

AJD/tw

RVSD County GPA 1122 CA 7902 DEIR 548

5.1

COMMENT LETTER NO. 5: MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

Response 5.1 The commenter notes that the project does not propose development within the Mojave Desert Air Quality Management District. As such, the district does not have any comments on the project at this time. No further response is required.

This page intentionally left blank

May 24, 2016

William Gayk, Project Manager
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409

Subject: 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone No. 7902) (EIR No. 548 /SCH No. 2015061083)

Dear Mr. Gayk:

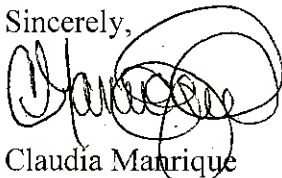
The City of Moreno Valley appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the County of Riverside's 5th Cycle Housing Element Update.

General Plan Amendment No. 1122 proposes to update the Riverside County General Plan Housing Element, as well as minor updates to related elements, in order to maintain consistency between the updated Housing Element and the General Plan. Change of Zone No. 7902 proposes to adopt two new zone classifications, Highest Density Residential (R-7) and Mixed Use Area (MUA), and rezone parcels within ten (10) Plan Areas within the County of Riverside. The updated land use designations and zoning classifications will affect portions of the following Area Plans: Eastern Coachella Valley, Elsinore, Harvest Valley/Winchester, Highgrove, Lakeview/Nuevo, Mead Valley, Southwest, Temescal Canyon, The Pass, and Western Coachella Valley. As the proposed project land use designations and zoning classifications will not affect Moreno Valley city limits, the City of Moreno Valley Community Development Department (Planning Division) does not have any specific environmental issues or mitigation measures/alternatives to provide at this time.

We look forward for the opportunity to review the Final EIR once it becomes available. Please include the City of Moreno Valley on any future mailing lists regarding the final documents as well as for future notification of meetings/public hearings associated with the project.

Should you have any questions or concerns, please contact Claudia Manrique, Associate Planner at (951) 413-3225 or claudiam@moval.org.

Sincerely,



Claudia Manrique
Associate Planner

c: Richard J. Sandzimier, Planning Official

PLANNING DIVISION

6.1

COMMENT LETTER NO. 6: CITY OF MORENO VALLEY

Response 6.1 The commenter notes that the proposed project would not impact land within the Moreno Valley city limits; as such, the commenter does not have any comments on the project. These comments have been noted, and the County will continue to notify the City of Moreno Valley of final project documents and public hearing information. This comment does not identify any specific concern with the adequacy of the Draft EIR or any other environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

This page intentionally left blank



PECHANGA INDIAN RESERVATION
Temecula Band of Luiseño Mission Indians

OFFICE OF THE GENERAL COUNSEL
Post Office Box 1477 • Temecula, CA 92593
Telephone (951) 770-6000 Fax (951) 695-7445

Comment Letter 7

General Counsel
Steve Bodmer

Deputy General Counsel
Michele Hannah

Associate General Counsel
Breann Nu'uhiwa
Lindsey Fletcher

Of Counsel
Frank Lawrence

May 20, 2016

VIA E-MAIL AND USPS

Mr. William Gayk
Project Manager
Riverside County TLMA
Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92502

Re: Pechanga Tribe Comments on the County of Riverside General Plan Amendment No. 1122 (GPA1122) Housing Element Update and Change of Zone No. 7902 Draft Environmental Impact Report

Dear Mr. Gayk:

This comment letter is submitted by the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government, in response to receipt of the Notice of Availability (NOA) for the GPA 1122 and CZ 790 Draft Environmental Impact Report (DEIR). 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 with developing appropriate Mitigation Measures as they relate to the Cultural Resources. In short, these comments express the Tribe's concerns that the proposed Mitigation Measures were developed without the Tribe's input, as required by AB 52. The Tribe also sets forth its recommended amendments to the proposed Mitigation Measures.

7.1

I. THE PROPOSED MITIGATION MEASURES WERE DEVELOPED WITHOUT ADEQUATE TRIBAL INPUT

7.2

This Project is subject to the provisions of AB 52, which requires the County to consult with the Tribe on a government-to-government basis (unlike a member of the public prior to the change in the law).¹ The purpose of consultation is to determine the presence of Tribal Cultural

¹ Importantly, even without AB 52, it has been the intent of the Federal Government and the State of California that tribes be consulted on issues which impact cultural and spiritual resources. 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; See also California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352.3 and 65352.4.

Resources, impacts to them, and appropriate avoidance and Mitigation Measures. The law also requires the County to acknowledge tribal expertise and the tribal values inherent in a Tribal Cultural Resource. The California legislature adopted AB 52 to ensure that lead agencies use tribal expertise and information in determining what resources may be impacted, what those impacts may be, and how to avoid or minimize such impacts.

As you are aware, the Tribe asserts that western Riverside County is part of *Payómkawichum* (Luiseño), and therefore the Tribe's, aboriginal territory. To comply with CEQA, as amended by AB 52, and other applicable law, it is imperative for the County to consult with the Tribe in order to guarantee adequate knowledge for the appropriate evaluation of the Project effects to potential Tribal Cultural Resources, as well as archaeological resources, in addition to generating adequate avoidance and Mitigation Measures.

Here, the Tribe is concerned that the County has not conducted appropriate consultation under AB 52. During the Tribe's AB 52 consultation with the County, the County suggested that no Mitigation Measures were proposed for Tribal Cultural Resources because there were no implementing projects. Thus, AB 52 consultation was closed – erroneously – on April 19, 2016.² Unbeknownst to the Tribe, the County developed its proposed Cultural Resources Mitigation Measures without any review or input from the Tribe prior to release of the DEIR. As a result, the proposed Mitigation Measures lack appropriate protection language for significant resources, village complexes, Traditional Cultural Properties, Tribal Cultural Resources, Tribal Cultural Landscapes, and other archeological and cultural resources located within the County. This is in violation of AB 52 as the law explicitly requires, “[a]s part of the consultation process...the parties may propose mitigation measures...capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource...If the California Native American tribe requests consultation regarding...mitigation measures...the consultation shall include those topics.” (See PRC §21080.3.2, Emphasis Added.) Further, “The consultation shall be considered concluded when either of the following occurs: (1) [t]he parties agree to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource....” (§21080.3.2(b)(1).) Finally, [a]ny mitigation measures agreed upon in the consultation...shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program...” (§21082.3(a).)

As you know, in our electronic mail correspondence on April 19, 2016, the Tribe clearly stated that it was understood there would be no mitigation measures applied to this Project. In Ms. Thompson's reply that same day, on which you were copied, she made no indication that any proposed mitigation measures would be included for this Project. It was a complete surprise to the Tribe to then receive the DEIR and find that in fact, there are mitigation

² Please note that even if AB 52 consultations were closed, SB 18 consultation is ongoing and continues until the Project is approved by the Board of Supervisors. See Cal. Govt. C. § 65352.3. The Tribe requests to continue to be involved and to participate with the County in assuring that an adequate and appropriate language to include in the proposed environmental documents.

measures – for cultural resources only, completely ignoring the potential for Tribal Cultural Resources, which is now a category mandated for review under CEQA. For these reasons, the Tribe asserts that the proposed mitigation measures must be amended and that the AB 52 consultation process be re-opened as it was closed based upon incorrect and incomplete information from the County. The Tribe does not agree that AB 52 consultation has been completed for this Project or that the DEIR adequately assesses the potential impacts to Tribal Cultural Resources.

7.2

II. THE PROPOSED MITIGATION MEASURES MUST BE AMENDED

In addition to the absence of any measures regarding Tribal Cultural Resources, the Tribe is not in agreement with the proposed Mitigation Measure 3.5.3, and the section regarding the disposition of the human remains. California law clearly states that the treatment and disposition of Native American human remains must be handled with appropriate dignity. See Cal. Pub. R. Code § 2097.98. Disposition of the human remains following scientific analysis not acceptable to the Tribe and does not constitute the appropriate dignity that is mandated by law.

The Tribe recommends that the following edited Mitigation Measures be included in the final environmental documentation (strikeouts are deletions; underlines are additions).

MM 3.5.1 Avoidance is the preferred treatment for cultural resources. Where feasible, project plans shall be developed to allow avoidance of cultural resources. Where avoidance of construction impacts is possible, ~~capping of the cultural resource site~~ and avoidance planting (e.g., planting of prickly pear cactus) shall be employed to ensure that indirect impacts from increased public availability to the site are avoided. Where avoidance is selected, cultural resource sites shall be placed within permanent conservation easements or dedicated open space.

7.3

MM 3.5.2 If avoidance and/or preservation in place of cultural resources is not feasible, the following mitigation measures shall be initiated for each impacted site: a. Discoveries shall be discussed with the Native American tribal (or other appropriate ethnic/cultural group representative) and the Riverside County Archaeologist, and a decision shall be made with the concurrence of the Planning Director, as to the mitigation (documentation, recovery, avoidance, etc.) appropriate for the cultural resource. b. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to appropriate preservation or mitigation measures.

MM 3.5.3 If human remains are encountered during a public or private construction activity, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Riverside County Coroner must be notified within 24 hours. If the Coroner

determines that the burial is not historic, but prehistoric, the Native American Heritage Commission must be contacted to determine the most likely descendant for this area. The decision as to the treatment and disposition of the remains shall be made consistent with the procedures and standards contained in Health and Safety Code Section 5097.98 and CEQA Guidelines Section 15064.5(e). ~~The most likely descendant may become involved with the disposition of the burial following scientific analysis.~~

7.3

The Tribe specifically requests to further consult with the County under AB 52 to determining appropriate mitigation measures for Tribal Cultural Resources that may be impacted by future implementing projects. The Pechanga Tribe looks forward to continuing to work together with the County of Riverside in protecting the invaluable Pechanga cultural resources found in the County. Please contact Ebru Ozdil at 951-770-8113 or me at 951-770-6179 if you have any questions or comments.

7.4

Sincerely,



Michele Hannah
Deputy General Counsel

cc: Pechanga Cultural Resources Department

COMMENT LETTER NO. 7: PECHANGA BAND OF LUISEÑO INDIANS, OFFICE OF THE GENERAL COUNSEL

- Comment 7.1** The County appreciates the continued involvement of the Pechanga Band of Luiseño Indians (the Tribe) in the Housing Element update and EIR process, including consultation with the County during the AB 52 and SB 18 process. This comment serves as a general introduction to the comment letter, as specific responses are included below.
- Comment 7.2** This comment has been duly noted. The County participated in AB 52 and SB 18 consultation with the Tribe throughout the EIR process and will continue to allow for SB 18 consultation with the Tribe throughout the EIR and public hearing process. At the time AB 52 consultation was initiated (beginning in June 2015), it was believed that the mitigation measures adopted for the County's General Plan Amendment No. 960 (GPA No. 960) would be sufficient because they would also apply to the project. However, after AB 52 consultations were concluded, the County's GPA No. 960 was legally challenged. In response to the active litigation, mitigation measures similar to those in EIR No. 521 for GPA No. 960 were incorporated into this EIR to ensure all appropriate mitigation measures to offset potential environmental impacts would also apply to the project.
- Comment 7.3** This comment has been duly noted. The suggested edits to Mitigation Measure 3.5.1 and Mitigation Measure 3.5.3 have been incorporated into the Errata section of Final EIR No. 548 as shown below.

Page 3.0-65:

- MM 3.5.1** Avoidance is the preferred treatment for cultural resources. Where feasible, project plans shall be developed to allow avoidance of cultural resources. Where avoidance of construction impacts is possible, ~~capping of the cultural resource site and~~ avoidance planting (e.g., planting of prickly pear cactus) shall be employed to ensure that indirect impacts from increased public availability to the site are avoided. Where avoidance is selected, cultural resource sites shall be placed within permanent conservation easements or dedicated open space.

Page 3.0-68:

- MM 3.5.3** If human remains are encountered during a public or private construction activity, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Riverside County Coroner must be notified within 24 hours. If the Coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission must be contacted to determine the most likely descendant for this area. *The decision as to the treatment and disposition of the remains shall be made consistent with the procedures and standards contained in Health and Safety Code Section 5097.98 and CEQA Guidelines Section 15064.5(e).* ~~The most~~

2.0 COMMENTS AND RESPONSES

~~likely descendant may become involved with the disposition of the burial following scientific analysis.~~

Comment 7.4 This comment is noted. The County will continue to notify the Tribe of all project milestones and will facilitate consultation as necessary. This comment serves as the conclusion to the letter and provides general information. Responses to specific comments are included above; no further response is required.



AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

CHAIR
Simon Housman
Rancho Mirage

May 27, 2016

VICE CHAIRMAN
Rod Ballance
Riverside

Mr. Bill Gayk, Project Manager
Riverside County Planning Department
4080 Lemon Street, Twelfth Floor
Riverside CA 92501
(VIA HAND DELIVERY)

COMMISSIONERS

Arthur Butler
Riverside

Glen Holmes
Hemet

John Lyon
Riverside

RE: GPA No. 1122/CZ No. 7902 Environmental Impact Report (EIR No. 548/SCH No. 2015061083: Riverside County 2013-2021 Housing Element Update and Associated Site-Specific Amendments to Area Plan Land Use Designations, Zone Change and Ordinance Amendment)

Greg Pettis
Cathedral City

Dear Mr. Gayk:

Steve Manos
Lake Elsinore

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a CD copy and Notice of Availability of the Draft Environmental Impact Report for County of Riverside General Plan Amendment No. 1122 and Change of Zone No. 7902, a proposal to update the Housing Element of the Riverside County General Plan. The proposal also includes amendments to land use designations and zoning on approximately 4,856 acres of land in various locations extending from Home Gardens on the west to North Shore on the east.

STAFF

Director
Ed Cooper

John Guerin
Russell Brady
Barbara Santos

As this is a Countywide amendment that also amends land use designations of properties within the Airport Influence Areas (AIAs) of various airports, this proposal is subject to ALUC review pursuant to Section 21676(b) of the California Public Utilities Code (PUC). The associated rezoning/ordinance amendment is also subject to mandatory ALUC review pursuant to the same PUC section. An official submittal to ALUC for a determination as to the consistency of this project with applicable Airport Land Use Compatibility Plans is mandatory. Complete applications submitted by June 1 are eligible for consideration at ALUC's July 14, 2016 public hearing.

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

www.rcaluc.org

While the majority of the proposed land use designation and zoning changes will not present issues relating to airports, we would direct your attention to our letter of August 17, 2015 in which we expressed concerns regarding the exhibit entitled "Mead Valley Community (I-215/Nuevo Rd. Vicinity)" (Figure A-6.2). Those concerns remain outstanding, as the designation of Neighborhoods 1 and 2 as Mixed Use Areas, 50 percent of which would be reserved for Highest Density Residential uses, as depicted on that exhibit, is inconsistent with the provisions of the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. These properties are located within Airport Compatibility Zone C2, where densities are limited to 6 dwelling units per acre (12 with infill, but this area would not qualify as infill based on the definition of "infill" included in the Countywide Policies of the Riverside County Airport Land Use Compatibility Plan). We would recommend that these two Neighborhoods be excluded from this proposal.

8.1

8.2

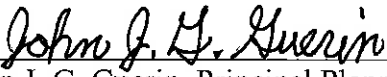
AIRPORT LAND USE COMMISSION

May 27, 2016

Please notify this office of all public hearings regarding this project. If you have any questions, please contact John Guerin, ALUC Principal Planner, at (951) 955-0982. 8.3

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION



John J. G. Guerin, Principal Planner,
for Edward C. Cooper, ALUC Director

cc: Juan Perez, Director, Riverside County Transportation and Land Management Agency
Steven Weiss, AICP, Planning Director
Kristi Lovelady
Jerry Jolliffe
Phayvanh Nanthavongdouangsy
ALUC Staff

Y:\AIRPORT CASE FILES\Regional\County GPA 1122 EIR Comments - ltr to County.doc

COMMENT LETTER NO. 8: RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

- Response 8.1** The County appreciates and values the commission's comments during the Housing Element update and EIR participation process. This comment provides general introductory and background information. Responses to specific comments are included below; no further response is required.
- Response 8.2** Staff have reviewed the proposed Neighborhood 1 and Neighborhood 2 of the Mead Valley Community Sites (as shown in EIR No. 548 Figure 4.2-1c) in regard to the submitted comments. The County agrees with the commenter and has determined that Neighborhood 1 and Neighborhood 2 should be removed from the proposed project. Corrected text excluding Neighborhoods 1 and 2 has been included in the General Plan Errata document showing the removal of the neighborhoods.
- Response 8.3** The County will continue to notify the Airport Land Use Commission of hearings and other milestones for the project.

This page intentionally left blank



Department of Public Works

Environmental & Construction • Flood Control
Operations • Solid Waste Management
Surveyor • Transportation

Gerry Newcombe
Director

May 26, 2016

Riverside County Planning Department
William Gayk, Project Manager
4080 Lemon Street, 12th Floor
Riverside, CA. 92502-1409
BGAYK@rctlma.org

File: 10(ENV)-4.01

RE: CEQA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HOUSING ELEMENT UPDATE FOR THE COUNTY OF RIVERSIDE

Dear Mr. Gayk:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on April 14, 2016** and pursuant to our review, we have no comments.

9.1

Sincerely,

A handwritten signature in blue ink, appearing to read "Nidham Aram Alrayes".

NIDHAM ARAM ALRAYES, MSCE, PE, QSD/P
Public Works Engineer III
Environmental Management

NAA:PE:sr

BOARD OF SUPERVISORS

ROBERT A. LOVINGOOD
Vice Chairman, First District

JANICE RUTHERFORD
Second District

JAMES RAMOS
Chairman, Third District

CURT HAGMAN
Fourth District

JOSIE GONZALES
Fifth District

GREGORY C. DEVEREAUX
Chief Executive Officer

COMMENT LETTER NO. 9: COUNTY OF SAN BERNARDINO, DEPARTMENT OF PUBLIC WORKS

Response 9.1 The commenter notes that the proposed project would not impact land within the County of San Bernardino's jurisdiction and that the commenter has no comments at this time. This comment does not identify any specific concern with the adequacy of the Draft EIR or any other environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

This page intentionally left blank

FRIENDS OF THE NORTHERN SAN JACINTO VALLEY
POST OFFICE BOX 4036
IDYLLWILD, CALIFORNIA 92549
www.northfriends.org

May 30, 2016

Bill Gayk, Project Manager
Riverside County Planning Department
4080 Lemon St. 12th Floor
Riverside, CA 92501

Via: Email: bgayk@rctlma.org and U.S. Mail

RE: Draft EIR No. 548 for the adoption of GPA No. 1122 and CZ No. 7902 which will update the Riverside County General Plan and Land Use Ordinance No. 348 to guide anticipated growth in accordance with the State and County Housing Objectives.

Dear Mr. Gayk:

We are providing our objections to Draft EIR No. 548 for the adoption of GPA No. 1122 and CZ No. 7902 and Ordinance No. 348 as individuals and on behalf of our conservation group the Friends of the Northern San Jacinto Valley (FNSJV). We have reviewed the Biological Resources section of the Lakeview Nuevo Area Plan. The Lakeview Nuevo Area Plan exemplifies the folly of the western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the Riverside County Board of Supervisors collective renouncement of the MSHCP wildlife conservation goals and objectives

10.1

Numerous endangered, threatened, or MSHCP covered plants and animals [i.e. Stephens' kangaroo rat, San Jacinto Valley Crownscale, Burrowing owl, San Diego horned lizard] will be adversely impacted by implementation of the Lakeview Nuevo Area Plan. Because these species are reportedly afforded full coverage under the MSHCP and because the project is said to be consistent with the MSHCP, Draft EIR No. 548 claims potential direct, indirect and cumulative impacts are less than significant under CEQA. This faulty analysis is in error. The western Riverside County MSHCP was established pursuant to the State Natural Community Conservation Planning Act (NCCP Act – Fish and Game Code § 2800 -2835). The State NCCP Act does not exempt a project in a Natural Community Conservation Planning area from CEQA or alters or affects the applicability of CEQA (Fish and Game Code § 2826). Project compliance-consistency with the MSHCP or the mere inclusion of a cursory MSHCP compliance statement in the environmental document **is not** CEQA compliance.

10.2

Draft EIR No. 548 failed to comply with CEQA Guideline 15065 (c) – Mandatory Finding of Significance. 1) Draft EIR No. 548 did not identify the effects on Biological Resources [MSHCP Covered Species] to be analyzed in depth. 2) The Draft EIR did not examine the feasibility of alternatives or mitigation to substantially lessen or avoid significant effects on Biological Resources. 3) Draft EIR No. 548 did not consider feasible changes in the project to substantially lessen or avoid significant effects on Biological Resources.

10.3

Draft EIR No. 548 incorrectly asserts the review of future project sites is properly made when the sites are initially converted from vacant to developed lands and because the Draft EIR does not propose any specific development required biological survey would occur at the time future development of the neighborhood sites are proposed (Draft EIR: page 4.9-32). This approach is an improper deferral of mitigation measures for MSHCP covered species. Once the General Plan Amendments and Change of Zone receive approval any future CEQA review would only result in a post hoc rationalization of an already approved project. Such an approach is contrary to the wildlife conservation goals and objectives of the MSHCP.

10.4

It is not apparent the California Department of Fish and Wildlife (CDFW), the State Trustee Agency for Fish and Wildlife resources, reviewed and commented on Draft EIR No. 548. The Draft EIR should be forwarded to CDFW for review and comment. CDFW review comments should be included in the Final EIR and considered by the Riverside County Board of Supervisors prior to the approval and certification of the Final EIR (CEQA Guidelines § 15073 (c); Gentry V. City of Murrieta (1995) 36 Cal. App. 4th. 1359).

10.5

Please advise the FNSJV of the availability of the Final EIR and any public hearing for this Project. Thank you for the opportunity to participate in the environmental review of this important Project.

10.6

Tom Paulek
FNSJV, Conservation Chair

Susan Nash
FNSJV, President

COMMENT LETTER NO. 10: FRIENDS OF THE NORTHERN SAN JACINTO VALLEY

Response 10.1 This comment serves as an introduction to the comment letter. The County appreciates and values the FNSJV's comments during the EIR participation process. This comment provides general introductory and background information. No further response is required.

Response 10.2 When the County of Riverside developed both MSHCPs, comprehensive data was collected under the purview of a scientific committee. The final conservation strategy in the MSHCPs was developed to fully mitigate impacts to sensitive biological resources. The issuance of the Section 10(a) permit by the US Fish and Wildlife Service (USFWS) acknowledged the adequacy of the conservation programs as full mitigation. As described in Section 2.3 of the Draft EIR, each covered project in the county must comply with the requirements of the MSHCPs, including conducting habitat assessments and focused surveys, mandatory conservation of lands identified to have conservation value that would support the assemblage of several Conservation Areas in Western Riverside County and Coachella Valley, and payment of mitigation fees. Compliance must occur prior to any project approval.

RCA, CVAG, the County of Riverside, USFWS, and CDFW meet routinely throughout the year to review all actions, including project approvals, resulting from conservation activities and other required mitigation measures taken under the MSHCPs. A series of meetings are held each year between all of the above agencies to ensure that the MSHCPs are being successfully implemented and managed. Annual reports are prepared and work plans for the subsequent year are prepared, reviewed, approved, and implemented. This robust process is a joint effort by the federal, state, and local governments to ensure the sensitive biological resources found in Western Riverside County and Coachella Valley are successfully protected and conserved for the future.

It should be noted that as part of an applicant's participation in the MSHCPs, habitat assessments and focused surveys will be required to assess the ongoing status of sensitive biological resources in specific areas. The results of these surveys will be used by the County, RCA, and the wildlife agencies to verify the ongoing adequacy of the MSHCPs in protecting biological resources and to make the adjustments to guide the development of the annual work plans for the conservation programs authorized by USFWS and CDFW. This process will ensure that the ongoing conservation programs are protecting and managing sensitive biological resources as required by the federal and state Endangered Species Acts, the Migratory Bird Treaty Act, and other applicable natural resources laws, as well as required by CEQA.

