

**Appendix A Notice of Preparation (NOP), NOP
Comments, and Scoping Meeting Sign-in
Sheet**

Appendices

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THE CITY OF JURUPA VALLEY

**NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
AGUA MANSA COMMERCE PARK SPECIFIC PLAN
Case No. MA16170**

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, and Interested Parties

Notice is hereby given that the City of Jurupa Valley ("City"), as lead agency, will be preparing an Environmental Impact Report (EIR) for the project identified below. We are requesting your comments on the scope and content of the EIR.

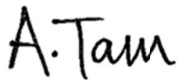
PURPOSE OF THE NOTICE OF PREPARATION: The purpose of this notice is (1) to serve as a Notice of Preparation of an EIR pursuant to the CEQA Guidelines Section 15082, (2) to advise and solicit comments and suggestions regarding the scope and content of the EIR to be prepared for the proposed project, and (3) to notice the public scoping meeting.

HOW AND WHEN TO COMMENT: The City of Jurupa Valley welcomes input and comments regarding the preparation of the EIR. Comments in response to this notice must be received **no later than 30 days** beginning **July 19, 2017** and ending the close of business on **August 17, 2017**. All comments must be submitted in writing or email to the following:

City of Jurupa Valley Planning Department
Attn: Annette Tam, Senior Planner
8930 Limonite Avenue, Jurupa Valley, CA 92509
Phone: (951) 332-6464
E-mail: atam@jurupavalley.org

PUBLIC SCOPING MEETING: The City will conduct a Public Scoping Meeting in conjunction with this Notice of Preparation in order to present the project and the EIR process and to receive public comments and suggestions regarding the scope and content of the EIR. The meeting will be held on July 27, 2017 at 2:00 p.m. at the Jurupa Valley City Hall, 8930 Limonite Avenue, Jurupa Valley, CA 92509. You are welcome to attend and give us your input on the scope of the EIR so that it addresses all relevant environmental issues.

By:



Annette Tam, Senior Planner

Publishing Date: July 19, 2017

PROJECT TITLE: Agua Mansa Commerce Park Specific Plan

PROJECT LOCATION: The Specific Plan area is within the City of Jurupa Valley in Riverside County and adjacent to the City of Rialto and the unincorporated community of Bloomington, in San Bernardino County. The project site is in the northeastern quadrant of the City along an existing industrial corridor and contained within the prior Riverside Cement Plant site (see Figure 1, *Location Map*). The site is bounded by El Rivino Road to the north, the North Riverside & Jurupa Company Canal to the south, Rubidoux Boulevard to the west, and a portion of Hall Avenue to the east. A Union Pacific Railroad spur crosses through the western project area (see Figure 2, *Aerial Photograph*). Overall, the project site consists of the following fourteen (14) Assessor Parcel Numbers (APNs): 175-170-035, -036, -040, -041, -043, 175-180-001, 175-200-001 through -005, -007, -008, and -009.

The Specific Plan area is located approximately 2.5 miles south of Interstate 10 (I-10), 1.4 miles north of State Route 60 (SR-60), and 2.5 miles west of Interstate 215 (I-215).

PROJECT DESCRIPTION: The Agua Mansa Commerce Park Specific Plan is a proposed industrial business park with retail overlay and open space development located on the former Riverside Cement Plant facility. The site was previously been utilized for mining and cement production, until operations ceased in 2014. Concrete and steel structures, cement production lines, storage silos and sheds, a cement bagging building, empty tanks, conveyor belts, soil and material stockpiles, utility tunnels, a control center and an administration building still remain onsite. Additionally, former limestone quarries are located in the southern portion of the site. The brownfield site is being decommissioned and prepared for environmental remediation in order to redevelop the site as proposed in the Specific Plan.

The Specific Plan area encompasses approximately 291.5 acres of land in Jurupa Valley and would consist of three primary land uses: 1) Industrial Park, 2) Business Park (with potential retail component) and 3) Open Space (see Figures 3, *Proposed Land Use Plan*, and 4, *Conceptual Site Plan*). Buildout of the Specific Plan would allow up to 4,500,000 square feet of total building area and 67.7 acres of open space. The table below includes a breakdown and summary of the allowable development within the proposed land uses.

Table 1 Proposed Land Use Development Potential

Map Area	Specific Plan Land Use Designation	Total Building Area (Square Feet)	Acreage
1	Industrial Park (IP)	4,277,000 SF	189.8
2	Business Park with Retail Overlay (BP)	Option A: 150,000 SF business park with 25,000 SF retail Option B: 180,000 SF industrial (no retail)	15.4
3	Business Park with Retail Overlay (BP)	84,000 SF of Business Park (including existing 23,000-SF research and development building)	18.6
4	Open Space/ Potential Park (OS) ¹	N/A	67.7
TOTAL		4,536,000 SF with Option A 4,541,000 SF with Option B	291.5 acres

¹ Park development is contingent upon successful remediation of the brownfield site.

Industrial Park

The Industrial Park component would encompass about 190 acres and is planned for three logistics warehouse buildings. In total, the three buildings would make up approximately 4,277,000 square feet (3,600,000 square feet of building footprint and up to 900,000 square feet of mezzanine area) of industrial park uses, such as manufacturing, research and development, fulfillment centers, e-commerce centers, high-cube, general warehousing and distribution, and cross-dock facilities. Trailer, truck and/or car parking is also proposed in the southern portion of the Industrial Park area.

A key component of the Industrial Park is the specified ingress and egress points for trucks and automobiles from El Rivino Road and Hall Avenue to provide for efficient vehicle circulation and to minimize conflicts with pedestrian circulation between uses and structures.

Business Park with Retail Overlay

The 32-acre Business Park with Retail Overlay area consists of two development options:

- Option A: 150,000-square foot business park building and 25,000 square feet of neighborhood serving retail use
- Option B: 180,000-square foot industrial building (no retail)

An existing 23,000-square foot building would remain in the southern portion of the Business Park area and would continue to be used as a research and development facility.

Open Space

The 67.7-acre Open Space component would be located in the southern portion of the Specific Plan area. Existing landforms would remain onsite and the area is anticipated to be transitioned to a more natural state. Contingent on successful remediation of the site, a Recreation Master Plan would be prepared for City review and approval to allow development of various recreational amenities.

Potential recreational features may include bike tracks, trails and features; radio-controlled vehicle race tracks; gathering areas with shade structures; community amphitheater; multipurpose trails (e.g., hiking, biking, and equestrian), children play areas; dog park; and equestrian facilities. Additionally, cultural facilities may include ecological and cultural interpretive facilities to highlight the history of the site and cement industry.

Circulation

As shown on Figure 5, *Circulation Plan*, various access points are proposed to connect internal drive aisles to adjacent streets. Three access points are located along El Rivino Road, two on the eastern portion of the site (one each on Hall and Brown Avenue), two to access the Open Space area (one each on Agua Mansa Road and Rubidoux Boulevard), and three to access the Business Park with Retail Overlay area on the northwest corner. Five of the access points, including the two on the Open Space area, specify truck restrictions. The Specific Plan ensures that truck restrictions of surrounding streets are observed, and conceptual improvements to accommodate new traffic are identified.

The internal site circulation is composed of interconnected shared driveways within each land use area leading up to access points. The proposed layout of the buildings, docks, driveways, and access points provides the most direct routes possible that minimize turns, idling, and congestion within the site.

Phasing Plan

As shown in Figure 6, *Phasing Plan*, construction of the Specific Plan project is anticipated to occur in four phases. Before construction of major improvements, the land will need to be remediated in accordance with all applicable laws. Site remediation will address fugitive dust, former cement kiln dust disposal areas and potential releases from cement operations. In addition, the project improvements, including buildings, parking facilities, and landscaped common areas, will incorporate design features to ensure the ongoing effectiveness of site remediation measures.

- Phase 1 – Site cleanup and mass grading of the Industrial and Business Park with Retail Overlay areas.
- Phase 2 – Construction of Buildings 1 through 3 within the Industrial Park area.
- Phase 3 – Construction of the Business Park with optional retail on the western portion of the site.
- Phase 4 – Developing the open space area and potential recreational features. If the recreation plan moves forward, it will require the development of a Recreation Master Plan, which may identify a specific phasing program for different components and areas of the Recreation Master Plan.

