

## **Appendix B: NOP, NOP Comment Letters**

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**Subject:** Green River Ranch Specific Plan - Scoping Session  
**Date:** Monday, August 29, 2022 at 12:56:28 PM Pacific Daylight Time  
**From:** Tricia Campbell  
**To:** Sandra Yang  
**CC:** Betsy Dionne, Leslie Levy, Britney Schultz (bstrittmater@dudek.com)  
**Priority:** High  
**Attachments:** image001.png, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, 4768\_001.pdf, JPR 22-04-02-01 (Green River Ranch Business Park) Comments 4.13.22.eml

**[CAUTION]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hi Sandra:

We received the attached NOP for the Green River Ranch SP EIR. I want to bring to your attention that MSHCP compliance has not been completed. I have attached the last email communication sent by the RCA on the submitted documents to support RCA's JPR of the project. Please let us know if you need any guidance for continuing to process the JPR for this project.

Sincerely,  
Tricia



**Tricia A. Campbell**

Regional Conservation Deputy Director  
RCA/Riverside County Transportation Commission  
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**Subject:** JPR 22-04-02-01 (Green River Ranch Business Park) Comments 4.13.22  
**Date:** Wednesday, April 13, 2022 at 7:48:24 AM Pacific Daylight Time  
**From:** Betsy Dionne  
**To:** Sandra Yang  
**CC:** Tricia Campbell, Wendy Worthey (wworthey@dudek.com), Leslie Levy, Britney Strittmater (bstrittmater@dudek.com), Anna Cassady (acassady@dudek.com), Sarah Greely  
**Attachments:** image001.png, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, JPR 22-04-02-01\_Comments\_Tracking Table\_date 04.13.22.docx

Hi Sandra,

We have reviewed the supporting application materials for JPR 22-04-02-01 (Green River Ranch Business Park) including the JPR Application Form (March 11, 2022), a *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis (Analysis; January 17, 2022)* and a *Determination of Biologically Equivalent or Superior Preservation Analysis (DBESP; January 17, 2022)* both prepared by Glenn Lukos Associates (GLA).

We have some questions and requests for additional information. The attached "Comments Tracking Table" is being requested in order to provide complete and accurate documentation that supports the record for this project's consistency with the MSHCP.

The Permittee/Applicant should pay close attention to the notes provided in the attached Comments/Responses Table, located above the Table. These notes and the overall approach have changed slightly.

The Table and revised JPR documentation OR the Table-only (if the Permittee/Applicant chooses this latter approach) should be sent to me via email, with a copy to Tricia Campbell ([tcampbell@rctc.org](mailto:tcampbell@rctc.org)) at the RCA and Britney Strittmater ([bstrittmater@dudek.com](mailto:bstrittmater@dudek.com)) at Dudek. This JPR will be placed "on hold" to allow you adequate time to address the comments. Feel free to call or email me if you have any questions.

Thank you

Betsy

Note: Please be sure to include Tricia Campbell [tcampbell@rctc.org](mailto:tcampbell@rctc.org), Leslie Levy [llevy@rctc.org](mailto:llevy@rctc.org), and Britney Strittmater [bstrittmater@dudek.com](mailto:bstrittmater@dudek.com) on all reply emails.



**Betsy Dionne**

Senior Management Analyst-Reserve Management/Monitoring  
RCA/Riverside County Transportation Commission  
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## JPR 22-04-02-01 – Comments/Responses Tracking Table

**PROJECT IDENTIFIER** – Green River Ranch Business Park

**REVIEWER** – Betsy Dionne

**DOCUMENTATION REC'D** – JPR submittal materials provided by the Permittee included a JPR Application Form (March 11, 2022), a *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis (Analysis; January 17, 2022)* and a *Determination of Biologically Equivalent or Superior Preservation Analysis (DBESP; January 17, 2022)* both prepared by Glenn Lukos Associates (GLA).

The Permittee/Applicant must provide a summary response to each comment in the Table below, including the document name and section/page# where the revised information relative to the response can be found. If the Permittee/Applicant chooses to do so, responses may be provided in the Table only in advance of revising the JPR supporting documents. However, without the revised documentation accompanying the Table as a way of providing context, this may add time to the review. When revised documents are submitted, they should be provided in tracked changes that clearly reflect the summary response below. If revised documents (with tracked changes) are submitted in Word, revised Figures should also be provided separately. The intent of this Table is to provide a forum for the Permittee/Applicant to address comments up front, if needed, particularly if the Permittee/Applicant would like to further discuss any of the comments in advance of revising the supporting documents. Note that each time responses and/or revised JPR supporting documents are sent back to RCA, the 14-day review clock begins again. We also strongly encourage the Permittee/Applicant to reach out to the RCA reviewer or arrange a meeting early on if there are any questions regarding the comments or any complex issues related to the JPR.

**The Permittee/Applicant must also fill out the column for Response Codes using one of the following:** A=Comment Addressed; B=Comment Partially Addressed; C=Comment Not Addressed. If a response was not provided or was only partially provided, please provide a justification regarding why the comment was not fully addressed.

**Additional Notes for the Permittee /Applicant:**

- It is recommended that a tracked changes version of resubmitted documentation be provided along with this Table in order to facilitate reviews.
- The dates on any revised documents should be updated with each submittal to reflect most recent submittals and to avoid version control issues.
- Please also note that additional comments may be provided after review of the requested/revised information.

- The Table and revised JPR documentation, OR the Table-only (if the Permittee/Applicant chooses this latter approach), should be sent back to the RCA reviewer via email. Please also copy Betsy Dionne (bdionne@rctc.org) Leslie Levy (llevy@rctc.org), Tricia Campbell (tcampbell@rctc.org), and Britney Strittmater (bstrittmater@dudek.com) on the email.