As such, with the implementation of the MCHSPs, when development accommodated by the proposed updated Housing Element occurs throughout the county, the requirements of the existing MCHSP process will require mitigation of impacts at the site-specific scale. As noted and detailed above, the MSHCP process serves as project-level mitigation for future development projects and is applicable to the proposed project as a method of impact mitigation and reduction.

2.0 COMMENTS AND RESPONSES

Response 10.3 In regard to the commenter's assertion that the EIR did not identify effects on biological resources, as stated in the responses above, the EIR thoroughly evaluates potential impacts on biological resources on both a countywide and an Area Plan level. For the Lakeview Nuevo Area Plan, potential impacts were analyzed on pages 4.9-31 through 4.9-34. Furthermore, countywide impacts to biological resources were addressed on pages 3.0-42 through 3.0-58.

In regard to the commenter's assertion that the EIR does not evaluate alternatives and mitigation to lessen impacts to biological resources, extensive mitigation is included in Section 3.0 of the EIR specifically to reduce impacts to biological resources (starting on page 3.0-42). Furthermore, a number of existing regulatory programs require extensive compliance to ensure reduction of potential impacts to biological resources. In regard to alternatives, Section 5.0, Alternatives, of the EIR discusses three alternatives to the proposed project, all of which were analyzed extensively, including impacts to biological resources. Therefore, despite the commenter's assertion, the EIR fully complies with CEQA, including mandates under State CEQA Guidelines Section 15065.

Response 10.4 As explained above, the MSHCPs incorporate a thorough regulatory framework in order to reduce potential impacts to biological resources. The EIR also contains an extensive set of mitigation measures to reduce impacts related to the proposed project, as noted in Response 10.3 above. The commenter does not include any mitigation measures for consideration. Furthermore, beyond the proposed mitigation and the MSHCPs, the project would also be subject to a number of state, federal, and local programs to protect the biological resources in the county. As also mentioned in the responses above, the implementation of the MSHCP process ensures that the criteria required under CEQA for biological resources analysis are met. Through the MSHCP program, all future projects will be required to comply with a full biological resources analysis and all future impacts will need to be mitigated. As such, the EIR provides extensive mitigation related to biological resources that would ensure an equitable review of future development accommodated under the proposed project.

Response 10.5 The EIR is a program-level document pursuant to State CEQA Guidelines Section 15168 and includes detailed analysis as appropriate for a planning-level document of this magnitude. The Draft EIR was sent to an extensive list of recipients for review, both through direct mail and via the California State Clearinghouse. The California Department of Fish and Wildlife and the US Fish and Wildlife Service were both notified of the project and given the opportunity to review and comment on the Draft EIR.

Response 10.6 The County will continue to provide project status notifications to the Friends of the Northern San Jacinto Valley as the project continues through the public participation and hearing process. This comment serves as the conclusion to the letter. Responses to specific comments are included above; no further response is required.

June 1999

HIGHGROVE HAPPENINGS



Community plan continued from page 1

The following is a list of those who were notified about the "Highgrove"

Community Plan

Roy Hord, District V Supervisor Mullen's Office; Theresa Griffin, Dist. V Planning Commissioner; Tom Ingram, Riverside County Building & Safety Director; Scott Barber, Deputy Director, Riverside County Building & Safety; Dave Barnhart, Riverside County Transportation Director; Brad Hudson, Executive Director, Economic Development Agency; Lance Noland, and Kathy Thomas, Riverside County E.D.A.; Mark Balys, Public Information Director, Riverside County Planning; Ed Studor, Planning Manager, Riverside County Transportation; Katherine Lind, Riverside County Counsel-Land Use Section; Christopher Hans, Director, County Service Area 126; Marc Brewer, Riverside County Regional Park & Open Space Dist.; Andrew Avila, Riverside County Fire Dept.; Kathy Gifford, Waste Resources Management Dept.; Deputy Jay Stewart, Riverside County Sheriff; John Silva, Riverside County Environmental Health/Hygiene; Santa Wiley, Riverside County Agriculture Commissioner's Office; Mekbib Degaga, Riverside County Flood Control Dist.; Brian Loea, Riverside County Habitat Conservation Agency; WQCB, Santa Ana Basin Region; Andrea DeLeon, Riverside Transit Agency; Steve Ruddick, WRCOG; Dan Johnson, UCR Planning, Design & Construction; Paul Blackwelder and Susan Cornelison, Riverside County Transportation Commission; George Spiliotis, Riverside County LAFCO; CALTRANS-District 8; Andy Soto, City of Colton Planning Dept.; John Lampe, City of Grand Terrace Community Development Dept.;

Mike Coyazo, City of Riverside Planning Dept.; Bob Johnson, City of Riverside Park & Recreation; Rick McGrath, City of Riverside Public Works Dept.; Ed Kostjal, City of Riverside Water Utilities; Pauleen Hedge, City of Riverside Real Property Services; Margie Brown, Facility Planning, Riverside Unified School Dist.; Greg Gage, Facility Planning, Colton Joint Unified School Dist.; Willie Williams, Facility Planning, Moreno Valley Unified School Dist.; Riverside County Building Services Dept.; Borre Winckel, Riverside County BIA; James Forbes, Property Owners Association of Riverside County; Gene McMeans, Riverside Highland Water Co.; Robert Perkins Riverside County Farm Bureau; Riverside Chamber of Commerce; Shelton Douthitt, Riverside County Land Conservancy; Dan Silver, Endangered Habitats League; Riverside-Corona Resource-Conservation Dist.; Bob Brendza, Industrial Dev't. Director, BNSF Railroad; Chris Tren, Southern California Edison Co.; Michael Edson, Southern California Gas Co.; Mary Ann Cassaday, Pacific Bell Telephone; GTE Area Forecasting; Curt Taucher, CDFG, Inland Desert-Eastern Sierra Region; Nadell Gayou, California Dept. of Water Resources; Ana Reyes, Metropolitan Water Dist., Env. Planning Branch; Michael Adackapra, WQCB, Santa Ana Basin Region; Ron Lockmann, US Army Corps of Engineers; Christine Moren, US Fish & Wildlife Service; US Postal Service, Growth Management Coordinator, Reche Canyon Association.

11.1

61 names or agencies and NOT (1) person or agency from Highgrove!

A letter was sent to the Planning Department to notify "ALL CONCERNED" that if there is anything concerning Highgrove, they are to notify any and all of the following CSA 126 Highgrove Advisory Board members: **R.A. Barnett (909) 683-4994, Denis Kidd (909) 783-1664,**

Colton Planning Dept.; John Lampe, City of
Grand Terrace Community Development
Dept.;

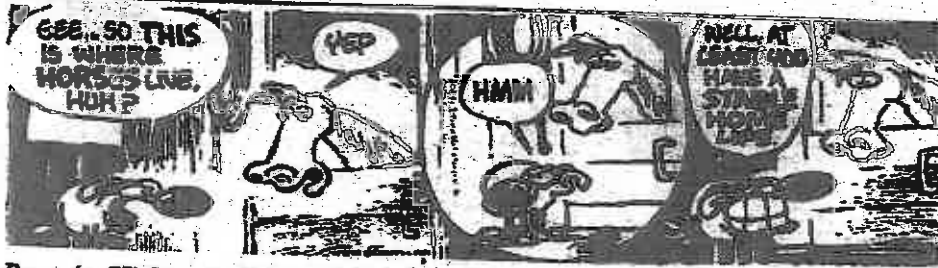
US MAIL & VOUCHER SERVICE, US Postal Ser-
vice, Growth Management Coordinator, Reche
Canyon Association.

61 names or agencies and NOT (1) person or agency from Highgrove!

A letter was sent to the Planning Department to notify "ALL CONCERNED" that if there is anything concerning Highgrove, they are to notify any and all of the following CSA 126 Highgrove Advisory Board members: R.A. Barnett (909) 683-4994, Denis Kidd (909) 783-1664, Dave Tinker (909) 684-9745, Linda Olchawa (909) 683-1329, and Terri Horn (909) 682-6128.

Also on May 14th I received a copy of a letter from the County Administration Office in regard to a meeting that was held last March 18th. This meeting had already occurred almost 2 months prior to my receiving notification!

It was a very important meeting too because it concerned the division of 10 acres of Highgrove land into 36 residential lots and the changing of designation from agriculture to residential zoning. If anyone received notice before the March 18th meeting please let me know. I know our Advisory Board did not receive notification. I have received apologies from the County Planning Department and from the County Administrative Office but if we, as Highgrove residents, are to know what is happening to our land and our community we need to be kept better informed!!!



Riverside County Planning Department
Draft Environmental Impact Report
William Gayk, Project Manager
4080 Lemon Street, 12th floor
Riverside, Ca. 92502-1409

April 14, 2016

Dear Mr. Gayk,

Since June of 1999 the community of Highgrove has wanted to be involved in recommending changes that would improve our community. And also, for as many years, as Chairman of Highgrove's former County Service Area 126 and the presently known Highgrove Municipal Advisory Council, for several years I have submitted information about the changes that are wanted by our community. Some of these changes have already been made and some of them have not. We understand that all requests can not be granted but I am re-submitting some of the changes needed for the DRAFT EIR No. 548 that has a public comment deadline of May 30, 2016.

11.2

In reading the document on-line today (April 14, 2016) I noticed that much of the information has not been up-dated. Many of the statement in the 64 page EIR no longer apply. I am including an old request dating back to Sept. 26, 2012 showing what no longer applies and what is still needed. These items are listed in the same order as they appeared over 3 ½ years ago but **here is a similar list to show what is needed in 2016:**

“Zoning Changes”:

The 68 acre property known as the Bixby property in Highgrove is still all vacant land but in cooperation of Supervisor Tavaglione, the Bixby Land Company, the Highgrove Municipal Advisory Council, and the Highgrove residents, the zoning has been changed to allow future single family homes instead of warehouses.

“North/South Road”

Michigan Ave. goes between Grand Terrace and Riverside but has a short gap through vacant land formerly known as Spring Brook Estates. By extending a short ½ mile road southward from Spring St. through this vacant land and connecting to Palmyrita Court would allow Michigan Ave. to become a NORTH/SOUTH road all the way from Barton Road in Grand Terrace to Columbia Ave. in Riverside.

11.3

This idea was suggested by Juan Perez when I gave him a tour of Highgrove several years ago.

“Highgrove Metrolink Station”:

After 14 years, the Riverside County Transportation Commission still refuses to build a parking lot on their vacant land at Highgrove that they do not need for the Perris Valley Line. RCTC's property is right next to the BNSF main line where daily Metrolink trains pass by, 7 days a week between the 2 counties.

The Highgrove location has been supported in writing for many years from residents in both counties including written support from the City Councils of Grand Terrace, Colton, and Loma Linda; written support from California State Senators from both counties; and Riverside's Congressman Takano. Documentation can be found on: www.highgrovehappenings.net and click on Metrolink.

Page 24 of the current General Plan states: *"The proposed San Jacinto branch line could utilize a Tier II station site in Highgrove as a transfer or staging point for needed equipment or employees"*.

This should be changed! The General Plan and the Highgrove Area Plan should read:

"Due to the long term support for a Metrolink Station at Highgrove and the current construction of 1,409 homes in Spring Mountain Ranch and the availability of hundreds of additional acres of vacant land in Highgrove for additional future homes, the 17.22 acres of vacant land at Highgrove that is currently owned by the Riverside County Transportation Commission should be reserved for a future Metrolink parking lot and station and RCTC should be prevented from selling or using this unique property for any other purposes".

If this unique property is sold or used for any other purpose except a Metrolink parking lot for commuters between the counties, it will be lost forever!

Someone needs to intervene and overrule RCTC's decision because a Metrolink station at Highgrove affects the whole region on both sides of the county line. Future commuters who board the proposed Metrolink trains at the new Marlborough Station on the Perris Valley Line will not be able to get to San Bernardino. They will only go between Riverside and Perris. Meanwhile, only 1 mile away at RCTC's Highgrove location there are already daily Metrolink trains (including week-ends) that go between Riverside and San Bernardino Counties in both directions. All that is needed is a parking lot so these existing daily Metrolink commuter trains can stop at Highgrove!

"Train Whistling Ordinance"

A "Quiet Zone" is still needed at Main St. and Center Street. These 2 grade crossings are close together and if they were quiet zones, all trains would not be required to blow their whistle (unless an emergency exists) between Valley Blvd. in Colton and Palmyrita Ave. in Riverside. The Grand Terrace High School on Main St. and residents in both Highgrove and Grand Terrace would benefit from this quality of life quiet zone ordinance.

"Street name change"

This item has been resolved and is no longer a problem.

"Concrete Curbs"

The new Spring Mountain Ranch homes have concrete curbs, concrete sidewalks and concrete driveways and this concern has already been resolved.

"Pigeon Pass Corridor"

A future road between Moreno Valley and Highgrove should connect to Palmyrita Ave which is already a wide road with warehouses on both sides and not a residential area. Center St. has historical buildings including a church that is 126 years old and a former bank building.

"Community Involvement"

Several years ago, under Supervisor Marion Ashley's supervision, any new developers planning construction in Highgrove are supposed to present their project to the Highgrove Municipal Advisory Council first, before going through the County Planning Department. This procedure was implemented during the planning stages of the 87 unit Highgrove Blossom Apartments. After the Highgrove MAC's involvement, the project was recommended for approval to our Supervisor.

11.3

“Annexation”

“All or nothing” is how the Highgrove people feel about a future annexation to the city of Riverside if and when that ever happens!

“Sewers”

All of the new homes in the Spring Mountain Ranch portion of Highgrove currently have sewer connections that connect to the City of Riverside’s sewer system. The only other properties in Highgrove that are currently connected to the sewer system are the Highgrove Library, 87 units of the Highgrove Blossom Apartments, 5 apartments across from the Highgrove Elementary School, and the Chevron Gas Station all of which are located on Center Street. There is a plan already in place to put sewer trunk lines in other parts of Highgrove but this plan should be revisited.

“Rails to Trails”

The Union Pacific Railroad has abandoned their track from the I-215 freeway in Grand Terrace, through Highgrove to Marlborough Ave. in Riverside. The track has been completely removed and would make an ideal trail between these communities.

Please consider these changes for the 2016 General Plan and contact me if necessary.

Thank you,



R. A. “Barney” Barnett

Chairman: Highgrove Municipal Advisory Council

Editor: Highgrove Happenings Newspaper

474 Prospect Ave.

Highgrove, Ca.

92507 (951) 683 4994

highgrovenews@roadrunner.com Web site: www.highgrovehappenings.net

Attachments:

Letter dated Sept. 26, 2012 about changes needed in General Plan as it pertains to Highgrove.

Letter dated Nov. 30, 2011 from Highgrove MAC to Planning Dept., Tavaglione, and EDA.

Letter dated August 5, 1986 showing historical structures in Highgrove.

Copy of June 1999 Highgrove Happenings with headline: “*Where is the Highgrove in Highgrove Community Plan*”?

Christensen, Karen

From: Christensen, Karen
Sent: Wednesday, September 26, 2012 4:32 PM
To: 'R.A. "Barney" Barnett'
Subject: Highgrove

Hi Barney,

The attached is from John Field. He is out of the office this week, so if you have questions, he will be back on Monday, October 1st. Thanks and see you tonight.

*Karen Christensen
Senior Legislative Assistant to
John F. Tavaglione
Second District Supervisor
County of Riverside
(951) 955-1021 - Office
(951) 955-2362 - Fax
kchrste@rcbos.org*

From: Field, John

Dear Highgrove Municipal Advisory Council Board Members. I am in receipt of your letter of August 14, 2012 regarding your requests for changes in the Riverside County General Plan as it pertains to the community of Highgrove. Below are my responses to each issue:

"Zoning Changes": The County of Riverside is in the process of updating its General Plan which is the document that lays out the county's vision for the future. Part of that document is the "land use element", which is intended to guide development patterns and lead to balanced communities which provide for an adequate jobs/housing balance, sustainable development patterns, and appropriate separation of uses, among other things. A well designed general plan should improve the quality of life for those who live and work in a community. I believe the 68 acre property referenced in your letter is the property commonly referred to as the "Bixby" property. Because I was not involved in the application process of the plot plans that were approved several years ago for this property, I do not have the necessary background on this particular proposal to know what lead to its approval. I can say however, that we believe that keeping industrial uses away from residential uses is generally good planning. Please keep in mind, the landowner is a very important part of this process and they are entitled to provide their input on what the designation afforded their property will be. The general plan update process will include public hearings and public input. If the Highgrove MAC has a preferred land use plan for the Bixby property I would invite you to forward that plan to the County Planning Department for their consideration.

"North/South Road": Extending Michigan Avenue from its southerly terminus to Palmyrita in the City of Riverside makes a lot of sense to me and I have forwarded this request to the Transportation Department to get their input on feasibility. The development of several industrial buildings on the City's side of the wash combined with the issues associated with crossing the wash itself will pose some challenges to this proposal but it is definitely worth looking at. If our transportation engineers agree with me we will approach the City of Riverside and get their input on including this change to the transportation elements of our respective general plans. No promises, but we'll take a close look at it.

"Highgrove Metrolink Station": This issue has been vetted fully on several occasions and it is apparent that at this time the likelihood of a station being built on the property in question is very low. Who knows what the future holds but as of now, that is not going to happen.

"Train Whistling Ordinance" A "Quiet Zone" in Highgrove is a very good idea and one we should explore further. It will require significant upgrades to the railroad crossings at both Main Street and Center Street but it can be done given sufficient funding. The loss of redevelopment has affected the County's ability to construct these kinds of improvements right now but as the economy improves perhaps we can find another source of funds to install a quiet zone. Have you ever invited representatives from the railroad to a MAC meeting to discuss what it takes to install a quiet zone? To my knowledge this is not something that requires a county ordinance as the railroad is not required to follow local ordinances. I believe they are governed by the Federal Surface Transportation Board. I don't know what the process is but we will find out.

"Street Name Changes": I have forwarded this request to the Transportation Department for their response. Sounds logical to me and if there is no compelling reason not to do this I believe they will agree. On the County GIS system, the "East Center Street" name change is already in place so I think that change has been made. We may not have changed the sign however. I have already asked our Transportation Department to order a sign if the name change has indeed occurred.

"Concrete Curbs": It is the county's development standard to require the use concrete when constructing curbs, however, when constructing a road in an interim fashion, (meaning that future widening is eminent) sometimes we will agree to allow the use of asphalt instead of concrete. If there is a particular curb(s) in question please let me know and I can check as to why we allowed asphalt instead of concrete.

"Pigeon Pass Corridor": This is a very reasonable request and I have asked that the Transportation Department include the Highgrove MAC in the process of examining the possible alternatives.

"Community Involvement": I believe this request comes from the approval of the Bixby Land Company plot plans where you have indicated that the county did not consult with the MAC before approving those cases. I understand your concern and agree that you should have been provided the opportunity to look at those plans and give your input. I will discuss this issue with the Planning Director to see what she thinks is the best way to include the MAC on land use applications. A lot of the cases we get in Highgrove are very small in nature and are not what would typically deserve the scrutiny of the MAC (room additions, swimming pools, etc..). However as there are several large undeveloped properties in the community it certainly makes sense that you become involved in those processes and that we receive your input.

"Annexation": Unincorporated "islands" like Highgrove, El Cerrito and Coronita, (to name a few in our district) are very costly for the county to service. As such we agree that taking some, but not all of Highgrove, would exacerbate that problem and we would not be supportive of partial annexations.

I hope this adequately answers your questions. If not please don't hesitate to contact us again for clarification or more information. I know you are aware, but just as a reminder, there will likely be a new county supervisor representing Highgrove next year and that individual may have a very different viewpoint on some of these issues. Should we not be around next year I'd like to say that we have thoroughly enjoyed working with you and we very much appreciate your help and input with respect to issues affecting your community. Keep up the good work!

Sincerely,

John Field, Chief of Staff
Office of Supervisor John F. Tavaglione
County of Riverside, Second District

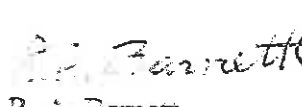



Riverside County Planning Department
Riverside County Supervisor John Tavaglione
Riverside County Economic Development Agency

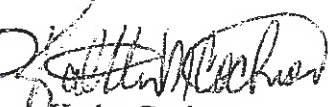
Nov. 30, 2011


All concerned:

The following members of the Highgrove Municipal Advisory Council request that a new Highgrove Community Plan be implemented to better adjust to the changes to the Highgrove community since the last community plan in 1999.


R. A. Barnett


Raina Boal


Kathy Cochran


Don Earp


Tom Rice


Mark Visyak


Melanie Zimmermann

 **MAC**
Municipal Advisory Council

Chairman

951-683-4284 (Home) R.A. "Barney" Barnett
951-683-7288 (Fax) highgrovenews@roadrunner.com
951-256-6646 (Cell) web: www.highgrovehappenings.net



COUNTY OF RIVERSIDE
PARKS DEPARTMENT

4600 Gresham Road, P.O. Box 3507, Riverside, CA 92519 • (714) 787-2551

PAUL D. ROMERO
Director

August 5, 1986

Ms. Terri L. Eagan
Gunn, Russell, Copenhagen & Co., Inc.
150 W. First Street, Suite 280
Claremont, CA 91711-4139

Dear Ms. Eagan:

DIER - Riverside County Redevelopment Projects

Enclosed is the historic resource inventory information that we previously discussed this past month.

Each site has individual survey sheets which are maintained by our history division. Should you have questions regarding any site, please contact Diana Seider, History Division Director, at 714/787-2551.

Thank you for your patience in this matter.