Land Use Entitlement Requests

The proposed project would require approval of the following entitlement requests:

- **General Plan Amendment** – To re-designate the existing land use designation from ‘Heavy Industrial’ to ‘Light Industrial/Specific Plan Overlay’ and ‘Recreation’
- **Change of Zone** – To rezone the existing zoning from ‘Manufacturing - Heavy’ to ‘Specific Plan’
- **Specific Plan** – To adopt the Agua Mansa Commerce Park Specific Plan and exclude the project site from the existing Agua Mansa Specific Plan No. 210
- **Development Agreement**
- **Site Development Permit** – To establish the speculative buildings for the future uses

POTENTIALLY ENVIRONMENTAL IMPACTS: An Initial Study was not prepared for the project. Therefore a “full scope” EIR will be prepared describing the existing environmental conditions on the project site and identifying the significant environmental impacts anticipated to result from development of the project as proposed.

The following technical studies will be prepared in support of the EIR:

- | | |
|--|-------------------------------|
| ▪ Phase I and II Environmental Site Assessments (ESAs) | ▪ Biological Resources Report |
| ▪ Geotechnical Report | ▪ Traffic Study |
| ▪ Utilities Assessment Report | ▪ Air Quality/GHG Study |
| ▪ Hydrology Report | ▪ Health Risk Assessment |
| ▪ Water Supply Assessment | ▪ Noise and Vibration Study |
| ▪ Cultural Resources Report | ▪ Remedial Action Plan |

Where potentially significant environmental impacts are identified, the EIR will discuss mitigation measures that may make it possible to avoid or reduce significant impacts, as appropriate. The analysis in the EIR will include the following specific categories of environmental impacts and concerns related to the proposed project:

- » **Aesthetics.** The Riverside Cement Plant covers most of the site, with some areas of undeveloped, vacant land to the north and west. Redevelopment of the site under the proposed Specific Plan with industrial, business, and retail uses would introduce a completely new character to the project site. The aesthetics analysis will address the project's potential effect on scenic vistas, visual and community character and quality, and lighting/glare.
- » **Agriculture and Forestry Resources.** Based on the Department of Conservation's California Important Farmland Finder and Riverside County's Williamson Act Map, the Specific Plan area does not have any prime farmland, farmland of statewide importance, or unique farmland, and also does not have any Williamson Act contract lands. Therefore, an individual Agriculture and Forestry Resources section is not required. The impact thresholds will be closed out in Chapter 8, *Impacts Found Not to Be Significant*, of the EIR.
- » **Air Quality.** Findings and mitigation measures, if needed, from the Air Quality/GHG study will be integrated into the EIR section and will include an assessment of consistency with the South Coast Air Quality Management District's Air Quality Management Plan, quantified emissions for construction and operational criteria pollutants, and evaluation of potential air quality impacts. The Health Risk Assessment will also determine whether air emissions associated with operational activities (i.e., diesel truck emissions) could pose a risk to nearby sensitive receptors.
- » **Biological Resources.** Findings from the biological resources technical report will be summarized in this section to determine whether the project would have any impact on sensitive species and habitat, jurisdictional resources, and wildlife corridors.
- » **Cultural Resources.** Findings from the cultural resources assessment and mitigation measures, if needed, related to historical, archeological, and paleontological resources will be summarized in this section of the EIR.
- » **Geology and Soils.** This section will summarize the findings from the geotechnical report, define the existing geologic, soils, and groundwater characteristics onsite; identify regional seismic influences; and explain the characteristics of any areas with constraints to site development. Mitigation measures identified in the geotechnical report will be integrated into the EIR.
- » **Greenhouse Gas Emissions.** Project-related greenhouse gas (GHG) emissions will be quantified, and project consistency with statewide GHG emissions reduction strategies as well as any applicable thresholds the City may use, will also be summarized. Mitigation measures will be incorporated, as necessary, to reduce potentially significant GHG impacts of the project.
- » **Hazards and Hazardous Materials.** This section will summarize findings from the Phase I and II ESAs, including review of the site history and usage as they relate to the presence of hazardous substances and petroleum products onsite; documenting visible evidence of current and past usage of the property, particularly related to potential hazardous substances, petroleum products, storage tanks, and evidence of spills or releases of hazardous substances or petroleum products; and identifying any required mitigation measures for remediation and cleanup prior to development of the proposed project.
- » **Hydrology and Water Quality.** This section will include an analysis of existing hydrology and water quality conditions, identifying the regulatory framework, regional and site-specific hydrological setting of the area, stormwater drainage characteristics, water quality data (surface and groundwater), local

receiving water bodies, pollutants of concern based on changes in land use, and potential hazards due to flooding. The section will conclude with a discussion of the potential hydrology and water quality impacts attributable to the proposed project, based on applicable significance criteria, and incorporate mitigation measures from the hydrology/erosion control plan as necessary.

- » **Land Use and Planning.** The proposed project will require a general plan amendment and zone change. Currently, the City is updating its General Plan. In anticipation of the 2017 General Plan adoption, this section will review the requested project entitlements and status for consistency with the various elements of the City's updated General Plan and its overall vision, goals, and policies. This section will also analyze the project's consistency with applicable regional plans, including the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy.
- » **Mineral Resources.** The Riverside Cement plant and quarry onsite operated since 1909, over 100 years ago. This section will identify any remaining mineral resources onsite and address the project's potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- » **Noise.** Operational and construction noise impacts could be a potential project issue. Findings from the noise and vibration study will be integrated into this section, and mitigation measures, if necessary, will be incorporated to reduce potentially significant noise impacts of the project.
- » **Population and Housing.** The project would not introduce any housing or permanent residents to the site. However, it will generate substantial employment opportunities from the proposed industrial, business, and retail uses. This section will analyze the project's buildout impacts on the City's anticipated jobs-housing balance.
- » **Public Services.** Because no permanent residents would be introduced by the project, no direct impacts would occur to school and library services. However, this section will analyze the project's impacts on the City's fire and police services.
- » **Recreation.** Similar to school and library services, recreational services would not be directly impacted by the proposed project because no permanent residents would be introduced by the proposed Specific Plan. However, the project proposes a large open space/recreation area in the Open Space area of the site. Impacts of the proposed recreational features will be analyzed.
- » **Transportation and Traffic.** This section will summarize the findings from the traffic study and will include analysis of existing roadways and traffic conditions compared to future conditions at each phase of project development. Potential congestion along El Rivino Road, Agua Mansa Road, and Rubidoux Boulevard will be analyzed. Traffic impacts related to project-generated trips and intersection levels of service will be identified, and appropriate mitigation measures will be incorporated into the EIR section. The section will also address conformance with the congestion management plan, the potential for hazardous conditions, and impacts to pedestrian and bicycle travel, and include a discussion of vehicle miles traveled to address anticipated requirements with Senate Bill 743.
- » **Tribal Cultural Resources.** Per Assembly Bill (AB) 52, the City is required to notify and invite Native American tribes to consult on projects proposed within Jurupa Valley for potential tribal cultural resources. This section will summarize the City's efforts to notify and consult with AB 52 tribes as well

as the City's consultation efforts through Senate Bill 18. Any mitigation measures identified in the cultural resources report and/or through consultation that reduce the project's impacts on tribal cultural resource will be integrated into the EIR.

- » **Utilities and Service Systems.** This section will summarize the findings from the utilities assessment report and water supply assessment to determine project-related impacts to the City's water, wastewater, solid waste, natural gas, and electricity services.

As required by CEQA, the EIR will also address potential Energy impacts pursuant to Appendix F in a separate section, "Other CEQA Considerations."

CUMULATIVE IMPACTS: The EIR will include a discussion of the potentially significant cumulative impacts of the project when considered with other past, present, and reasonably foreseeable future projects in the area.

CONSIDERATION OF SIGNIFICANT EFFECTS: The EIR will identify and focus on the significant effects of the project and include the following discussions, as required by CEQA Guidelines Section 15126.2:

- » Effects Found Not to Be Significant
- » Significant Unavoidable Impacts
- » Significant Irreversible Changes
- » Growth-Inducing Impacts

ALTERNATIVES TO THE PROPOSED PROJECT: In compliance with CEQA, the EIR will also address a reasonable range of alternative that are defined and analyzed on the basis of their ability to: 1) avoid or reduce one or more of the project's significant impacts, and 2) feasibly attain most of the basic objectives of the project.

In addition to the No Project Alternative, potential project alternatives may include:

- » Construction Phasing Alternative (to address interim environmental impacts)
- » Alternative Land Use Mixes
- » Reduced Intensity Alternative

Alternatives considered but eliminated from further consideration will also be documented. The environmentally superior alternative will be identified; if it is the No Project Alternative, then one of the development alternatives will be identified as environmentally superior to the others.