Round 1 – RCA Reviewer Comments (Submitted 04-13-22)	Response Codes	Round 1 – Permittee/Applicant Responses Summary (Please include date submitted back)
<b>General (GEN)</b>		
GEN-1. None		
<b>JPR Application (JA)</b>		
JA-1. None		
<b>Project Description (PD)</b>		
<p><b>PD-1.</b> <i>Analysis, Sec 2.1, states “The Project will conserve 83.57 acres of land that will contribute to Reserve Assembly, of which 2.77 acres will be temporarily graded to construct the Industrial Project but that will be restored to create a wildlife movement path that will connect the proposed conservation lands to the south with areas north of the Project site.”</i></p> <p>Include a discussion regarding whether maintenance activities associated with the project will be needed for the 2.77-acre wildlife movement path. Activities including, but are not limited to, weed abatement, fuel modification, slope maintenance, fence maintenance, etc. If no maintenance activities are needed, state that as well. Note that manufactured slopes and fuel modification zones are not permitted in the conservation area (i.e., referred to in the <i>Analysis</i> as “wildlife movement path”).</p> <p>Also, refer to <b>UWIG-3</b> below.</p>		
<p><b>PD-2.</b> Include that a Habitat Mitigation and Monitoring Plan (HMMP) for the restoration of the 2.77-acre wildlife movement path will be prepared. In addition, this HMMP must be reviewed and approved by the RCA and Wildlife Agencies.</p>		
<p><b>PD-3.</b> The <i>Analysis</i> states “An additional 6.35 acres of land is associated with the Estate Residential area that will not be graded by the Project but will be designated as Residentially-Zoned Open Space. This Residentially-Zoned Open Space is not a part of the Project.” Although the project can designate the 6.35 acres as “Residentially-Zoned Open Space,” it must be considered part of the project. Revise all text and figures to reflect that the 6.35 acres is part of the project.</p>		
<p><b>PD-4.</b> Based on the mapping provided, the 6.35 acres of Residentially-Zone Open Space contains riparian/riverine features. Based on Sec 6.1.2 of the MSHCP, if the project proposes to avoid these features, then a deed restriction or conservation easement must be placed over them. Revise the <i>Analysis</i> and DBESP to include a discussion regarding how the project proposes to avoid impacts to riparian/riverine features within the 6.35-acre open space area. Alternatively, the project</p>		

can assume these riparian/riverine feature will be impacted and then propose mitigation for these impacts in the DBESP.		
<b>PD-5.</b> Include a discussion regarding the off-site improvements for Fresno Road and Green River Road. For example, sidewalks, curb and gutter, culverts turn lanes, etc.  In addition, provide a discussion regarding how wildlife movement across Green River Road will not be further impeded by the proposed improvements.		
<b>PD-7.</b> Provide grading plans for the proposed project.		
<b>Public/Quasi-Public (PQP) Lands (PQP)</b>		
<b>PQP-1.</b> None		
<b>Reserve Assembly Analysis/Covered Roads (RA)</b>		
<b>RA-1.</b> Include a discussion regarding the width of Proposed Constrained Linkage 1 relative to how the project proposes to facilitate movement of the associated Planning Species, which includes mountain lion and bobcat. In other words, provide evidence that the proposed 100-foot linkage would facilitate (i.e., not impede) movement of Planning Species. Although the project will not impede Reserve Assembly “acreage” goals for this linkage, the issue regarding the function of this linkage must also be addressed.		
<b>6.1.2 Riparian/Riverine (RIP/RIV)</b>		
<b>RIP/RIV-1.</b> The DBESP needs to include an Equivalency Analysis to demonstrate that the project’s proposed mitigation will result in habitat conditions that are biological equivalent or superior to the existing conditions. This should be presented as a discussion regarding the functions and values (i.e., hydrological regime, flood storage, nutrient retention, sediment trapping and transport, toxicant trapping, wildlife habitat, and aquatic habitat) of the resources being impacted in comparison to the functions and values being gained by the proposed mitigation.		
<b>RIP/RIV-2.</b> Include the type of mitigation proposed (i.e., rehabilitation, re-establishment, or preservation).  Note that the project must provide at least a 1:1 mitigation ratio in the form of re-establishment in order to prevent no net loss of riparian/riverine resources. The remainder of the mitigation can include enhancement or re-establishment.		
<b>RIP/RIV-2.</b> Based on Google Earth Aerials and the shapefiles provided it appears that the extent of the riparian/riverine resources are not completely accounted for. The project depicts segments of riparian/riverine features that are not connected. However, on Google Earth these features appear to be contiguous. Revise the Analysis, DBESP, and shapefiles to reflect the full extent of riparian/riverine resources on site. Alternately, provide an explanation to why these features are not fully mapped.		
<b>RIP/RIV-3.</b> According to the <i>Analysis</i> and DBESP there is no suitable fairy shrimp habitat on the project site. However,		

<p>based on Google Earth aerials there appears to be a concrete water basin on the property. Include a discussion regarding this basin relative to the potential presence of potential fairy shrimp habitat.</p>		
<p><b>6.1.3 Narrow Endemic Plant Species and Section and 6.3.2 Criteria Area Plant Species (PLANT)</b></p>		
<p><b>PLANT-1.</b> Include whether reference populations were checked for the narrow endemic and criteria area plant species surveys. If so, please provide those details. If the reference populations were blooming at another location, this type of comparison may be beneficial in supporting a conclusion of absence on the project site.</p>		
<p><b>6.3.2 Additional Survey Needs - Burrowing Owl (BUOW)</b></p>		
<p><b>BUOW-1. Analysis.</b> Include how habitat suitability for burrowing owl was assessed (e.g., topography, vegetation, etc.)</p>		
<p><b>BUOW-2.</b> Due to the presence of suitable habitat, include the follow statement, <b>“A 30-day pre-construction survey for burrowing owls is required prior to initial ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, grading, tree removal, site watering, equipment staging) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.”</b></p>		
<p><b>Section 6.1.4 Urban/Wildlands Interface Guidelines (UWIG)</b></p>		
<p><b>UWIG-1.</b> Include that all fencing plans will be reviewed and approved by the RCA and Wildlife Agencies.</p>		
<p><b>UWIG-2.</b> Include that fencing will be placed along the western border and along the wildlife movement path. In addition, include that all fencing proposed along the wildlife movement path will consist of at least 8-foot-tall block wall construction.</p>		
<p><b>UWIG-3.</b> Include that all fuel modification zones will occur entirely within the development footprint. In addition, fuel modification zones must be depicted on all applicable figures, and shapefiles must be provided.</p>		



**Subject:** Green River Ranch Specific Plan Amendment & Industrial Park Project  
**Date:** Friday, September 9, 2022 at 8:34:46 AM Pacific Daylight Time  
**From:** Mauricio Alvarez  
**To:** Sandra Yang

**[CAUTION]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good Morning Sandra,

Thank you for including Riverside Transit Agency in the review of the SEIR for the Green River Ranch Specific Plan Amendment & Industrial Park Project. After reviewing the documents, there are no comments to submit for this particular project at this time.

Thank you,

**Mauricio Alvarez, MBA**

Planning Analyst  
Riverside Transit Agency  
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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Boulevard, Suite C-220  
Ontario, CA 91764  
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GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



September 21, 2022

*Sent via email*

Sandra Yan  
Senior Planner  
City of Corona  
400 S. Vicentia Avenue, Suite 120  
Corona, CA 92882

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Green River Ranch Specific Plan Amendment and Industrial Park Project  
State Clearinghouse No. 2022080640

Dear Ms. Yang:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Corona (City) for the Green River Ranch Specific Plan Amendment and Industrial Park Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

## **CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## **PROJECT LOCATION**

The proposed Project is located south of State Route 91, southwest of Dominguez Ranch Road, and southeast of Fresno Road within the City of Corona, in Riverside County. The proposed Project is located within Assessor Parcel Numbers 101-180-014, 101-180-015, 101-180-017, 101-180-034, 101-180-035, 101-180-037, 101-180-038, and 101-190-034. The site is located within the U.S. Geological Survey (USGS) 7.5-Black Star Canyon quadrangle; Township 3 South, Range 7 West, Sections 30 and 31 of the San Bernardino Base and Meridian (SBBM).