Sincerely,


George Bacteria
Assistant Park Planner

GB:gm

cc: Sam Ford, Deputy Parks Director
Diana Seider, History Division Director

Highgrove

1. "Craftsman Bungalow"
2. "Bungalow"
3. "Classic Revival"
4. "Bungalow"
5. "Bungalow"
6. "Mediterranean/Spanish Revival"
7. "Vernacular Wood Frame"
8. Trujillo Adobe
9. "Mediterranean/Spanish Revival"
10. M. E. Church
11. "Vernacular Wood Frame"
12. "Bungalow"
13. "Vernacular Wood Frame/Colonial Revival"
14. Highgrove Bank Building
15. "Colonial Revival"
16. Oberschmidt Home
17. "Vernacular Wood Frame"
18. "Vernacular Ranch House"
19. "Vernacular Ranch House"
20. "Vernacular Wood Frame"
21. "Vernacular Wood Frame"
22. "Victorian (mixed style). Queen Anne"
23. "Vernacular Adobe"
24. "Queen Anne"
25. "Vernacular Ranch House"
26. "Tudor Revival"
27. "Vernacular Ranch House"
28. "California Ranch House"
29. "Mediterranean/Spanish Revival"
30. Our Lady of Guadalupe Church
31. "Vernacular Wood Frame"
32. "Mediterranean/Spanish Revival"
33. Ethan Allen Chase House
34. "Victorian (mixed style)/Adobe Construction"
35. "Vernacular Wood Frame"
36. "Colonial Revival"
37. "Vernacular Wood Frame"
38. "Eastlake"
39. "Vernacular Wood Frame"
40. "Bungalow"
41. "Vernacular Wood Frame"
42. W.W. Ayers
43. "Victorian (mixed style)"
44. "Vernacular Wood Frame"
45. "Vernacular Wood Frame w/Classical Revival Elements"
46. "Victorian (mixed style)"
47. "Vernacular Ranch House, Eastlake, Victorian (mixed style)"
48. "Vernacular Wood Frame"
49. "Eastlake, Victorian (mixed style)"
50. "Craftsman Bungalow"
51. "Bungalow"

3405 Center St. Highgrove 92501

3311 Chase Rd

649 Kemp St

715 W La Cadena Dr

753 W La Cadena Dr

781 W La Cadena Dr

220 N Main St

Orange & Center Streets

3667 Placentia Ln

Center & Prospect, Highgrove 92

888 Center St

909 Center St

971 Center St

1057 Center St

1079 Center St

1112 Center St

1143 Center St

1213 Center St

1110 Church

495 Electric Ave

1197 Church

227 Commercial

1677 Elliott St

186 Highland Ave

248 Highland Ave

411 Highland Ave

895 Marlborough Ave

900 Marlborough Ave

126 Pacific Ave

209 Pacific Ave

375 Pacific Ave

410 Pacific Ave

503 Palmyrita

1646 Palmyrita

228 Prospect Ave

240 Prospect Ave

260 Prospect Ave

327 & 331 Prospect Ave

391 Prospect Ave

422 Prospect Ave

430 Prospect Ave

456 Prospect Ave

466 Prospect Ave

474 Prospect Ave

484 Prospect Ave

510 Prospect Ave

558 Prospect Ave

210 Transit Ave

238 Transit Ave

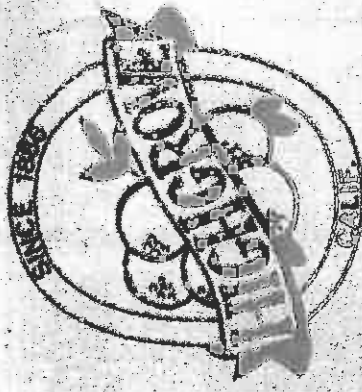
513 Transit Ave

536 Transit Ave



HIGHGROVE HAPPENINGS

Newsletter



"Dedicated to the improvement of our community through awareness and involvement in local issues"



Vol.2 No.3

Local News for the Highgrove Area

June 1999

Where is the "Highgrove" in "Highgrove Community Plan"?

by R.A. "Barney" Barnett

The Riverside County Planning Department hosted a planning meeting on April 19th at the Norton Younglove Community Center. Unfortunately I was unable to attend do to falling and breaking two ribs. I depended on information relayed to me from those who attended the meeting. On May 14th, I received a copy of the draft of the Highgrove Community Plan along with a letter from the Planning Department dated April 29th. This information was not sent to me by the Riverside County Planning Department. On pages 4 and 5 of the letter there was a list of 61 names or agencies who received a copy of the Highgrove Community Plan Draft. NOT ONE OF THESE NAMES OR AGENCIES ARE FROM HIGHGROVE! I immediately called and asked the Planning Department to send a copy of the Draft to each CSA 126 Highgrove Advisory Board member and I supplied them with the proper addresses. One particular sentence taken from the letter dated April 29th, states the following: "The Community Plan Policies would provide standards to assist decision-makers in evaluating proposed development projects".

How is it that so many people and agencies can be notified about the Highgrove Community Plan and not notify anyone from the Highgrove community? In the past the county has referred to our board as the eyes and ears of the "Community". We are to serve as a go-between, between Highgrove and the County of Riverside. Our monthly meetings are supposed to inform our residents about what is going on in Highgrove. (see community plan on page 4)

Firemen's Pancake Breakfast Big Success!

COMMENT LETTER NO. 11: HIGHGROVE MUNICIPAL ADVISORY COMMITTEE

- Response 11.1** The commenter included an excerpt from the Highgrove Happenings Newspaper from June 1999. The commenter also attached a comment letter submitted to the County in 2011, not related to the proposed project. The attachments have been reviewed and will be included in the public record for the project. The attachments do not raise any comments related to the Draft EIR or its analysis.
- Response 11.2** The County appreciates and values the committee's comments during the EIR participation process. This comment provides general introductory and background information. No further response is required. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 11.3** The commenter notes a number of comments related to concerns within the Highgrove community. However, these concerns do not pertain to the Housing Element or the EIR. The comments have been noted and will be considered by the County during project deliberations. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. As such, no further response is required.

This page intentionally left blank



SIERRA CLUB
SAN GORGONIO

4079 Mission Inn Avenue
Riverside, CA 92501
(951) 684-6203
sangorgonio.sierraclub.org

Bill Gayk, Project Manager
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501

Dear Mr Gayk:

Re: Comments on DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902

The Sierra Club appreciates this opportunity to make comments on this project. With May 30th being Memorial Day, a national holiday, our comments will arrive on May 31, 2016. We are very concerned that the Housing element DEIR relies too much on the recently approved Riverside County General Plan Amendment (GPA) 960. You do acknowledge that the "GPA 960 is currently in active litigation with an unknown outcome", but then proceed as if nothing will change. The Final EIR for this project needs to discuss the possibility that either an agreed settlement or court decision could significant change GPA 960 and its impact on the housing element documents as well as possible approvals.

"With few exceptions, the proposed project would increase the number of housing units (density) allowed on certain parcels that have been identified for development in the Riverside County General Plan. The Riverside County General Plan Update Project No. 960 was approved after environmental impacts of the plan were evaluated in Environmental Impact Report No. 521 (State Clearinghouse #200904105). This previous analysis was considered in evaluating the impacts associated with the proposed project and is incorporated by reference." (2.2.3 DEIR 548)

As explained in prior comments on the EIR for GPA 960, Appendix E-1 offers no evidence to support or even explain how it determined the “midpoint” units per acre densities and “probable” floor area ratios, beyond the general assertion that these factors take into account “roads, rights-of ways, easements and public facilities.” RDEIR Appendix E-1 at 1. Nor does the Appendix explain or even mention the evidence that supports the County’s decision to revise many of these factors downward in this update to the General Plan. *See, e.g.*, RDEIR Appendix E-1 at Table E-1 (significantly reducing midpoint DU/AC for residential designations as compared to 2003 EIR).

Recent developments in Riverside County indicate that using the midpoint density units per acre and probable floor area ratios underestimate the General Plan’s potential impacts. For instance, the County recently released a Notice of Preparation for the Paradise Valley project (EIR No. 506). This 4,947.8-acre project is currently designated “Open Space – Rural” under the existing General Plan and the Plan amendment. Using the factors provided in Appendix E-1, the County anticipates 123.7 residential units will be built on this site (Open Space – Rural (OS-RUR) DU/AC Midpoint of 0.025 x 4,947.8 acres = 123.7 density units). Yet the Notice of Preparation indicates the developer is seeking to build 8,490 residential units, 198,950 square feet of commercial, and 1,182,040 square feet of light industrial and mixed use.

Similarly, the County is currently reviewing a revised version of the Villages of Lakeview Project, which appears to include 8,900 residential units and some light industrial on 2,800 acres. *See* Exhibit B. Land use designations under the current General Plan and Plan amendment are mixed, but the site is primarily Agriculture, Rural Mountainous, Very Low Density Residential, Low Density Residential, and Conservation. Even assuming the densest designation (Low Density Residential) applied across the entire site—which it does not—the analysis in Appendix E-1 assumes that only 4,200 residential units would be built on this site (LDR DU/AC Midpoint of 1.5 x. 2,800 acres = 4,200 density units). Given the pending application for more than twice that number of units, this assumption is demonstrably erroneous.

The GPA 960 EIR purports to analyze the impacts of the its Plan assuming “midrange” projections for population, dwelling units, and floor-area ratios, rather than analyzing the impacts associated with the scope of development actually authorized by the Plan. CEQA, however, requires lead agencies to analyze the impacts associated with the “whole of an action” and does not permit the lead agency to assume that some of the authorized development will not be built. CEQA Guidelines § 15378(a). The GPA 960 RDEIR attempts to justify its failure to describe and analyze the entirety of the proposed Plan by stating that midrange projections would be most representative of a reasonably foreseeable future build-out. *Id.* The County has taken the “reasonably foresee-

12.2

12.3

12.4

able” language from the definition of project under the CEQA Guidelines, but has misinterpreted its meaning. Under CEQA, a project means “*the whole of an action*, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” CEQA Guidelines § 15378(a). “Reasonably foreseeable” describes the likelihood of indirect impacts; it does not suggest that an EIR need only evaluate the “reasonably foreseeable” aspects of a project. Here, the whole of the action is the level of development permitted under the General Plan.

12.4

As explained above and in prior comments to the County, GPA 960 must be described and analyzed in the RDEIR as the Plan’s full build-out, not a midrange scenario. This distinction is not merely academic. Importantly, the Plan’s full build-out allows for substantially more development than is assumed under the midrange projection. To use the RDEIR’s explanation for its calculation of dwelling units as an example, the County multiplied the number of gross acres by the land use designations’ respective dwelling-unit-per-acre (du/ac) factor. “For example, 400 acres of Medium Density Residential, with a density range of 2.0 to 5.0 du/acre, has a midpoint of 3.5 du/acre. Thus, for planning projection purposes, a total of 1,400 dwelling units would be associated with these 400 acres (400 ac x 3.5 du/ac = 1,400 du).” *Id.* at 4.1-4. Had the County assumed full build-out rather than a midrange scenario, the dwelling unit count would have been 2,000, not 1,400 (400 ac x 5.0 du/ac = 2,000 du). The County also assumed a midpoint scenario for its calculation of commercial and industrial land uses. *Id.* at 4.1-6.

The magnitude of this error is enormous. The GPA 960 designates roughly 56,000 acres throughout the County’s unincorporated lands as Medium Density Residential. RDEIR at 4.2-39. Using the County’s midpoint scenario, this equates to 196,000 dwelling units in the County (56,000 ac x 3.5 du/ac = 196,000). Had the County assumed full build-out, as CEQA requires, the dwelling unit count would have been 280,000 (56,000 ac x 5.0 du/ac = 280,000), an additional 84,000 dwelling units. Underestimating the amount of potential development results in a serious underestimation of the General Plan’s impacts in virtually every category. The development of an additional 84,000 dwelling units would result in a substantially greater loss of biological, cultural, and other resources. It would greatly increase traffic, air pollution, GHG emissions and noise, and would result in a far greater consumption of water and energy resources. The list goes on and on.

12.5

In light of these deficiencies, the Sierra Club, Center for Biological Diversity, and the San Bernardino Audubon Society filed a lawsuit challenging the County’s adoption of GPA 960 based on violations of CEQA. It appears that, as a result of the Sierra Club lawsuit challenging the EIR for GPA 960, the County is now conservatively assuming full build out for the analysis in the Housing Element EIR.

See DEIR at 3.0-3. The Final EIR No. 548 must explain its analysis as to whether it is using the number of housing units claimed in GPA 960 with their mid range approach or if they are using the number of units permitted under GPA 960.

As written the proposed Housing Element project would cumulatively result in the capacity "for up to 73,255 more housing units and 240,805 more people in the unincorporated County in comparison to buildout of GPA 960." The Housing element DEIR must analyze the worst case scenario which means that building on the GPA 960 use of the "mid-point" units per acre density and "probable" floor area ratios erroneous assumptions must be eliminated. The FEIR No. 548 must add its worst case additional housing and people to the amount of growth permitted under GPA 960 as well as the Villages of Lakeview (VOL) and Paradise Valley projects or it will be inadequate. The Final EIR must then analyze these cumulative impacts caused to air quality, traffic, aesthetics, hydrology and water quality, greenhouse gas emissions, Climate Change or Climate Disruption, Climate Action Plan, hazards and hazardous materials, biological resources, geology and soils, agricultural resources, Public Health, increase energy demands, and all other areas required under CEQA or it will be inadequate. While there has been no environmental review of the VOL and Paradise Valley, they will almost certainly result in many of the same impacts as the GPA 960 and the Housing Element. The County's failure to analyze the cumulative environmental effects of these planned developments, together with the Housing Element DEIR No. 548, is an egregious CEQA violation. CEQA Guidelines § 15355.

12.6

An EIR must discuss significant "cumulative impacts." CEQA Guidelines § 15130(a). "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." CEQA Guidelines § 15355(a). "[I]ndividual effects may be changes resulting from a single project or a number of separate projects." CEQA Guidelines § 15355(a). A legally adequate "cumulative impacts analysis" views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b). The cumulative impacts concept recognizes that "[t]he full environmental impact of a proposed . . . action cannot be gauged in a vacuum." *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 408.

12.7

Too few of the proposed HHDR/MUA neighborhoods are near existing urban areas. DEIR 548 would have you believe that because GPA 960 and the previous General Plan mentions directing growth towards existing urban areas to reduce sprawl that the County's actions and the documents themselves would implement those words. Rather than clearly guide development toward the existing incorporated cities within the County, GPA 960 seeks to facilitate development in unincorporated County areas. *See, e.g.*, RDEIR at 4.13-75: "The Proposed project's update to the General Plan includes [land use changes] that would allow for the conversion of rural, semi-rural, agricultural and vacant lands into suburban or urban uses in areas throughout the county." While the GPA 960 notes that decentralized development patterns cause impacts on environmental resources and increase the costs of providing community infrastructure and services, the County nonetheless makes no concerted attempt to direct the growth towards existing cities. This approach to land use development is the polar opposite of established smart growth principles and is certainly not sustainable.

12.8

The same is true for DEIR 548 and the Lakeview Nuevo HHDR/MUA is an example of how the County continues these non sustainable practices. Over one-fifth of the almost 5,000 acres being set aside for these important purposes are in this valley. A few years ago the County approved the 11,000 unit Villages of Lakeview (VOL) housing project in the same area of the valley only to have a judge overturned the approvals on many counts. Leapfrog development of the VOL played into the judges decision. The same is true for the proposed HHDR/MUA neighborhoods J and K. These also impact many criteria cells and biological resources as well as the resources of the San Jacinto Wildlife Area— directly, indirectly and cumulative. The Final EIR must address the issues mentioned in this letter which has not been done in the DEIR. There is also no promise that future project approvals will have a full EIR process and therefore it must be done now prior to a vote on this project. The environmental documents cannot just state that the western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) mitigates all biological impacts. The State Natural Community Conservation Planning Act (NCCP act) does not exempt a project in a Natural Community Conservation Planning area from CEQA or alters or affects the applicability of CEQA (Fish and Game Code § 2826) and the MSHCP derives much of its authority from the NCCP act.

12.9

The GPA 960 EIR asserted that the Plan would result in the direct conversion of only 32 acres of Prime Farmland and Farmland of Statewide Importance, and consequently concludes that direct impacts to agricultural land would be less than significant. The EIR fails to provide any explanation to support this conclusion, particularly given other statements that between 2000 and 2006, Riverside County lost roughly 30 percent of its existing agricultural lands. The placement of HHDR/MUA neighborhoods like in Nuevo/Lakeview away from urban areas continues the unnecessary loss of important agricultural

12.10

lands. The Final EIR No. 548 must have other alternatives which decreases the loss of agricultural lands. All alternatives also need to show how much public transportation is available at each location as well as how near people will be to emergency medical care. You cannot assume that these services will come. How far will people in these HHDR/MUA neighborhoods need to travel to work? This needs to be explained for each area. The court decision on the Villages of Lakeview development in the Lakeview/Nuevo area ruled that this was a major problem for this leapfrog development. It could be even more of a problem for those who may need access to public transportation. What will be the impacts to air quality, greenhouse gas, climate change caused by not having HHDR/MUA's near existing cities? Where are all the mitigations to reduce these impacts such as all these units required to have solar on site?⁶⁷

12.10

The Los Angeles Department of Public Health recommends that schools, housing and other sensitive land uses within 1,500 feet of a freeway adhere to best-practice mitigation measures such as the use of air filtration systems. Too many of the HHDR/MUA neighborhoods are within 1,500 feet of major roads and/or freeways as well as railroad tracks and yet nothing is being done to protect the health of future residents from the pollution in our non attainment area. The Final FEIR must explain how the health risk associated air pollution will be significantly reduced for those HHDR/MUA neighborhoods which will be within 1,500 feet of major roads like the Ramona Expressway. Remembering that people who need these neighborhoods will probably not have the money to replace these special filters when needed. The Final EIR 548 must also acknowledge that the Mid County Parkway (MCP) is also involved in active litigation with an unknown outcome. The Sierra Club will expect to read an analysis of the Lakeview/Nuevo HHDR/MUA neighborhood with the six lane MCP being built as well as the MCP not being built and the two lane Ramona Expressway remaining in this area.

12.11

It is very evident that the environmental impacts of the Housing Element and GPA 960 are related and both significant. It is for that reason that the Sierra Club believes the County should have held off and done them as one. This can and should still be done. It is not too late to combine the full buildout allowed under GPA 960 with what you acknowledge will be allowed under this Housing Element and analyze their cumulative impacts. This project's Final EIR needs to also analyze the cumulative environmental effects of the Villages of Lakeview, Paradise Valley and the Rio Vista Project as well as any other project that is undergoing environmental review. The Final EIR 548 must also explain with analysis how this Housing Element allows the the recently approved Climate Action Plan to meet its goals or it will be inadequate.

12.12

Please keep the Sierra Club notified of all future meetings and environmental documents related to DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902 by using the address below my name to contact me in a timely manner.

12.13

Sincerely,

George Hague
Sierra Club
Moreno Valley Group
Conservation Chair

26711 Ironwood Ave
Moreno Valley, CA 92555

788393.2

COMMENT LETTER NO. 12: SIERRA CLUB, SAN GORGONIO CHAPTER, MORENO VALLEY GROUP

Response 12.1 While the existing General Plan is under litigation, no decision has been rendered; therefore, the plan, policies, and mitigation included in EIR No. 521 are assumed to be in effect. Rather than rely on the adopted mitigation measures from EIR No. 521, EIR No. 548, prepared for the proposed project, includes a separate set of mitigation measures. Although the text of the mitigation measures is similar to those of EIR No. 521, the proposed project's EIR No. 548 will have a separate mitigation monitoring and reporting program (MMRP).

Response 12.2 In regard to the use of a midrange projection uses for GPA No. 960, and as analyzed in EIR No. 521, the EIR is required to analyze the "whole of an action" and all "reasonably foreseeable" indirect impacts related to the project, pursuant to State CEQA Guidelines Section 15378. As stated on page 1 of GPA No. 960 Appendix E-1, Socioeconomic Build-Out Assumptions and Methodology, "Land use designations differ among jurisdictions for a variety of reasons including unique physical and geographic characteristics, market forces, and varying community desires. There are no industry standards for population density or building intensity that can be applied to the new land use designations created for the Riverside County General Plan. ULI Handbooks, SCAG data, General Plans of cities within Riverside County and contemporary planning experience have been used to define the factors below to estimate Riverside County's future socioeconomic environment."

The document continues in stating that a midpoint projection is utilized for analysis due to the fact that "the range includes a minimum and maximum density for each designation as well as a midpoint. These ranges have been established based on actual product types and account for roads, rights-of way, conservation dedications, easements and public facilities typically found in residential areas such as elementary schools, parks, detention basins, etc." This point is reiterated throughout Appendix E-1.

Analyzing the EIR in a manner that assumes buildout of the entire county at maximum buildout (assuming no roadways or other facilities required for future development) would result in modeled impacts which would far exceed those that are "reasonably foreseeable" under GPA No. 960 and would largely void the EIR as an informational document suitable for decision-making. Analyzing the impacts in such a manner would create a disconnect between the expected buildout as accommodated under GPA No. 960, while also departing from the analytical methods from those developed and certified under EIR No. 441 for the 2003 General Plan. Consequently, a more reasonable and thoroughly vetted mid-range projection was undertaken in order to better account for the factors that limit development potential, including the development infrastructure to serve projects, dedicated conservation lands, site constraints, and roadways and regional transportation projects, as well as other variables.

Furthermore, this midpoint analysis is in alignment with the use of gross acreages (rather than net) in the General Plan and allows the use of the EIR as an informational document in conjunction with the General Plan. The methodology presented in GPA No. 960 Appendix E-1 was originally developed

2.0 COMMENTS AND RESPONSES

for the 2003 RCIP project and has been further refined in order to better analyze and capture the long-term potential impacts associated with development under the General Plan. Use of this modeling in the EIR allows the document to analyze, and (where appropriate) subsequently mitigate where appropriate, accurately modeled potential impacts that are grounded in the practical implications of the development process.

As such, the midpoint projection has been developed and refined in order to provide the most precise reasonably accurate estimate of future development, while ensuring that the whole of the project is analyzed and considered. While the commenter asserts that the use of a mid-range projection does not accomplish this, the use of a projection that includes buildout across the entire county at its highest designated land use (without an account of required future infrastructure and other externalities) would grossly overestimate the severity of impacts to a degree that is beyond the “reasonably foreseeable” requirement mandated under CEQA and would create a disconnect between the General Plan and EIR No. 548.

Furthermore, the commenter notes the Paradise Valley Project, which proposes development of residential and commercial uses on land currently designated as Open Space-Rural. This potential project will require an extensive environmental review process and will be required to complete a General Plan amendment prior to approval to change the existing land use designation. Under the commenter’s logic used in reference to the Paradise Valley Project, the County should analyze development of highly intense uses across the entirety of Riverside County, including areas designated as low-density and agricultural uses. This is well beyond the realm of reasonably foreseeable as defined by CEQA.

While the commenter’s statements are noted, the EIR extensively analyzes potential future population growth that may result from the proposed project and provides substantial support to justify the use of the mid-range population projection as outlined in General Plan Appendix E-1.

Response 12.3 Refer to Response 12.2 above. The commenter again gives a current planning project example that would require extensive environmental analysis and a General Plan amendment. While these comments are noted, future developments, particularly those that require an amendment to the General Plan, would be too speculative to analyze in EIR No. 548. Furthermore, the use of population projects as outlined in General Plan Appendix E-1 has been extensively reviewed and analyzed to ensure it accurately projects future development patterns as accommodated by the General Plan. The General Plan and EIR No. 548 fulfill the requirements of CEQA in regard to evaluating the whole of a project and analyzing reasonably foreseeable impacts.

Response 12.4 Refer to Responses 12.2 and 12.3 above. The County disagrees with the commenter’s statement that the term “reasonably foreseeable” only describes the likelihood of indirect impacts and therefore presumably the County is required to study impacts that would extend beyond those that are reasonably foreseeable or unreasonable future developments as part of the project description. An EIR is required to focus on both short- and long-term direct impacts that would result from a project (State CEQA Guidelines Section

15126.2). Further, the analysis of impacts must cover the entire project when considering the direct, indirect, and cumulative impacts related to a proposed project. While the commenter is correct in that the State CEQA Guidelines make it clear that only reasonably foreseeable indirect impacts should be evaluated in the EIR (see State CEQA Guidelines Sections 15064 and 15358), that does mean a “reasonableness” standard would not apply to future projects, project components, or other potential environmental impacts aside from indirect impacts. As stated under Section 15358(a)(1), “Effects include direct and primary effects which are caused by the project and occur at the same time and place.” Further, as stated in Section 15151, “An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably foreseeable.” Regarding the project description, it’s true that the project must include the “whole of the action” that may result in a direct or reasonably foreseeable indirect change in the environment (State CEQA Guidelines Section 15378). However, the extent of potential projects is limited to reasonably foreseeable future activities. Regarding project components, as stated by the Supreme Court, “we hold that an EIR must include an analysis of the environmental effects of future expansions or other actions if: (1) it is a reasonably foreseeable consequence of the initial project...” *Lauren Heights Improvement Ass’n v. Regents of Univ. of Cal.* (47 Cal.3d 376, 396); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comm’rs* (2001) Cal.App.4th 1344, 1362 [rejecting arguments that additional future long-range goals and projects need to be included as part of the project since the contemplated long-range projects were not a “reasonably foreseeable consequence of the project under review.”] A substantial number of cases also support a lead agency’s determination that uncertain future projects or activities that are not reasonably foreseeable consequences of the project proposed for approval are not required to be analyzed in detail in an EIR. No further response is required.

Response 12.5 The commenter continues to assert that the population projections used in EIR No. 548, as outlined in General Plan Appendix E-1, underestimated the reasonably foreseeable impacts of the project. The commenter further asserts that EIR No. 548 does not accommodate for development projects such as the Villages of Lakeview and Paradise Valley.