Attachments:

- Figure 1. Location Map
- Figure 2. Aerial Photograph
- Figure 3. Proposed Land Use Plan
- Figure 4. Conceptual Site Plan
- Figure 5. Circulation Plan
- Figure 6. Phasing Plan

Figure 1 Location Map

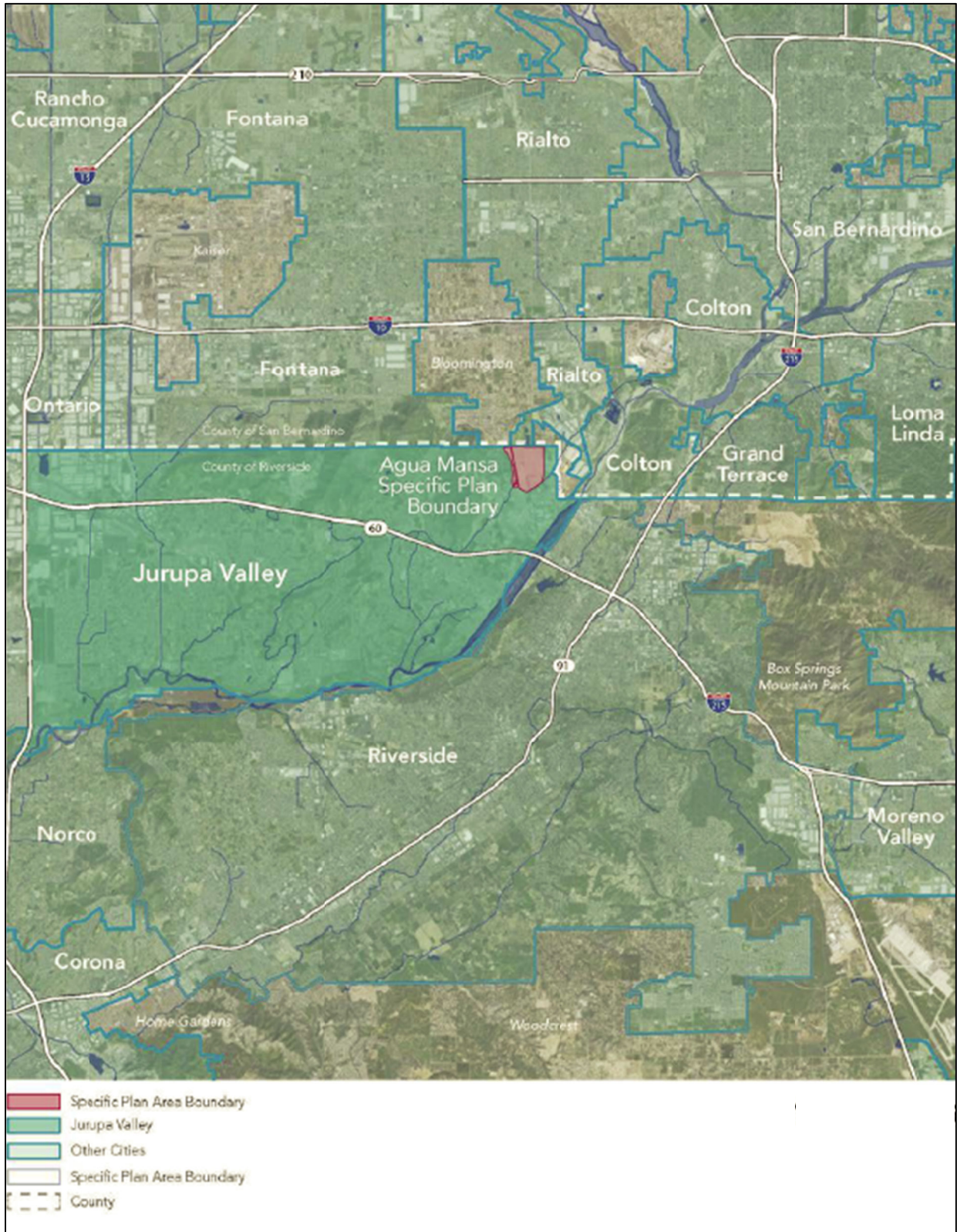


Figure 2 Aerial Photograph



