

#### **CITY OF CORONA**

#### **NOTICE OF PREPARATION**

TO:	Attached Distribution List	FROM:	Jason Moquin, Senior Planner 400 S. Vicentia Ave.
			Corona, CA 92882

#### SUBJECT: Notice of Preparation of a Draft Environmental Impact Report

The **City of Corona** will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We would like to know your thoughts as to the scope and content of the environmental information in connection with the proposed project.

This Notice of Preparation contains the location, background, and description of the project. An initial study has not been prepared for the proposed project, as the City has determined that all but one of the environmental issues (mineral resources) found on the City's environmental checklist will be addressed in the EIR. The issues to be addressed in the EIR include the following:

- Aesthetics
- Biological Resources
- Greenhouse Gas Emissions
- Land Use and Planning
- Public Services
- Mandatory Findings of Significance
- Agriculture and Forestry Resources
- Cultural Resources
- Hazards/Hazardous Materials
- Noise
- Transportation/Traffic

- Air Quality
- Geology and Soils
- Hydrology and Water Quality
- Population and Housing
- Utilities

#### Si necesita translación en Espanol favor de llamar al 951-736-2262

	A copy of the Initial Study IS attached.
$\boxtimes$	A copy of the Initial Study IS NOT attached.
$\boxtimes$	The proposed project IS considered a project of statewide, regional or areawide significance.
	The proposed project IS NOT considered a project of statewide, regional or areawide significance.
	The proposed project WILL affect highways or other facilities under the jurisdiction of the State Department of Transportation.
$\boxtimes$	The proposed project WILL NOT affect highways or other facilities under the jurisdiction of the State Department of Transportation.
$\boxtimes$	A scoping meeting WILL be held by the lead agency.
	A scoping meeting WILL NOT be held by the lead agency.

If the project meets the criteria requiring the scoping meeting, or if the agency voluntarily elects to hold such a meeting, the date, time and location of the scoping meeting are as follows:

Date: March 4, 2014	Time: 6:30 PM	Location: City of Corona Public Library – 650 S. Main Street, Corona
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Your response must be sent at the earliest possible date, but not later than 30 days after receipt of this notice. Please send your response to Jason Moquin, Senior Planner, at the address shown above, by **March 5, 2014**.

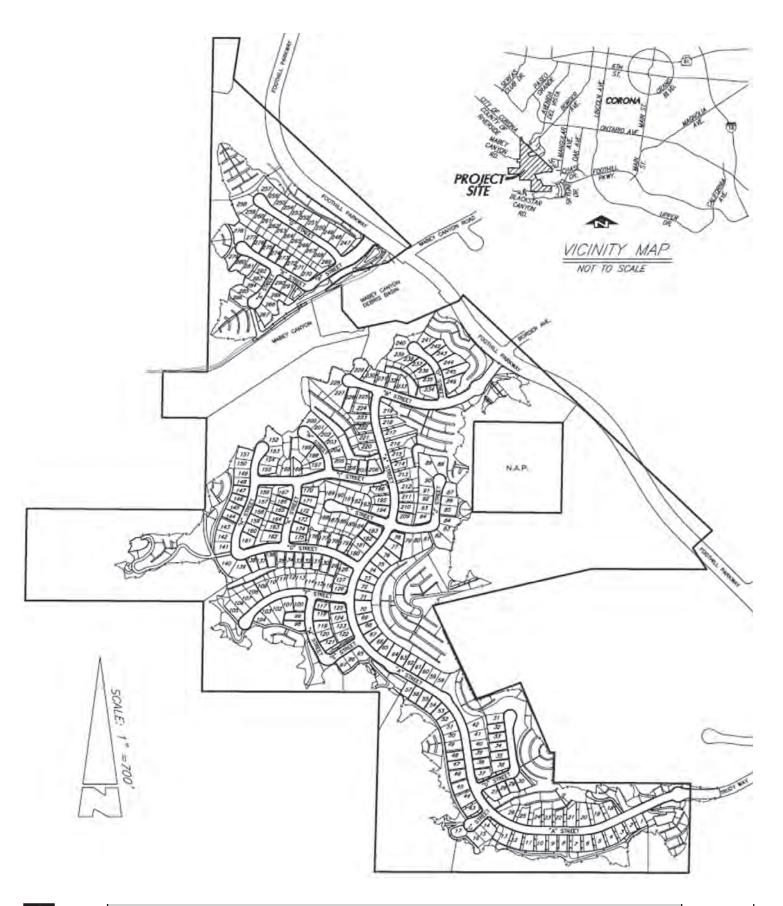
Project Title:		Skyline Heights Project
Project Location – Specific address and cross street or showing project site (prefer 7 ½' topographical map ide quadrangle name):	attach a map rably a USGS 15' or	The project area is located generally south of the proposed westerly extension of Foothill Parkway, east of Paseo Grande and west of Trudy Way. The project area includes 38 parcels totaling 421.2 acres, all of which are located in the unincorporated area of Riverside County but within the City of Corona Sphere of Influence.
		See Figures 1 and 2 below for an illustration of the Project site location and proposed annexation area, respectively.
Project Description:		The project involves the annexation of 421.2 acres into the City of Corona. The annexation is accompanied by a tentative tract map to subdivide approximately 271 acres into 291 single family residential lots. The development will also include non-buildable lettered lots that will be set aside for landscaping and natural open space, streets and utilities. Richland Developers is the project proponent and has submitted the following applications to the City of Corona:
		■ General Plan Amendment 13-003 (GPA13-003): Amendment to Corona's General Plan Sphere of Influence Land Use Plan (westerly sphere) to amend 421.2 acres from Rural Residential I (0.2 – 0.5 dwelling units/acre) to Low Density Residential (3-6 du/ac) on 384.47 acres and Open Space on 36.73 acres.
		■ Change of Zone 13-002 (CZ13-002): Application to prezone 36.73 acres to Open Space, 113.56 acres to Agriculture and 270.91 acres to R-1-7.2 (single family residential, 7,200 square foot minimum lot size) located in the city's sphere of influence (westerly sphere) to facilitate the annexation of the property into the City of Corona.
		■ Annexation 117: Annexation of 421.2 acres from the unincorporated area of Riverside County into the City of Corona.
		■ Tentative Tract Map 36544 (TTM 36544): Subdivision of 270.91 acres into 291 single family residential lots including numerous lettered lots to be set aside for open space, slope landscaping, streets and utilities in the proposed R-1-7.2 Zone being proposed under CZ13-002.
		See Figure 1 below for an illustration of the proposed Project site plan.
Project Applicant (if any):		Richland Developers
California Environmental I Hazardous Waste List (if a		N/A
Date: <u>January 31, 2014</u>	Signature:	
1		

Date: <u>January 31, 2014</u>	Signature:	
	Title:	Senior Planner
	Telephone:	(951) 736-2268