Refer to Responses 12.2, 12.3, and 12.4 above. While these comments are noted, the commenter’s statements contain a number of inaccuracies related to the examples provided. The County has not approved the Villages of Lakeview and Paradise Valley projects, and if they are approved, these project would require the approval of a General Plan amendment. It would be speculative for EIR No. 548 to evaluate a project proposing development that is inconsistent with existing land use designations, as this would require the assumption that the entirety of the county could be developed at high intensity levels, including those areas designated for low intensity uses such as open space and agriculture.

As thoroughly addressed above, a mid-range projection was used in order to ensure an accurate analysis of the proposed Housing Element has been completed. The use of a full buildout, assuming no roadways, setbacks, or other infrastructure, would be erroneous and would nullify the EIR as an informational

2.0 COMMENTS AND RESPONSES

document. Use of a complete buildout of the county would result in inflated impacts in all of the analyzed impact areas, well beyond those reasonably associated with the proposed project.

- Response 12.6** In regard to population projections, refer to Responses 12.2, 12.3, 12.4, and 12.5 above. EIR No. 548 extensively evaluates probable development that could be accommodated by the updated Housing Element, pursuant to the outlined procedures in General Plan Appendix E-1. Furthermore, EIR No. 548 evaluates cumulative impacts throughout Section 3.0, Countywide Impacts. The Villages of Lakeview and Paradise Valley projects are not included in the cumulative impact analysis, as they would be speculative to analyze in EIR No. 548 at this time. While the commenter's assertions are noted, the EIR extensively reviewed impacts on the cumulative and countywide scale pursuant to Section 15355 of the State CEQA Guidelines.
- Response 12.7** Refer to Response 12.6 above. EIR No. 548 extensively addressed cumulative and countywide impacts in Section 3.0, Countywide Impacts. The commenter merely states portions of the State CEQA Guidelines and case law, without providing substantive information as to how or why the cumulative impact analysis is deficient. No further response is warranted.
- Response 12.8** The commenter asserts that the community sites are not located in close proximity to existing urban areas. The proposed neighborhood sites were chosen through an exhaustive process that evaluated sites based on a number of criteria. These criteria included the availability of local community-supportive facilities and services, availability of intra- and interregional transportation facilities, availability of supportive on-site and site-edge land use and environmental characteristics, availability of primary on-site infrastructure (roads, sewer, and water), and flexibility in individual site development options. While not all sites contain all of these features, the County selected sites that contain as many of these features as possible while spreading development throughout the county to provide potential future housing options throughout Riverside County. These development patterns, as proposed by the updated Housing Element, exemplify smart growth patterns and the goals of the Housing Element update process. This comment pertains to a General Plan land use designation or General Plan policy comment. The County is compiling a database of comments on land use designations and General Plan policies, which will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 12.9** Refer to Responses 12.2, 12.3, 12.4, and 12.5 above. EIR No. 548 extensively analyzes impacts across each area plan individually, including the Lakeview Nuevo Area Plan. The document also proposes extensive mitigation to ensure less than significant impacts to biological resources in the Lakeview Nuevo Area Plan as well as countywide. No further response is warranted.

Response 12.10 Regarding alternatives, the EIR discusses alternatives in Section 5.0. These alternatives include a no project alternative, an alternative site alternative, a fewer sites alternative, and modification to existing specific plans, as well as others. Furthermore, the EIR specifically evaluates an alternative that eliminates development in agricultural areas (Alternative 2, analysis begins on page 5.0-13 of EIR No. 548). Refer to Section 5.0, Alternatives, for further discussion related to project alternatives.

The commenter comments on the potential for impacts to agricultural lands as a result of the project, specifically related to the conversion of agricultural lands. Potential impacts specifically to individual Area Plans, including the Lakeview Nuevo Area Plan, as well as potential impacts to the county as a whole, have been thoroughly evaluated and mitigated where appropriate throughout the EIR No. 548 document. Specifically, as noted in Table 2, Statistical Summary of Lakeview/Nuevo Area Plan, no reduction in agricultural lands are proposed by the project. All of the changes are proposed in the Community Development Foundation Component, specifically to reduce potential impacts associated with development on agricultural lands. The greatest changes, within the Area Plan, are changing the designation of Medium Density and Medium High Density land to Highest Density Residential and Mixed Use Area.

Furthermore, on a countywide scale, it should be noted that as illustrated in Table LU-1, Unincorporated Riverside County Cumulative Acreage Summary, the project would result in the loss of only 0.2 percent of the County Agricultural Foundation Component. For further information related to potential impacts to agricultural lands in the county, refer to Section 3.0, Countywide Impact Analysis.

In regard to requiring all future development to include solar panels, while alternative energy sources are beneficial, requiring inclusion of solar panels across all future development is not appropriate for all potential future uses. In order to offer a number of options for reducing greenhouse gas (GHG) emissions for future developments, the County developed the Climate Action Plan, which includes a number of options for projects to reduce GHG emissions. Refer to Appendix F (Screening Tables) for the full list of GHG reduction measures that could be implemented by development projects in order to reduce GHG emissions in compliance with County GHG thresholds.

Response 12.11 In regard to buffering development from freeways, a number of mitigation measures have been developed to reduce potential risks associated with development in close proximity to major transportation infrastructure. It should be noted that the General Plan already includes various policies that support South Coast Air Quality Management District (SCAQMD) goals to protect sensitive receptors. For example, Policy AQ 1.4 requires coordination with the SCAQMD to ensure that all elements of air quality plans are being enforced. Policy AQ 4.9 requires compliance with Rules 403 and 403.1. Additionally, Mitigation Measure 3.3.11 requires the minimum distance buffer zones for incompatible land uses that are recommended by the SCAQMD and the California Air Resources Board (CARB) to minimize health risk impacts.

2.0 COMMENTS AND RESPONSES

Regarding analysis of the potential expansion of Ramona Expressway, potential development of the expanded roadway is possible; however, it would be speculative to review multiple scenarios for the roadway specifically within the Lakeview Nuevo Area Plan. The Mid-County Parkway is currently in litigation and may be developed or modified, depending on the outcome of the litigation. As such, the County has evaluated the project including Ramona Expressway as the existing Expressway roadway designation, which can include a facility constructed to a maximum of 6–8 lanes (General Plan Table C-1). As such, the most reasonably foreseeable outcome for Ramona Expressway, currently, is the potential expansion of the roadway to the full Expressway designation as included in the General Plan. As such, this is how the roadway was analyzed in EIR No. 548.

Response 12.12 The commenter asserts that the Housing Element and prior GPA No. 960 should have been completed as one project and that the EIR should further evaluate projects such as the Villages of Lakeview, Rio Vista, and Paradise Valley.

In regard to the analysis of the Housing Element and GPA No. 960, the two projects were initiated at separate times due to the State-mandated timing for updates to the Housing Element. The Housing Element is required to be updated pursuant to the California Department of Housing and Community Development. These requirements differ from the standards required for the other General Plan elements; as such, the General Plan and the Housing Element cannot be updated continuously on the same interval. However, EIR No. 548 uses GPA No. 960 as the baseline for the analysis and considers the approved GPA No. 960 land use designations.

Regarding the analysis of projects such as the Villages of Lakeview, Rio Vista, or Paradise Valley projects, refer to Responses 12.2, 12.3, 12.4, and 12.5 above. The above-noted projects are specific plan projects that are separate from the General Plan. These projects will be required to go through independent environmental review and are not included in the General Plan EIR No. 548, as any analysis related to the projects would be speculative at this time. No further response is warranted.

Response 12.13 The County will continue to provide project status notifications to the Sierra Club, San Geronio Chapter as the project continues through the public participation and hearing process. This comment serves as the conclusion to the letter. The County appreciates and values the Sierra Club's comments during the Housing Element update and EIR participation process. Responses to specific comments are included above; no further response is required.

BLUM|COLLINS LLP

Aon Center
707 Wilshire Boulevard
Suite 4880
Los Angeles, California
90017

213.572.0400 phone
213.572.0401 fax

May 27, 2016

Bill Gayk, Planning Consultant
Riverside County Planning
Department
4080 Lemon Street, 12th Floor
Riverside, California 92501

VIA EMAIL TO:
bgayk@rctlma.org

Re: *Fifth Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone No. 7902) (EIR No. 548, SCH No. 2015061083)*

Dear Mr. Gayk:

This letter is to serve you with comments on behalf of the SoCal Environmental Justice Alliance ("SEJA") regarding the Fifth Cycle Housing Element Update (the "Project"; General Plan Amendment No. 1122 and Change of Zone No. 7902) and its Environmental Impact Report (the "EIR"; EIR No. 548, SCH No. 2015061083).

SEJA believes the EIR is flawed. The County of Riverside's ("County's") environmental review process has failed to ensure environmental, social, and economic justice for the County's minority communities and sensitive populations. "[Environmental justice] means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Government Code Section 65040.12, subd. (e). Therefore, we believe you should redraft and recirculate the EIR.

We look forward to your responses. Please forward a notice of availability of the Final EIR to blum@blumcollins.com and ho@blumcollins.com.

13.1

I. COMPLIANCE WITH FAIR HOUSING AND CIVIL RIGHTS LAWS

A. Failure to Affirmatively Further Fair Housing

Government Code Section 65583(c)(5) requires that local governments commit to "[p]romote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability." Local governments are bound to comply with civil rights and fair housing laws requiring them to affirmatively further fair housing opportunities in their development and implementation of their housing elements as well as other land use policies, programs, and actions." 42 U.S.C. § 2000d; 42 U.S.C. § 3601, et seq.; 24 C.F.R. § 1; Gov. Code §§ 11135.

California Department of Housing and Community Development ("HUD") defines "affirmatively furthering fair housing" ("AFFH") as:

"...taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development."

13.2

The EIR provides almost no analysis demonstrating its compliance with its obligation under state and federal civil rights laws to affirmatively further fair housing. Gov. Code §§ 12900, et seq., 65008, et seq. In order to fulfill this obligation, the County must assess whether its planning and zoning decisions perpetuate racial segregation or creates housing choice for County residents by

zoning for multiple housing options in each area of the County. The Final Housing Element must include an analysis of patterns of racial and ethnic segregation, concentrated poverty, disparities in access to resources and amenities across the County and adopt policies and programs to promote housing opportunities and access to opportunity broadly for residents regardless of protected status.

This is especially critical in the County of Riverside, which has high rates of racially and ethnically concentrated poverty. The EIR must include analysis, policies, and program actions demonstrating that the Housing Element will reduce - and not fortify - barriers to fair housing for protected classes in the County.

Fair housing and civil rights laws prohibit the County from taking actions that result in or contribute to the concentration of housing affordable to low-income populations in areas characterized by racially and/or ethnically concentrated poverty (RCAP/ECAP areas) or the imposition of a disproportionate adverse impact on protected classes. Gov. Code §§ 11135, 12900, et seq., 65008, et seq.; 42 U.S.C. §§ 2000d, 3601, et seq. The EIR provides no analysis demonstrating distribution of sites by income category in a manner that complies with fair housing and civil rights laws or even any information that would allow the public to assess the County's compliance in this regard. The documented existence and persistence of RCAP/ECAP neighborhoods in the County, reinforces the County's duty to provide information and analysis demonstrating the its compliance with fair housing and civil rights laws.

B. Failure to Adequately Identify or Adopt Programs to Address Habitability Barriers to Housing Opportunity

Every jurisdiction's housing element must include programs which will "conserve and improve the condition of the existing affordable housing stock." Gov. Code § 65583(c)(4). As explained further in HCD's "Building Blocks for Effective Housing Elements" ("Building Blocks"):

"The existing affordable housing stock is a valuable resource and the element must include programs to conserve and improve the existing affordable housing stock..."

13.2

13.3

The EIR fails to contain adequate programs that will serve to "conserve and improve" the condition of existing affordable housing in the County, including extensive substandard housing conditions that plague residents of low-income housing. The Final Housing Element must commit the County to resolving substandard housing conditions through code enforcement action and other means and to adopt and implement policies and procedures in order to "conserve and improve" the County's affordable housing stock.

13.3

C. Inadequate Analysis and Mitigation of Special Needs Population Housing

The EIR fails to fully analyze and mitigate the housing needs of the special needs populations identified under Government Code Section 65583(a)(7). Government Code Section 65583(a)(7) requires that housing elements include an analysis of special housing needs in the jurisdiction, including but not limited to those of the elderly, persons with disabilities, large families, families with female heads of households, and families and persons in need of emergency shelter.

13.4

Building Blocks states that the analysis of each special needs group should include the quantification of the number of persons or households in the special needs group; a quantitative and qualitative description of the need; and identification of potential program or policies options and resources to address the need. Building Blocks further specifies additional recommended analysis for each special needs population.

The EIR does not adequately address overcrowding and substandard housing conditions as potential problems faced by large households. The EIR contains no commitment by the County to apply for funds for or ensure production of any specific number of units suitable for large families in particular and contains no program or actions for the identification and mitigation of barriers to housing opportunity.

13.5

The EIR does not adequately address the various housing issues associated with residency in a mobile home in the County. Residents of mobile homes in the County are often subject to extremely high utilities charges by mobile home park owners. These charges in addition to the monthly cost of renting a space in a

13.6

mobile home park often result in mobile home owners paying in excess of 50% of their income on housing costs. Many residents of mobile homes own their mobile homes and would like opportunities to purchase a space in the mobile home park or elsewhere to avoid paying perpetual rental charges. Many residents of mobile home parks in the County are low, very-low, and extremely-low income residents and members of special needs populations and protected classes whose particular housing problems must be thoroughly analyzed and addressed in the Final Housing Element.

13.6

The EIR does not adequately address the significant challenges faced by female-headed households in meeting the daily needs of their families, including safe and affordable housing. The Final Housing Element must incorporate additional analysis of resource and program options available and adopt programs to assist this segment of the population in obtaining safe and affordable housing and a suitable living environment.

13.7

The EIR does not adequately address the unique housing needs of undocumented residents, including obstacles to accessing financing for housing and subsidized housing opportunities. The Final Housing Element must include programs and policies to address these unique needs.

13.8

Lastly, low-income households in the County are disproportionately comprised of Limited English Proficient ("LEP") and Non-English Language speakers, immigrants and refugees, and undocumented residents compared to the population as whole. These households face special barriers to the attainment of safe and affordable housing which the EIR does not identify or respond to through its policies and programs.

In particular, LEP speakers may face barriers to learning about and accessing opportunities for housing assistance offered by the County, the Housing Authority, or other entities as well as their rights to safe and healthy housing under local and state laws. They also face barriers to participating in public processes for the development of policies and programs impacting housing opportunity due to absent or inadequate translation. Immigrants and refugees often face barriers to accessing opportunities and assistance due to lack of contact between themselves and County staff and decision-makers and a corresponding lack of information about available resources. In addition, undocumented

13.9

residents are ineligible for most housing assistance programs offered by the County, though they suffer from various housing issues associated with their low-income and LEP status and membership in large households. The Final Housing Element must examine and respond to the housing issues impacting low-income residents and special needs populations in the County on the basis of language, country of origin, and immigration status.

↑
13.9
↓

Sincerely,

A handwritten signature in black ink, appearing to be 'S. Blum', with a large, sweeping initial 'S' and a stylized 'B'.

Steven A. Blum
BLUM | COLLINS LLP

COMMENT LETTER NO. 13: SoCAL ENVIRONMENTAL JUSTICE ALLIANCE (SEJA) VIA BLUM COLLINS LLP

Response 13.1 The County appreciates and values SEJA's comments during the General Plan Housing Element update and EIR participation process. This comment provides general introductory and background information. Responses to specific comments are included below. The County will notify the commenter of project milestones as they occur. No further response is warranted.

Response 13.2 The commenter asserts that the EIR does not address fair housing practices, pursuant to Government Code Section 65583. The Housing Element specifically outlines all the components required of a housing element, in accordance with Government Code Section 65583, beginning on page H-1 of the Housing Element. The requirements are reviewed in the Housing Element, and a summary of applicable programs and resources are outlined in Table H-64 of the Housing Element (beginning on page H-240). These requirements are noted again in Section 2.1, Project Description, of EIR No. 548 starting on page 2.1-2.

The role of EIR No. 548 is not to provide the programs and policies related to compliance with Government Code Section 65583; it is to analyze the potential physical environmental impacts that may occur as a result of compliance with Housing Element laws, as enforced by the California Department of Housing and Community Development (HCD).

The Housing Element process, as enforced by HCD, requires the County to submit annual Housing Element status reports to HCD. These reports describe the status of the implementation programs contained in the Housing Element to ensure the effective implementation of the Housing Element programs is occurring. Furthermore, Housing Element Table H-1 reviews the County's progress in implementing the element's goals and actions. The table also contains a column indicating whether programs should be continued, modified, or deleted.

While the EIR does include extensive analysis related to physical environmental impacts that may occur as required under CEQA, the programs and policies that will ultimately implement the HCD requirements for the Housing Element are contained in the General Plan and its associated implementation program.

Response 13.3 As noted under Response 13.2, the Housing Element, in association with the General Plan, is the document which provides programs, implementation, and policies developed to ensure compliance with HCD's Housing Element requirements, not the EIR. Extensive programs and policies have been developed for the General Plan to ensure that implementation of the Housing Element is measurable and effective. Specifically, Goal 2T listed in Housing Element Table H-63 states, "To conserve and improve the condition of the housing stock, particularly affordable housing." This goal is supplemented by policies, actions, and other items to ensure its implementation. As noted above, these goals will be analyzed annually in the Housing Element status report, which the County submits to HCD annually. Extensive programs and policies are included in the Housing Element to help improve the opportunity for affordable housing to be developed in Riverside County. No further response is warranted.

2.0 COMMENTS AND RESPONSES

- Response 13.4** The commenter states that EIR No. 548 does not contain an analysis of housing needs for special needs groups, as defined by Government Code Section 65583(a)(7). Housing for special needs groups, including all of the categories indicated by the commenter, has been addressed in the Housing Element (starting on page H-120). No further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 13.5** The commenter states that EIR No. 548 does not address overcrowding. Overcrowding is addressed in the Housing Element starting on page H-10. No further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 13.6** The commenter states that EIR No. 548 does not address mobile home housing and issues that can be prevalent in mobile home parks. The Housing Element extensively addressed mobile home issues throughout its analysis and policy development. In regard to utility costs, the Housing Element continually focuses on utility costs and the potential for rising utility costs to cause financial hardship (see Housing Element pages H-84, H-257, and H-259). In regard to programs developed to assist with rent and ownership of property for mobile homes, the Housing Element analyzes and provides programs to support subsidizing rent and encouraging ownership in mobile home communities (see Housing Element page H-310 and General Plan Appendix K-1, page 30). Regardless, the issues the commenter raises are not physical environmental impacts to be evaluated under CEQA. No further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 13.7** The commenter states that EIR No. 548 does not address female-headed households. As noted in Response 13.4 above, special needs groups, including female-headed households, have been extensively evaluated in the Housing Element (starting on page H-122). Furthermore, Goal 1, which is included in Table H-63, states, "To assist in the development of adequate housing to meet the county's fair share of the region's housing needs for all economic segments of the population, with an emphasis on lower-income households and households with special needs." This goal includes female-headed households, as do subsequent policies and actions. Regardless, the issues the commenter raises are not physical environmental impacts to be evaluated under CEQA. No further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 13.8** The commenter states that EIR No. 548 does not address undocumented citizens and potential housing inequalities they may experience. The commenter does not raise an environmental issue regarding the adequacy of the EIR. No further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 13.9 The commenter states that EIR No. 548 does not address or provide programs for citizens with limited English proficiency. The Housing Element extensively addresses potential language barriers for residents to be able to read information for housing programs. Policies 3.2a and 3.2b specifically state that the County should continue to provide services, including outreach, for residents in both English and Spanish. No further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

This page intentionally left blank

Winchester Town Association

**P. O. Box 122
Winchester, CA 92596**

501(c) Tax ID # 95-3604267

May 26, 2016

Transmitted via e mail to bgayk@rctlma.org

William Gayk, Project Manager
Riverside County Planning Department
4080 Lemon Street, 12th floor
Riverside, CA 92502-1409
Riverside County Planning

Re: Draft EIR No 548/SCH No. 2015061083 - 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone No. 790s)

Dear Mr. Gayk:

The Winchester-Homeland Land Use Committee, on behalf of the Winchester Town Association, is submitting these comments to Draft EIR No 548, General Plan Amendment No 1122, and Change of Zone No 7902 (Project). Our community has particular interest, as stated in our comments to the Notice of Preparation for the EIR 548 dated August 14, 2015, that the proposed changes in the housing element for the Winchester Town Center be consistent with the vision that the Community has for this very important Downtown area. Our major concern and comment, as further described below, is that the EIR and Project needs to include the proposed uses, flexibility in planning, street, parks, and other public amenities that are depicted in the proposed Winchester Downtown Core Plan (see attached map for reference). Given that a major portion of the proposed land uses and densities for the Downtown Core Plan have not been included in the EIR we request that the EIR be revised to include them. Our support for the EIR and Project is conditioned on this revision.

14.1

Our comments are further provided below:

1. The EIR has assumed that most of the Winchester downtown core will remain with its current zone designations which are Medium Density Residential (MDR) and Commercial Retail. The Winchester Town Association is concerned that the EIR and Proposed Project be consistent and promote the goals of the Proposed Downtown Winchester Core Plan. Thus we request that the EIR and Project be revised to include the Winchester Downtown Core Plan. The integrity of the Winchester Downtown Core Plan needs to be incorporated into the EIR and Project.
2. Table 2 on pages 4.5-9 and 4.5-10 summarizes and shows a net increase in population of approximately 33,000 residents and no change in Employment in the Harvest Valley / Winchester Area Plan. The increase in population is effectively due to the HHDR designation and increases in residential densities. The "no change" in employment effectively is due to a shift of retail and slight reduction in commercial office from the Winchester downtown core to the "Neighborhoods". One of the goals of the Winchester Downtown Core Plan is to have the greatest concentration of retail and office / commercial in the downtown core. We again request that the proposed uses and densities contained in the Winchester Downtown Core Plan be incorporated in to the EIR and Project. We are concerned that the adoption of the Project and EIR as currently drafted (including the above shift of commercial) negatively impacts the ability to have the Winchester Downtown Core Plan implemented.