Figure 3 Proposed Land Use Plan

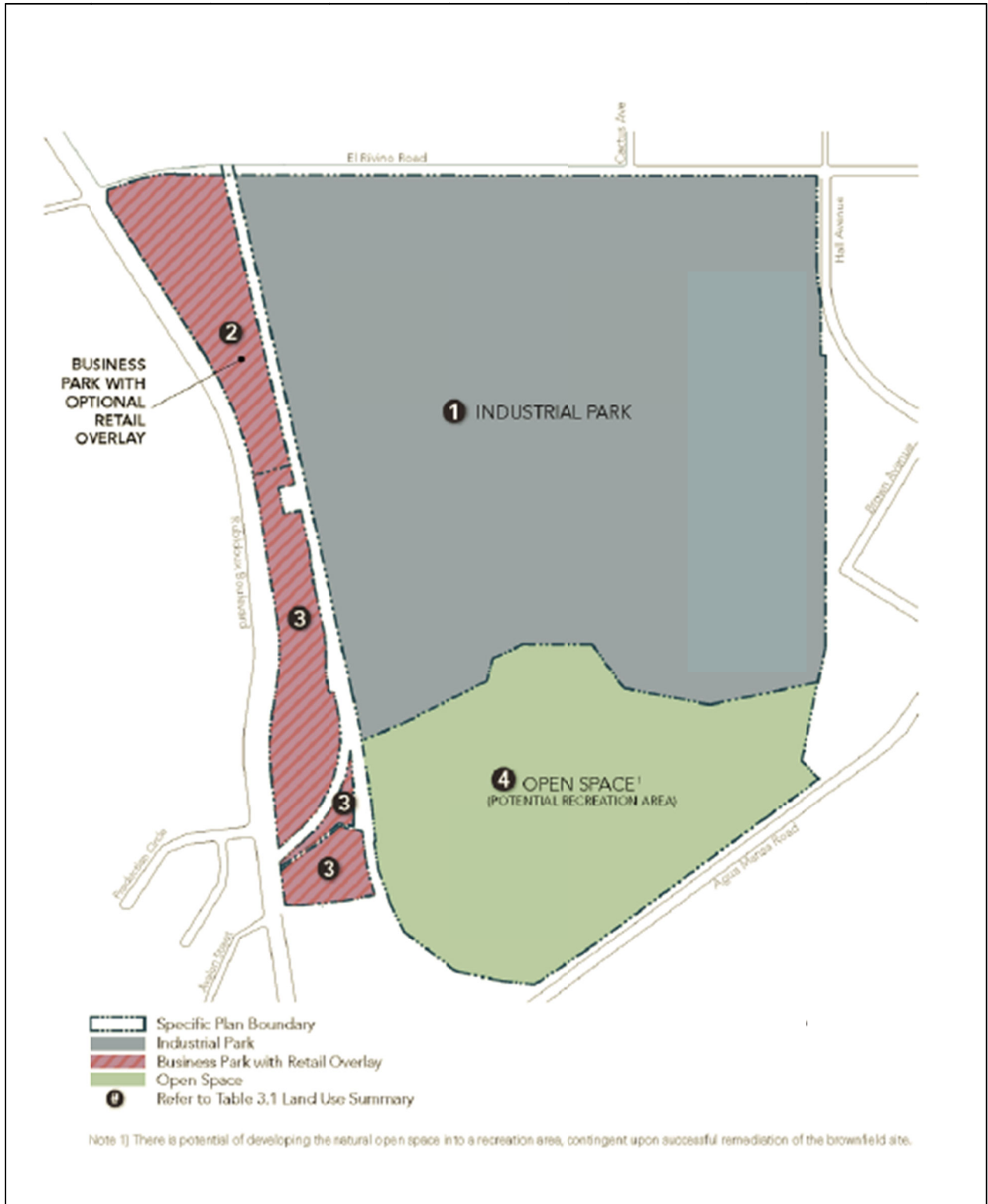


Figure 4 Conceptual Site Plan

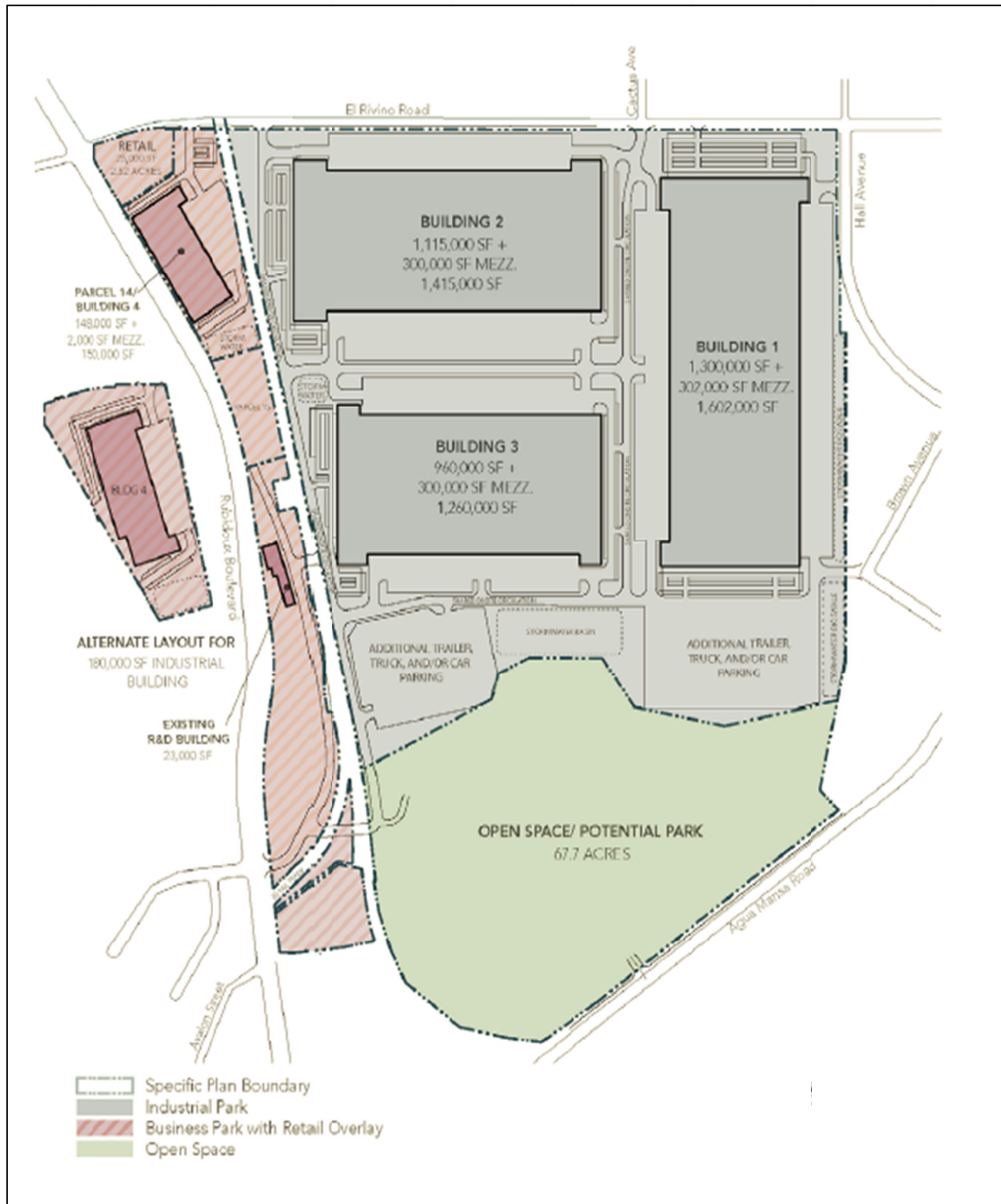


Figure 5 Circulation Plan

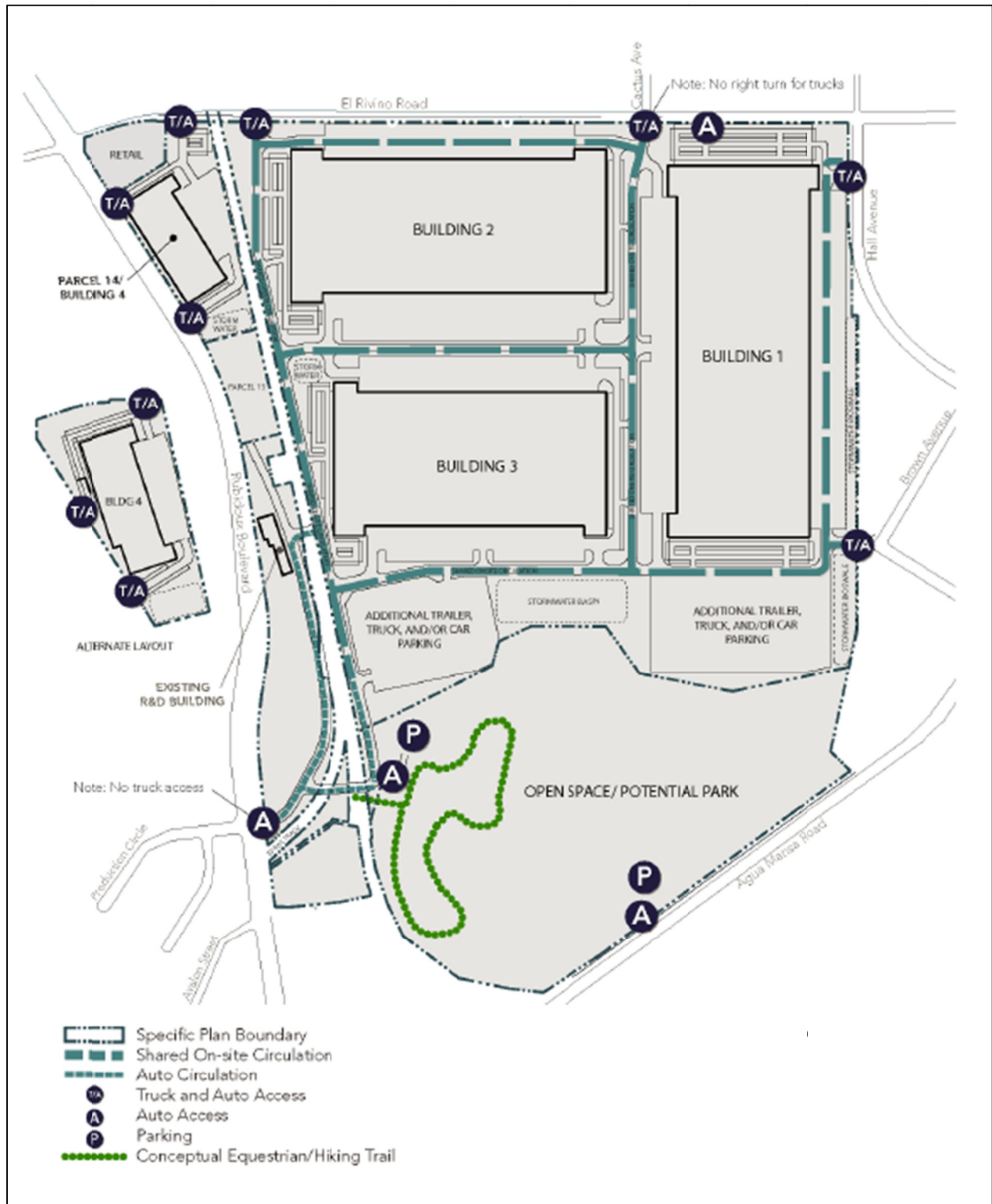
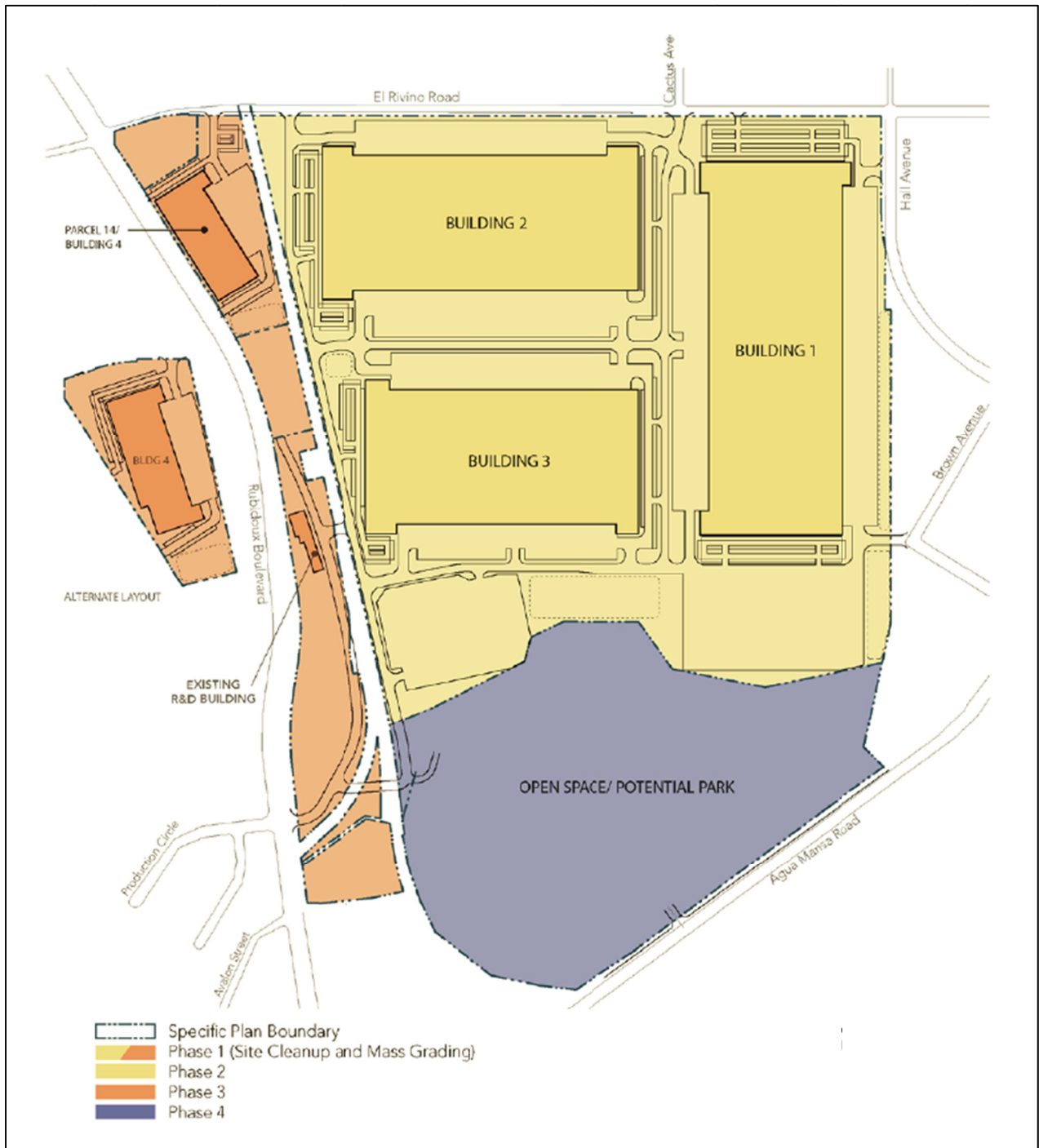