## **PROJECT DESCRIPTION SUMMARY**

The proposed Project would amend the Green River Ranch Specific Plan boundary and rezone several parcels for the construction of a 49.52-acre industrial business park, 5.5 acres of mixed-use commercial buildings, 32 residential lots on 20.39 acres, and 1.44 acres of roads on the 160.4-acre Project site. In addition, 12.8 acres of off-site improvements to roads and utilities are proposed. Also, approximately 83.55 acres would be designated as open space for permanent conservation.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

CDFW recommends that the forthcoming DEIR address the comments below.

### **Assessment of Biological Resources**

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the

region. To enable CDFW staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009<sup>2</sup>). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov) or <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific/MSHCP surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are

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<sup>2</sup> Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018<sup>3</sup>).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or

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<sup>3</sup> CDFW, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency, Department of Fish and Wildlife: March 20, 2018 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

3. An evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies, and programs on the environment. 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. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

### **Alternatives Analysis**

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no project" alternative (CEQA Guidelines § 15126.6[e]).

### **Mitigation Measures for Project Impacts to Biological Resources**

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The City of Corona should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should

be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.

3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the project area, including, but not limited to: burrowing owl, northern harrier, loggerhead shrike, and yellow warbler.
4. *Mitigation*: CDFW considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines,

§§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame



bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way*: To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

### **California Endangered Species Act**

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the project. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR

addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

### **Western Riverside County Multiple Species Habitat Conservation Plan**

CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for 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. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed 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: <https://www.wrc-rca.org/>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City of Corona is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project implements the following:

1. Pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP.
2. Demonstrates compliance with the HANS process or equivalent process to ensure application of the Criteria and thus, satisfaction of the local acquisition obligation.
3. Demonstrates compliance with the policies for 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, set forth in Section 6.1.2 of the MSHCP; 2) the policies for the Protection of Narrow Endemic Plant Species set forth in Section 6.1.3 of the MSHCP; 3) compliance with the Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4 of the MSHCP; 4) the policies set forth in Section 6.3.2 and associated vegetation survey requirements identified in Section 6.3.1; and 5) compliance with the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

The Project is located within the MSHCP Criteria Area and therefore, pursuant to the Implementing Agreement and the City's Resolution No. 2003-141 public and private projects are expected to be designed and implemented in accordance with the Criteria for

each Area Plan and all other MSHCP requirements as set forth in the MSHCP and in Section 13.0 of the Implementing Agreement. Section 13.2 of the Implementing Agreement identifies that City obligations under the MSHCP and the Implementing Agreement include, but are not limited to: the adoption and maintenance of ordinances or resolutions (City Ordinance No. 3326 and Resolution No. 2003-141), as necessary, and the amendment of general plans as appropriate, to implement the requirements and to fulfill the purposes of the Permits, the MSHCP, and the Implementing Agreement for private and public development projects (including siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP); and taking all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of the project approvals for public and private projects, including compliance with the MSHCP, the Permits, and the Implementing Agreement.

The City is also obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process (JPR) set forth in Section 6.6.2 of the MSHCP or proposed discretionary Projects within the Criteria Area and participate in any further requirements imposed by MSHCP Section 6.6.2. The proposed Green River Ranch Specific Plan was the subject of a review by the RCA (JPR 06-06-20-01); however, the proposed amendment and offsite impacts described in the NOP would require the City to submit an amended JPR with the new proposed Project footprint to the RCA for review.

To examine how the Project might contribute to, or conflict with, assembly of the MSHCP Conservation Area consistent with the reserve configuration requirements, CDFW recommends that the DEIR identify the specific Area Plan and Area Plan Subunit within which the Project is located, and the associated Planning Species and Biological Issues and Considerations that may apply to the Project, further discussed below. The DEIR should also discuss the specific Criteria for Cells within which the Project is located and identify the associated Core(s) and/or Linkage(s) (i.e., Proposed Constrained Linkage 1). Next, the DEIR should identify the vegetation communities toward which conservation should be directed along with the connectivity requirements. Finally, the DEIR should examine the Project with respect to the percentage conservation portion within Criteria Cells 1702, 1704, 1811, and 1812.

Following this sequential identification of the relationship of the Project to the MSHCP the DEIR should then include an in-depth discussion of the Project in the context of these aforementioned elements, and as mentioned, examine how the Project might contribute to, or conflict with, the conservation criteria of the MSHCP.

#### Covered Activities

CDFW also recommends that the City demonstrate how the Project is consistent with Section 7.0 of the MSHCP.

### *Roads*

For projects proposed inside the MSHCP Criteria Area, the DEIR should include a discussion of the Project and its consistency with Covered Activities (Section 7.3 of the MSHCP) and specifically Existing Roads Within the Criteria Area (Section 7.3.4) and Planned Roads Within the Criteria Area (7.3.5). Where maintenance of existing roads within the Criteria Area is proposed, CDFW recommends that the City reference MSHCP Section 7.3.4 and Table 7-3, which provides a summary of the existing roads permitted to remain in the MSHCP Criteria Area. Planned roads within the MSHCP Criteria Area are discussed in MSHCP Section 7.3.5 and identified on Figure 7-1. Please note that roadways other than those identified in Section 7.3.5 of the MSHCP are not covered without an amendment to the MSHCP in accordance with the procedures described in MSHCP Section 6.10. CDFW recommends that the City review MSHCP Section 7.3.5 and include in the DEIR information that demonstrates that Project-related roads are MSHCP covered activities. The DEIR should also discuss design and siting information for all proposed roads to ensure that the roads are sited, designed, and constructed in a manner consistent with MSHCP conservation objectives.

### *Allowable Uses in MSHCP Conservation Areas - Trails*

CDFW recommends that the DEIR also include a discussion of the Project and MSHCP Allowable Uses (Section 7.4) and Conditionally Compatible Uses (Section 7.4.2) in MSHCP Conservation Area such as trails. For example, if trails are proposed as part of the Project, the DEIR should discuss whether the trail is identified on Figure 7-4, and provide details regarding trail construction (siting and design), and operations and maintenance that demonstrate that the proposed trail is consistent with MSHCP Section 7.4.

### Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools.