14.2

3. Pages 4.5-6 and 4.5-8 of the EIR include the proposed Harvest Valley / Winchester Area Plan Policy 8.20 (HVWAP 8.20) that requires a 50% HHDR Certificates of Occupancy Requirement prior to issuance of 50% non HHDR Certificates of Occupancy. This policy, if adopted, would create a potential significant negative economic impact on the value of these properties. We are concerned that this requirement could derail this Project, the EIR Process, and the goals of the Winchester Downtown Core Plan which have many very positive benefits. This proposed policy should be eliminated to allow normal economic conditions to control the timing of development of HHDR and NON HHDR land. Other items that we request to be evaluated in the EIR and included in the proposed Project include :
- a. Allow for HHDR Density be transferred from one land owner / site to another land owner / site. Policies in the amendment to the General Plan should allow flexibility to transfer HHDR density throughout the greater [see Winchester MAC Area map attached]. This flexibility may result in a more efficient and less costly infrastructure system.
 - b. Provide a small parcel density standard that satisfies the State HCD and the RHNA. The small parcel density standard could be applied / used in the downtown core along with MUA standards and transit orientated development standards to promote the goals of the proposed Downtown Core Plan and help satisfy the RHNA. We believe that many of the smaller parcels in the downtown core will be developed with mixed uses having residential densities of 20 units per acre and greater.
 - c. Please provide the definition of a "transit orientated development project". After reviewing the definition we will request proposed revisions, if needed, to this definition to allow the downtown core and the MUA neighborhoods to qualify.
4. The EIR did not address the economic impacts of the proposed increase in densities including the cost of the additional infrastructure that will need to be built to service the additional density. Page 4.5.1 – mentions "Voluntary incentives maybe necessary" – Is this mentioned or more detailed anywhere else in the document? Incentives will be needed to entice developers. The EIR needs to address economic mitigation measures related to the infrastructure. The County Board of Supervisors should adopt economic mitigation measures concurrently with the consideration and adoption of this Project and the EIR.
5. What level of future highway and road improvements were assumed and included in the traffic analysis of the EIR? What realignment of Highway 79 was assumed in this analysis? Was the proposed Metro Link station assumed in the analysis?
6. Table 2.1-4 on Page 2.1-18: This Table Summarizes the MUA and R-7 Zone Classifications. The R-7 Zone should be expanded to allow, but not require, the same MUA categories. To promote the goals of the Winchester Downtown Core Plan we are proposing that that those portions of the "Neighborhoods" in Winchester that have the HHDR designation also have a MUA overlay to allow retail and other commercial uses in these HHDR areas.
7. What commercial and office densities were assumed for the Neighborhoods? Are these commercial and office densities in these neighborhoods required?
8. Page 30 of the Executive Summary States: Transportation / Traffic Mitigation Measures: Mitigation measures will require a Level of Service (LOS) of D or better through fair share contributions of proposed projects. Section 2.3-6 regarding Circulation Policies allows a LOS of E within designated areas where transit orientated developments and walkable communities are proposed and on roadways where the addition of travel lanes would have a significant adverse environmental impact. How are transit orientated developments and or walkable communities
- 14.2
- 14.3
- 14.4
- 14.5
- 14.6

determined? What steps does downtown Winchester have to go through to qualify as a transit orientated development and or walkable community?

14.6

9. Section 5: Other Alternatives: Was a "granny flat" ordinance considered? Can Riverside County encourage incorporated areas of Riverside County to adopt similar Granny Flat Ordinances and will the addition of such units help the County in satisfying its RHNA?

14.7

10. Neighborhood #1 in the Winchester Town Center is entirely HHDR. This site should be allowed, but not required, to have MUA zone uses with mix of retail and commercial given its close proximity to the proposed transit center. Within the defined downtown core are, further subdividing neighborhood boundaries is unnecessarily limiting, carries a level of complexity that is not supported by this committee. The downtown core would be better served by a policy area that encourages MUA developers to respond to market demands for housing, goods, and services, and allows for the healthy development of jobs to correspond with the increased population.

11. The area identified to the north of Neighborhoods 1 and 2 is identified on the General Plan as Low Density Residential. Given their close proximity to the Downtown core and the proposed Metro Link Station we recommend the EIR be amended to evaluate this area as HHDR with an MUA overlay. This allows for some additional acreage to handle some of the HHDR.

14.8

12. Does the "Community Center Overlay" effectively provide the benefits and flexibility in land uses of a MUA for the HHDR areas? If not then we request that all HHDR areas in the Winchester Town Center (i.e. Winchester TC Neighborhood Sites on Figure 4.5-1a and Figure 4.5-1b) have a MUA overlay.

13. HVWAP in Policy 8.9, Page 4.5-3 and in other policies in the EIR, HHDR shall be measured in both gross and net acres? How is this measured? Please provide an example?

14. What are the minimum units per acre for the 9 Neighborhoods near or within the downtown core that are proposed to have a portion of HHDR?

15. Page 4.5.2 – Winchester Town Center – refers to an exhibit or figure 3. Unable to locate that figure – is it mismarked? Should it be figure 4.5.1a?

14.9

16. Policies HVWAP 8.28 AND 8.34 have the wording "legally existing uses may either remain...". We recommend that these policies be changed to "legally existing and non-conforming uses may either remain...".

14.10

We are excited and steadfast in planning for the future of our community. We look forward to continuing dialogue with the county to accomplish those goals and objectives. Please feel free to contact us with any questions, or if any additional information can be provided.

14.11

Sincerely,

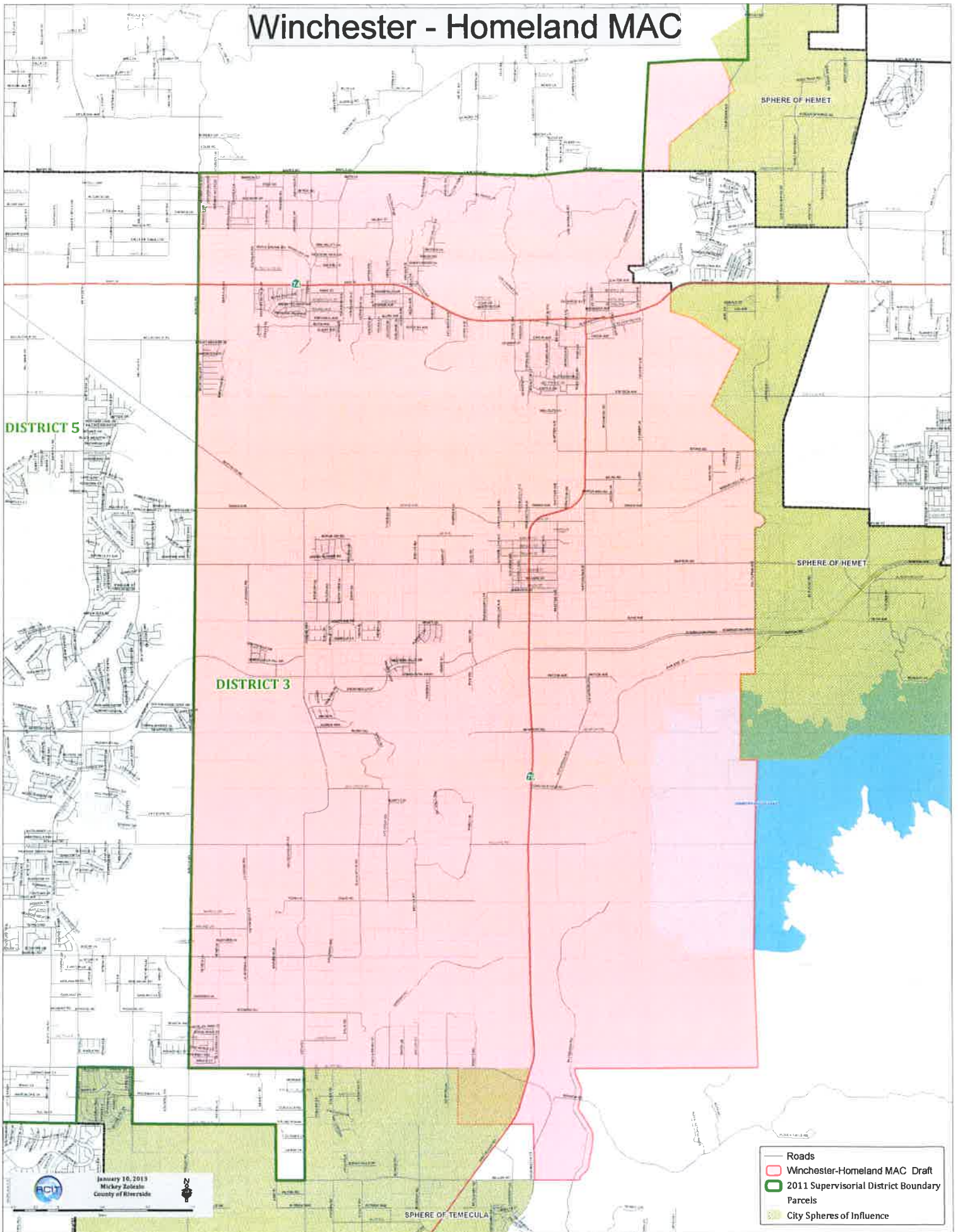


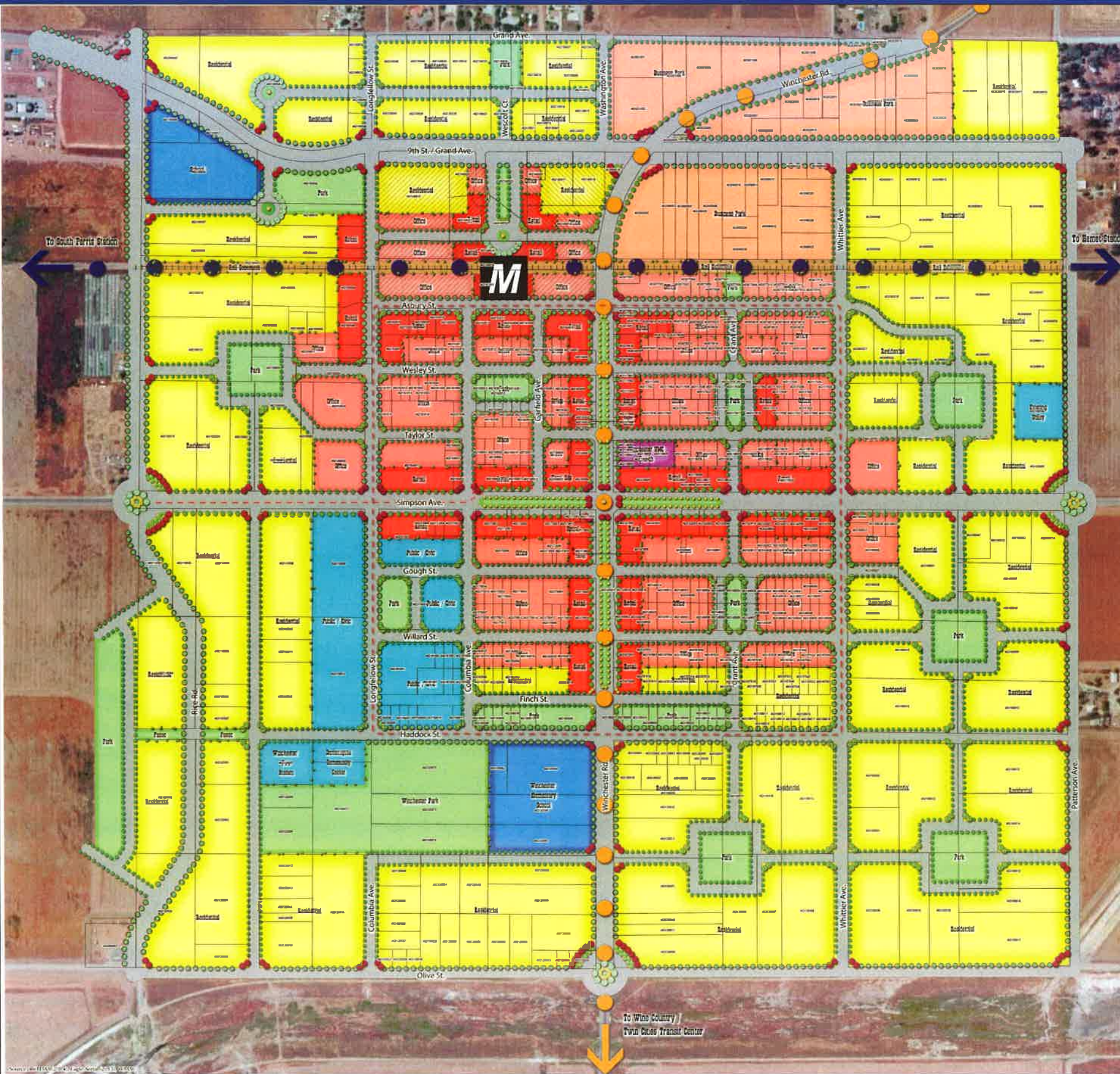
Gregg Cowdery

President - Winchester Town Association

CC: Third District Supervisor Chuck Washington
Mr. Juan Perez, Riverside County Director of Transportation & Land Management
Mr. Steve Weiss, Riverside County Planning Director
Winchester-Homeland Municipal Advisory

Winchester - Homeland MAC





CONCEPTUAL DRAFT

This land use concept requires adoption of density transfer policies and implementation measures to ensure that landowners whose property is designated as open space are compensated for the value of their property.

LEGEND (Acreage Estimated)

- 072.1 Residential
- 35.0 Small Commercial / Residential Above
- 32.5 Office Commercial / Residential Above
- 35.0 Business Park
- 51.0 Parks
- 31.0 Public / Civic Uses / Utilities
- 14.0 Schools
- 1.0 Church
- 7.0 Rail, Seaport
- 100.1 Circulation
- M Transit District
- Metrolink
- Wine Country / Twin Cities Transit Center Route
- XXXXXXXXXX Parcel Boundary (ownership details are located on the accompanying "Parcel Ownership Matrix")

WINCHESTER DOWNTOWN CORE

COMMENT LETTER NO. 14: WINCHESTER TOWN ASSOCIATION

Response 14.1 The County appreciates and values the association's comments during the Housing Element update and EIR participation process. The County has worked extensively with the Winchester Town Association to better incorporate the vision of the Winchester Downtown Core Plan into the General Plan. This comment serves as the introduction of the comment letter and provides general background information. Responses to specific responses are included below. It should be noted that the role of the EIR is to evaluate the potential environmental impacts of the project; the EIR does not propose land uses, policies, or other General Plan implementation methods. Many of the comments submitted by the commenter are noted as EIR comments; however, they contain comments related to General Plan policies, land uses, and other project features.

Response 14.2 The commenter notes a number of concerns related to the land use mix in the Harvest Valley/Winchester Area Plan. Specifically, the commenter notes concerns related to the potential implementation of the Winchester Downtown Core Plan, which was initiated and developed by the Winchester Town Association. The County has reviewed the Winchester Downtown Core Plan extensively, and while its implementation is not under consideration under GPA No. 1156, it may be implemented under a separate future General Plan update. The development and implementation of the Housing Element is in order to comply with the California Department of Housing and Community Development's Regional Housing Needs Assessment. The adoption of GPA No. 1122 does not preclude the implementation of the Winchester Downtown Core Plan.

In regard to comments related to housing and employment, it should be noted that policy HVWP 8.20 states, "Prior to the issuance of any certificates of occupancy that would result in 50% of the maximum amount of non-HHDR development to be placed in use in any of the Mixed-Use Area neighborhoods, certificates of occupancy should have been issued for at least 50 percent of the required minimum amount of HHDR development required in that neighborhood." This policy does not set forth a rigid 50% occupancy requirement; it merely sets a goal for future development and it would not preclude development of commercial uses in the project area.

The commenter also makes a number of suggestions related to transfer of development rights, small parcel development, and transit-oriented development. All of the items listed have been reviewed and will be considered. These comments do not identify any specific concern with the adequacy of the Draft EIR or any other environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.3 One of the key considerations for the selected community locations included in the Housing Element was the location of infrastructure to ensure that the development of infrastructure is efficient and reduced to the greatest degree possible. The Housing Element includes a number of policies and action items related to infrastructure cost and financing. Housing Element Action Item 1.2d

2.0 COMMENTS AND RESPONSES

states that the County should identify areas with adequate infrastructure and limited environmental constraints that are best suited for development of new housing (Housing Element page H-22). This process, as outlined in Action Item 1.2d, was completed during the site selection process for the Housing Element update. Action Item 2.2c also includes reference to using Community Development Block Grants and other funding sources to maintain infrastructure (Housing Element page H-43). A number of other action items are included in Housing Element Table H-1. Furthermore, the Housing Element addresses funding for infrastructure, beginning on page H-200. This commenter does not identify any specific concern with the adequacy of the Draft EIR or any other environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.4 The commenter asks a number of questions related to the traffic analysis in EIR No. 548. In regard to the roadway improvements analyzed in the EIR, refer to Table 3.16-1, Regional Traffic Operating Conditions Under Buildout of the General Plan and the Proposed Project, for key roadway segments and the facility type that is assumed at buildout. In regard to Highway 79, the analysis used the existing alignment of the roadway, as shown on General Plan Harvest Valley/Winchester Area Plan Figure 8. In regard to the Metrolink station, the analysis did not include the new Perris Valley line of the Metrolink system. The Metrolink station was not included because it has not been approved, and inclusion of the project in the analysis would have been speculative.

Response 14.5 The commenter notes a number of comments and suggested edits to the MUA and R-7 zone classifications. This comment pertains to the General Plan. These comments will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.6 The commenter requests clarification on what designates a community as walkable in respect to General Plan Policy C.2.1. Policy C.2.1 states:

Maintain the following countywide target Levels of Service: LOS along all roads designated in the Circulation Element and along state highways at intersections along all Riverside County-maintained roads and conventional state highways, and at freeway ramp intersections.

LOS E may be allowed by the Board of Supervisors within designated areas where transit-oriented development and walkable communities are proposed and on roadways where the addition of travel lanes would have a significant adverse impact on environmental and cultural resources, such as habitat, wetlands, MSHCP preserves, wildlife movement corridors, stands of mature trees, historic landmarks, or archaeological sites.

Other levels of service may be allowed by the Board of Supervisors for a plan, program or project for which an Environmental Impact Report, or equivalent has been completed, based on the Board's policy decision about the

balancing of congestion management consideration in relation to the benefits, impacts and costs of future plans, programs and projects.

As defined, the Board of Supervisors, at their discretion, can allow a level of service (LOS) E in an area where a walkable community exists. The LOS E could remain and no transportation infrastructure improvements would need to be completed to achieve an LOS D. The County defines transit-oriented development (TOD) in the General Plan Glossary; however, staff further reviewed the definition of walkable in the General Plan and has added clarification to the document. The following definition for walkable has been added to the General Plan, Appendix A, Glossary:

Walkable: A continuous network of sidewalks, paths, and street crossings that encourages pedestrian travel between origins and destinations free of obstructions and in a safe and comfortable environment.

This comment pertains to a General Plan land use designation or policy comment. These comments will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.7 The commenter requests clarification related to “granny flats” in the County. Under Ordinance No. 348 (Riverside County Zoning Ordinance), second dwelling units (or granny flats) are allowable as long as certain conditions are met. As such, an alternative utilizing these units was not included in EIR No. 548 because they are currently allowed in the county. Further, removing any conditions related to second dwelling units would still not allow the County to meet its required RHNA allocation. In regard to neighboring jurisdictions, the County does not have jurisdiction over land within a city’s jurisdiction and the RHNA allocations are required to be achieved within the unincorporated county.

Response 14.8 The commenter makes a number of suggestions related to the Housing Element update. The designation of HHDR areas, as opposed to MUA, is in order to meet the required RHNA allocation. While some of this requirement can be met through MUA development, HHDR development is required in order to meet the RHNA requirements. In regard to the Community Center Overlay, the overlay affords some flexibility for future development; however, as noted above, the HHDR areas have been designated in portions of the county in order to meet the RHNA requirements.

In regard to the use of net acres as opposed to gross acres, the General Plan uses gross acreages. In regard to the assumed density for HHDR, the designation allows for a range of 20–40 dwelling units per acre. It is assumed that approximately 30 dwelling units per acre would be constructed on HHDR sites, although any range between 20 and 40 is allowable.

2.0 COMMENTS AND RESPONSES

The above comments pertain to the General Plan land use designations. These comments will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any physical environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.9 The reference to Figure 3 on page 4.5.2 is included to show text revisions to the Harvest Valley/Winchester Area Plan. Refer to the Harvest Valley/Winchester Area Plan revisions, in Appendix 2.2-1(GPA No. 1122), to review the maps referenced in the text revisions. This comment pertains to a General Plan land use designation or policy comment. The comment will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.10 The commenter suggests updated policy language for HVWP Policies 8.28 and 8.34. This comment pertains to a General Plan land use designation or policy comment. The comment will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 14.11 This comment serves as the conclusion to the comment letter. The County appreciates the continued feedback provided by the Winchester Town Association and looks forward to continued coordination on this project as well as others.

Minegar, Peter

From: Gayk, Bill <BGAYK@rctlma.org>
Sent: Thursday, June 02, 2016 8:37 PM
To: Minegar, Peter; Teague, Mark; Gettis, Aaron; Clack, Shellie; Lovelady, Kristi
Subject: FW: Sierra Club Comments on DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902
Attachments: 2016 Housing Element V.pdf; ATT00002.htm

Received this from George Hague this evening. Bill

From: George Hague [gbhague@gmail.com]
Sent: Thursday, June 02, 2016 5:45 PM
To: Gayk, Bill
Subject: Sierra Club Comments on DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902

Good evening/morning Mr Gayk,

I understand the comment period closed a couple of days ago for DEIR 548 (Housing Element), but I thought I would let you know two other areas which should be more fully explained in the Final EIR. 15.1

1) The area around Lakeview/Nuevo has significant flooding and dam inundation. I was surprised at how many other areas studied also have significant flooding. Each of these areas need to have the area examined for events greater than 100 years with the appropriate mitigations explained. What is being done in the case of the cumulative impact of 100 year plus flooding event and dam inundation? I have seen the Lakeview/Nuevo area with shallow water standing for many days. This area is capable of having flood events greater than 100 years and the Final EIR needs to address this as well as dam inundation— addressing that both can happen at the same time. Make sure the Final EIR has good charts showing the several different possible dam inundations for this area. 15.2

2) DEIR 548 acknowledges that the almost 5,000 acres of additional HHDR/MUA neighborhoods will result in significant increase in traffic. The mitigations for this are woefully weak. It appears that simply allowing the Level of Service to slip to LOS E or even F will make everything okay. The Final EIR needs to have other mitigations at each HHDR/MUA neighborhood and surrounding area that work to reduce the LOS numbers. It is an Environmental Justice issue to have these neighborhoods suffer with LOS of E and especially F. 15.3

Thank you for including these comments,

George Hague
Sierra Club
Moreno Valley Group
Conservation Chair

Begin forwarded message:

From: "Gayk, Bill" <BGAYK@rctlma.org>
Subject: RE: Sierra Club Comments on DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902

Date: May 31, 2016 at 4:05:17 PM PDT
To: 'George Hague' <gbhague@gmail.com>

Mr. Hague,
Thank you for your comment letter.
Bill Gayk

From: George Hague [<mailto:gbhague@gmail.com>]
Sent: Tuesday, May 31, 2016 3:52 PM
To: Gayk, Bill
Subject: Sierra Club Comments on DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902

Good afternoon Mr Gayk,

Please acknowledge receipt of the Sierra Club Comments on DEIR No. 548 (Housing Element) and GPA No. 1122 and CZ No. 7902 . That they were received in a timely manner and you were able to open the attachment. Do you have a tentative timeline for the FEIR and the project moving forward?

Thank you very much,

George Hague

COMMENT LETTER NO. 15: GEORGE HAGUE

Response 15.1 The commenter indicates that the submitted comments are in addition to the previously submitted comments from the Sierra Club, San Geronio Chapter, Moreno Valley Group. Responses have been provided to that letter, Letter 12 of the FEIR No. 548 document. Responses to specific comments are included below.

Response 15.2 EIR No. 548 contains information related to both flooding and dam inundation. In regard to flooding, the County compiles flood hazard maps using the Riverside County Special Flood Hazard Area database. This flood zone database is maintained by the Riverside County Flood Control and Water Conservation District (RCFWCD), as stipulated in Riverside County Ordinance No. 458. The flood areas identified using the Riverside County Special Flood Hazard Area database include FEMA 100-year flood areas, select US Army Corps of Engineers inundation boundaries, and a number of boundaries for county inundation zones, as enumerated in Ordinance No. 458. The RCFWCD updates the quarterly and incorporates new flood zones as necessary. The flood hazard zone is supported by numerous policies in order to ensure the safety of development in the county.

Regarding dam inundation, the Dam Inundation Zones are the responsibility of the California Office of Emergency Services (OES) and as such are beyond the County's purview. However, General Plan policies have been developed according to the boundary mapped by the OES in order to protect existing and future development from potential risks associated with dam inundation. The dam inundation zones are depicted on Figure 3.9-3 of EIR No. 548.