Figure 6 Phasing Plan



DEPARTMENT OF TRANSPORTATION

DISTRICT 8

PLANNING (MS 722)

464 WEST 4th STREET, 6th Floor

SAN BERNARDINO, CA 92401-1400

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www.dot.ca.gov/dist8

RECEIVED

JUL 27 2017

CITY OF JURUPA VALLEY

*Make Conservation
A California Way of Life.*

July 24, 2017

Annette Tam
Senior Planner
City of Jurupa Valley
Planning Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

Agua Mansa Commerce Park (RIV 60 PM 10.01)

Ms. Tam,

We have completed our initial review for the above mentioned proposal for the development of a 3.6 million square foot building that includes a warehouse distribution center with commercial services at the corner of Rubidoux and El Rivino all located on approximately 277 acres.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. Under the California Environmental Quality Act (CEQA), we are required to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Jurupa Valley due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

Please refer to the comment letter date January 13, 2017, I have added a copy of the letter for your viewing of Caltrans comments and recommendations.

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Talvin Dennis at (909) 806-3957 or myself at (909) 383-4557 for assistance.

Sincerely,

A handwritten signature in black ink that reads "Mark Roberts".

MARK ROBERTS

Office Chief

Intergovernmental Review, Community and Regional Planning

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*



January 13, 2017

Ms. Annette Tam
Senior Planner
City of Jurupa Valley, Planning Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

Agua Mansa Commerce Park Specific Plan
08-RIV 60, PM-11.055, SBd 10, PM 19.961
Projects Case#MA16170, APNs: 175-170-025, -035, -036, -040; 175-200-001 to -005, -007 to
-009, 175-170-041

Dear Ms. Tam:

The California Department of Transportation (Caltrans) has reviewed the Administrative Draft December 2016 for the Agua Mansa Commerce Park Specific Plan. The project covers 291.5 acres of industrial park uses, such as manufacturing, research and development, fulfillment centers, e-commerce centers, high-cube, general warehousing and distributions, and cross-dock facilities. It will also include an open-space area, and potential retail/food services. It is located on Rubidoux Boulevard at the deactivated Riverside Cement Plan site, south of Interstate 10 (I-10), north of State Route 60 (SR-60), and west of Interstate 215 (I-215).

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate with local jurisdictions when proposed development may impact our facilities. Although the project is under the jurisdiction of the City of Jurupa Valley, due to the Project's potential impact to State facilities, it is also subject to the policies and regulations that govern the SHS.

We offer the following comments based on Traffic Impact Analysis (TIA) methodology, access, and multimodal accessibility:

Traffic Operations and Forecasting:

- All State facilities within 5-mile radius of the Project should be analyzed in a TIA. The project is located between three major Highway systems with access to the site by I-10 Riverside Avenue Interchange, SR-60 Market Street Interchange, and I-215 Center Street Interchange. The data used in the TIA should not be more than two years old, and shall be

"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"

Ms. Annette Tam
January 13, 2017
Page 2

based on the Southern California Association of Governments 2016 Regional Transportation Plan Modal. The study should include adequate truck percentages and utilize adjustment factors for passenger car equivalents. See *Caltrans Guide for the Preparation of Traffic Impact Studies* at:
http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

- Please forward all Synchro analyses and two hard copies of the TIA to Caltrans' Intergovernmental Review unit for review and concurrence.

These recommendations are preliminary and summarize our review of materials provided for our evaluation. If you have any questions regarding this letter please contact me at (909) 383-4557.

Sincerely,



MARK ROBERTS
Office Chief
Community and Regional Planning

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710



July 24, 2017

Annette Tam
City of Jurupa Valley
8304 Limonite Avenue
Jurupa Valley, CA 92509

Sent via e-mail: atam@jurupavalley.org

RE: SCH# 2017071034; Agua Mansa Commerce Park Specific Plan Project, City of Jurupa Valley; San Bernardino County, California

Dear Ms. Tam:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,



Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

August 10, 2017

atam@jurupavalley.org

City of Jurupa Valley Planning Department

Attn: Annette Tam, Senior Planner

8930 Limonite Avenue

Jurupa Valley, CA 92509

Notice of Preparation of a Draft Environmental Impact Report for the Agua Mansa Commerce Park Specific Plan (Case No. MA16170)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

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

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air in the

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

South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. Achieving NO_x emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

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

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the proposed project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When

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

quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlap should be combined and compared to SCAQMD's regional operational thresholds to determine significance.

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

Mitigation Measures

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

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 AQMP available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf?sfvrsn=5>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

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

Permits

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the proposed project. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

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

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC170718-08

Control Number



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- Charles Landry
Executive Director

August 14, 2017

Annette Tam, Senior Planner
City of Jurupa Valley Planning Department
8930 Limonite Avenue
Jurupa Valley, CA 92509
Delivered via email

RE: AGUA MANSA COMMERCE PARK SPECIFIC PLAN/ CASE NO. MA 16170 NOTICE OF PREPARATION

Ms. Tam:

The Western Riverside County Regional Conservation Authority (RCA) is a joint powers authority formed to implement the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The City of Jurupa Valley is an MSHCP Permittee and an important partner in implementation. We appreciate the opportunity to review and comment on the proposed project.