The procedures described in Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section (MSHCP Section 6.1.2) are to ensure that the biological functions and values of these areas are maintained throughout the MSHCP area. Additionally, this process helps identify areas to consider for priority acquisition, as well as those functions that may affect downstream values related to Conservation of Covered Species within the MSHCP Conservation Area. The assessment of riparian/riverine and vernal pool resources may be completed as part of the CEQA review process as set forth in Article V of the State CEQA Guidelines. However, the MSHCP identifies that the U.S. Fish and Wildlife Service and CDFW shall be notified in advance of approval of public or private projects of draft determinations for the biologically equivalent or superior determination findings associated with the Protection of Wetland Habitats and Species policies presented in Section 6.1.2 of the MSHCP (MSHCP Section 6.11). As required by MSHCP, completion of the DBESP process prior to adoption of the environmental document ensures that the project is consistent with the MSHCP and provides public disclosure and transparency during the CEQA process by identifying the

project impacts and mitigation for wetland habitat, a requirement of CEQA Guidelines, §§ 15071, subds.(a)-(e).

The MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools. The assessment shall consider species composition, topography/ hydrology, and soil analysis, where appropriate. The documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species identified in Section 6.1.2 of the MSHCP. Factors to be considered include hydrologic regime, flood storage and flood-flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife Habitat, and aquatic Habitat.

The MSHCP identifies that for mapped riparian/riverine and vernal pool resources that are not included in the MSHCP conservation area, applicable mitigation under CEQA, shall be imposed by the Permittee (in this case the City). Further, the MSHCP identifies that to ensure the standards in Section 6.1.2 are met, the Permittee shall ensure that, through the CEQA process, project applicants develop project alternatives demonstrating efforts that first avoid, and then minimize direct and indirect effects to the wetlands mapped pursuant to Section 6.1.2. If an avoidance alternative is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible shall be selected. Those impacts that are unavoidable shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced as through the Determination of Biologically Equivalent or Superior Preservation (DBESP). The City is required to ensure the Applicant completes the DBESP process prior to completion of the DEIR to demonstrate implementation of MSHCP requirements in the CEQA documentation.

### Special Survey Areas

Within the Project site, the following MSHCP requirements apply for the Narrow Endemic Plant Species Survey Area (MSHCP Section 6.1.3) and Additional Survey Needs and Procedures (MSHCP Section 6.3.2):

#### *Narrow Endemic Plant Species*

The Project site falls within the MSHCP Section 6.1.3 survey area and has the potential to support the following Narrow Endemic Plant Species: San Diego ambrosia (*Ambrosia pumila*), Brand's phacelia (*Phacelia stellaris*), San Miguel savory (*Clinopodium chandleri*). Therefore, the DEIR should address any potential impacts to these species.

More specifically the DEIR should include surveys for these species done within the appropriate time of years. Based on rainfall in a given year, surveys for San Diego ambrosia and San Miguel savory are typically done at peak blooming which can be

from April through the end of July. Surveys for Brand's phacelia species should be completed between March to May. The survey results and discussion of the findings should be included in the DBESP, pursuant to MSHCP Section 6.1.3. Additionally, the DBESP should be submitted prior to completion/adoption of the DEIR per the City's Resolution No. 2003-141. Site specific surveys for Narrow Endemic Plant Species are required for all public and private projects where appropriate habitat is present.

CDFW recommends that the City follow the recommendations and guidance provided through MSHCP Section 6.1.3 to ensure Narrow Endemic Plant Species requirements are fulfilled.

#### *Burrowing Owl (Athene cunicularia)*

The Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill."

CDFW recommends that the City of Corona follow the survey instructions in the "Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area"<sup>4</sup>. The Survey Instructions specify that first a habitat assessment is conducted. If suitable habitat is not found on site, simply reporting the site is disturbed or under agricultural/dairy use is not acceptable. A written report must be provided detailing results of the habitat assessment with photographs and indicating whether or not the project site contains suitable burrowing owl habitat. If suitable habitat is found, then focused surveys at the appropriate time of year (March 1 to August 31), time of day, and weather conditions must be completed. Surveys will not be accepted if they are conducted during rain, high winds (> 20 mph), dense fog, or temperatures over 90 °F. The surveys must include focused burrow surveys and burrowing owl surveys. For the focused burrow surveys, the location of all suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates in the report. The focused burrowing owl surveys include site visits on four separate days. CDFW recommends that the site visits are conducted at least a week apart to avoid missing owls that may be using the site. Finally, CDFW recommends the report also include an impact assessment evaluating the extent to which burrowing owls and their habitat may be impacted, directly or indirectly by Project activities. A final report discussing the survey methodology, transect width, duration, conditions, and results of the Survey shall be submitted to the RCA and the City.

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4 [https://www.wrc-rca.org/species/survey\\_protocols/burrowing\\_owl\\_survey\\_instructions.pdf](https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf)

Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

Additionally, CDFW recommends that the City of Corona review and follow requirements for burrowing owl outlined in the MSHCP, specifically Section 6.3.2 (Additional Survey Needs and Procedures) and Appendix E (Summary of Species Survey Requirements). Appendix E of the MSHCP outlines survey requirements, actions to be taken if survey results are positive, and species-specific conservation objectives, among other relevant information.

#### Urban/Wildland Interface Guidelines

As the MSHCP Conservation Area is assembled, hardline boundaries are established between development and MSHCP Conservation Areas. Development near MSHCP Conservation Area may result in edge effects that will adversely affect biological resources within the MSHCP Conservation Area. To minimize edge effects and maintain conservation value within the Conservation Areas, the City is required to implement the Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4) for drainage, toxics, lighting, noise, invasives, barriers, and grading/land development. The Project site is within or adjacent to Criteria Cells 1702, 1704, 1811, and 1812 and is subject to the Urban/Wildland Interface Guidelines, MSHCP Section 6.1.4, for provisions to reduce the direct and indirect impact to conserved lands. Potential indirect impacts for the Project include but are not limited to noise, lighting, invasive plants, and possibly toxic materials such as herbicides and pesticides used in landscaping and maintenance, as well as non-hazardous oils and fuels used during project operations. The MSHCP identifies that project review and impact mitigation are provided through the CEQA process to address the Urban/Wildland Interface guidelines. CDFW recommends that potential Project impacts are addressed by including in the DEIR Project specific biological mitigation measures to address the Urban/Wildland Interface guidelines.

The DEIR should include analysis of Project impacts on edge effects such as noise, lighting, trespass, and toxics that have potential indirect impacts from development. The DEIR should include Project specific measures that address Projects impacts to avoid and minimize edge effects. Such measures can include, but are not limited to:

1. *Lighting Plan*: A Lighting Plan that identifies existing ambient lighting conditions, analyzes the Project lighting impacts on the adjacent Conservation Area, and demonstrates that the proposed lighting plan will not significantly increase the lighting on the Conservation Area. The Lighting Plan should identify measures that address light and glare from interior and exterior building lighting, safety and security lighting, and vehicular traffic accessing the site at a minimum.