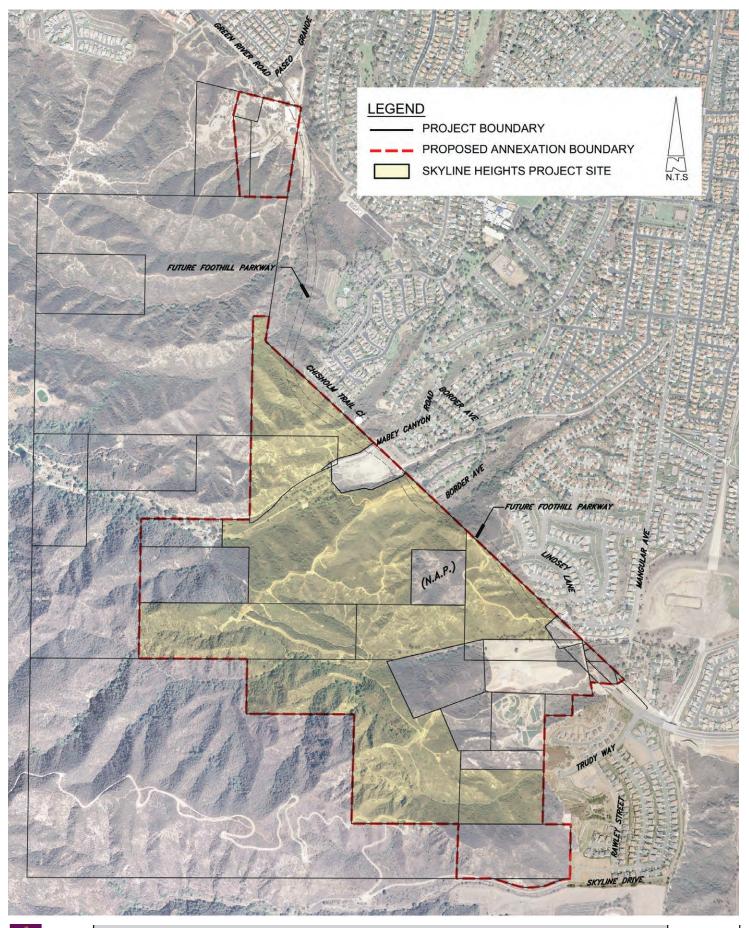
Consulting firm retained to prepare draft EIR (if applicable):

Name:	PCR Services Corporation
Address:	1 Venture Plaza, Suite 150
City/State/Zip:	Irvine, CA 92618
Contact Person:	David A. Crook, AICP, Principal Planner

Reference: California Code of Regulations, Title 14 (CEQA Guidelines) Sections 15082(a), 15103, 15375.











## COUNTY OF RIVERSIDE

# TRANSPORTATION AND LAND MANAGEMENT AGENCY LAND MANAGEMENT AGENCY

### **Transportation Department**

Director
Patricia Romo, P.E.
Assistant Director

Juan C. Perez, P.E., T.E.

March 4, 2014

Mr. Jason Moquin, Senior Planner City of Corona 400 S. Vicentia Avenue Corona, CA 92882

Re: Environmental Impact Report for the Skyline Heights Project

Dear Mr. Moquin:

The County of Riverside would like to submit comments on the scope of the environmental review being performed for the Skyline Heights project in the City of Corona. We are in receipt of the notice for a scoping meeting dated January 31, 2014 and Figures 1 and 2 showing the project location, tentative tract map, and proposed annexation map.

The proposed annexation map identifies an annexation boundary that extends beyond the project site to match up with the existing City boundary with the exception of one location. The proposed annexation proposes to extend the City limits westerly while carving out a portion of Skyline Drive creating a gap. City jurisdiction would be to the North and to the South of a County Road.

The County recommends that any proposed annexation include Skyline Drive. This would create a clean boundary rather than weaving the new City boundary around the road and the County could enter into a maintenance agreement with the City to continue maintenance along the road if desired.

Maps of the existing City limits south of Skyline Drive are included for your reference.

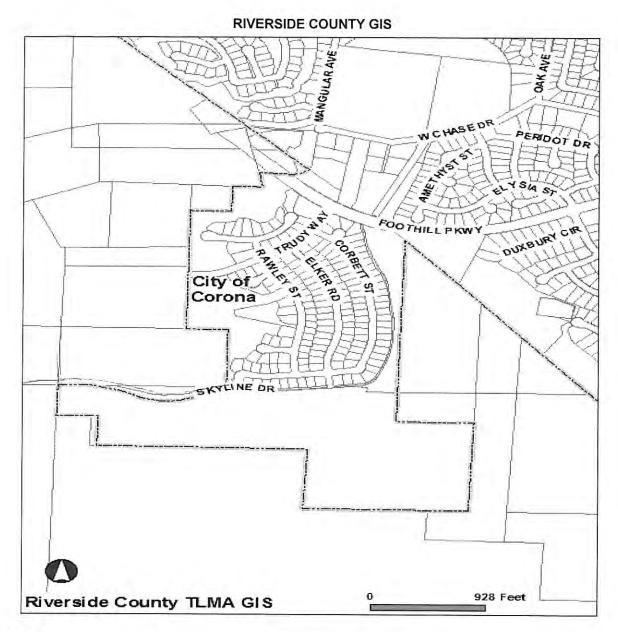
Sincerely.

Patricia Romo, P.E.

Assistant Director of Transportation

cc: Tina Grande

4080 Lemon Street, 8<sup>th</sup> Floor · Riverside, CA 92501 · (951) 955-6740 P.O. Box 1090 · Riverside, CA 92502-1090 · FAX (951) 955-3198



"IMPORTANT"