The Agua Mansa Commerce Park *“is a proposed industrial business park with retail overlay and open space development located on the former Riverside Cement Plant facility.”* The proposed site is on *“291.5 acres of land in Jurupa Valley and would consist of three primary land uses: 1) Industrial Park, 2) Business Park (with potential retail component) and 3) Open Space (see Figures 3, Proposed Land Use Plan, and 4, Conceptual Site Plan). Buildout of the Specific Plan would allow up to 4,500,000 square feet of total building area and 67.7 acres of open space.”*

In the context of the MSHCP, the Agua Mansa Commerce Park site occurs in all three Agua Mansa Criteria Cells (21, 22, and 55). The purpose of Criteria Cells 21, 22 and 55 is specifically for conservation of the endangered Delhi Sands flower-loving fly (DSFLF). Per DSFLF Objective 1B *“Within Cells 21, 22 and 55 of Area Plan Subunit 3 of the Jurupa Area Plan, surveys shall not be required. Instead, 50 acres of Additional Reserve Lands shall be acquired within the geographic areas identified in Objective 1A and according to the reserve configuration guidance included in Objective 1A.”* Objective 1A reserve configuration guidance includes *“suitable dispersal and/or movement habitat and interconnecting linkages within the Core Areas themselves or be contiguous to areas that have already been conserved within and outside the Plan Area including locations outside the MSHCP Criteria Area or within San Bernardino County in the situation noted below. The first priority for conservation will be within Core Areas including the three known occupied areas that include the known localities of the Delhi Sands flower-loving fly in the Plan Area. These locations include one in the northwestern corner of the Plan Area near Hamner Avenue and SR-60 (Mira Loma), one in the Jurupa Hills, and one in the Agua Mansa Industrial Center.”*

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Ms. Annette Tam
August 14, 2017
Page 2

Since focused surveys are not required in Cells 21, 22 and 55, the objectives are interpreted to mean that suitable conservation sites do not necessarily need to be occupied by DSFLF.

The northern portion of the proposed Agua Mansa Commerce Park is the only area in Cells 21, 22 and 55 that is both undeveloped and within mapped DSFLF suitable habitat (MSHCP, Fig. 9-9). The site therefore presents the only opportunity to meet the 50 acre conservation goal in Agua Mansa. The Draft Environmental Impact Report (DEIR) should address the above comments specific to the City of Jurupa Valley's MSHCP consistency determination for the site.

The project site is in the MSHCP Criteria Area therefore Joint Project Review for MSHCP consistency is required and should be completed prior to the DEIR completion and public review.

If you should have any questions, please feel free to contact Laurie Correa at ldcorrea@wrcrca.org, (951)955-8805.

Sincerely,



Charles Landry

cc: Heather Pert, CDFW
Karin Cleary-Rose, USFWS



State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(909) 484-0167
www.wildlife.ca.gov

EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director



August 16, 2017
Sent via email

Ms. Annette Tam
Senior Planner
City of Jurupa Valley
8930 Limonite Avenue
Jurupa Valley, CA 92509
atam@jurupavalley.org

Subject: Notice of Preparation of a Draft Environmental Impact Report
Agua Mansa Commerce Park Specific Plan Project
State Clearinghouse No. 2017071034

Dear Ms. Tam:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Agua Mansa Commerce Park Specific Plan Project (project) [State Clearinghouse No. 2017071034]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The 291.5 acre project proposes an industrial and business park with retail overlay, and open space development, located on the former Riverside Cement Plant facility, located south of El Rivino Road, north of North Riverside and Jurupa Company Canal, east of Rubidoux Boulevard, and west of Hall Avenue, in the City of Jurupa Valley, Riverside County, California; within assessor parcel numbers (APNs): 175-170-035, -036, -040, -041, -043, 175-180-001, and 175-200-001 through 005, 007, 008 and 009. In order to redevelop the site as proposed in the Specific Plan, environmental remediation will be needed over a portion of the project area. Buildout of the Specific Plan would allow up to 4,500,000 square feet of total building area and 67.7 acres of open space.

Conserving California's Wildlife Since 1870

The project is proposed to occur in four phases:

- Phase 1 – Site cleanup and mass grading of the Industrial and Business Park with Retail Overlay areas.
- Phase 2 - Construction of Buildings 1 through 3 within the Industrial Park area.
- Phase 3 – Construction of the Business Park with optional retail on the western portion of the site.
- Phase 4 – Developing the open space area and potential recreational features. If initiated, the recreation plan will require the development of a Recreation Master Plan, which may identify a specific phasing program for different components and areas of the Recreation Master Plan.

The proposed project includes a general plan amendment, zone change and specific plan. Specific details of the proposed project include:

1. General Plan Amendment to the Jurupa Valley General Plan to re-designate the existing land use designation from 'heavy industrial' to 'light industrial/specific plan overlay' and 'recreation.'
2. Zone Change to the City of Jurupa Valley Zoning Map from 'Manufacturing-Heavy' to 'Specific Plan.'
3. Adoption of the proposed Agua Mansa Commerce Park Specific Plan and to exclude the project from the existing Agua Mansa Specific Plan No. 210.

COMMENTS AND RECOMMENDATIONS

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department offers the comments and recommendations presented below to assist the City of Jurupa Valley (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources and the project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

The Department acknowledges that the project is a specific plan and that additional environmental review may be forthcoming (on a project-by-project basis; or for each of the four proposed phases). However, we recommend that the DEIR include as much specificity as possible related to each of the four project phases, and that biological surveys be completed over the entirety of the Specific Plan area with results presented in the DEIR. Recent biological survey data is needed for the City to adequately analyze the direct, indirect, and cumulative impacts of the project. The Department also requests that the forthcoming DEIR clearly describe the threshold that will be relied on for

requiring additional environmental review (for example subsequent DEIRs, negative declarations) for each phase of the project.

The Department recommends that the forthcoming DEIR address the following:

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 Department 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. The Department 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. The Department 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). 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. The Department's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov 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. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at:
<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

Please note that the Department's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. The Department 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 effected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game 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 required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service, where necessary. Note that the Department 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 the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://www.wildlife.ca.gov/Conservation/Plants>);
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]);

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

3. An evaluation of impacts to 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 § 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. 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.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the project. When proposing measures to avoid, minimize, or mitigate impacts, the Department recommends consideration of the following:

1. *Sensitive Plant Communities*: The Department 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.
2. *Mitigation*: The Department 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 should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

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, including, but not limited to measures to ensure domestic animals (e.g., cats

and dogs) cannot access mitigation areas, and removal procedures to implement if they do; proposed land dedications; long-term monitoring and management programs; control of illegal dumping; water pollution; and increased human intrusion, etc.

3. *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.

The Department 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 the near future 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.

4. *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. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful

to take or possess any migratory nongame bird as designated in the MBTA 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 MBTA.

The Department 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 Department 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.

5. *Moving out of Harm's Way*: To avoid direct mortality, the Department recommends that the lead agency condition the DEIR to require that a Department-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., the Department 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.
6. *Translocation of Species*: The Department 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

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department recommends that a CESA 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. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

The Department encourages early consultation, as significant modification to the proposed project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. Please note that the proposed avoidance, minimization, and mitigation measures must be sufficient for the Department to conclude that the project's impacts are fully mitigated and the measures, when taken in aggregate, must meet the full mitigation standard. Revisions to the California Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA ITP unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit.

Western Riverside County Multiple Species Habitat Conservation Plan

Within the Inland Deserts Region, the Department 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: <http://rctlma.org/epd/WR-MSHCP>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. In order to be considered a covered activity, Permittees must demonstrate that proposed actions are consistent with the MSHCP and its associated Implementing Agreement. The City of Jurupa Valley is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. The project is located within the Delhi Sands Area Subunit (SU3) of the Jurupa Area Plan and occurs within MSHCP Criteria Cells 21, 22, and 55. The MSHCP states that conservation within these cells contributes to assembly of Delhi soils (MSHCP Section 3.3.6), which provides critical habitat for the federally listed Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*; DSFL) and is defined in the species-specific conservation objectives 1A, 1B and 1C in Table 9-2 of the MSHCP. This project is located in the only remaining area within the Jurupa Area plan for the MSHCP to meet the conservation objectives of 50 acres for DSFL. Currently the undeveloped northern portion of the proposed project in Cells 21 and 22 is the only suitable habitat within the Criteria Cells to meet this goal. Because the proposed project is located within MSHCP Criteria Cells, it is subject to the Joint Project Review (JPR) process through the Western Riverside County Regional Conservation Authority (RCA). In addition, MSHCP policies and

procedures that apply to the proposed project include the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP section 6.1.2), Protection of Narrow Endemic Plant Species (MSHCP section 6.1.3) and Additional Survey Needs and Procedures for burrowing owl (MSHCP section 6.3.2). The project will also be required to submit a Determination of Biologically Equivalent or Superior Preservation (DBESP) to the RCA, the United States Fish and Wildlife Service, and the Department.