2. *Noise Plan*: A Noise Plan to avoid and minimize noise impacts based on a Noise assessment of Project noise impacts on adjacent conservation areas during construction and post development (the MSHCP identifies that Project noise impacts do not exceed the residential standards within the Conservation Areas).
3. *Landscaping Plan*: A Landscaping plan that includes the use of native plant material on the Project site and avoids the use of invasive plant species identified in Table 6-2 of the MSHCP.
4. *Fencing Plan*: A Barrier and Fencing plan that provides specific details designed to minimize unauthorized public access, domestic animal predation, illegal trespass, and dumping in the MSHCP Conservation Area (such as block walls along areas directly adjacent to potential conservation areas) and
5. *Best Management Practices*: The DEIR should incorporate the guidance in MSHCP Section 7.0 and Appendix C of the MSHCP for addressing Best Management Practices.

### **Stephens' Kangaroo Rat Habitat Conservation Plan**

The Project occurs within the Stephens' kangaroo rat (*Dipodomys stephensi*) Habitat Conservation Plan (SKR HCP) fee area boundary, SKR HCP plan area map available here: <https://rchca.us/DocumentCenter/View/200/SKR-Plan-Area>. State and federal authorizations associated with the SKR HCP provide take authorization for Stephens' kangaroo rat within its boundaries, and the MSHCP provides Take Authorization for Stephens' kangaroo rat outside of the boundaries of the SKR HCP, but within the MSHCP area boundaries. The DEIR should identify if any portion of the Project will occur on SKR HCP lands, or on Stephens' kangaroo rat habitat lands outside of the SKR HCP, but within the MSHCP. Note that the SKR HCP allows for encroachment into the Stephens' kangaroo rat Core Reserve for public projects, however, there are no provisions for encroachment into the Core Reserve for privately owned projects. If impacts to Stephens' kangaroo rat habitat will occur from the proposed Project, the DEIR should specifically identify the total number of permanent impacts to Stephens' kangaroo rat core habitat and the appropriate mitigation to compensate for those impacts.

### **Lake and Streambed Alteration Program**

Based on review of material submitted with the NOP, drainage features may traverse some of the parcels within the Project's scope. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream, or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those



that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW'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 DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

## **ADDITIONAL COMMENTS AND RECOMMENDATIONS**

### *Native Landscaping*

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE: <https://calscape.org/>. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <https://saveourwater.com/>.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following

Sandra Yang, Senior Planner  
City of Corona  
September 21, 2022  
Page 17 of 17

link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data> . The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.


## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Green River Ranch Specific Plan Amendment and Industrial Park Project in the City of Corona (SCH No. 2022080640) and recommends that the City of Corona address the CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to Katrina Rehrer, Environmental Scientist, at [katrina.rehrer@wildlife.ca.gov](mailto:katrina.rehrer@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
84F92FFEEFD24C8...

Kim Freeburn-Marquez  
Acting Environmental Program Manager

ec:

Heather Pert, Senior Environmental Scientist Supervisor  
Inland Deserts Region  
[Cindy.Castaneda@wildlife.ca.gov](mailto:Cindy.Castaneda@wildlife.ca.gov)

Office of Planning and Research, State Clearinghouse, Sacramento  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Tricia Campbell, Western Riverside County Regional Conservation Authority  
Regional Conservation Deputy Director  
[tcampbell@rctc.org](mailto:tcampbell@rctc.org)

**Subject:** FW: Green River Rich Specific Plan Amendment  
**Date:** Wednesday, September 28, 2022 at 9:49:29 AM Pacific Daylight Time  
**From:** Sandra Yang  
**To:** Raymond Hussey, Noah Ridlon  
**Attachments:** hippa.jpeg

See response below for the Green River Ranch project.

Sincerely,

**Sandra Yang, Senior Planner**  
Planning & Development Department  
[Sandra.Yang@CoronaCa.gov](mailto:Sandra.Yang@CoronaCa.gov)

---

**From:** adamruiz@scannmore.com <adamruiz@scannmore.com>  
**Sent:** Friday, September 23, 2022 8:05 AM  
**To:** Sandra Yang <Sandra.Yang@CoronaCA.gov>  
**Subject:** Green River Rich Specific Plan Amendment

To Sandra Yang:

Regarding the " Green River Ranch notice of preparation"

My husband and I, our two daughters are residents of the sierra del pro community. More specifically we live right up the street on Dominguez Hills st. From where the green river ranch property will possibly take place.

We would like to voice our concerns as residents of the area about the harms it may do by developing the green river ranch area. We have lived in this area for more than half our lives and have welcomed 2 daughters in this home/ community when green river ranch housed horses, even before the goats moved in . The concern we have are on behalf of not just our family, but our entire community:

By continuing to develop in (P.A.1-P.A6) there will be and increase in :

-potential traffic that has preexisting traffic from its freeways (CA 91, CA241, CA71) connecting Los Angeles county, Orange County, and Riverside county's traffic in the first exit going eastbound to green river. I understand the potential for business that may generate but the harm it will have on the residents that are also coming home from work, picking up their children, or attending our own community gatherings, hasgiven those who are luckily enough to live here a disadvantage to get home to our families.

-not to mention it will increase a risk of preexisting concerns our residents have to face when wild fires occur in the Cleveland national forest just behind us all, creates the increase of mudslides and evacuations we have all faced before. 2017 the green river ranch area was consumed by heavier rain than normal the season (September 2017) when we were evacuated from our homes dude to fires and mudslides in one year. Fires are unfortunately extremely common and have become increasingly dangerous over the last 10 years. Green river ranch has a large homeless population that is visible from the 91 freeway going east. The homeless residents have a reputation For starting fires to keep warm or cook in the day time or night, as recent as 2019 Cesar Chavez and another elementary school in the green river immediate area having to evacuate because one fire began to spread too Close to our schools and only grocery store in our area. My mother, also a resident living up Dominguez ranch was a commercial (suite) resident Of green river ranch community experience the homeless light dumpster fires nightly at the already developed

commercial residence for years now.

-due to all the experiences of heightened natural disasters in our area (wildfires, mud slides, flash flood, potential damn flooding) our forestry and calcite are exceptionally special and appreciated in our community. During the floods Corona PD was here nightly for weeks guarding our homes during evacuation confirming homes and families were safe, while firemen and women fight the wild fires. That underdeveloped area allows for those first responders and forestry fire to use at their disposal as a resource for helping our community.