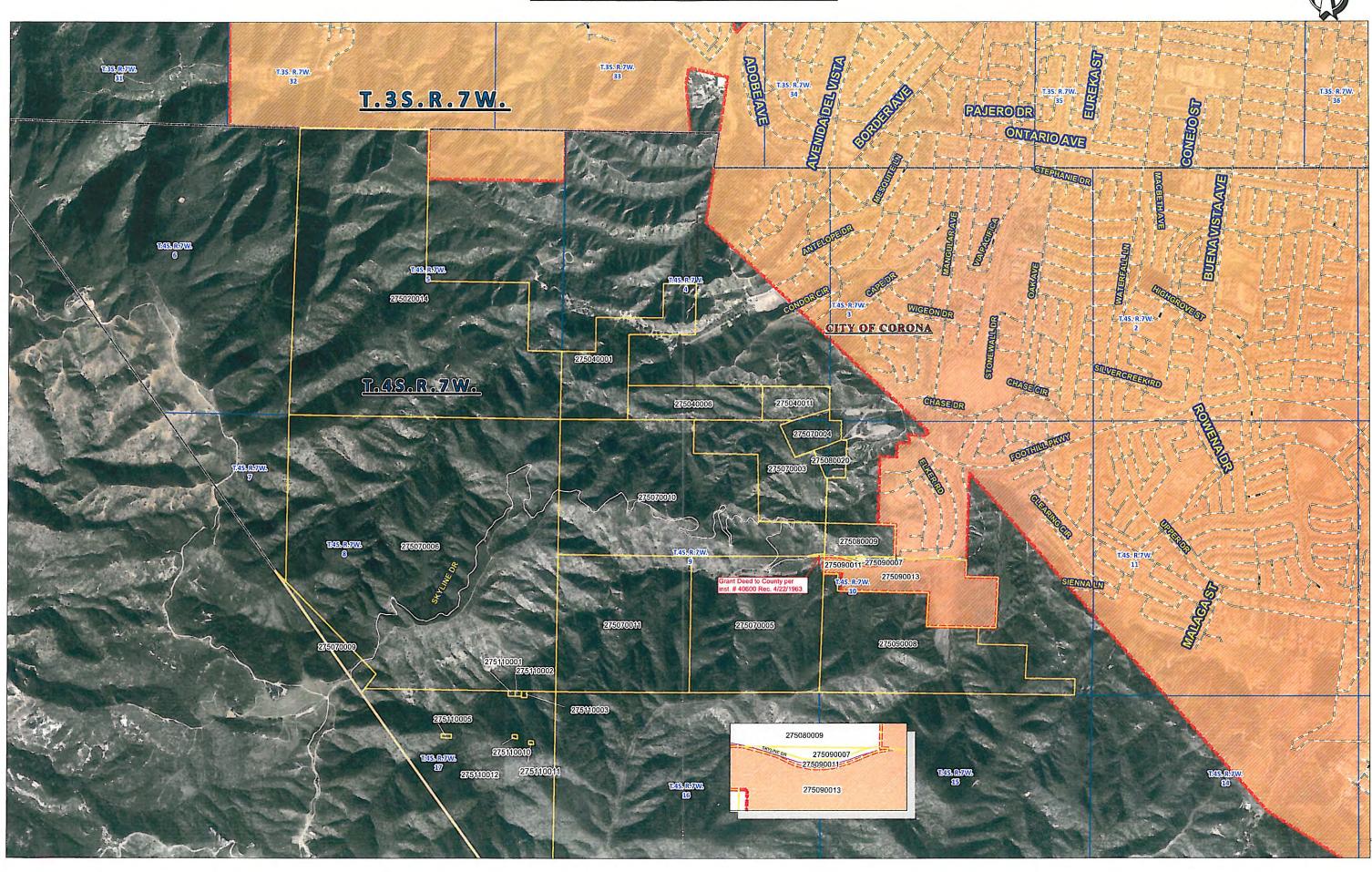
Maps and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness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

REPORT PRINTED ON...Wed Feb 19 11:27:41 2014

Version 131127



## SKYLINE DRIVE



### Received



Forest Service

Cleveland National MAR - 6 2014 Trabuco Ranger District

1147 East 6th Street Community Development Oopbna, CA 92879-1616

(951) 736-1811 (951) 736-3002 FAX CRS 1-800-735-2922

File Code: 5400/7700 Date: March 3, 2014

Jason Moquin Senior Planner City of Corona 400 S. Vicentia Ave. Corona, CA 92882

Dear Mr. Moquin:

In response the Notice of Preparation for the Skyline Heights Project, the Cleveland National Forest has identified several items that we would like the City of Corona and Richland Developers to consider, and appropriately address, mitigate, or implement through the Environmental Impact Report (EIR) and development and construction processes.

- 1. Survey and post the private property boundary line, within the project area, where it abuts National Forest System (NFS) lands.
- 2. Take appropriate developmental measures to reduce or eliminate encroachment onto NFS lands by pedestrian, bicycle, and motorized traffic on unauthorized routes. The public should be discouraged from accessing NFS lands directly from the development, but should rather use Skyline Road as the authorized access point.
- 3. As it relates to this project, ensure that long-term access to, and on, Skyline Road remains intact, and is not blocked, fragmented or otherwise hindered.
- 4. Ensure that fuel modification for fire protection is planned and implemented on private property. Do not plan to conduct vegetation clearance on National Forest System lands.

Thank you for the opportunity to comment on the Skyline Heights Project. Please keep us apprised of any additional opportunity to provide comments or hold discussions regarding this matter. Please send us a copy of the draft EIR, and continue to coordinate with us through the environmental and development process where applicable.

If you have any questions or concerns regarding the information above, please contact Jake Rodriguez. Recreation and Lands Officer, at (951) 736-1811.

Sincerely,

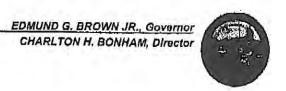
DARRELL W. VANCE

District Ranger









March 10, 2014

Mr. Jason Moquin City of Corona 400 S. Vincentia Avenue Corona, CA 92882

Re:

Notice of Preparation for an Environmental Impact Report

Skyline Heights Project

City of Corona, County of Riverside State Clearinghouse No. 2014021003

#### Dear Mr. Moquin:

The Department of Fish and Wildlife (Department) appreciates this opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (NOP) for the Skyline Heights Project (Project) [State Clearinghouse No. 2013111039]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources [Fish and Game Code sections 711.7 and 1802 and the California Environmental Quality Act Guidelines (CEQA) Section 15386] and as a Responsible Agency regarding any discretionary actions (CEQA Guldelines 15381), such as a Lake and Streambed Alteration Agreement (LSAA) (Section 1600 et seq.) or a California Endangered Species Incidental Take Permit (Fish and Game Code Sections 2080 and 2080.1).

#### Project Description

The City of Corona is proposing the annexation of 421.2 acres and the subdivision of 271 acres into 291 single family lots. The General Plan Amendment would change 421.2 acres from Rural Residential I (0.2-0.5 dwelling units/acre) to Low Density Residential (3-6 du/ac) on 384.47 acres and unspecified open space on 36.73 acres. The Project includes Mabey Canon Wash, Kroonen Canyon Channel and Oak Street Channel and tributaries.

The annexation area is located inland of the western boundary of the City of Corona between Chisholm Trail Court to the north and Skyline Drive to the south. The annexation also includes land south of Green River Drive and west of the City boundary. The proposed Foothill Parkway is located along the western boundary of the City from Green River Drive to Trudy Way.

Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project State Clearinghouse No. 2014021003
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#### Biological Resources and Impacts

The Project is located in the foothills of the Cleveland National Forest. The majority of the annexation area is currently non-developed open space. The site includes riparian habitat, coastal sage scrub habitat, chaparral habitat and the species associated with them, including coyotes, bobcats, mountain lions and numerous State Species of Special Concern.

The CEQA document should contain sufficient, specific, and current biological information on the existing habitat and species at the Project site; measures to minimize and avoid sensitive biological resources; and mitigation measures to offset the loss of native flora and fauna and State waters. The CEQA document should not defer impact analysis and mitigation measures to future regulatory discretionary actions, such as a Lake or Streambed Alteration Agreement

If State or Federal Threatened or Endangered species have the potential to occur on the Project site or the site is located within Federal Critical Habitat areas, species-specific surveys should be conducted using methods approved by the Department or assume the presence of the species throughout the Project site. Surveys should be conducted with one year of submission of the CEQA document. The CEQA document should also address areas of Federal critical habitat and State species of special concern. To assist with review, an accompanying map showing the areas of impact should be included in the subsequent CEQA document. Additional maps detailing the location of (threatened or endangered species, special plants, and species of special concern) should also be included in the subsequent CEQA document.