While the commenter's request for an evaluation of the potential for flooding and dam inundation events to occur simultaneously is noted, such estimates would be based on such vague and generalized parameters that they would not provide a realistic or useful prediction of potential environmental impacts that would occur in the county and would be speculative. CEQA advises against speculation (State CEQA Statutes Sections 21082.2(c) and 21159(a), and State CEQA Guidelines Section 15064(f)(5)) and states that "argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion support by facts." Also, State CEQA Guidelines Section 15145(f)(5) states that "if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." Due to the immense number of variables and the low likelihood of flooding and dam inundation events to occur simultaneously, potential impacts related to such an event are not included in EIR No. 548.

Response 15.3 The commenter asserts that the EIR should include further mitigation to avoid potential for level of service (LOS) E and LOS F in the county. While this comment is noted, extensive mitigation is included in order to reduce impacts to levels of service in the county. Specifically, Mitigation Measure 3.16.1 in EIR No. 548 states, "As part of its review of land development proposals, the County of Riverside shall require project proponents to make a fair share contribution to

2.0 COMMENTS AND RESPONSES

required intersection and/or roadway improvements. The required intersection and/or roadway improvements shall be based on maintaining the appropriate level of service (LOS D or better). The fair share contribution shall be based on the percentage of project-related traffic to the total future traffic." These improvements would be required prior to development to ensure that new development would not cause impacts to roadway conditions.

Furthermore, Mitigation Measure 3.16.2 states, "As part of its review of land development proposals, the County of Riverside shall ensure sufficient right-of-way is reserved on critical roadways and at critical intersections to implement the approach lane geometrics necessary to provide the appropriate levels of services."

These mitigation measures are further supported by extensive General Plan policies developed specifically to ensure the effectiveness of the circulation network. These policies include Policies C 2.1 (establishes LOS targets for county roadways), C 2.5 (requires mitigation of impacts through fee programs), and C 2.7 (establishes a trip generation cap for the Highway 79 policy area), as well as many others. While the comments are noted, EIR No. 548, in conjunction with General Plan policies, provides extensive mitigation to reduce future trips on the county roadway network.

This comment serves as the conclusion to the submitted comment letter. For responses to other comments submitted by the commenter, refer to Comment Letter 12, Sierra Club, San Geronimo Chapter Moreno Valley Group, of Final EIR No. 548.



Established in 1918 as a public agency

Coachella Valley Water District

Comment Letter 16

Directors:

John P. Powell Jr., President - Div. 3
Peter Nelson, Vice President - Div. 4
G. Patrick O'Dowd - Div. 1
Ed Pack - Div. 2
Cástulo R. Estrada - Div. 5

Jim Barrett, General Manager
Robert Cheng, Assistant General Manager
Sylvia Bermudez, Clerk of the Board

June 1, 2016

Best Best & Krieger LLP, Attorneys

Files: 1150.011, 0163.1

Mr. William Gayk, Project Manager
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Dear Mr. Gayk:

Subject: Notice of Availability - Draft Environmental Impact Report
5th Cycle Housing Element Update

Thank you for affording the Coachella Valley Water District (CVWD) the opportunity to review the Draft Environmental Impact Report prepared for the 5th Cycle Housing Element Update. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management services to a population of nearly 300,000 throughout the Coachella Valley.

16.1

CVWD submits the following comments regarding the proposed project. This comment letter will be provided via email to: bgayk@rctlma.org and mailed to the address above.

Sanitation Comments:

1. Page 4.7 – 44

Update second to last paragraph as follows:

Most CVWD domestic water customers also receive wastewater services from the water district. The CVWD provides wastewater service to more than 93,000 home and business accounts. The CVWD operates 5 water reclamation plants and maintains more than 1,129 miles of sewer pipelines and 33 lift stations that collect and transport wastewater to the nearest regional water reclamation plants (WRP). The current and planned treatment capacity at each of the reclamation plants is shown in **Table 4.7 – 5** below.

16.2



2. Page 4.7 – 44 CVWD Wastewater Treatment

Update table per below:

- Delete the planned additional columns.
- Existing Capacities/Average for WRPs are as follows
 - WRP 1 – 0.15 MDG/.016 MGD
 - WRP 2 – 0.033 MGD/.012 MGD
 - WRP 4 – 9.9 MGD/4.51 MGD
 - WRP 7 – 5.0 MGD/2.69 MGD
 - WRP 9 – 0.400 MGD/0.210 MGD (This plant has been inactivated and the permit is scheduled for rescission this month.)
 - WRP 10 – 18.0 MGD/9.49 MGD

Total Capacity is 33.083 MGD

3. Page 4.7 – 97 Wastewater

Update the four paragraphs per information above.

4. Page 4.8 – 47

Update last paragraph as follows:

Most CVWD domestic water customers also receive wastewater services from the water district. The CVWD provides wastewater service to more than 93,000 home and business accounts. The CVWD operates 5 water reclamation plants and maintains more than 1,129 miles of sewer pipelines and 33 lift stations that collect and transport wastewater to the nearest regional water reclamation plants (WRP). The current and planned treatment capacity at each of the reclamation plants is shown in **Table 4.8 – 6**.

5. Page 4.8 – 48

Update Table 4.8 – 6 per above comment

16.3

16.4

16.5

16.6

6. Page 4.8 – 93 Wastewater

Update the four paragraphs per information above

16.7

7. Need to review Sections 4.1 to 4.10 for wastewater treatment

Waste treatment facilities are located throughout the unincorporated County. The details regarding specific wastewater treatment service providers and facilities for each of the sites affected by the proposed project are discussed in Sections 4.1 through 4.10 of this EIR.

16.8

Irrigation Comments:

General Plan Amendment No. 1122 (Project) lies within the CVWD's ID1 Irrigation and Drainage boundary. The communities that are surrounded by the irrigation and drainage systems are Indio, Coachella, Thermal, Vista Santa Rosa, Oasis and Mecca. The U.S. Bureau of Reclamation constructed the irrigation distribution pipelines in the early 1905's and CVWD constructed the drainage system in the 1960's. The pipelines are constructed of concrete and reinforced concrete pipeline that serve the agricultural areas of the Eastern Valley. There are several Neighborhoods from the General Plan that will affect the existing distribution and drainage pipeline facilities.

Mecca Town Center (figure 4.8 – 1a):

- Facilities affected by Neighborhood 1 (Lincoln – 66th West Neighborhoods): Irrigation Lateral 97.0-0.5; Lateral 97.0-0.5-1.5; and multiple private drain tiles.
- Facilities affected by Neighborhood 2 (66th Avenue/Gateway Neighborhood): Irrigation Lateral 97.0 and multiple private drain tiles
- Facilities affected by Neighborhood 3 (66th Avenue/North Neighborhood): None
- Facilities affected by Neighborhood 4 (66th Avenue/Lincoln Street West Neighborhood): Lincoln St. Drain
- Facilities affected by Neighborhood 5 (Lincoln – 66th East Neighborhood): Irrigation Lateral 94.2 and multiple private drain tiles
- Facilities affected by Neighborhood 6 (Hammond Road/66th Avenue Neighborhood): Irrigation Lateral 94.2 and Irrigation Lateral 94.2-2.0-0.5; Johnson Street Drain pipeline; and multiple private drain tiles

16.9

Oasis Town Center (Mixed-Use Areas):

- Facilities affected by Neighborhood 1 (Pierce East Neighborhood): Irrigation lateral 97.1-10.1, lateral 97.1-10.1-1.5, Avenue 76 drain and Stormwater channel, and multiple private tile lines.
- Facilities affected by Neighborhood 2 (Pierce West Neighborhood): Irrigation lateral 97.1-10.1-1.0, Irrigation lateral 97.1-10.1-1.3, Avenue 76 drain and Stormwater channel, and multiple private tile lines.

Thermal Town Center:

- Facilities affected by Neighborhood 1 (Church Street/Grapefruit Blvd. Southwest Neighborhood): Irrigation lateral 99.8-0.51, lateral 99.8-0.51-2.5, and multiple private tile lines.
- Facilities affected by Neighborhood 2 (Avenue 57/Polk Street Southeast Neighborhood): Irrigation lateral 99.8-0.51-2.5, Thermal drain and Stormwater channel, and multiple private tile lines.

Domestic Water Comments:

General Plan Amendment No. 1122 (Project) lies with the CVWD's Domestic Water Service Area. The below communities are located in CVWD's Domestic Water Pressure Zones of Lower ID 8, Valley, Sky Mountain, Mecca, Middleton, Area 23, and North Shore. Each of these domestic water pressure zones are unique and have existing limited capacity and facilities. Each of the below planning area projects may be required to provide the additional facilities for the orderly expansion of its domestic water systems. These facilities may include pipelines, wells, reservoirs, booster pumping stations, treatment plants and other facilities. The developer may be required to install these facilities and provide land and/or easements on which some of these facilities will be located.

4.7 Western Coachella Valley Area Plan

Desert Edge Southeast Desert Hot Springs Neighborhood Sites (Figure 4.7-1d)

Thousand Palms Community Neighborhood Sites (Figure 4.7-1e)

Thousand Palms TC Neighborhood Sites (Figure 4.7-1f)

16.9

16.10

4.8 Eastern Coachella Valley Area Plan

Mecca Town Center Neighborhood Sites (Figures 4.8-1a)

North Shore TC Neighborhood Sites (Figure 4.8-1b)

Oasis TC Neighborhood Sites (Figure 4.8-1c)

Thermal Town Center Neighborhood Sites (Figure 4.8-1d)

16.10

Stormwater Comments:

General Plan Amendment No. 1222 (Project) lies within the area of the Eastern Coachella Valley Master Stormwater Planning Project, which will provide flood protection to the communities of Thermal, Vista Santa Rosa, Oasis, Mecca and North Shore. CVWD is currently preparing an EIR for this long-range planning effort. Upon completion of the design phase, developers and property owners within the area may be required to dedicate right-of-way for flood control facilities and/or participate in the financing of a portion of these facilities. The executive report for the Eastern Coachella Valley Stormwater Master Plan provides a summary of the master planning effort for Mecca and other town centers described below (<http://www.cvwd.org/Archive.aspx?ADID=440>).

16.11

Mecca Town Center Neighborhood Sites (Figure 4.8-1a):

CVWD prepared the Mecca/North Shore Area Stormwater Master Plan (MSMP) which analyzed riverine flooding from the CVSC, as well as local flooding from the drainage area downstream of the East Side Dike to the CVSC or to the Salton Sea. The MSMP study updated Town of Mecca Stormwater Master Plan and recommends improvements to the CVSC and proposed conveyance channels to manage the flood hazards. However, it will take several years before the required improvements are implemented. Therefore, each neighborhood within the Town Center shall implement the applicable stormwater facility included in the MSMP or satisfy the requirements of Riverside County Ordinance 458 for proposed developments.

16.12

Northshore Town Center Neighborhood Sites (Figure 4.8-1b):

Neighborhoods 1 and 2 of the Northshore Town Center are either subject to flooding or designated Zone A on Federal Flood Insurance rate maps, which are in effect at this time by the FEMA. Also, it will be several years before the proposed improvements in the MSMP are implemented to manage the flooding hazards in these neighborhoods. Therefore, proposed developments within these neighborhoods shall satisfy the requirements of Ordinance 458 and CVWD Ordinance 1234.1 (or latest versions).

16.13

Oasis Town Center (TC) Neighborhood Sites: Neighborhoods 1 & 2 (Figure 4.8-1c):

CVWD submitted a Letter of Map Revision Report (LOMR) to FEMA to revise FEMA's Flood Insurance Rate Map (FIRM) for the Oasis Area. If the LOMR report is approved by FEMA, the Oasis TC neighborhood areas is subject to shallow flooding and will be designated as Zone AO (special flood hazard area, SFHA) on the Federal Flood Insurance rate maps. Riverside County Ordinance 458 and CVWD Ordinance 1234.1 (or later version) will apply to any proposed developments within these neighborhood areas.

16.14

Thermal Town Center Neighborhood Sites (Figure 4.8-1d):

CVWD has performed a detailed hydraulic analysis of the levees of the Coachella Valley Stormwater Channel (CVSC) from Monroe Street Bridge to the Salton Sea. The levees of the CVSC are not currently accredited by the Federal Emergency Management Agency (FEMA) to provide flood protection during the 100-Year Flood (FEMA's standard). Adjacent areas subjected to inundation from a levee breach or overtopping during the 100-Year Flood. The flooding areas are mainly from upstream of Airport Boulevard to the Salton Sea.

16.15

FEMA in coordination with CVWD and other stakeholders for the area has issued (April 2015) Proposed Flood Insurance Rate Maps (Proposed-FIRMs) based on the findings in the above study. The Proposed-FIRM map indicates that the Thermal Town Center Neighborhoods 1 and 2 are located in a FEMA Flood Zone AE, a special flood hazard area with a base flood elevation. Riverside County Ordinance 458 will apply to any proposed developments within these areas.

Mr. William Gayk, Project Manager
Riverside County Planning Department

7

June 1, 2016

If you have any questions, please call Luke Stowe, Environmental Supervisor at (760) 398-2651, extension 2545.

16.16

Sincerely,



Steve Bigley
Director of Environmental Services

EM:j/ENG/ENV SVCS/ENV/2106/June/RivCo Housing Element Update.docx

COMMENT LETTER NO. 16: COACHELLA VALLEY WATER DISTRICT (CVWD)

Response 16.1 The County appreciates and values the district's comments during the Housing Element update and EIR participation process. This comment provides general introductory and background information. Responses to specific comments are included below; no further response is required

Response 16.2 The commenter requests minor changes to text on page 4.7-44 of EIR No. 548. The requested changes have been reviewed, incorporated in the Errata section of the Final EIR, and are shown below. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Page 4.7-44:

Most CVWD domestic water customers also receive ~~sewer~~ *wastewater* services from the water district. The CVWD provides wastewater service to more than ~~91,000~~ *93,000* home and business accounts. The CVWD operates ~~6~~ *5* water reclamation plants and maintains more than ~~1,000~~ *1,129* miles of sewer pipelines and ~~37~~ *33* lift stations that collect and transport wastewater to the nearest regional water ~~reclamation facility (RWRF)~~ *reclamation plants (WRP)*. The current and planned treatment capacity at each of the reclamation plants is shown in **Table 4.7-5** below.

Response 16.3 The commenter requests minor changes to Table 4.7-5 on page 4.7-44 of EIR No. 548. The requested changes have been reviewed, incorporated into the Errata section of the Final EIR, and are shown below. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Page 4.7-44:

Plant #	Current		Planned		Total Capacity (MGD)
	Treatment	Capacity/Ave. (MGD)	Additional Capacity (MGD)	Treatment	
1	WRP-1 Secondary	0.15 / <i>0.016</i> ave	—	—	0.15
2	WRP-2 Secondary	<i>0.18/0.03</i> ave 0.33/0.012	—	—	0.18
3	WRP-4 Secondary	9.9 / 4.75 <i>4.51</i> ave	Tertiary	—	9.90
4	WRP-7 Secondary and Tertiary	<i>5.0 / 2.69</i> and <i>2.5 / 3.0</i> ave	Tertiary	<i>5.0</i> Additional	7.50
5	WRP-9 Secondary	0.40/ 0.210 <i>0.33</i>	—	—	<i>0.40</i>
6	WRP-10 Secondary and Tertiary	18.0 / <i>9.49</i> and <i>10.8/10.8</i> ave	—	—	18.50 <i>18.0</i>
Totals		33.083	—	<i>5.0</i>	<i>33.083</i> 36.63

Source: ~~CVWD 2012~~ CVWD, Draft EIR Comment, June 2016

2.0 COMMENTS AND RESPONSES

- Response 16.4** The commenter requests minor changes to the text on page 4.7-97 of EIR No. 548. The requested changes have been reviewed, incorporated into the Errata section of the Final EIR, and are shown below. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Page 4.7-90:

Future development of the neighborhood sites under the project would contribute to increased generation of wastewater needing treatment. As previously described, the CVWD treats approximately ~~33.083~~ ~~36.63~~ mgd via ~~six~~ ~~five~~ ~~RWRF~~ ~~WRPs~~. As discussed under Impact Analysis 4.7.12, future development of the neighborhood sites under the proposed project could result in up to 19,988 more dwelling units and 48,610 more persons than anticipated for buildout of the sites under the adopted Western Coachella Valley Area Plan. This increase in population and housing would generate an increased demand for wastewater conveyance and treatment. The average wastewater generation rate for a residential unit in Riverside County is 230 gallons per day per capita (County of Riverside 2015b). Therefore, future development would result in the generation of 4,597,240 gallons per day (4.597 million gallons daily).

The 4.59724 mgd wastewater demand generated by the proposed project would represent approximately ~~12.5~~ ~~13.89~~ percent of the current design capacity at the CVWD ~~RWRF~~ ~~WRPs~~. This increase in service is not considered a substantial increase over existing capacity. Additionally, future development would be required to pay development impact fees and connection fees, which would fund any potential future expansion of the ~~RWRF~~ ~~WRP~~ in the CVWD's jurisdiction. Actual expansion of any ~~RWRF~~ ~~WRP~~ would be subject to subsequent project-level environmental review.

- Response 16.5** The commenter requests minor changes to the text on page 4.8-47 of EIR No. 548. The requested changes have been reviewed, incorporated into the Errata section of the Final EIR, and are shown below. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Page 4.9-47:

Most CVWD domestic water customers also receive ~~sewer~~ ~~wastewater~~ services from the water district. The CVWD provides wastewater service to more than ~~91,000~~ ~~93,000~~ home and business accounts. The CVWD operates ~~6~~ ~~5~~ water reclamation plants, maintains more than ~~1,000~~ ~~1,129~~ miles of sewer pipelines, and maintains ~~37~~ ~~33~~ lift stations that collect and transport wastewater to the nearest water reclamation ~~facility~~ ~~plant~~ ~~(WRP)~~. The current and planned treatment capacity at each reclamation plant is shown in **Table 4.8-6**.

- Response 16.6** The commenter requests minor changes to Table 4.8-6 on page 4.8-48 of EIR No. 548. The requested changes have been reviewed, incorporated into the Errata section of the Final EIR, and are shown below. This comment does not

identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Page 4.7-48:

Plant #	Current		Planned		Total Capacity (MGD)
	Treatment	Capacity/Ave. (MGD)	Additional Capacity (MGD)	Treatment	
1	WRP-1 Secondary	0.15 / 0.016 ave	—	—	0.15
2	WRP-2 Secondary	0.18/0.03 ave 0.33/0.012	—	—	0.18
3	WRP-4 Secondary	9.9 / 4.75 4.51 ave	Tertiary	—	9.90
4	WRP-7 Secondary and Tertiary	5.0 / 2.69 and 2.5 / 3.0 ave	Tertiary	5.0 Additional	7.50
5	WRP-9 Secondary	0.40/0.210-0.33	—	—	0.40
6	WRP-10 Secondary and Tertiary	18.0 / 9.49 and 10.8/10.8 ave	—	—	18.50 18.0
Totals		33.083	—	5.0	33.083 36.63

Source: ~~CVWD 2012~~ CVWD, Draft EIR Comment, June 2016

Response 16.7 The commenter requests review of text on page 4.8-93 of EIR No. 548 for potential consistency issues related to updates to Table 4.8-6. The section has been reviewed, and no inconsistencies would occur as a result of updating Table 4.8-6. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 16.8 The commenter requests the review of the water treatment information contained in EIR Sections 4.1 through 4.10. The wastewater information used in the EIR analysis represents the most recent data available from the respective water and wastewater agencies at the time of the release of the Notice of Preparation. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 16.9 The commenter notes that there are existing irrigation facilities that would need to be accommodated by future development within the Coachella Valley Water District service area. This comment has been noted; however, it does not pertain to a potential inadequacy in EIR No. 5480. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

2.0 COMMENTS AND RESPONSES

- Response 16.10** The commenter notes that development accommodated in the proposed Housing Element communities may be required to expand the water supply network to meet the demands of new development. This has been documented and is addressed throughout the water supply analysis in EIR No. 548. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 16.11** The commenter notes that CVWD is currently working on developing an Eastern Coachella Valley Master Stormwater Planning Project, which would provide flood protection to communities in the eastern Coachella Valley. The commenter notes that future development may be required to dedicate right-of-way for future stormwater facilities. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 16.12** The commenter notes that any development constructed within the Mecca Town Center neighborhood site would be required to comply with the Mecca/North Shore Area Storm Water Master Plan. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 16.13** The commenter notes that all developments within the Northshore Town Center may be subject to flooding and as such, all development must be compliant with County Ordinance No. 458 and CVWD Ordinance No. 1234.1. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 16.14** The commenter notes that the CVWD has submitted a Conditional Letter of Map Revision for the Oasis Area that would designate areas in the community as special flood hazard areas. As such, all development in the Oasis Area would be subject to County Ordinance No. 458. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 16.15** The commenter notes that the Thermal Town Center Neighborhoods 1 and 2 could be located in a flood area and as such would be subject to County Ordinance No. 458. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 16.16 This comment serves as the conclusion of the letter. No further response is required.

This page intentionally left blank

DEPARTMENT OF TRANSPORTATION

DISTRICT 8

PLANNING (MS 722)

464 WEST 4th STREET, 6th Floor

SAN BERNARDINO, CA 92401-1400

PHONE (909) 383-4557

FAX (909) 383-5936

TTY (909) 383-6300

www.dot.ca.gov/dist8



*Serious drought
Help save water!*

June 2, 2016

File: 08-RIV-Variou

Mr. Bill Gayk
Riverside County Planning
Transportation and Land Management Agency
County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409

Draft Environmental Impact Report (No. 548) for the Riverside County 2013-2021 Housing Element Update

Mr. Gayk,

The California Department of Transportation (Caltrans) has completed its review of the Draft Environmental Impact Report for the Riverside County 2013-2021 Housing Element Update (Project). The Project proposes the redesignation and rezoning of approximately 2,908.50 acres of land located in 10 different Area Plans. The proposed sites will accommodate 30,303 regional housing units in various high density residential and mixed-use areas throughout the County.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As a responsible agency under the California Environmental Quality Act (CEQA), it is also our responsibility to make recommendations to offset associated impacts with the proposed project, which may include traditional mitigation measures, in addition to multimodal transportation access, traffic safety modifications, and travel demand management strategies. Although the project is under the jurisdiction of the County of Riverside (County), due to the Project's potential impact to State facilities, it is also subject to the policies and regulations that govern the SHS.

We offer the following policy-oriented comments for future projects planned in accordance with the Project:

Sustainable Community Development and Multimodal Accessibility:

Based upon sustainable community and complete streets research conducted by this office, we offer the following recommendations to support the Project objective of "[emphasizing] development potential near transit corridors and existing infrastructure":

Urban Infill:

We strongly encourage Counties to utilize the concepts of sustainability and urban in-fill development planning when envisioning their projects. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We therefore commend the County of Riverside for planning high-density, mixed-use, transit-oriented communities to meet its regional housing needs, as these communities integrate different transportation modes and land uses, reducing vehicle use. However, it is apparent that some of the planned communities exist in rural areas that do not provide the transit options necessary to meet the needs of many prospective residents. Due to this, we encourage the County prioritize Project development in more urbanized areas, which may include the Elsinore Area; Temescal Canyon Area; Highgrove Area; and Mead Valley Area.

17.3

Transit Access:

Case studies of sustainable communities developed around the world show that the provision of high quality transit to all residents is a primary focus for their development. It is therefore necessary to develop sustainable communities around a transit station that is integrated with other regional transit and local walking and biking networks that provides an efficient option when compared to automobile travel. This ensures that a higher proportion of trips are taken utilizing public transit, walking and bicycling rather than automobiles. We therefore recommend that each Area Plan be focused around a transit center featuring high quality transit options. This is to ensure that the individual projects meet SB 743 regulations permitting the use of Vehicle Miles Traveled (VMT) analyses rather than Level of Service (LOS) analysis.