Sincerely Adam Ruiz  
1321 San Ponte Road Corona Ca 92882

Adam Ruiz  
Scan N More  
Office 1-800-593-1826  
Mobile 951-403-5588  
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SENT VIA E-MAIL:

September 28, 2022

[Sandra.Yang@CoronaCA.gov](mailto:Sandra.Yang@CoronaCA.gov)

Sandra Yang, Senior Planner  
City of Corona  
Planning and Development Department  
400 South Vicentia Avenue  
Corona, California 92882

**Notice of Preparation of a Draft Subsequent Environmental Impact Report for the  
Green River Ranch Specific Plan Amendment and Industrial Park Project  
(Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Subsequent Environmental Impact Report (SEIR). Please send a copy of the Draft SEIR upon its completion and public release directly to South Coast AQMD as copies of the Draft SEIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**Responsible Agency and South Coast AQMD Permits**

South Coast AQMD is a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) if implementation of the Proposed Project requires permits from South Coast AQMD. It is important to note that the assumptions in the air quality analysis in the CEQA document will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. In order to ensure that impacts from the permits are fully and adequately evaluated as required under CEQA Guidelines Section 15096(b), it is recommended that the Lead Agency initiate consultation with South Coast AQMD by contacting Michael Morris, Planning and Rules Manager.

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at:

<http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at:

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed 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, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project will include, among others, 5.8 acres as "Hotel/Mixed Use/Office" and 98.2 acres as "Estate Residential" residential units and is located in close proximity to freeway 91 and other industrial sources, and to facilitate the purpose of a SEIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup> to disclose the potential health risks<sup>6</sup>.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>7</sup> 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 with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>8</sup>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>9</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

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<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> *Ibid.*

<sup>7</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>8</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>9</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions<sup>10</sup>. According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 400 in one million<sup>11</sup>. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan<sup>12</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy<sup>13</sup>.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft SEIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule<sup>14</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>15</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year<sup>16</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter

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<sup>10</sup> South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

<sup>11</sup> South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/mates-v).

<sup>12</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>13</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

[https://www.connectsoocal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsoocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf)

<sup>14</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>15</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>16</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023,

(PM) and 0.20 g/bhp-hr of NO<sub>x</sub> emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft SEIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing



a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. If the Proposed Project consists of the development of a warehouse more than 100,000-square-foot in size, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation<sup>17</sup>. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage<sup>18</sup>.

### **Health Risk Reduction Strategies**

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters<sup>19</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft SEIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft SEIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

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<sup>17</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

<sup>18</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

<sup>19</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [swang1@aqmd.gov](mailto:swang1@aqmd.gov).

Sincerely,

*Sam Wang*

Sam Wang  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Area Sources

SW  
RVC220901-09  
Control Number



09/28/2022

**VIA EMAIL ONLY**

Sandra Yang, Senior Planner  
Planning and Development Department,  
City Of Corona  
400 South Vicentia Avenue,  
Corona, CA 92882  
[Sandra.Yang@CoronaCA.gov](mailto:Sandra.Yang@CoronaCA.gov)

**RE: NOP Comments for Green River Ranch Specific Plan Amendment and Industrial Park Project**

Dear Ms. Yang,

On behalf of Californians Allied for a Responsible Economy ("CARE CA") thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") for environmental review of the Green River Ranch Specific Plan Amendment and Industrial Park Project (the "Project"). The Project applicant is PSIP WR Green River, LLC.

The proposed Project includes an amendment to the GRRSP to rearrange the previously approved land uses, slightly expand the Specific Plan boundary, and to designate a large portion of the GRRSP Planning Area as open space for permanent preservation to comply with the Western Riverside County MSHCP, and the construction and operation of up to 746,330 square feet of industrial uses.

The NOP notes that the draft SEIR analysis will include all environmental impacts under CEQA. CARE CA respectfully requests, under CEQA complete analysis of these impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives, including at least two environmentally superior alternatives to the Project.

In addition, we request that the City take into consideration the following comments related to the project-specific components.

I) **Project Objectives:** Project objectives should reflect the fundamental purpose of the Project and not be crafted in a manner that limits the range of alternatives considered.

II) **Unspecified Industrial Use:** The Project proposes up to 746,330 square feet of industrial uses. Yet, based on the NOP, we do not know whether the Project is a 'speculative' building or not and the type of warehouse proposed. Although tenant(s) or planned operations are usually unknown at this stage of development, the DSEIR should reflect a good faith effort at full disclosure by including as much information on the nature of operations as can be reasonably obtained. This is important because different types of high cube warehouses have different levels of environmental impacts.

To ensure a conservative analysis, the DSEIR should study a reasonable worst-case scenario (i.e., most impactful), which includes assumptions about the types of uses so that a broad and diverse range of environmental impacts are included. Therefore, the DSEIR should study a combination of the five primary logistics-type uses at the site,<sup>1</sup> including providing justification and square footage assumed for each use analyzed to ensure that the unique impacts of each use (i.e., both truck and vehicular trips, air quality, GHG emissions, public health risk and other environmental effects) are comprehensively evaluated.

III) **Air Quality & Public Health:** CARE CA has a particular interest in air quality and public health. The Project will have high daily volumes of heavy-duty diesel truck traffic and on-site equipment that pollute the air with toxic diesel emissions and expose nearby communities to air pollution. The City must make all efforts to minimize air quality effects to the greatest extent possible. This in part means that a mobile source Health Risk Assessment (including other emission sources such as backup generators and on-site diesel-powered equipment) must be prepared and include both construction and operational diesel PM emissions and cancer risk assessment.

IV) **Land Use:** To mitigate negative public health effects of industrial operations, the DSEIR should analyze the impacts of creating a buffer zone between PA1/ PA3 Business Park Industrial and PA 5 residential zones.

V) **Mitigation Measures:** Mitigation measures must be effective and enforceable. Every effort must be made to incorporate modern technology in the mitigation measures and MMRP. For example, a requirement that all off-road equipment and trucks using the site during construction and operations be zero emission, near-zero emissions or alternative-fueled vehicle would both reduce and/or eliminate air pollution impacts and CO2 emissions.

Mitigation measures can also include requirements to install cool roofs to reduce operational energy demand and solar canopies on the parking lot to generate energy, electrification of

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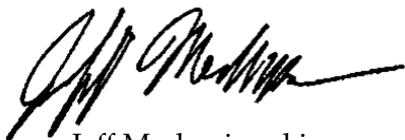
<sup>1</sup> South Coast Air Quality Management District [SCAQMD], High Cube Warehouse Vehicle Trip Generation Analysis, prepared by Institute of Transportation Engineers, October 2016, p. 3.

loading docks and provision of EV charging infrastructure, and measures to reduce urban heat island effect impacts.