All special plants should be surveyed as per the Department's 2009 guidance for Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. If the Department guidelines were not utilized, surveys conducted after the 2009 issuance of the guidelines should be updated to incorporate the guidelines. The guidance document can be found at the following link: <a href="http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/ProtocolsforSurveyingandEvaluatingImpacts.pdf">http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/ProtocolsforSurveyingandEvaluatingImpacts.pdf</a>

#### Natural Community Conservation Program (NCCP)

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources, including rare, threatened, and endangered plant and animal species, pursuant to the CESA, and administers the Natural Community Conservation Planning Program (NCCP Program). On June 22, 2004, the Department issued NCCP approval and Take Authorization for the WRMSHCP per Section 2800 et seq. of the California Fish and Wildlife Code. The WRMSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: http://www.rctlma.org/mshcp/.

Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project State Clearinghouse No. 2014021003
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The City of Corona is the Lead Agency and signatory to the Implementing Agreement of the MSHCP.

#### Lake and Streambed Alteration Program

The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based upon this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resource and provide adequate avoldance, mitigation, and monitoring and report commitments. Early consultation with the Department is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <a href="https://www.dfg.ca.gov/habcon/1600/forms.html">https://www.dfg.ca.gov/habcon/1600/forms.html</a>.

Although the proposed Project is within the MSHCP, a Notification of Lake or Streambed Alteration is still required by the Department, should the site contain jurisdictional waters. Additionally, the Department's criteria for determining the presence of jurisdictional waters are more comprehensive than the MSHCP criteria in Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools).

The Department is responsible for assessing and evaluating impacts to jurisdictional waters; typically accomplished through reviewing jurisdictional delineation (JD) reports, supporting information, and conducting site visits. Following review of a JD, the Department may request changes to the JD. The Department may also recommend that additional project avoidance and/or minimization measures be incorporated, or request additional mitigation for project-related impacts to jurisdictional areas.

The following information will be required for the processing of a Notification of Lake or Streambed Alteration and the Department recommends incorporating this information into the CEQA document to avoid subsequent documentation and project delays. Please note that failure to include this analysis in the project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue an LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the project:

- Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the Project (include an estimate of Impact to each habitat type);
- Discussion of avoidance and minimization measures to reduce Project impacts; and,
- Discussion of potential mitigation measures required to reduce the Project impacts to a level of insignificance. Please refer to section 15370 of the CEQA Guidelines for the definition of mitigation.

Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project State Clearinghouse No. 2014021003
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#### Cumulative Impacts

The Project is proposed in a densely populated region of southern California. The regional scarcity of biological resources may increase the cumulative significance of Project activities. Cumulative effects analysis should be developed as described under CEQA Guidelines Section 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis.

#### Alternatives Analysis

The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6). The analysis should include a range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources. The Department considers Rare Natural Communities as threatened habitats, having both local and regional significance. Thus, these communities should be fully avoided and otherwise protected from Project-related impacts. The CEQA document should include an evaluation of specific alternative locations with lower resource sensitivity where appropriate. Off-site compensation for unavoidable impacts through acquisition and protection of high-quality habitat should be addressed.

Please note that the Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

#### Department Recommendations

The Department has the following concerns about the Project, and requests that these concerns be addressed in the CEQA document;

- The CEQA document should quantify impacts to habitats and species as per the informational requirements of CEQA. An accompanying map showing the areas of impact should also be included.
- 2. The CEQA document should include recent biological surveys for fauna and flora (CEQA Guidelines Section 15125(a)). The Department recommends that the Lead Agency contact the Department's California Natural Diversity Database (CNDDB) in Sacramento, (916) 327-5960, to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the California Fish and Game Code. If state or federal threatened or endangered species may occur within the project area, species specific surveys, conducted at the appropriate time of year and time of day, should be included with the CEQA document. Acceptable species specific surveys have been developed by the Department, and by the U.S. Fish and Wildlife Service, and are accessible through each agencies websites. Assessments for rare plants and rare plant natural communities should follow the Department's 2009 Protocols for Surveying and Evaluating Impacts to

Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project State Clearinghouse No. 2014021003
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Special Status Native Plant Populations and Natural Communities. If the Department's 2009 guidelines were not used, surveys conducted after the issuance of the 2009 guidance should be updated following the 2009 guidelines. The guidance document is available here:

http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/protocols for surveying and evaluating impacts.pdf

- 3. The CEQA document should provide an analysis of habitat conservation plans and natural community conservation plans, including the MSHCP. The CEQA document should include a discussion of how the project will affect reserve assembly; how the Project will affect the goals and objectives of the NCCP; the applicable policies and procedures that pertain to the Project; a discussion of survey requirements; and a list of proposed mitigation measures pursuant to the NCCP. A copy of any documents discussing the Project's consistency with the NCCP (e.g., Determination of Biologically Equivalent or Superior Preservation) should be included with the CEQA document.
- The analysis in the CEQA document should satisfy the requirements of the Department's Lake and Streambed Alteration Program and CESA (if deemed necessary).
- The CEQA document should provide a thorough analysis of direct, indirect, and cumulative impacts and identify specific measures to offset such impacts.
- The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6).
- The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6).

In summary, the Department requests that the CEQA document include current information regarding biological resources, adequately address whether the project will be processed through the MSHCP, provide a thorough analysis of cumulative impacts, and provide an alternatives analysis. If you should have any questions pertaining to these comments, please contact Robin Maloney-Rames, Environmental Scientist, at (909) 980-3818.

Sincerely,

Senior Environmental Scientist

C State Clearinghouse, Sacramento



Received MAR 1 4 2014

Community Development Dept.

March 10, 2014

City of Corona Community Development Department c/o Jason Moquin 400 S. Vicentia Avenue Corona, CA 92882

Re: Notice of Preparation of a Draft EIR - Skyline Heights Project (TTM 36544)

In response to your notice that was received on March 10, 2014, regarding the Skyline Heights project, there are several outparcels. When an application for annexation is submitted to LAFCO those outparcels will have to be included so islands are not created. As part of our application process those outparcels will have to be pre-zoned.

Should you have any questions, please feel free to contact me at (951) 369-0631. Thank you.

Sincerely,

Crystal M. Craig

Local Government Analyst

cc: PCR Services Corporation





March 3, 2014 NCL-14-003

Mr. Jason Moquin, Senior Planner City of Corona, Community Development Department 400 South Vicentia Avenue Corona, California 92882

Subject: Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project

Dear Mr. Moquin:

The County of Orange has reviewed the Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project and request that the following topical issues be addressed in the Draft Environmental Impact Report:

#### **Environmental Resources:**

- 1. Description of project characteristics; with respect to water quality issues, such as project site location in a given watershed, site acreage, known soil contamination, known groundwater contamination, and anticipated change in percent impervious surface area.
- 2. Identification of receiving waters; the EIR should identify all downstream receiving waters that may receive contributory runoff from the project site.
- Sensitivity of receiving waters; EIR should identify Areas of Special Biological Significance, water bodies with Total Maximum Daily Loads (TMDL), and Clean Water Act Sec. 303(d) listed impaired water bodies.
- 4. Characterization of potential water quality impacts from the proposed project and identification of the anticipated pollutants to be generated by the project.
- 5. Identification of downstream hydrologic conditions of concern that may be affected by project-related changes in runoff volume and velocity; sediment load, makeup or characteristics; reduced infiltration; and/or increased flow, frequency, duration, and peak(s) of storm runoff.
- Evaluation of thresholds of significance.
  - 7. Assessment of project impact significance to water quality.