17.4

Considering the Project objectives and vision, it is apparent that a VMT analysis would be more appropriate for these planning areas. We therefore strongly encourage the County to work with the Riverside County Transportation Commission (RCTC) and Riverside Transit Agency (RTA) to ensure high quality public transit options, as defined by SB 743, are provided to residents in the early phases of development. Additionally, Caltrans suggests the County, prospective applicants, and RTA consider transit passes or subsidies to stimulate future residents to patronize the regional public transit system.

Please refer to our office's June 22, 2015 Letter regarding this project for a list of potential transit options to meet the recommendations above.

Land use and Housing:

Due to increased density of the planned neighborhoods, the Project's planned communities' carbon, water and ecological footprints will be reduced. Further, the provision of mixed-use areas within these communities will reduce vehicle trips and vehicle miles traveled. These are both encouraging signs that will help the State meet its environmental goals and mandates.

17.5

These communities can therefore be viewed as sustainable communities that may influence development planning throughout the region. We support the core concepts of the plan, which include street-grid networks, high density, pedestrian and bicycle paseos and paths, and mixed uses as paramount to successful urban design. The provision of public spaces is also encouraged, to promote high quality community interaction and engagement. Finally, we strongly endorse applicants consult with environmental design certification programs to ensure the constructed buildings utilize the most updated criteria for meeting sustainability goals and reduce per capita water, energy and resource use.

17.5

Thank you for providing us the opportunity to review the Draft Environmental Impact Report for the Riverside County 2013-2021 Housing Element Update and for your consideration of these and future comments. These recommendations are preliminary and summarize our review of materials provided for our evaluation. If this proposal is revised in any way, please forward appropriate information to this office so that updated recommendations for impact mitigation may be provided. If you have questions concerning these comments, or would like to meet to discuss our concerns, please contact Dustin Foster (909) 806-3955 or myself at (909) 383-4557.

17.6

Sincerely,



MARK ROBERTS
Office Chief
Intergovernmental Review, Community and Regional Planning

COMMENT LETTER NO. 17: CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) DISTRICT 8

- Response 17.1** The County appreciates and values Caltrans's comments during the Housing update and EIR participation process. This comment provides general introductory and background information.
- Response 17.2** The commenter indicates that a number of policy-related comments have been provided. Responses to specific responses are included below. No further response is warranted.
- Response 17.3** The commenter includes comments related to urban infill development in relation to the proposed project. While these comments are not related to EIR No. 548, they have been included in the record and will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 17.4** The commenter includes comments related to transit access and the use of a vehicle miles traveled (VMT) analysis. The comments, while they do not pertain to the adequacy of EIR No. 548, have been noted and will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 17.5** The commenter includes comments related to sustainable communities and notes the department's agreement with the core principles of the proposed Housing Element update. This comment is a General Plan comment and does not pertain to the adequacy of EIR No. 548. The submitted comment will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)
- Response 17.6** This comment serves as the conclusion of the letter. The County appreciates the continued coordination provided by Caltrans on this project, as well as others, and looks forward to future coordination. Responses to specific comments are included above; no further response is required.

This page intentionally left blank



June 6, 2016

Mr. Bill Gayk, Project Manager
Riverside County Planning Department
4080 Lemon Street, 12th Floor
PO Box 1409
Riverside, CA 92502-1409

Re: Comments to 5th Cycle Housing Element Update (General Plan Amendment No. 1122 and Change of Zone no. 7902)(EIR No. 548/SCH No. 2015061083)

Dear Mr. Gayk:

These comments are submitted in response to the County's public notice and request for comments on the Draft Environmental Impact Report for General Plan Amendment No. 1122 and Change of Zone No. 7902. We are taking this opportunity to submit further comments relating to the content of the Housing Element update as well as the proposed Change of Zone and Analysis of Disadvantaged Communities pursuant to Senate Bill 244. These comments will refer to and hereby incorporate those comments submitted with respect to the County's draft Housing Element and comments submitted with respect to the Notice of Preparation of this current Draft Environmental Impact Report.

18.1

A. Analysis of Disadvantaged Communities

Government Code Section 65302.10 requires county governments to assess infrastructure deficiencies in each disadvantaged unincorporated community in its jurisdiction. Riverside County's analysis pursuant to Government Code Section 65302.10 provides significant information with respect to disadvantaged communities throughout Riverside County and can help target and prioritize funding for the various deficiencies and opportunities identified in the analysis. Unfortunately, though, Riverside county's analysis fails to comply with 65302.10 and includes inaccurate information.

18.2

Inaccuracies in Disadvantaged Unincorporated Communities Analysis

Both the table and the narrative descriptions of disadvantaged unincorporated communities include inaccurate information regarding population. For example, the population of Indio is listed as 980, while that conforms more to the number of housing units according to the American Community Survey which itself likely undercounts housing units. Riverside County must review population information regarding each unincorporated community identified and make corrections as necessary. There are severe undercounts found for the populations of Thermal, Indio Hills, Oasis and others.

18.3

The analysis fails to analyze service deficiencies in each "community" as required by law

18.4

Government code 65302.10 requires that Riverside County assess service and infrastructure deficiencies for each community, and community is defined as areas where there are no fewer than 10 dwelling units in close proximity to one another. Several areas in Riverside County, including Thermal, Mecca, North Shore and Oasis, include several communities as defined by 65302.10. Given the vast service discrepancies with respect to both water and wastewater service within these areas and among the communities that reside in each area, an overall analysis of deficiencies for Thermal, Mecca, North Shore, Oasis and other similar communities cannot adequately comply with the requirements of the Government Code and the County must refine its analysis to include a community by community analysis of infrastructure and service deficiencies that includes an analysis of each mobile home park and other grouping of homes that qualify as a community per section 65302.10.

18.4

The analysis lacks a comprehensive analysis of wastewater and drinking water deficiencies

The analysis lacks sufficient information as to which specific communities lack adequate drinking water and wastewater as noted above. Similarly, the analysis lacks sufficient analysis as to the deficiencies themselves. The analysis of several areas notes that parts of each area (e.g. Thermal and Mecca) are not connected to wastewater services but instead rely on on-site septic systems. However, it includes no analysis of the quality and adequacy of the septic systems. Furthermore, many homes and communities lack septic systems and instead rely on cesspools. Riverside County must refine the analysis of wastewater system adequacy and deficiency to include an analysis of the adequacy of septic systems and cesspools in each community. The analysis should also include information as to the potential threat of inadequate wastewater service on drinking water quality along with the prevalence of Hexavalent Chromium in drinking water.

18.5

The analysis fails to assess the adequacy of infrastructure for anticipated growth

The County's adopted housing element includes significant anticipated growth in many unincorporated communities, including the unincorporated communities in the Eastern Coachella Valley. As noted in greater detail below, there is insufficient infrastructure in place for housing development in several communities in which growth is anticipated. Accordingly, this analysis is not consistent with the Housing Element and as such the General Plan is not internally consistent.

18.6

B. 2013-2021 Housing Element Update

On March 9, 2016 we provided detailed comments to the County regarding the draft housing element. We incorporate those comments here by reference. Subsequent to our comment letter the County made revisions to the draft housing element without soliciting any input from the community or stakeholders. The County's revisions did not adequately address the numerous concerns we have regarding the element's compliance with state law.

One of the key areas where the County's element fails to meet the requirements of state law is the absence of infrastructure for a large percentage of the sites identified to meet the housing needs of thousands of residents during this planning period. For example, the draft element proposes an additional 31, 862 units within the Coachella Valley Water District but that district only has capacity for 8,100 sewer connections - far less than the proposed number of residential units. Likewise, the draft element identifies a proposal of 3,641 units served by the Desert Water Agency, and the district has the capacity for 300 sewer connections.

18.7

In response to the clear evidence that the County has sites in its land inventory that clearly lack access to infrastructure that would make these sites available for residential development within the planning period the County included Action item 1.2h in the revisions submitted to HCD without prior public review. Action item 1.2h pledges that the County when it has available funding sources may help with gap financing

to help provide adequate infrastructure. The County's analysis as required by Government Code section 65583.2(b) is that there is currently inadequate sewer connections to develop identified parcels and that there is no planned service expansion to serve those parcels then the parcels must not be included in the County's inventory of available sites. Therefore, even as revised, the housing element continues to fall short of state law requirements.

18.7

Evaluation of the Previous Housing Element

The County must not discontinue certain programs which they have failed to implement but which are among the few programs that relate directly to ameliorating the financial hardship faced by low income residents. Among them:

- Action 1.1g - Adoption of special density bonus is being discontinued because the County "feels" that State housing density bonus laws meets the needs of the community. This is not a quantitative assessment and falls short of the requirements of the Housing Element law to provide a quantitative and qualitative assessment of past programs.
- Action 1.1h - The development of a fee assistance program with sliding scale pegged to affordable housing units provided is being deleted due to a lack of funding, despite the fact that the program was never implemented.
- Action 1.2n - The consideration of land-swapping and other incentives is slated for deletion, however, under "result/effectiveness" the County states that it will continue to consider land swapping and other incentives for the development of affordable housing. There is an inconsistency in whether the county will keep or delete this program.
- Action 2.2g - Deletes the policy giving HCD authority to implement the employee housing (farm labor camp) enforcement program. Pursuant to the Title VI Voluntary Compliance Agreement and Title VIII Enforcement agreement between the United States Department of HOusing and Urban Development and Maria Hernandez et al. and County of Riverside, and pursuant to Riverside County Board of Supervisors Resolution 99-413, Riverside County has ceded its employee housing inspection authority to HCD.
- Actions 2.4a and 2.4c - The County proposes to delete and combine action 2.4c with action 2.4a, however, there is no mention of action 2.4c in the modified action 2.4a.
- Action 3.1b - "Update the 2003 Fair Housing Impediments Study." HUD has released new guidance with respect to the future of the analysis of impediments studies previously undertaken by jurisdictions. The new "Assessment of Fair Housing" will replace the Analysis of Impediments and "involves refining the fair housing elements of the existing planning process that states, local governments, insular areas, and public housing agencies (program participants) now undertake. The process proposed by this rule assists these program participants to assess fair housing determinants, prioritize fair housing issues for response, and take meaningful actions to affirmatively further fair housing." This action must be modified and updated to reflect the new policy goals and regulations promulgated by HUD.
- Action 4.31 - "Continue the Housing Review Committee Advisory Council...." the County proposes to modify and combine with other farm worker programs. This is a vague explanation of what will become of the Housing Review Committee. To what "other farm worker programs" is the County referring? This question must be clarified.

18.8

- Action 4.5a - Proposed a review of housing and infrastructure expenditures and programs of the various departments and agencies in the County to determine where they are implemented geographically. The County proposes to merge this action with action 4.3m (the establishment of numeric targets for housing production annually, by region, income, category, and type), which is to be deleted. This item must be preserved as is, rather than merging, or deleting.

18.8

Without an adequate explanation as to why these programs should be discontinued, the County must reinstitute them and implement them in conformity with an established timeline.

Community Profile

Special Needs Groups

Homeless

It appears as if the County has repeated the vast majority of the assertions made in its 2010 Housing Element Update, which we refuted then, and over which we continue to raise concerns. We repeat the same concerns now as we did then.

The County discusses its homeless population, but no mention is made of the fact that a large number of the homeless in the Eastern Coachella Valley are in fact migrant farmworkers who come to the Coachella Valley during peak harvest seasons. The updated Housing Element correctly points out that there are no homeless shelters in the unincorporated County. The County's inadequate analysis of special housing needs for farmworkers simply states that due to a lack of employer housing for farmworkers, "[a]s a result, many farm workers must camp out or sleep in their vehicle." Farmworkers who "camp out or sleep in their vehicle" are in fact homeless. The updated Housing Element must be augmented and expanded in both sections dealing with farmworkers and the homeless to address the gravity and scope of "homeless farmworkers" in Riverside County.

18.9

The section on Homeless Population relies on data compiled by an annual "one day, point in time" count of sheltered and unsheltered homeless individuals beginning in the last week of January and summarizes the information in Table H-29. Table H-29 lists the County's homeless shelter providers but fails to include the area's (and the County's) largest homeless shelter provider, Martha's Village and Kitchen in Indio, which has approximately 200 beds available. Martha's Village is referenced in the 2015 Point-in-Time Homeless Count. Had the County conducted outreach, reviewed past concerns, and included participation from the community organizations which run these facilities we are fairly certain that the draft Housing Element would have revised its report to state that the Coachella Valley Rescue Mission, also located in Indio, has 105 beds available, not the 20 referenced in Table H-29 (or erroneously copied from the prior Housing Element).

Farmworkers

We strongly dispute the assertion that "migrant workers are generally in need of temporary shelter, which may include campgrounds or grower-provided boardinghouse-type facilities." It is completely inappropriate to suggest that farmworker housing needs could be satisfied by temporary shelter or campgrounds. Farmworkers must have access to decent, affordable housing, not temporary facilities that appear to be designed to ensure that they reside in the community for only a brief period of time. The County must also analyze farmworker housing needs in its various types. There are farmworker families, unaccompanied farmworkers, complex households, seasonal employees who migrate, permanent employees who work seasonally and farmworkers who work year round. Each group has different housing needs. Farmworkers also almost are extremely low-income, and County must analyze housing needs from the

18.10

affordability perspective. We have firsthand knowledge that there are no “campgrounds” in use in Riverside County by migrant farmworkers and we most certainly would not approve of the concept. While it is true that many migrant farmworkers are forced to camp in the orchards, vineyards, and underdeveloped desert areas, they are not “camping” in campgrounds. The reference to “grower-provided boardinghouse-type facilities” evidences a gross misunderstanding of how migrant farmworkers are housed. The types of facilities were largely phased out in the 1970s and 1980s and no longer exist.

The County unreasonably relies on outdated data in its Housing Element. Notably the 2006 Coachella Valley Farm Worker Survey is now 10 years old. Since then the nation has gone through an economic recession and redevelopment (from which the County obtained and lost significant funding for housing) has been dissolved. Reliance on a sample survey conducted prior to these significant events is simply not reliable. The same is true of the use of employment figures from the Economic Development Department, which does not accurately quantify the number of farmworkers. It is no secret that a large number of farmworkers are undocumented and their labor goes unreported. Most employment of farmworkers is not direct employment with the farmers and the growers, but is handled by farm labor contractors (FLC’s), some licensed, others who are not. Two common practices of FLCs who hire most undocumented workers usually include having two or more workers work under one social security number or paying the workers in cash and simply not reporting the wages or their labor. Thus reliance on the EDD is misplaced. The County should utilize the HCD Building Blocks to assist with its analysis and must rely on other available data including the National Agricultural Workers Survey and the California Agricultural Workers Survey. The County must update its data regarding the number of farmworkers in Riverside County and properly analyze their needs in order to comply with State Housing Element Law.

18.10

C. Draft Environmental Impact Report No. 548

Incorporation of Comments Submitted to Notice of Preparation

The comments we submitted with respect to the Notice of Preparation of this draft Environmental Impact Report suggested that the County conduct an analysis of the impacts on seven discrete items:

- a. Analysis of impacts on low income communities of color
- b. Analysis of distribution of burdens and benefits
- c. Analysis of HHDR and MUA feasibility
- d. Thermal and Oasis
- e. Health Impact Assessment
- f. Drought and Water Scarcity

18.11

Discuss methodology used to select the parcels identified for rezone

Upon review of the dEIR we find no analysis of the impacts that the GPA will have on low income communities of color, no analysis of burdens or benefits, no analysis of the feasibility of HHDR and MUA development, no assessment of the health impacts of the GPA, limited discussion of drought and water scarcity and no discussion of the methodology used to select the parcels identified for the change of zone required to meet the County’s RHNA obligations. The dEIR lacks information necessary for an adequate review pursuant to the California Environmental Quality Act (CEQA) and therefore must be updated and re-circulated prior to adoption of the General Plan Amendment.

Chapter 3.0 - Countywide Impacts

The County indicates that Action 1.3b (relating to the implication that employee housing on agriculture land does not differ from agricultural use) will have no cumulative environmental impact. We do

18.12

not disagree that the County's policies must adhere to state law with respect to conditional use permits, zoning variances, or zoning clearances. We do however raise the point that employee housing on agricultural land can and often does have a significant impact on the environment. This type of housing is often overcrowded because of a lack of affordable housing elsewhere in the County and, in particular, the lack of affordable temporary housing for farmworkers who come during the harvest seasons. This type of housing is also often found far from or unable to afford connections to water or sewer lines and rely on wells, which may or may not contain contaminants, and septic tanks, which are overburdened and in many occasions overflow onto surface soils rather than leeching out into the surrounding subsoils as intended. We congratulate the County for working with many parks over the course of the past two years to pave certain parks, which was done as a means of reducing particulate matter in the air and accomplished with air quality mitigation credits. Clearly this indicates that the County is aware that there are cumulative environmental impacts brought about by employee housing. The County must identify these impacts as significant, and further must institute mitigation measures including, but not limited to, ensuring adequate infrastructure, drinking water and wastewater services necessary to address the environmental impacts of housing.

18.12

Air Quality and GHG emissions

The Housing Element and Change of Zone allocates the majority of HHDR and MUA zones in areas with insufficient public transit and, in most cases, far from existing job centers. The County Wide Impact Analysis presents erroneous information, characterizing land for the rezone as "sites very close to existing community cores..." (3.0-27, County of Riverside Environmental Impact Report No. 548, April 2016). Both the Lakeview/Nuevo Area Plan and the Eastern Coachella Area Plans, where the most acreage has been identified for rezoning, lack sufficient infrastructure to address the current, let alone projected development, and are located considerable distances from employment, basic goods and services, such as schools, healthcare, commercial centers. Placing HHDR and MUA far from basic goods and services would undoubtedly result in increase in vehicle miles traveled (VMT), which in turn will increase Greenhouse Gas Emissions as well as criteria air pollutants. The Draft EIR must reflect these air and greenhouse gas impacts and identify mitigation measures including, but not limited to ensuring increased access to transit during the planning period and improving access to employment, educational and recreational opportunities for residents of communities lacking such access through proximity or transit.

18.13

Even more significant, there is a complete lack of analysis on increase in ozone as a result of significant development in undeveloped regions, the more land is covered in concrete and buildings, the more heat is reflected and the more significant the impact on ozone. The analysis completely omits any data or reference to Ozone in Tables 3.3-3 and 3.3-4, making it unclear whether or not ozone was even a factor in determining possible mitigation measures. According to the South Coast Air Quality District¹ the region's ozone standards are qualified as extreme nonattainment, any air quality analysis which completely omits mitigations measures related to ozone is inadequate. The County must revisit the Air Quality and GHG analyses to assess the impact of development on ozone and identify enforceable mitigation measures.

18.14

The Los Angeles Department of Public Health recommends sensitive land uses, such as schools and housing within 1,500 ft of major roadways utilize air quality mitigation measures such as air-filtration systems. Nowhere in the Air Quality Analysis mitigation measures have air-quality filtration systems even been mentioned. In order to ensure adequate mitigation pursuant to CEQA, the County must evaluate all sensitive land uses with 1,500 feet of major roadways and provide responsive mitigation measures.

18.15

Population and housing

18.16

¹ South Coast Air Quality District, Air Quality Management Plans: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2>

The County General Plan update zones the relatively more Latino areas with higher density development than relatively more Caucasian areas. The Environmental Impact Report must assess the impact of this amendment and related policies on segregation and socio-economic isolation within communities and between communities in the County. The County's obligation to do this analysis is heightened by the Supreme Court's decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, and the updated HUD regulations with respect to the obligations to affirmatively further fair housing.

18.16

Chapter 4.8 - Eastern Coachella Valley Area Plan ("ECVAP")

The description of the Mecca Town Center describes Mecca as a "small agricultural community that is characterized by its traditional Mexican heritage. Mecca serves as a service center for commuters and truckers due to its location along State Route 111 and State Route 86S." Notably absent from this description is the influx of thousands of migrant workers during the peaks of the harvest seasons who reside either in makeshift encampments, in their vehicles, or in dangerously overcrowded second homes. The County is proposing the greatest number of highest density residential housing with a preference for townhomes be built in Mecca. Nearly 1,500 mixed use acres are proposed throughout the Eastern Coachella Valley, with a preference for townhomes. Circumstances are similar with respect to the Oasis Town Center, Thermal Town Center, and North Shore Town Center that see profound increases in residents during the months-long harvest seasons. Similar concerns are raised with respect to the Oasis Town Center, Thermal Town Center, and North Shore Town Center that see profound increases in residents during the months-long harvest seasons. The DEIR must do so and identify mitigation measures to address the identified deficiencies and impacts

18.17

Additionally, given the admission that Mecca is surrounded by agricultural fields, the County must review the jobs-housing fit for the proposed rezone and related environment impacts. Introducing potentially thousands of new residents to the area, who may not likely work in agriculture will require these workers to commute to jobs centers impacting greenhouse gas emissions and air quality.

The description of Mecca in Section 4.8.2 "Setting" omits reference to the thousands of workers who live in second homes, or in their vehicles and who require services similar to the bathroom, showers, and laundry facility recently opened by the County. The County neglects to include the temporary workers who live in Mecca throughout the analysis.

The description of the Salton Sea underplays the ecological and environmental degradation of the sea and the impact that deterioration has on residents. The County omits reference to the AQMD's air quality alerts related to the smell of the decaying sea, the near permanent accumulation of dead fish along the shoreline, and the potentially hazardous effects of the sea's decline with respect to air quality and particulate matter that will be exposed by the sea's receding shoreline.

18.18

The description of Public Services and Utilities discusses currently available fire protection, law enforcement, water management, parks and recreation, water, wastewater, and solid waste and reaches the conclusion that there are less than significant impacts, no impacts, or less than cumulatively considerable impacts to the environment of the Eastern Coachella Valley. These findings are highly suspect given that the rezone contemplates the introduction of 1,500 acres of residential zoning to the Eastern Coachella Valley, which has the potential to bring tens of thousands of new residents to the ECV. These new residents can and will utilize Public Services and Utilities and the effects that this will have on the environment have not been taken into consideration in this draft report.

18.19

Chapter 4.9 - Lakeview/Nuevo Area Plan

The Lakeview/Nuevo Area Plan-LNAP (4.9-1, Lakeview/Nuevo Area Plan) presents: “a change in land use designation and zone classification for 1,028 acres within the Lakeview/Nuevo Policy Area to Highest Density Residential (HHDR [20-40 DU/acre]) or Mixed-Use Area (MUA)”. The LNAP is situated in rural terrain, characterized by rolling hills and renown for seasonal flooding, no where in the area Plan description are these features adequately described. Although the DEIR recognized the flooding (Impact Analysis 4.9.10, 4.9-43) it is unclear why the County would chose to place such a significant amount of high-density affordable units in a flood hazard area. Furthermore, the LNAP is not situated close to any regionally significant goods or services and job centers are not even remotely accessible by public transportation.

18.20

We are concerned with the inherent internal inconsistencies presented in the DEIR The County Wide Impact Analysis (CWIA) characterizes land rezone as “sites very close to existing community cores...” (3.0-27, County of Riverside Environmental Impact Report No. 548, April 2016), yet in section 4.9.2-Setting the county describes the area as: “ rural with highly visible topography including sweeping vistas, rugged hills...”. The CWIA bases its assumptions and associated mitigation measures on one scenario, citing proximity to community cores and basic goods and services whereas the actual rezone and build out of a major portion of the rezone is in an area clearly classified as rural. The internal inconsistency renders the DEIR impact analysis and mitigation measures inadequate.

18.21

As with the ECVAP, the description of Public Services and Utilities in the LNAP present conclusions that point to limited, if any impacts. If the LNAP were to be built out in its entirety the area would be home to tens of thousands new residents, the effects of these new users on the Public Utility system in the area would have pronounced impacts on the environment. The dEIR must be revised to identify such impacts and identify mitigation measures.

18.22

D. Area Plans Text and Map Revisions

We reiterate the concern that the updated Housing Element omits significant portions of the Area Plans and that commenters are expected to refer back to the draft Housing Element in order to view the document in its entirety. It is not conceivable that the public should be expected to comment on a document that is not complete and not mentioned in the Notice of Preparation, or Notice of Public Comment for dEIR No. 548.