Thank you for the opportunity to submit NOP comments. Again, CARE CA respectfully requests under CEQA full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

We look forward to reviewing and commenting on the DEIR. Please provide all sources and referenced materials when the DEIR is made available.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski  
*Executive Director*



September 28, 2022

Sandra Yang, Senior Planner
City of Corona, Planning and Development Department
400 South Vicentia Avenue
Corona, California 92882
Phone: (951) 279-3553
E-mail: Sandra.Yang@CoronaCA.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Green River Ranch Specific Plan Amendment and Industrial Park Project [SCAG NO. IGR10712]

Dear Sandra Yang,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Green River Ranch Specific Plan Amendment and Industrial Park Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Green River Ranch Specific Plan Amendment and Industrial Park Project in Riverside County. The proposed specific plan amendment would expand the Green River Ranch Specific Plan boundary, designate 83.55 acres of open space for permanent preservation, and allow up to 746,330 square feet (SF) of business park industrial uses, 19,500 SF of commercial uses, a 150-room hotel, 32 single-family homes, and 1.44 acres of roads on a 160.4-acre site.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Annaleigh Ekman, Associate Regional Planner, at (213) 630-1427 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

1 Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
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**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
GREEN RIVER RANCH SPECIFIC PLAN AMENDMENT AND INDUSTRIAL PARK PROJECT [SCAG NO. IGR10712]**

**CONSISTENCY WITH CONNECT SOCIAL**

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with Connect SoCal.

**CONNECT SOCIAL GOALS**

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

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

SCAG CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

**Connect SoCal Strategies**

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

The 2020 Connect SoCal also identifies open space resources in the SCAG region and develops strategies to address open space, biodiversity habitat and agriculture conservation in the SCAG region. For further information on open space strategies, please review the [2020 Connect SoCal Natural and Farm Lands Conservation Technical Report](#).

The 2020 Connect SoCal also identifies a goods movement system in the SCAG region and develops strategies to address expected growth trends and demands in goods movement. For further information on the goods movement strategies, please see the [2020 Connect SoCal Goods Movement Technical Report](#). For further information on industrial development and warehousing in Southern California, please see [Industrial Warehousing in the SCAG Region](#).

Connect SoCal identified Key Connections that lie at the intersection of land use, transportation and innovation meant to advance policy discussions and strategies to leverage new technologies and create better partnerships to increase progress on the regional goals. Accelerated Electrification is one of the Key Connections and was established to create a holistic and coordinated approach to de-carbonizing or electrifying passenger vehicles, transit, and goods movement vehicles. The Accelerated Electrification Key Connection sets a vision to reduce both the local and global emissions associated with multiple modes of transportation by deploying clean mobility solutions and the infrastructure needed to support them. SCAG staff encourages the lead agency to incorporate clean mobility solutions and supporting infrastructure into the project, as appropriate.

**DEMOGRAPHICS AND GROWTH FORECASTS**

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and



local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Corona Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	166,904	174,061	177,702	185,073
Households	6,333,458	6,902,821	7,170,110	7,633,451	47,358	49,407	50,437	52,444
Employment	8,695,427	9,303,627	9,566,384	10,048,822	81,271	84,480	85,547	92,776

**MITIGATION MEASURES**

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

**Subject:** FW: Comment re SEIR to Green River Ranch Specific Plan EIR  
**Date:** Thursday, September 29, 2022 at 2:23:11 PM Pacific Daylight Time  
**From:** Sandra Yang  
**To:** Raymond Hussey, Noah Ridlon

Ray/Noah, see response below for the GRR project.

Sincerely,

**Sandra Yang, Senior Planner**  
Planning & Development Department  
[Sandra.Yang@CoronaCa.gov](mailto:Sandra.Yang@CoronaCa.gov)

---

**From:** Robert Schnabel <[schnabels@sbcglobal.net](mailto:schnabels@sbcglobal.net)>  
**Sent:** Thursday, September 29, 2022 2:17 PM  
**To:** Sandra Yang <[Sandra.Yang@CoronaCA.gov](mailto:Sandra.Yang@CoronaCA.gov)>  
**Subject:** Comment re SEIR to Green River Ranch Specific Plan EIR

You don't often get email from [schnabels@sbcglobal.net](mailto:schnabels@sbcglobal.net). [Learn why this is important](#)

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Attn: Sandra Yang

COMMENT FOR SEIR TO GREEN RIVER RANCH SPECIFIC PLAN EIR

The SEIR will need to supply detailed information regarding traffic and circulation. Specifically what impacts will the proposed development have on Green River Rd. and Dominguez Ranch Rd.?

The environmental review for the originally proposed project admitted that the peak-hour traffic at the SR 91/ Green River Rd. intersection exceeded the acceptable level of service. There were references to budgeted improvements by Cal Trans and the City of Corona. The environmental review summarily concluded that because of these future improvements, the level of service at the SR 91/ Green River intersection would be improved even with the additional traffic generated by the proposed development.

The environmental review being conducted for the newly proposed development needs to address and answer the following questions with sufficient detail and specificity:

- 1) A significant amount of the improvements alluded to in the original environmental review have already been completed. At this time, what is the current level of service of peak-hour traffic at the SR 91/ Green River interchange? I do not believe it has become acceptable even without any development in place on the subject site. Traffic still routinely backs up beyond Dominguez Ranch Rd.
- 2) Does the proposed project call for other signal lights between the ones currently at Dominguez Ranch Rd. and the SR 91/ Green River Rd. interchange? What effect will they have on traffic and circulation?
- 3) At peak-hour traffic times, what will be the effect of the fully completed proposed development on Dominguez Ranch Rd. and Green River Rd.?

Thank you.



**Subject:** FW: GRRSP comments

**Date:** Monday, October 3, 2022 at 8:15:49 AM Pacific Daylight Time

**From:** Sandra Yang

**To:** Raymond Hussey, Noah Ridlon

Response for GRR project.

Sincerely,  
Sandra Yang, Senior Planner  
City of Corona, Planning Division

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**From:** Don Osborne <osbod007@hotmail.com>

**Sent:** Sunday, October 2, 2022 8:50 PM

**To:** Sandra Yang <Sandra.Yang@CoronaCA.gov>

**Subject:** GRRSP comments

You don't often get email from [osbod007@hotmail.com](mailto:osbod007@hotmail.com). [Learn why this is important](#)

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Hello Sandra, Don Osborne here. I live just off Dominguez Ranch Rd. 951-817-0524. Just a bit of input on the proposed amendment to the GRRSP.

The original GRRSP's intent was for the bulk of the development to be used for 'Mixed Use'. Zoning should never allow for an Industrial Park ( or...think airport) to be placed in close proximity to an existing neighborhood housing development.

The aesthetics of the proposed amendment is off, the proposed Industrial Complex is much larger than the Promenade business area. It's going to be a 49.52 acre Industrial Park, no other way to say it. The BPI Precise Plan shows the intent of the developer by skirting any inclusion of PA4 or PA5. The Precise Business Plan addresses only the 49.52 acres by showing the 5 concrete Tilt-Up Business Park Industrial Buildings. Nothing else.