- 8. If a proposed project has the potential to create a major new stormwater discharge to a water body with an established TMDL, the EIR should consider quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters.
- 9. Analysis of the cumulative impact of the proposed project together with past, presents and reasonably anticipated future projects.
- 10. Mitigation to reduce identified impacts to a level of insignificance or, if that cannot be accomplished, inclusion of all reasonable and feasible mitigations for identified impacts.

If you have any questions or need clarification please do not hesitate to call me at (714) 667-3211.

Sincerely,

Polin Modanlou, Manager Strategic Land Planning Division OC Public Works/OC Planning Services 300 North Flower Street Santa Ana, California 92702-4048 Polin.modanlou@ocpw.ocgov.com

cc: Chris Crompton, Manager, OC Public Works/Environmental Resources



#### PECHANGA CULTURAL RESOURCES

Temecula Band of Luiseño Mission Indians

Post Office. Box 2183 • Temecula, CA 92593 Telephone (951) 308-9295 • Fax (951) 506-9491

March 10, 2014

Chairperson: Mary Bear Magee

Vice Chairperson: Darlene Miranda

Committee Members: Evie Gerber Bridgett Barcello Maxwell Richard B. Scearce, III Germaine Arenas

Director: Gary DuBois

Coordinator; Paul Macarro

Cultural Analyst: Anna Hoover

#### **VIA E-MAIL and USPS**

Mr. Jason Moquin Senior Planner City of Corona Planning Division 400 S. Vicentia Avenue Corona, CA 92882

Re: Pechanga Tribe Comments on the Notice of Preparation for a Draft Environmental Impact Report on the Skyline Heights Project, GPA 13-003, C13-002, Annexation 117, TR 36544

Dear Mr. Moquin:

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

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project and to assist the City in developing appropriate avoidance and preservation standards for the potentially significant Luiseño cultural resources that the Project could impact. Currently, our records do not show previously recorded Native American resources on the Project and the May 2013 archaeological study did not identify resources during the field survey. However, as the Tribe has not had the opportunity to view and walk the Property and the 2013 survey stated that vegetation was dense, we are concerned that cultural resources may be identified during earthmoving activities. The Tribe is also concerned that deeply buried resources could be unearthed. The location of the Property at the base of the Cleveland National Forest/Santa Ana Mountains likely contains a deep accumulation of alluvium which would have covered Luiseño habitations and villages over time. Additionally, there are several drainages that flow from the mountains that would have

supplied fresh water to any inhabitants in the area. Thus, the potential for impacting surface and subsurface cultural resources is high and both archaeological and Pechanga tribal monitors should be present during all earthmoving activities including mass grading, brushing, grubbing and utility installation.

## THE CITY OF CORONA MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS

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

## <u>PURSUANT TO CAL. GOVT. C. §§ 65351, 65352, 65352.3, AND 65352.4</u> (SENATE BILL 18 – TRADITIONAL TRIBAL CULTURAL PLACES LAW)

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

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

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

#### PECHANGA CULTURAL AFFILIATION TO PROJECT AREA

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

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

Luiseño history originates with the creation of all things at 'éxva Teméeku, the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the Luiseño deity Wuyóot lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying Wuyóot to the many hot springs in Luiseño territory and finally to the hot springs at Lake Elsinore, where he died (DuBois 1908). He was taken back to 'éxva Teméeku, where he was cremated. From Elsinore and Temecula, the people spread out, establishing villages and marking their territories in the surrounding areas such as Corona, Riverside and the unincorporated areas of western Riverside County.

Many traditions and stories are passed from generation to generation by songs. One of the Luiseño songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Káamalam/Moniivol*, are songs of the places and landmarks that were destinations of the Luiseño ancestors, including the City of Corona and surrounding lands. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their

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

migrations (DuBois 1908:110). Further, the story of *Táakwish* and *Tukupar* includes place names for events from the Idyllwild area to the Glen Ivy/Corona area (Krocber 1906). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to Lake Mathews on the northwest, down Temescal Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. The Project area is located within the northwestern area of this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

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

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

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

Flowing waterways were highly important to the Luiseño ancestors as still water often was associated with evil spirits and disease. According to the National Hydrological Dataset, there are three blue-line streams flowing through this Project. As water is a requirement to

survive, the Tribe's experience shows that often there are cultural resources situated on either bank of the water source. Although the terrain is steep, it is clear from the dense vegetation in the area that the water could have supported a high number of floral and faunal resources needed for subsistence. Thus, the Tribe is highly concerned that there are resources located both on the surface and subsurface that will be impacted by the proposed grading.

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

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

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

The proposed Project is located in a sensitive region of Luiseño territory and the Tribe believes that the possibility for recovering subsurface resources during ground-disturbing activities is high. The Tribe has over thirty-five (35) years of experience in working with various types of development and construction projects throughout its territory. The combination of this knowledge and experience, along with the knowledge of the culturally-sensitive areas and oral tradition, is what the Tribe relies on to make fairly accurate predictions regarding the likelihood of subsurface resources in a particular location.

The Pechanga Tribe is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to tribal cultural resources. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work. The Tribe requests to be involved and participate with the City of Corona in assuring that an adequate environmental assessment is completed, including all archaeological studies and analysis, and in developing all preservation, avoidance, monitoring and mitigation plans and measures for the duration of the Project.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §15064.5(f)); Section 106 (36 CFR §800.13); NAGPRA

(43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(f) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5- 10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

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

#### RECOMMENDATIONS FOR DEIR ANALYSIS

The Tribe further believes that a DEIR is not complete unless all impacts to cultural resources has been thoroughly vetted and analyzed, especially concerning the cumulative impacts and the growth-related or long-term impacts that a Project will have. As discussed above, the Property has a high potential to impact covered (by dense vegetation) and previously unidentified cultural resources. Should cultural resources be identified during earthmoving, the DEIR should analyze the potential for preservation and avoidance and ensure that any potential mitigation includes a long-term preservation plan for the resources protection.

Cumulative impacts are a major concern for the Tribe. The destruction of any "individual" cultural resource is detrimental to the whole cultural landscape as the destruction of one piece of a complex destroys the integrity of the whole complex. This type of destruction also serves to further destroy the Tribe's traditional ancestral places. Unfortunately, most of the traditional ancestral places of the Tribe are on private and public lands which are constantly threatened by development. The Tribe is not anti-development; however, we increasingly struggle to protect and preserve our invaluable resources which continue to be destroyed and impacted on nearly a daily basis. Improper recordation and analysis of features within a larger community or habitation context allows for the piecemealing of sites and which can result in improper eligibility determinations which leads ultimately to damage or destruction. While the Tribe is aware that not all sites and cultural resources can be saved during development, it is important to acknowledge in project documentation that these are not renewable resources and thus the impairment or destruction of any site or resource IS a cumulative impact. The City must also take into account the impacts that this many new people will have on the cultural resources within the Project and surrounding it, including the potential for graffiti, looting, off-road vehicle

destruction, among other impacts. The Tribe also knows that growth-related impacts to this area can negatively affect cultural resources if not properly addressed in the environmental documents.