The DEIR needs to address how the proposed project will affect the policies and procedures of the MSHCP. Therefore, all surveys required by the MSHCP policies and procedures listed above to determine consistency with the MSHCP should be conducted and results included in the DEIR so that the Department can adequately assess whether the project will impact the MSHCP.

Lake and Streambed Alteration Program

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") is required to provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Please note that streams include all those that flow at least episodically, including ephemeral streams, desert washes, and watercourses with subsurface flow. Based on the notification and supporting information, the Department 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.

The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). Therefore, 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 the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

Additional Comments and Recommendations

To ameliorate the water demands of this project, the Department recommends incorporation of water-wise concepts in project landscape design plans. In particular, the Department recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). 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: <http://saveourwater.com/what-you-can-do/tips/landscaping/>

Further Coordination

The Department appreciates the opportunity to comment on the NOP of a DEIR for the Agua Mansa Commerce Park Specific Plan Project (SCH No. 2017071034) and recommends that the City of Jurupa Valley address the Department's comments and concerns in the forthcoming DEIR. If you should have any questions pertaining to the comments provided in this letter, please contact Carly Beck at carly.beck@wildlife.ca.gov or 909-945-3294.

Sincerely,


Leslie MacNair
Regional Manager

For

ec: State Clearinghouse
Heather Pert, CDFW
Laurie Correa, RCA
Karin Cleary-Rose, USFWS

Literature Cited

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



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Palm Springs, California 92262
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California Department of Fish and Wildlife
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Ontario, California 91764
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In Reply Refer To:
FWS-WRIV-17B0633-17CPA0303

August 17, 2017
Sent by e-mail

Planning Department
City of Jurupa Valley
Attn: Annette Tam, Senior Planner
8930 Limonite Avenue
Jurupa Valley, California 92509-5183

Subject: Notice of Preparation of EIR for the Agua Mansa Commerce Park Specific Plan, City of Jurupa Valley, Riverside County, California

Dear Ms. Tam:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Preparation of an Environmental Impact Report (EIR) for the proposed Agua Mansa Commerce Park Specific Plan (Case No. MA16170) commercial project (Project) which we received on July 20, 2017. The EIR will be prepared to identify the proposed project's direct, indirect, and cumulative environmental impacts, to discuss alternatives, and to propose mitigation measures that avoid, minimize, or offset significant environmental impacts.

The proposed Project is a 291.5-acre industrial and business park with retail overlay, as well as an open space development, located on the former Riverside Cement Plant facility located south of El Rivino Road, north of the Riverside & Jurupa Company Canal, east of Rubidoux Boulevard, and west of Hall Avenue, in the City of Jurupa Valley. In order to redevelop the site as envisioned in the new Specific Plan, environmental remediation will be needed over a portion of the project area. Buildout of the Specific Plan would allow up to 4,500,000 square feet of total building area and 67.7 acres of allotted open space.

The proposed Project requires an amendment to the City's General Plan, a zoning change, and a new Specific Plan. Specific details of the project include:

1. Amendment to the Jurupa Valley General Plan to re-designate the existing land use designation from Heavy Industrial to Light Industrial/Specific Plan Overlay and Recreation.
2. Zoning Change to the City of Jurupa Valley Zoning Map from "Manufacturing – Heavy" to "Specific Plan".
3. Removal of the Project site from the (existing) Agua Mansa Specific Plan, and adoption of the proposed Agua Mansa Commerce Park Specific Plan.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The

Service is also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.).

The Service acknowledges that the project is a Specific Plan, and that additional environmental review may be forthcoming on a project-by-project basis. However, we recommend that the Draft EIR include as much specificity as possible, and that biological surveys be completed over the entirety of the Specific Plan area, with the results presented in the Draft EIR. Recent biological survey data are needed in order for the City to be able to adequately analyze the direct, indirect, and cumulative impacts of the Project. The Service also requests that the forthcoming Draft EIR clearly describe the threshold that will be relied on for requiring additional environmental review for each phase and sub-project tiering off of the Specific Plan.

On June 22, 2004, the Service issued a section 10(a)(1)(B) permit for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. The Service is providing the following comments as they relate to the Project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the California Environmental Quality Act (CEQA).

Compliance with existing regional conservation 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 or conflicts between a proposed Project and applicable regional conservation plans, including Habitat Conservation Plans and Natural Communities Conservation Plans. An evaluation of the proposed project's consistency with the MSHCP is necessary in the EIR to address CEQA requirements.

The proposed Project is located within the MSHCP Plan Area, and is subject to the provisions and policies of the MSHCP. The City of Jurupa Valley is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. Permittees (i.e., the City) must conduct covered activities consistent with the MSHCP and its associated Implementing Agreement.

The Project is located within the Delhi Sands Area Subunit (SU3) of the MSHCP's Jurupa Area Plan and falls inside MSHCP Criteria Cells 21, 22, and 55. The MSHCP states that conservation within these cells will contribute to the assembly in the Reserve System of Delhi soils (MSHCP section 3.3.6), which provides critical habitat for the endangered Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*; DSF) and is described in the species' Conservation Objectives 1A, 1B, and 1C in Table 9-2 of the MSHCP. The undeveloped northernmost part of the Project site is the only remaining area within the Jurupa Area Plan for the MSHCP to meet the conservation objective of placing 50 acres of suitable DSF habitat into the Reserve System.

The Agua Mansa Commerce Park site is located in all three of the MSHCP's Agua Mansa Criteria Cells (cells 21, 22, and 55). The purpose of Criteria Cells 21, 22, and 55 is specifically for conservation of the endangered Delhi Sands flower-loving fly (DSF). Per DSF species Objective #1B "Within Cells 21, 22, and 55 of Area Pan Subunit 3 of the Jurupa Area Plan,

surveys shall not be required. Instead, 50 acres of Additional Reserve Lands shall be acquired within the geographic areas identified in Objective #1A and according to the reserve configuration guidance included in Objective 1A.” Objective #1A reserve configuration guidance includes “suitable dispersal and/or movement habitat and interconnecting linkages within the Core Areas themselves or be contiguous to areas that have already been conserved within and outside the [MSHCP] Plan Area, including locations outside the MSHCP Criteria Area or within San Bernardino County in the situation noted below. The first priority for conservation will be within Core Areas including the three known occupied areas that include the known localities of the Delhi Sands flower-loving fly in the Plan Area. These locations include one in the northwestern corner of the Plan Area near Hamner Avenue and SR-60 (Mira Loma), one in Jurupa Hills, and one in the Agua Mansa Industrial Center.”

Since focused surveys are not required in Cells 21, 22, and 55, the objectives are interpreted to mean that suitable conservation sites do not necessarily need to be occupied by the DSF. That said, the species has been found in several locations near the proposed project site.

The northern portion of the proposed Agua Mansa Commerce Park is the only area in Cells 21, 22, and 55 that is both undeveloped and within DSF suitable habitat (MSHCP Figure 9-9). The Project site therefore presents the only opportunity to meet the 50-acre conservation goal in Agua Mansa. The Riverside County soil map prepared by the U.S. Natural Resources Conservation Service (NRCS) indicates that there are 39 to 55 acres of undeveloped DSFL suitable habitat in the northern quarter of the project site.

The Service recommends that the City rearrange the project’s conceptual land use (NOP Figure 3, Land Use Plan) in the EIR to shift commercial land uses out of DSF suitable habitat in the northernmost part of the project site (conceptual Planning Areas 1 and 2 in NOP Figure 3) and move them south into conceptual Planning Area 4. This would avoid impacting the endangered species’ habitat and provide for MSHCP implementation while maintaining the commercial acreage and square-foot objectives of the Project. Placement of the DSF habitat in the northernmost part of the site into conservation as part of the MSHCP’s Additional Reserve Lands would help fulfill the City’s MSHCP obligations to conserve the species. The Draft Environmental Impact Report should address the above comments specific to the City’s MSHCP consistency determination for the Project.

The Project site is located in the MSHCP narrow endemic plant species (MSHCP Section 6.1.3) and burrowing owl (MSHCP Section 6.3.2) survey areas. Surveys for the narrow endemic plants should be conducted during the months when the relevant species blooming tends to peak and should include simultaneous surveys of a reference site for each species to help evaluate the degree assure that the target species is detectable. Many species fail to germinate, resprout, and/or flower in years of below-average rainfall or in years where the rainy season ends early, resulting in “false-negative” conclusions that the species was absent from a project site when it actually was present but was either dormant or not easily visible in a particular year.