The applicant PSIP Western Realco LLC has already taken the liberty of stating that the. "Specific Plan already allows the following uses, which are being carried over to the BPI zone. Manufacturing, assembly and fabrication of goods. Warehouse and distribution.". I'm sure that the intent of the Corona City Planning Commission was to allow light Commercial and not Business Industrial. Legal posturing by the applicant.

Noise of an Industrial Park can ruin the quality of life for people within close proximity. One poignant example is at Butterfield Park at the far west baseball field. On a distant hill south of the field is a constantly running large industrial vacuum with it's high pitch irritating whine that carries for long distances. There is the possibility of freezer equipt trucks entering after hours and left running overnight. Metal fabrication businesses generate a lot of noise. The businesses that generate substantial exterior noise are numerous and once this zoning is approved (forever) then the local residents are stuck with their new neighbors forever without recourse. If this amended GGRSP is approved as it is proposed I can see an injunction and pending lawsuit against the city being filed on behalf of the local residents.

I am unsure of the electrical grid and it's capacity to support the needs of the proposed. Currently the incoming water pressure drops 8 psi from 10pm to 10am, will this be addressed?

The amendment as submitted shows a portion of the land between Fresno Rd and PA1 to be designated Open Space General. This is a relatively small difficult strip to maintain and was going to be utilized in the original plan. If it is allowed to be conveyed to the Riverside Conservatory Authority it will not be maintained properly and the developers will absolve themselves of any liability. It will fall to becoming unkept and a

potential fire hazard.

Ingress. Semi Trucks do not turn well in tight spaces. Upon entering the complex from Green River Rd trucks will need a wide driveway. Drivers quite often before entering a complex will pull over and exit their rig to search out an address on foot. Then return to take their load to the correct destination. This amendment shows no allowance for an oversized entry.

Ingress/Egress. The amended GRRSP designates a road to intersect Dominguez Ranch Rd. This will only work if the proposed road is gated and closed during morning commute hours 6:30 to 9am. Make the complex responsible for it's operation and maintenance. Anxious morning commuters otherwise will use the path through the complex to skirt around traffic and create more congestion. Presently, West bound anxious commuters get off Green River Rd and go into the east Promenade business entrance and exit the west end onto Dominguez Ranch Rd. forcing themselves into heavy traffic coming down from the residential area. Corona City Traffic Controller's only solution was to maximize the RED light time and minimize the GREEN light time for departing Dominguez Ranch onto Green River Rd.

Thank you for lending an ear. Don Osborne. 4151 Mt Cantara Cir. Res. since 2000

**Subject:** FW: Proposed project at old horse property location

**Date:** Tuesday, October 4, 2022 at 2:06:17 PM Pacific Daylight Time

**From:** Sandra Yang

**To:** Raymond Hussey, Noah Ridlon

Please see response to GRR project.

Sincerely,

**Sandra Yang, Senior Planner**

Planning & Development Department

[Sandra.Yang@CoronaCa.gov](mailto:Sandra.Yang@CoronaCa.gov)

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**From:** lisa c <safari5763@hotmail.com>

**Sent:** Tuesday, October 4, 2022 1:41 PM

**To:** Sandra Yang <Sandra.Yang@CoronaCA.gov>; lisa c <safari5763@hotmail.com>

**Subject:** Proposed project at old horse property location

You don't often get email from [safari5763@hotmail.com](mailto:safari5763@hotmail.com). [Learn why this is important](#)

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Hello,

I just flew in from out of the country and found the information regarding proposed development that will impact the montenero neighbors.

My husband and I own three properties in Corona area near the old horse property location. We are opposed to the hotel/industrial project. Our daughter lives in the area and endures heavy traffic already. Further development in the area will further hinder an already problematic traffic area.

I already sent in information to oppose this proposed development prior to me leaving out of the country.

Please keep us informed of the outcome of this project or any other future meetings.

Sincerely,

Klaus Kraemer and Sonia Carrigan

Sent from [Mail](#) for Windows

**Subject:** FW: Green River Ranch SPA  
**Date:** Tuesday, October 11, 2022 at 10:08:53 AM Pacific Daylight Time  
**From:** Sandra Yang  
**To:** Raymond Hussey, Noah Ridlon  
**Attachments:** image001.png

Response from ALUC.

Sincerely,

**Sandra Yang, Senior Planner**  
Planning & Development Department  
[Sandra.Yang@CoronaCa.gov](mailto:Sandra.Yang@CoronaCa.gov)

---

**From:** Vega, Jaqueline <JaVega@RIVCO.ORG>  
**Sent:** Tuesday, October 11, 2022 10:02 AM  
**To:** Sandra Yang <Sandra.Yang@CoronaCA.gov>  
**Subject:** Green River Ranch SPA

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Hello,

Thank you for transmitting the above referenced project to ALUC for review. Please note that the project is outside the Airport Influence Area, and review by ALUC is not required.

Should you have any questions, please contact me.

Jackie Vega  
Urban Regional Planner I



**Riverside County Airport Land Use Commission**  
4080 Lemon Street, 14<sup>th</sup> Floor  
Riverside, Ca 92501  
(951) 955-0982  
[Javega@RIVCO.ORG](mailto:Javega@RIVCO.ORG)  
[www.rcaluc.org](http://www.rcaluc.org)

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[County of Riverside California](#)



**Craig D. Miller**  
General Manager

**Mike Gardner**  
Division 1

**Gracie Torres**  
Division 2

**Brenda Dennstedt**  
Division 3

**Laura Roughton**  
Division 4

**Fauzia Rizvi**  
Division 5

October 17, 2022

**Sent Via Email**

Sandra Yang  
Senior Planner  
City of Corona, City Hall  
Planning and Development Department  
400 South Vicentia Avenue  
Corona, CA 92882  
[Sandra.Yang@CoronaCA.gov](mailto:Sandra.Yang@CoronaCA.gov)

**RE: NOTICE OF PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT**

This letter is in response to your Initial Case transmittal dated August 29, 2022.

Western Municipal Water District (Western) has no comments on the proposed Green River Ranch Specific Plan Amendment and Industrial Park Project.

Western does not provide retail water, sanitary sewer, or recycled water services within the vicinity of Green River Road and Fresno Road. Our records indicate Corona City is the water and/or sewer purveyor for this area.

Should you have any questions regarding this matter, please contact Development Services at (951) 571-7100 or by email at [development@wmwd.com](mailto:development@wmwd.com).

A handwritten signature in blue ink that reads "Tom Scott".

THOMAS G. SCOTT  
Principal Engineer

TGS:bp:tp

Attachment(s): Western Municipal Water District GIS Exhibit





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