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

The Pechanga Tribe looks forward to working together with the City of Corona in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 or at ahoover@pechanga-nsn.gov should you have any questions or concerns. Thank you.

Sincerely,

Anna Hoover Cultural Analyst

Cc Pechanga Office of the General Counsel



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159449

City of Corona	
Planning Department	
Post Office Box 940	
Corona, CA 92882-094	10

Plannir Post O	ng Department ffice Box 940 a, CA 92882-0940		
Attentio	on: Jason Moquin		
Ladies	and Gentlemen:	Re:	Skyline Heights Project
specific drainag	reports for projects that are located within interest to the District including District	n incorporated ci Master Drainaç gical component	or provide State Division of Real Estate letters/flood ties. Exceptions are made for cases with items of the Plan facilities, other regional flood control and to or extension of a master plan system, and District
constitu	strict has not reviewed the proposed project te or imply District approval or endorsement fety or any other such issue:	ct in detail and t nt of the propose	he following checked comments do not in any way ad project with respect to flood hazard, public health
_X_	This project would not be impacted by Disof regional interest.	strict Master Dra	inage Plan facilities or any other proposed facilities
	This project involves City Master Plan faci	ilities.	
	consider accepting ownership of such	ogical extension facilities upon v District plan ch	r larger in diameter, or other facilities that could be of an existing District's facility. The District would ritten request from the City. Facilities must be seck and inspection will be required for District sex will be required.
_X_	An encroachment permit shall be obtained of way or facilities. Mabey Canyon Debris	d for any constru Basin and Oak	action related activities occurring within District right Street Channel.
GENER	RAL INFORMATION		

This project may need to obtain an applicable National Pollutant Discharge Elimination System (NPDES) permit coverage from the State Water Resources Control Board or the California Regional Water Quality Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation or other final approval of the project, and a Letter of Map Revision (LOMR) prior to occupancy.

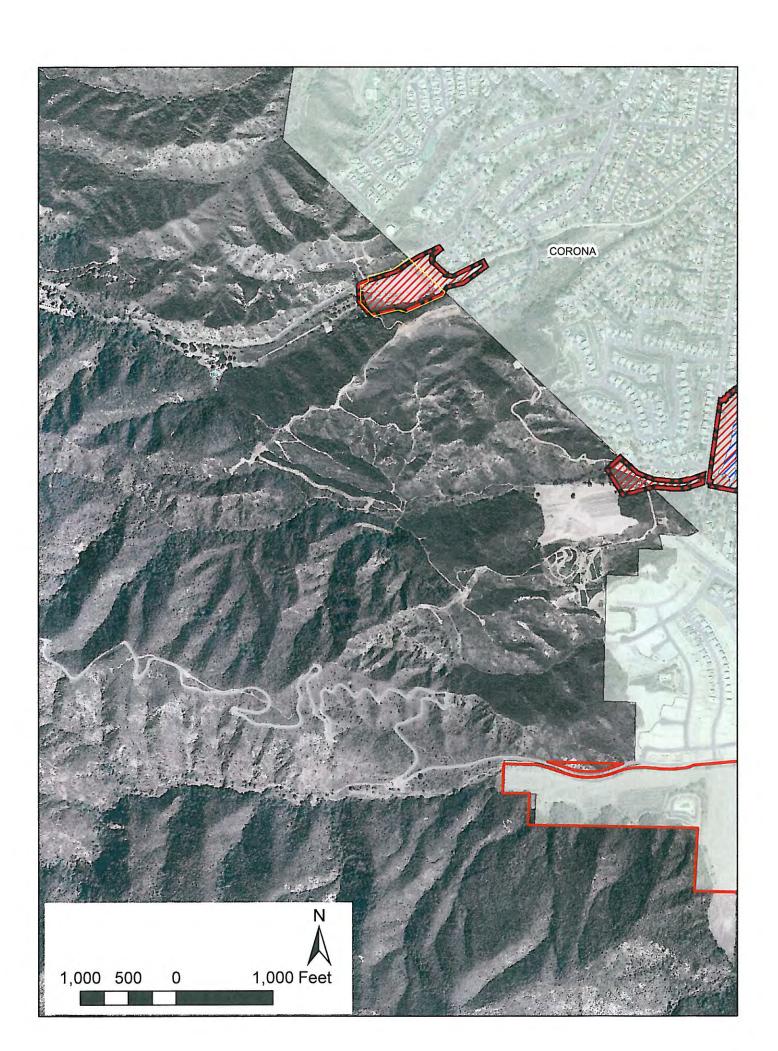
If a natural watercourse or mapped flood plain is impacted by this project, the City should require the applicant to obtain a Section 1601/1603 Agreement from the California Department of Fish and Game and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

Engineering Project Manager

Date: March 6, 2014

Riverside County Planning Department Attn: Kristi Lovelady SKM:blj



#### SOUTHERN CALIFORNIA



#### ASSOCIATION of GOVERNMENTS

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Community, Economic and Human Development Margaret Finlay, Duarte

Energy & Environment James Johnson, Long Beach

Transportation Keith Millhouse, Ventura County Transportation Commission March 5, 2014

Mr. Jason Moquin Senior Planner City of Corona 400 South Vicentia Corona, CA 92880 jasonm@ci.corona.ca.us

RE: SCAG Comments on the Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project [IGR7965]

Dear Mr. Moquin:

Thank you for submitting the Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of an Environmental Impact Report for the Skyline Heights Project. The proposed project involves the annexation of 421.2 acres into the City of Corona accompanied by a tentative tract map to subdivide approximately 271 acres into 291 single-family residential lots located in the City of Corona, California.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to leep@scag.ca.gov providing, at a minimum, the full comment period for review. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or <a href="leep@scag.ca.gov">leep@scag.ca.gov</a>. Thank you.

Sincerely,

Johathan Nadler,

Jonatha Madle

Manager, Compliance and Performance Assessment

SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

## COMMENTS ON THE NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE SKYLINE HEIGHTS PROJECT [SCAG NO. IGR7965]

#### CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

#### RTP/SCS Goals

The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <a href="http://rtpscs.scag.ca.gov">http://rtpscs.scag.ca.gov</a>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

	SCAG 2012 RTP/SCS GOALS
RTP/SCS G1:	Align the plan investments and policies with improving regional economic development and competitiveness
RTP/SCS G2:	Maximize mobility and accessibility for all people and goods in the region
RTP/SCS G3:	Ensure travel safety and reliability for all people and goods in the region
RTP/SCS G4:	Preserve and ensure a sustainable regional transportation system
RTP/SCS G5:	Maximize the productivity of our transportation system
RTP/SCS G6:	Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)
RTP/SCS G7:	Actively encourage and create incentives for energy efficiency, where possible
RTP/SCS G8:	Encourage land use and growth patterns that facilitate transit and non-motorized transportation
RTP/SCS G9:	Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

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

	SCAG 2012 RTP/SCS Goals	S
	Goal	Analysis
RTP/SCS G1:	Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference
RTP/SCS G2:	Maximize mobility and accessibility for all people and goods in the region.	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference
etc.	etc.	etc.

#### RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <a href="http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf">http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf</a> (Tables 4.3 – 4.7, beginning on page 152).