18.23

* * * *

We thank you for consideration of these comments and look forward to your response.

18.24

Sincerely,

Phoebe Seaton, Leadership Counsel for Justice and Accountability
Blaz Gutierrez, California Rural Legal Assistance, Inc.
Valerie Feldman, Public Interest Law Project
Michele Hasson, Center for Community Action and Environmental Justice

COMMENT LETTER NO. 18: LEADERSHIP COUNSEL FOR JUSTICE AND ACCOUNTABILITY, CALIFORNIA RURAL LEGAL ASSISTANCE, PUBLIC INTEREST LAW PROJECT, AND CENTER TO COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

Response 18.1 The County appreciates and values these entities' comments during the Housing Element update and EIR participation process, including the comments submitted on the EIR No. 548 Notice of Preparation. This comment provides general introductory and background information. Responses to specific comments are provided below; no further response is required.

Response 18.2 The commenter asserts that the County did not comply with Government Code Section 65302.10. Further explanations of the commenter's assertion can be found in the commentary that follows. This comment provides general introductory and background information. Responses to specific comments are included below; no further response is required.

Response 18.3 The commenter states that the analysis of disadvantaged unincorporated communities in the Housing Element undercounts population and housing units in the county. Riverside County underwent an extensive Disadvantaged Unincorporated Communities (DUC) analysis, which is included in General Plan Appendix P-2 (appended to EIR No. 548 in Appendix 2.2-1). The analysis included a multifaceted evaluation of more than 130 unincorporated communities. The 130 communities were then aggregated to allow detailed analysis of the communities on a local scale. Ultimately, 22 aggregated communities were analyzed. Each of the 22 communities was then evaluated individually for potential infrastructure deficiencies (Table P-2, DUCs with Infrastructure of Service Deficiencies in Riverside County 2015). As shown, a detailed analysis of DUCs was completed to support the Housing Element update. This comment pertains to the General Plan land use. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.4 As stated in Response 18.3 above, the County completed extensive analysis of all DUCs in the county and recorded the results of the analysis in General Plan Appendix P-2. The DUC analysis includes a community specific evaluation of infrastructure and public service conditions. Refer to Appendix P-2 to review the completed analysis. This comment pertains to the General Plan land use. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.5 The commenter asserts that the DUC analysis does not include a review of wastewater. Wastewater was analyzed on a community-specific basis in General Plan Appendix P-2. Furthermore, EIR No. 548 addresses countywide

2.0 COMMENTS AND RESPONSES

wastewater impacts under Impact Analysis 3.6.5, 3.9.1, and 3.17.1. Further, local wastewater impacts are addressed in each of the Area Plan impact analysis sections. This comment pertains to the General Plan. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a), which requires that a lead agency respond to environmental comments.)

Response 18.6 The commenter asserts that the county does not have sufficient infrastructure to support buildout development as proposed by the Housing Element. The County anticipates significant future growth under both the existing and the proposed General Plan Housing Elements. It is anticipated that growth would be accommodated through a gradual expansion of infrastructure. Infrastructure would be funded through development impact fees and fair-share contributions, as well as many other funding mechanisms, to satisfy the infrastructure needs and requirements as they develop. A detailed analysis of future infrastructure is included in the Housing Element, beginning on page H-206. This comment pertains to the General Plan land use. Comments on the General Plan comments will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.7 As stated in Response 18.6, the County extensively reviewed and analyzed the potential for infrastructure expansion in the Housing Element. It is anticipated that continual growth of infrastructure will occur as development is accommodated by the project. Any future housing development projects would be required, similar to any other development, to ensure adequate infrastructure is available to serve the development. This comment pertains to the General Plan. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.8 The commenter makes statements related to the Housing Element action items. This comment pertains to the General Plan. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.9 The commenter notes concerns about homeless shelter count data in the Housing Element. The data included in the counts was taken from the Riverside County Consolidated Plan, updated in 2014. This comment pertains to the General Plan. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.10 This comment is duly noted. This comment pertains to the General Plan. Comments on the General Plan will be presented to the Planning Commission and the Board of Supervisors during the public hearing process. This comment does not identify any specific concern with the adequacy of the Draft EIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

Response 18.11 This comment is duly noted. The commenter asserts that Draft EIR No. 548 does not analyze the impacts of the project on low-income communities of color, distribution of burdens or benefits, analysis of HHDR/MUA feasibility, Thermal and Oasis, health impacts, and water scarcity.

In regard to low-income communities of color and distribution of burdens and benefits, the Housing Element evaluates impacts to a variety of minority communities and those with special needs to ensure adequate housing is provided. Further, the distribution of housing facilities across the county, focusing on community sites in areas where housing needs are critical, was done to ascertain project benefits and impacts across the county. Regarding HHDR/MUA feasibility, the role of the EIR is to impartially evaluate the physical environmental impacts of the project, and not to determine the project's feasibility. Thermal and Oasis are evaluated extensively in the Eastern Coachella Valley Area Plan section of the EIR, water scarcity and supply are addressed specifically in regard to the eastern Coachella Valley beginning in Section 4.8.22 and countywide beginning in Section 3.17. The Draft EIR includes sufficient analysis of all direct, indirect, and cumulative physical environmental impacts that may occur based on available data and reasonable interpretation as required under CEQA for a planning-level document of this magnitude. The suggested additions from the commenter fall outside the level of review and analysis mandated by CEQA.

Furthermore, the commenter asserts that the site selection method was not included in the EIR. Site selection criteria is included in the Housing Element starting on page H-125.

Response 18.12 The commenter asserts that EIR No. 548 does not address farmworker housing. Housing Element page H-115 includes **an extensive analysis of farmworker housing. Further, EIR No. 548 also addresses farmworker housing needs.** The allowance of farmworker housing is noted in Table 3.0-1, which states that Action 1.3b (which allows farmworker housing without a CUP, zoning, or other applications on Agricultural land) would not cause any further environmental

2.0 COMMENTS AND RESPONSES

impacts than those analyzed in the General Plan EIR. Due to the limited scope of farmworker housing, in comparison to the amount of agricultural land in the county, it would be speculative to attempt to analyze the potential future farmworker housing facilities. Future development accommodated by the project would be required to undergo the County development review process, which would ensure that potential impacts related to unsuitable development on agriculture land would be avoided. The role of the General Plan EIR and the development review process is outlined in Section 1.3, Type of Document, of the EIR. Any project proposed on agriculture land would be required to undergo the development review process prior to construction. Mitigation measures have been included in EIR No. 548 to address adequate infrastructure, water quality, and other environmental concerns.

Response 18.13 The commenter asserts that the locations selected for inclusion in the proposed project do not include services needed to support future development. As such, the commenter states that air quality, greenhouse gas, and traffic impacts will occur. As stated in the Housing Element beginning on page H-125, the site selection process was extensive and not all sites exemplified all of the selection criteria. Potential future development sites would require the extension of infrastructure, including roadways and other services. EIR No. 548 extensively reviews potential air quality, greenhouse gas, and transportation impacts associated with the project.

On a countywide scale, Section 3.3 specifically addresses the countywide impacts associated with the proposed project. As noted in the analysis beginning on page 3.0-26, the project would have a number of cumulatively considerable and significant unavoidable impacts to air quality (see Section 3.3). These impacts were reduced through a number of mitigation measures, which include regulations for construction equipment, architectural coatings used in developments, and completion of a site-specific air quality analysis for future projects prior to development, as well as others. Further, EIR No. 548 includes an analysis of greenhouse gas emissions (Section 3.7), which could result in cumulatively considerable and significant unavoidable impacts. Lastly, the transportation and traffic (Section 3.16) impact analysis evaluated impacts to the county circulation system and found that cumulatively considerable and significant unavoidable impacts may occur. Mitigation has been included to reduce these impacts, including requiring new land development projects to pay fair-share contributions in order to maintain adequate level of service and for the County to review and ensure that adequate right-of-way is available for future roadways needed to accommodate development.

EIR No. 548 evaluates Area Plan-specific and countywide impacts for greenhouse gases, transportation, air quality, and other related impacts. Furthermore, mitigation for impacts was included to reduce these potential impacts.

- Response 18.14** The commenter asserts that ozone was not analyzed in EIR No. 548. Ozone was reviewed and potential ozone impacts as a result of the proposed project were analyzed in each Area Plan section, as well in the Countywide Impact Analysis 3.3.2, which specifically addressed whether the project would have the potential to violate a state or federal ozone standard. Furthermore, a number of mitigation measures were identified, starting on page 3.0-30 of the EIR, to reduce potential air quality impacts due to construction and operation of new development.
- Response 18.15** The commenter states that the Los Angeles Department of Public Health requires that all development within 1,500 feet of a major roadway must provide air filtration systems to reduce potential impacts related to air quality. While this comment is noted, the South Coast Air Quality Management District (SCAQMD) and the Mojave Desert Air Quality Management District (MDAQMD), both of which have jurisdiction over the project area, have not adopted a 1,500-foot barrier. The SCAQMD and MDAQMD use the California Air Resources Board's Air Quality and Land Use Handbook-recommended sensitive receptor buffers, which state that pollutants around roadways drop off substantially at a distance of 300 feet from the roadway, and risk drops off further at 500 feet from the roadway.¹ As such, this standard has been adopted by the SCAQMD and subsequently the County. Mitigation Measure 3.3.11 requires buffering pursuant to both SCAQMD and MDAQMD guidance, including development proximal to roadways.
- Response 18.16** The commenter erroneously asserts that the updated Housing Element includes higher-intensity zones focused in areas of color. This statement is unfounded, as the County conducted extensive analysis related to the selection of project sites dependent on the need for affordable housing. For a discussion of the process used to select potential project sites, refer to the discussion starting on page H-125 of the Housing Element. As proposed, the project meets all HCD Housing Element requirements, including those related to fair housing in the county.
- Response 18.17** The commenter asserts that the Eastern Coachella Valley General Plan text, as reflected in the EIR, is inaccurate, as it does not address farmworkers. The description explicitly addresses farmworkers in the community, specifically on page 4.8-1, which states, "The Mecca Family and Farm Worker's Service Center is the main focal point of the community. Downtown Mecca also includes local serving commercial uses, a library, a church, school facilities, fire station, the Boys and Girls Club of the Coachella Valley and College of the Desert satellite campus. The community is surrounded by agricultural uses that serve as the residents' largest employment sector for Mecca."
- The commenter also asserts that potential impacts related to air pollutants resulting from vehicle use must be addressed. As noted in Response 18.13 above, air quality and greenhouse gas impacts were thoroughly analyzed and mitigated in EIR No. 548.

¹ California Air Resources Board, 2005, Air Quality and Land Use Handbook, Table 1-2, Summary of Basis for Advisory Recommendations.

2.0 COMMENTS AND RESPONSES

Lastly, the commenter states that temporary workers are not analyzed. The Housing Element extensively reviews the needs specific to temporary residents, beginning on page H-108.

Response 18.18 The Salton Sea is a critical issue for the County and is addressed specifically on page 4.8-5 of EIR No. 548. The EIR states, “The sea’s decreased water level, increased salinity level, and exposed water bed has created economic, environmental, and public health issues for this community as well as the surrounding desert communities. Implementation of this Town Center MUA and HHDR development is largely dependent on the Salton Sea Authority Salton Sea restoration efforts.” The commenter does not raise any particular environmental issues or shortcoming on the part of the EIR, only a general reference to the Salton Sea and its potential air quality and odor issues.

Although the projected exposure of the Salton Sea bottom due to dropping water levels has the potential to become a new dust source, it should be noted that air quality and fugitive dust in this portion of the county are managed by the South Coast Air Quality Management District. The SCAQMD has an adopted Coachella Valley PM₁₀ State Implementation Plan that identifies control strategies and measure commitments to reduce fugitive dust emissions and attain ambient air quality standards. The California Irrigation Management Information System (CIMIS) operates a series of meteorological stations throughout agricultural areas of California, including the Coachella and Imperial Valleys. Several stations are located around the Salton Sea. Additionally, the California Air Resources Board maintains monitoring stations that measure pollutant concentrations (including PM₁₀) throughout the state. A total of seven stations monitor PM₁₀ in the Salton Sea Air Basin, and two of those stations are located in Riverside County.

Potential air quality impacts from a reduction in water levels at the Salton Sea are not a recent issue. As noted above, the SCAQMD has a demonstrated history of adopting and implementing PM₁₀ dust controls (e.g., 1990 Coachella Valley State Implementation Plan, 1994 Best Available Control Measures State Implementation Plan, SCAQMD Rules 403 and 403.1, local dust control ordinances, clean streets management program) to ensure healthful air. Additionally, sand fences are being used as one control element for the Coachella Valley PM₁₀ State Implementation Plan. Fugitive dust problems at the Salton Sea were also analyzed in a 2002 white paper by the Salton Sea Science Office Workshop.² The white paper notes that in general, lakebed sediments that would be exposed by a lowering of water levels in the Salton Sea are likely to have texture conditions similar to adjacent shoreline areas.

The Salton Sea is also managed by the Salton Sea Authority and the Imperial Irrigation District. Potential impacts to the Salton Sea have been addressed in the Imperial Irrigation District QSA EIR, as well as by the Salton Sea Authority.

Response 18.19 As stated in the EIR, future utility infrastructure and services will be required to expand to accommodate new development. This expansion would be funded and completed through development impact fees, fair-share contributions, and other funding methods. Furthermore, as development is approved,

² Salton Sea Science Office Workshop, The Potential for Fugitive Dust Problems at the Salton Sea if Water Levels are Lowered Significantly from Current Conditions, September 19, 2002.

pursuant to state and County law, additional services would be required prior to completion of development. Further, buildout of the proposed project is anticipated to occur over an extended period of time. As such, expansion of infrastructure and services would occur in conjunction with proposed development.

Response 18.20 The commenter asserts that the EIR does not cover the existing conditions of the Lakeview Nuevo Area Plan. Beginning on page 4.9-15, the EIR thoroughly and explicitly reviews the existing setting within the Lakeview Nuevo Area Plan.

The commenter also asserts that communities proposed within the Lakeview Nuevo Area Plan are situated near areas subject to potential flooding. EIR No. 548 contains information related to flooding. The County compiles flood hazard maps using the Riverside County Special Flood Hazard Area database. This flood zone database is maintained by the Riverside County Flood Control and Water Conservation District (RCFWCD), as stipulated in Riverside County Ordinance No. 458. The flood areas identified using the Riverside County Special Flood Hazard Area database include FEMA 100-year flood areas, select US Army Corps of Engineers inundation boundaries, and a number of boundaries for county inundation zones, as enumerated in Ordinance No. 458. The RCFWCD updates the database and incorporates new flood zones as necessary. The flood hazard zones are supported by numerous policies in order to ensure the safety of development in the county.

Lastly, the commenter notes that the Lakeview Nuevo Area Plan is not located proximal to a jobs or goods center. Impacts related to transportation, air quality, greenhouse gases, and other impact areas related to increased vehicle use in the Lakeview Nuevo Area Plan have been included in EIR No. 548. These potential impacts are discussed in Response 18.13 above.

Response 18.21 The commenter asserts that EIR No. 548 is internally inconsistent due to the explanation of the site selected in comparison to the noted existing conditions of the Lakeview Nuevo Area Plan. While the Lakeview area is generally rural, existing development has centralized along major roadways in the area as well in other portions of the community. While this development has occurred, the Lakeview Nuevo Area Plan also contains hillsides and other open space resources in the vicinity of the project area. The project does not propose the removal of these open areas; rather, it includes intensification of development proximal to the areas containing existing development. Furthermore, the Housing Element, on page H-125, states that the site selection process used a number of criteria including proximity to existing development. However, the Housing Element must also provide housing across the entire county; as such, some communities may be closer to existing development than others.

EIR No. 548 contains extensive discussion related to existing conditions and the proposed project; however, the noted perceived inconsistency is not contradictory in nature and does not constitute an environmental issue in the EIR.

Response 18.22 Refer to Response 18.19 above. The gradual expansion of infrastructure would occur in conjunction with development and would be funded by a variety of funding sources. No further response is required.

2.0 COMMENTS AND RESPONSES

- Response 18.23** The commenter asserts that the document sent to public review was not complete. Excerpts from the Area Plans were released to reduce the volume of information to allow reviewers to focus on the limited revisions made to the Area Plan documents. Furthermore, the complete adopted Area Plans are available on the County website (www.planning.rcltma.org). All proposed changes, analysis, and resources in order to provide meaningful public review and comment under CEQA have been fulfilled.
- Response 18.24** This comment serves as the conclusion of the letter and provides general information. Responses to specific comments are included above; no further response is required.

3.0 ERRATA

3.1 INTRODUCTION

Changes to Draft EIR No. 548 are noted below. The changes to the Draft EIR do not affect the overall conclusions of the environmental document, and instead represent changes to the Draft EIR that provide clarification, amplification and/or “insignificant modifications” as needed as a result of public comments on the Draft EIR, or due to additional information received during the public review period. These clarifications and corrections do not warrant Draft EIR recirculation pursuant to CEQA Guidelines §15088.5. As set forth further below and elaborated upon in the respective Response to Comments, none of the Errata below reflect a new significant environmental impact, a “substantial increase” in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted, nor do the Errata reflect a “fundamentally flawed” or “conclusory” Draft EIR.

Changes in this Errata Section are listed by chapter, page, and (where appropriate) by paragraph. Added or modified text from the April through May 2016 Public Review Period is shown by blue italics (*example*) while deleted text is shown by green strikethrough (~~example~~).

POST PRODUCTION AREA PLAN CHANGES

Note: It is anticipated that potential neighborhood modifications may occur during the public hearing process that may result in the reduction of the project area. A reduction of the size of the Project, or the potential reduction of parcels within the Project area would affect the overall analysis within the document, and would not warrant a recirculation pursuant to CEQA Guidelines §15088.5.

SECTIONS 4.1-4.10

Note: Minor editorial changes have been completed for the policies included in the General Plan Area Plans. Changes have been indicated using green italic text (*example*) for additions, and green strikeout for deletions (~~example~~). Refer to the General Plan Errata document, Attachment A (Area Plan Revisions) to review the updated language.

PAGE 3.0-65

MM 3.5.1 Avoidance is the preferred treatment for cultural resources. Where feasible, project plans shall be developed to allow avoidance of cultural resources. Where avoidance of construction impacts is possible, ~~capping of the cultural resource site and~~ avoidance planting (e.g., planting of prickly pear cactus) shall be employed to ensure that indirect impacts from increased public availability to the site are avoided. Where avoidance is selected, cultural resource sites shall be placed within permanent conservation easements or dedicated open space.

PAGE 3.0-68

MM 3.5.1 If human remains are encountered during a public or private construction activity, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Riverside County Coroner must be notified within 24 hours. If the Coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission must be contacted to determine the most likely descendant for this area. *The decision as*

3.0 ERRATA

to the treatment and disposition of the remains shall be made consistent with the procedures and standards contained in Health and Safety Code Section 5097.98 and CEQA Guidelines Section 15064.5(e). The most likely descendant may become involved with the disposition of the burial following scientific analysis.

PAGE 4.5-21

The project site is within the boundaries of the Hemet ~~Union~~ Unified School District (HUSD), which operates one K-5 school, one 6-8 middle school, and one high school for the plan area.

PAGE 4.5-59

If fully developed, the proposed project could result in new student enrollment at Hemet ~~Union~~ Unified School District (HUSD) schools serving the neighborhood sites.

PAGE 4.7-44

Most CVWD domestic water customers also receive ~~sewer wastewater~~ services from the water district. The CVWD provides wastewater service to more than ~~91,000~~ 93,000 home and business accounts. The CVWD operates ~~6~~ 5 water reclamation plants and maintains more than ~~1,000~~ 1,129 miles of sewer pipelines and ~~37~~ 33 lift stations that collect and transport wastewater to the nearest regional water ~~reclamation facility (RWRF)~~ Reclamation Plants (WRP). The current and planned treatment capacity at each of the reclamation plants is shown in **Table 4.7-5** below.

PAGE 4.7-44

Plant #	Current		Planned		Total Capacity (MGD)
	Treatment	Capacity/Ave. (MGD)	Additional Capacity (MGD)	Treatment	
1	WRP-1 Secondary	0.15 / 0.016 ave	-	-	0.15
2	WRP-2 Secondary	0.18/0.03 ave 0.33/0.012	-	-	0.18
3	WRP-4 Secondary	9.9 / 4.75 4.51 ave	Tertiary	-	9.90
4	WRP-7 Secondary and Tertiary	5.0 / 2.69 and 2.5 / 3.0 ave	Tertiary	5.0 Additional	7.50
5	WRP-9 Secondary	0.40/ 0.21 0-0.33	-	-	0.40
6	WRP-10 Secondary and Tertiary	18.0 / 9.49 and 10.8 / 10.8 ave	-	-	18.50 18.0
Totals		33.083	-	5.0	33.083 36.63

Source: ~~CVWD-2012~~ CVWD, Draft EIR Comment, June 2016

PAGE 4.7-90

Future development of the neighborhood sites under the project would contribute to increased generation of wastewater needing treatment. As previously described, the CVWD treats approximately ~~33.083~~ ~~36.63~~ mgd via ~~six~~ ~~five~~ ~~RWRF~~ ~~WRP's~~. As discussed under Impact Analysis 4.7.12 future development of the neighborhood sites under the proposed project could result in up to 19,988 more dwelling units and 48,610 more persons than anticipated for buildout of the sites under the adopted Western Coachella Valley Area Plan. This increase in population and housing would generate an increased demand for wastewater conveyance and treatment. The average wastewater generation rate for a residential unit in Riverside County is 230 gallons per day per capita (County of Riverside 2015b). Therefore, future development would result in the generation of 4,597,240 gallons per day (4.597 million gallons daily).

The 4.59724 mgd wastewater demand generated by the proposed project would represent approximately ~~12.5~~ ~~13.89~~ percent of the current design capacity at the CVWD RWRF. This increase in service is not considered a substantial increase over existing capacity. Additionally, future development would be required to pay development impact fees and connection fees, which would fund any potential future expansion of the RWRF in the CVWD's jurisdiction. Actual expansion of any RWRF would be subject to subsequent project-level environmental review.

PAGE 4.8-47

Most CVWD domestic water customers also receive ~~sewer~~ ~~wastewater~~ services from the water district. The CVWD provides wastewater service to more than ~~91,000~~ ~~93,000~~ home and business accounts. The CVWD operates ~~6~~ ~~5~~ water reclamation plants, maintains more than ~~1,000~~ ~~1,129~~ miles of sewer pipelines, and maintains ~~37~~ ~~33~~ lift stations that collect and transport wastewater to the nearest water reclamation ~~facility~~ ~~Plant~~ ~~(WRP)~~. The current and planned treatment capacity at each reclamation plant is shown in **Table 4.8-6**.

PAGE 4.8-48

Plant #	Current		Planned		Total Capacity (MGD)
	Treatment	Capacity/Ave. (MGD)	Additional Capacity (MGD)	Treatment	
1	WRP-1 Secondary	0.15 / 0.016 ave	-	-	0.15
2	WRP-2 Secondary	0.18/0.03 ave 0.33/0.012	-	-	0.18
3	WRP-4 Secondary	9.9 / 4.75 4.51 ave	Tertiary	-	9.90
4	WRP-7 Secondary and Tertiary	5.0 / 2.69 and 2.5 / 3.0 ave	Tertiary	5.0 Additional	7.50
5	WRP-9 Secondary	0.40/ 0.210 0.33	-	-	0.40

3.0 ERRATA

6	WRP-10 Secondary and Tertiary	18.0 / 9.49 and 10.8/10.8 ave	-	-	18.50 18.0
Totals		33.083	-	5.0	33.083 36.63

Source: ~~CVWD-2012 CVWD~~, Draft EIR Comment, June 2016

This page intentionally left blank