#### Regional Growth Forecasts

The Draft EIR for the Skyline Heights Project should reflect the most recently adopted SCAG forecasts (see <a href="http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf">http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf</a>), which consists of the 2012 RTP/SCS population, household and employment forecasts. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted City of Corona Forecasts	
Forecast	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	155,800	164,600
Households	6,458,000	7,325,000	46,100	48,800
Employment	8,414,000	9,441,000	88,300	105,000

#### MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects. Appendix G can be accessed at: <a href="http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR">http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR</a> Appendix G ExampleMeasures.pdf



## South Coast Air Quality Management District

Received
MAR 1 4 2014

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amunity Development Dept.

March 11, 2014

Jason Moquin, Senior Planner City of Corona 400 S. Vicentia Avenue Corona, CA 92882

### Notice of Preparation of a CEQA Document for the Skyline Heights Project

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

#### Air Quality Analysis

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

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <a href="http://www.aqmd.gov/ceqa/handbook/signthres.pdf">http://www.aqmd.gov/ceqa/handbook/signthres.pdf</a>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <a href="http://www.aqmd.gov/ceqa/handbook/LST/LST.html">http://www.aqmd.gov/ceqa/handbook/LST/LST.html</a>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: <a href="http://www.aqmd.gov/ceqa/handbook/mobile\_toxic/mobile\_toxic.html">http://www.aqmd.gov/ceqa/handbook/mobile\_toxic/mobile\_toxic/mobile\_toxic.html</a>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <a href="http://www.arb.ca.gov/ch/handbook.pdf">http://www.arb.ca.gov/ch/handbook.pdf</a>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

#### **Mitigation Measures**

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

- Chapter 11 of the SCAQMD CEQA Air Quality Handbook
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM\_intro.html
- CAPCOA's Quantifying Greenhouse Gas Mitigation Measures available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.
- SCAQMD's Rule 403 Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <a href="http://www.aqmd.gov/prdas/aqguide/aqguide.html">http://www.aqmd.gov/prdas/aqguide/aqguide.html</a>.

#### **Data Sources**

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

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at <a href="mailto:imacmillan@aqmd.gov">imacmillan@aqmd.gov</a> or call me at (909) 396-3244.

Sincerely,

Ian MacMillan

la V. M. mill

Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development & Area Sources

RVC140213-09 Control Number





Louis B. Davis Local Public Affairs 24487 Prielipp Drive Wildomar, CA 92595

March 4, 2014

Jason Moquin, Senior Planner City of Corona 400 S. Vicentia Avenue Corona, CA 92882

Re: Skyline Heights Project

Dear Mr. Moquin:

Southern California Edison (SCE) appreciates the opportunity to review the Notice of Preparation of an Environmental Impact Report (EIR) for the Skyline Heights Project. The project involves the annexation of 421.2 acres into the City of Corona. The annexation is accompanied by a tentative tract map to subdivide approximately 271 acres into 291 single family residential lots. The project is located in the unincorporated area of Riverside County, but within the City of Corona's Sphere of Influence.

SCE maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances within the City of Corona and unincorporated Riverside County; therefore, SCE would be the electrical service provider for this project. We appreciate the development plan notification, which will assist us in planning for future electrical needs for the area. We have reviewed the information that you've provided and have no further comments at this time.

If you have any questions regarding this letter, do not hesitate to contact me at <u>Louis.Davis@sce.com</u> or (951) 249-8468.

Regards,

Louis Davis

Local Public Affairs Region Manager Southern California Edison Company

cc: Karen Cadavona, SCE

March 4, 2014

Attn: Jason Moquin, Senior Planner City of Corona, Community Development Department 400 S. Vicente Ave, Corona, CA 92882



EST. JUNE 19, 1883

#### Re: Skyline Heights Project EIR (GPA13-003; TM 36544)

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. The Soboba Band is not opposed to the proposed amendments (Annexation 117; CZ 13-002; and the subdivision and landscaping of TTM 36544) associated with this project. We are, however, concerned with inadvertent discoveries that may be unearthed during the future ground-disturbing activities associated with the Skyline Heights Project.

Soboba Band of Luiseño Indians is requesting the following:

- 1. Government to Government consultation in accordance to SB18. Including the transfer of information to the Soboba Band of Luiseno Indians regarding the progress of this project should be done as soon as new developments occur.
- 2. Soboba Band of Luiseño Indians continues to act as a consulting tribal entity for this project.
- 3. Working in and around traditional use areas intensifies the possibility of encountering cultural resources during the construction/excavation phase. For this reason the Soboba Band of Luiseño Indians requests that a Native American monitoring component be included as a mitigation measure for the Environmental Impact Report. The Tribe is requesting that a Treatment and Dispositions Agreement between the developer and The Soboba Band be provided to the City of Corona prior to the issuance of a grading permit and before conducting any additional archaeological fieldwork
- 4. Request that proper procedures be taken and requests of the tribe be honored (Please see the attachment)

The Soboba Band of Luiseno Indians is requesting a face-to-face meeting between the City of Corona and the Soboba Cultural Resource Department. Please contact me at your earliest convenience either by email or phone in order to make arrangements.

Sincerely,

Joseph Ontiveros Cultural Resource Director Soboba Band of Luiseño Indians P.O. Box 487 San Jacinto, CA 92581 Phone (951) 654-5544 ext. 4137 Cell (951) 663-5279 jontiveros@soboba-nsn.gov <u>Cultural Items (Artifacts)</u>. Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer should agree to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. When appropriate and agreed upon in advance, the Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

The Developer should waive any and all claims to ownership of Native American ceremonial and cultural artifacts that may be found on the Project site. Upon completion of authorized and mandatory archeological analysis, the Developer should return said artifacts to the Soboba Band within a reasonable time period agreed to by the Parties and not to exceed (30) days from the initial recovery of the items.

#### Treatment and Disposition of Remains.

- A. The Soboba Band shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods shall be treated and disposed of with appropriate dignity.
- B. The Soboba Band, as MLD, shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98 (a). The Parties agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.
- C. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The Soboba Band, as the MLD in consultation with the Developer, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains.
- D. All parties are aware that the Soboba Band may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Developer should accommodate on-site reburial in a location mutually agreed upon by the Parties.
- E. The term "human remains" encompasses more than human bones because the Soboba Band's traditions periodically necessitated the ceremonial burning of human remains. Grave goods are those artifacts associated with any human remains. These items, and other funerary remnants and their ashes are to be treated in the same manner as human bone fragments or bones that remain intact.

<u>Coordination with County Coroner's Office</u>. The Lead Agencies and the Developer should immediately contact both the Coroner and the Soboba Band in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

Non-Disclosure of Location Reburials. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer agrees to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

#### Jason Moquin

From: Mark German <mgerman@ca.rr.com>
Sent: Saturday, March 08, 2014 7:28 AM

To: Jason Moquin
Subject: Input/Questions

Hi Jason, thanks for the email address for comments and questions regarding Corona Trails. I read your community statement on FB and it refers to city trails so I am not to sure how much of my comments relate to your organization. As I stated in FB I have been hiking the mountains and canyons around Corona since the mid sixties (I know that kind of dates me). I've recently started riding my mountain bike up and down Skyline.

Anyway, my frustration is the ever increasing restricted access to the mountains we enjoy. I don't think any of the local government agencies have really shown any concern over this, including the City of Corona, Riverside County and the US Forest Service.

The best recent example is the development around Skyline. When I started hiking Skyline, that was a remote area and there were no issues or problems accessing that area for hiking. Now you have to park a mile away and walk asphalt before you even reach the Skyline gate. I am concerned that future development in that area will degrade the forest adjacent to it and cause more access issues. I used to also hike from

the end of Paseo Grande at Shaffer's Ranch, the city has that closed off for Foothill Parkway construction. In the Temescal Valley area one of the main roads, (I am not home now, but I believe it is Bedford

Motorway) leading into the forest is now labeled a private road. So, does that mean we are trespassing to access the forest if we want to bike or hike up that road.

Also, one of the premier trails in the northern Santa Ana Mountains (the Trabuco District of the Cleveland) was the Coldwater Trail. That trail took you from Glen Ivy to Santiago Peak. The the scenery and views of the valley were some of the best anywhere. I hiked that trail dozens of times. I always thought the trail was closed because of easement issues with Glen Ivy. Recently, I have heard rumors for one reason the trail was abandoned was the danger of encountering pot farmers.

It may be too late for some of these suggestions, but the local government agencies need to work closer with people using the forest.

Instead of building right up to the forest boundary it would be nice if green belts or nature reserves would be developed as a buffer between development and the forest.

Also, easements need to be arranged for the public to access the forest, otherwise the only people that benefit form use of a public forest are those whose property back up to the forest and yet we all contribute through taxes and other resources to the maintenance of the forest.

Last, if the Coldwater Trail was abandoned because of pot farmers, the public is being punished and not the people breaking the law. If the trail was abandoned because of easement issues than work should be done to resolve that problem. As I said earlier the Coldwater Trail was one of the jewels of the Santa Anas.

Anyway, I don't know if much of my soap box falls under the Corona Trails Coalition, but I am truly concerned about the forest being opened to everyone, not just a few.

Thanks Mark German

#### Jason Moquin

From: Cap'n <dh43dh@gmail.com>
Sent: Monday, March 10, 2014 9:32 AM

To: Jason Moquin Subject: Skyline Heights

I'm late to the party on this project. But I'm getting a lot of anxious emails from my members. I'm the owner/admin of Gravity Rider Inc (Gravity pirates). The largest DH mountain bike group in the US. We're based right here in SoCal where we have 500 dedicated members. I'm reading more on the environmental impact study for Skyline now. Can you give any idea of the plans going forward to keep trail access in the area? Are you hearing any proposals to re route, and build new trails that adhere to the best management plan of the new report? Our volunteers provide a large resource of man power. And I have experience designing and developing trail systems that have no negative effect on watershed nor sensitive habitats. Let me know if you see any cooperation happening to help preserve public land use while still abiding by the EIS.

Steve Ford Pres, Gravity Riders Inc

From: mowcom@gmail.com on behalf of Brian Mowcomber <mowcom@ca.rr.com>

**Sent:** Friday, March 07, 2014 5:26 PM

To: Jason Moquin Subject: Skyline Heights

Jason,

I know it is too late for comments but I wanted to let you know that I am against seeing this project move forward.

This project will encroach on the trails and access to the Cleveland National Forest and as well as add too much traffic in this area.

This area is also a high fire risk and could add tremendous costs to the fire department.

Thank you Brian Mowcomber Corona Resident 951 549 9126

From: Dwight Woodward < thewoodward5@ymail.com>

**Sent:** Monday, March 03, 2014 12:48 PM

To: Jason Moquin

**Subject:** Skyline Heights Project

I would like to communicate my thoughts on the future development called Skyline Heights Project. I feel that access to the Cleveland Forest, by way of Skyline Drive, is way too important to let future development build without allowing proper parking close to any access points. When developers build next to the Forest Service land without providing property access or build gated communities, it appears they are denying access to Federal Land. I feel the City of Corona needs to help in keeping proper, close parking with access to Federal Land. I know of the plan to move the Skyline Dr parking 1½ miles away from the Cleveland Forest (Tin Mine Canyon). I, and others, feel this is unfair to the users of Tin Mine Canyon and that area. So I'm asking that the Master Plan for the City gets updated to add better parking with trails leading to Skyline Drive and the Cleveland Forest from this new development. Please consider a trail around this development, due to the fact that this area is already used by hikers, bikers, and is a high fire danger. Any public trails surrounding this development would create a fire break and provide quick access for the Fire Department to access any fires. Thank you for your time.

Best regards, Dwight Woodward 2272 Adrienne Drive 92882

From: Dwight Woodward < thewoodward5@ymail.com>

**Sent:** Monday, March 10, 2014 1:28 PM

To: Jason Moquin Subject: Skyline heights

My concerns for the Skyline Heights Development are:

- -Removal of the Oak Trees and the Chaparral -once the vegetation is removed; will it be replaced with native vegetation to the Santa Ana Mt.?
- -in a very high fire danger what precautions will take place to prevent mudslides after fires.
- -This area is a very high fire danger, what precautions will take place to protect the home?
- -is the area prone to landslides?
- -Will any cut slopes be left bare?
- -how will the animal habits be protected?
- -How will the light pollution affect my view of the mountains at night?
- -How will the lights from the Development affect the wildlife?
- -The development will create an island of federal land that will trap wildlife, will there be a corridor created?
- -There appears to be a historic bridge that represents pre-California construction. In the area of Mabe canyon, what steps will be taken to protect this bridge and allow the general public visit it?
- -There might be a historical runway that served the Tin Miners in the area of Mabe canyon, what steps will be taken to protect this bridge and allow the general public visit it?
- -In making an amendment to the general plan in this area, there needs to be trails added to the General Plan for this area.

Have a good day, Dwight Woodward 2272 Adrienne Dr.

Sent from my iPhone

From: Mark Drew <markmdrew@yahoo.com>
Sent: Saturday, March 08, 2014 5:41 AM

To: Jason Moquin
Cc: Mark D; Shelley

**Subject:** Skyline Heights Project

#### Hi Jason,

We are the Drew family (Shelley, Megan & Jordan) our current address is 7256 Piute Creek Dr. Corona 92881. As citizens of Corona since 1995 we have seen our city grow very quickly. One of the many things we love about Corona is having quick easy access to the Cleveland National Forest. We run, hike and mtn. bike regularly up Skyline Drive. Sorry I missed the meeting on 3/4, but I was able to view your PowerPoint.

I could not clearly understand if this new development was going to provide another entrance to Skyline Drive or not?

Please advise,

Thank you in advance for your help

Mark & Shelley Drew 951-343-3910 work 951-415-3338 cell



	Address: 2084 Adobe Ave, Corona (4 92882 Day Telephone Number: (951) 734-5060 110 926-8908
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Are there any questions or concerns for which you would like to be addressed as part of the Environmental Review and preparation of the Environmental Impact Report? (Please list below)

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Address: 2065 Ador Be Ave Day Telephone Number: 951 371 26 49



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Are there any questions or concerns for which you would like to be addressed as part of the Environmental Review and preparation of the Environmental Impact Report? (Please list below)

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