Burrowing owl surveys should follow the MSHCP’s instructions for burrowing owl surveys or the California Department of Fish and Wildlife’s (CDFW) 2012 Staff Report on Burrowing Owl

Mitigation. The EIR should include a mitigation measure stating that if 3 or fewer pairs of burrowing owls are found on the site, that the Project will notify the Service and the CDFW within 3 working days of discovering the owls, and will subsequently submit a Burrowing Owl Protection and Relocation Plan to the Service, the CDFW, and the Western Riverside County Regional Conservation Authority for their review and approval.

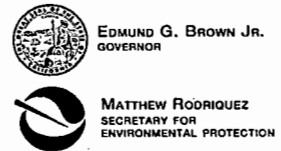
The Project site is located inside the MSHCP Criteria Area; therefore, the Joint Project Review process for MSHCP consistency is required, and should be completed prior to circulation of the Draft EIR.

We appreciate the opportunity to provide input to assist the City in configuring the Project in a manner which will fulfill the City's MSHCP obligations while also achieving the Project's commercial goals. If you have any questions or comments regarding this letter, or to schedule a meeting or a discussion of MSHCP procedures, please contact James Thiede at james_thiede@fws.gov or (760) 322-2070 extension 419.

Sincerely,

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

cc:
Charles Landry, Regional Conservation Authority
Jeff Brandt, California Department of Fish and Wildlife



Santa Ana Regional Water Quality Control Board

August 18, 2017

Annette Tam, Senior Planner
City of Jurupa Valley Planning Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

Email: atam@jurupavalley.org

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, AGUA MANSA COMMERCE PARK SPECIFIC PLAN - CITY OF JURUPA VALLEY, NO SCH NO.

Dear Ms. Tam:

Staff of the Regional Water Quality Control Board, Santa Ana Region (Regional Board) has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the Agua Mansa Commerce Park Specific Plan (Project). The generally rectangular 291.5-acre Project site is located on the site of the closed TXI Riverside Cement Company (RCC) Plant, in the northeastern portion of the City of Jurupa Valley, southeast of the intersection of El Rivino Road and Rubidoux Boulevard.

The Project consists of the conversion of the former RCC complex into:

- An industrial park (189.8 acres) in the northern portion;
- At least two business parks¹ (15.4 and 18.6 acres) with respective retail overlays, in a strip parallel to Rubidoux Boulevard (NOP Table 1); and
- An open space recreation area (67.7 acres) in the southern portion of the site.

For the industrial park, three warehouses will average approximately one million square feet (NOP Fig. 4, Conceptual Site Plan). These buildings will replace facilities that no longer function for the production, bagging, and export of cement in the northern two-thirds of the Project site. This area has been designated a brownfield (Comment 2 below) and would be remediated by this development. In the site's southern portion, limestone and marble were mined for most of the 20th Century in what are now three remnant quarries, all planned for open space and park/recreation land use.

The RCC combined the limestone and marble with imported "feed supplements" for burning in rotary kilns, in order to produce cement clinker. The clinker was crushed to create cement and exported. A by-product from this process, fine cement kiln dust (CKD), was often reused as a supplement in the kilns. Regional Board staff understand that the Environmental

¹ Additionally, a building west of Rubidoux Boulevard may be constructed as a concept for one of the business parks.

Protection Agency considers CKD to be a nonhazardous waste as long as proper management standards are followed.

According to RCC closure documents², waste CKD was deposited in three disposal sites along the steep banks of each quarry: 1) at the northern end of the "Crestmore Quarry" or "Mine" in the southwestern portion of the site; 2) beside the "Commercial Quarry" in the southeastern portion of the site, and 3) in a large area north and northwest of the "Wet Weather Quarry" in the east-central portion of the site (where depth of the deposit may vary greatly). By the 1990s, the CKD disposal areas were being covered with a cap of clay and rock as a closure measure. From Google Earth® images, it appears that one large CKD pile has remained exposed beside the Wet Weather Quarry for many years and that ubiquitous dust particles in the central portion of the site still pose a threat to air and water quality.

The NOP states that a Remedial Action Plan (RAP) will be discussed in the DEIR to address the onsite (CKD) disposal areas, as well as fugitive dust from Project construction. We add that any movement of the cap overlying these disposal areas would require a rigorous safety and logistics plan for CKD dust containment. The NOP lists many other appropriate subjects that will be addressed in the DEIR: generation of greenhouse gases, biological resources with jurisdictional delineations, stormwater drainage, pollutants of concern and water quality data, land use planning in terms of circulation and recreation, and as required, project alternatives. Further, the DEIR will include a hydrology report, a geotechnical report, a water supply assessment, and a cultural resources report intended to meet the tribal resources evaluation required by State Assembly Bill 52 (2014).

The NOP at page 4 indicates that because a formal Initial Study (IS) was not prepared for the Project pursuant to the California Environmental Quality Act (CEQA), the DEIR will identify existing environmental conditions onsite and significant environmental impacts posed by the Project. Regional Board staff understand that CEQA Guidelines Section 15063 does not necessarily require an IS when an EIR will definitely be compiled. Also, many of the CEQA Appendix G, Environmental Checklist questions routinely addressed in an IS are not relevant to such fully scoped projects. However, in the interest of maintaining the standards set by the Guidelines, we request that these questions be answered in some format of the City's choosing (table, appendix, incorporation by reference, etc.).

Regional Board staff recommend that the DEIR incorporate the following comments in order for the Project to best protect water quality standards (water quality objectives and beneficial uses), as defined in the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan):

² Riverside Cement Company, Crestmore Facility, Riverside County California, August 1991, Closure Plan Cement Kiln Dust Disposal Area and Boiler Blowdown Pond.

ERM EnviroClean-West, September 29, 1994, Letter to Dennis Smith of Riverside Cement Company, Proposal and Scope of Work for Boiler Blowdown Pond Closure and Rebuild of Secondary Containment.

Riverside Cement Company, May 1995, Closure Report Boiler Blowdown Pond, prepared for RCC by ERM EnviroClean-West, Inc. Irvine.

Regional Board files contain these closure documents, which may be helpful toward research for the DEIR and are available for review at our office.

1. The DEIR should discuss in detail how the site's geologic and mining history have led to the RCC's configuration of quarries and infrastructure, as well as to the need for careful remediation. From the closure documents above, Regional Board staff provide a basic summary that should be expanded upon in the DEIR. Two onsite limestone units are recognized, although not dated in the closure documents. Regional Board staff question the chronologic and stratigraphic distinctions of these units (and roof pendant origin) as described, because it seems possible that all onsite carbonate rock could represent one coeval unit from a water body. Notwithstanding, the units seen today were elevated and dipped 45 degrees to the east by a rising quartz diorite batholith, which represented the northernmost extension of the regional batholithic uplift throughout inland southern California. The limestone was physically separated into "western" and "eastern" units by a later intrusion (quartz monzonite) from the batholith. Contact metamorphism marbleized the limestone adjacent to the intrusion. Today, that intrusion remains as a tall local landmark ("Sky Blue Hill") between the site's three remnant limestone quarries.

East of Sky Blue Hill, the eastern limestone unit is found within the former "Wet Weather" and "Commercial" Quarries and it is saturated at depth with groundwater recharged by the Santa Ana River (SAR), an influent stream at its general location east of the site. In 1985, a mining drift originating from the western limestone unit (Crestmore Quarry, west of Sky Blue Hill) connected with the saturated eastern unit, flooding the Crestmore Quarry and ending RCC's productive days. The consequent "Crestmore Lake" remains perennially filled as an open "window" on subregional groundwater, and therefore pollutants entering it could be carried underground and impact downgradient resources. Surface runoff may convey pollutants toward Crestmore Lake from the higher central and northern portions of the site. The DEIR hydrology report must address creation of a Water Quality Management Plan (WQMP) for the Project to protect this vulnerable groundwater expression, using structural and procedural Best Management Practices (BMPs). The hydrology report should:

- Discuss groundwater quality onsite, as well as upgradient and downgradient, and establish a baseline prior to construction. Continue a monitoring program of sampling and analyses tracking throughout the Project;
 - Establish a groundwater elevation contour map (with seasonal fluctuations) indicating the gradient between the SAR, Crestmore Lake, and downgradient locations;
 - Discuss the Riverside-A Groundwater Management Zone (GMZ), over which the site is located (Regional Board Resolution No. R8-2004-0001, Figure 3-8 and Tables 3-1 and 4-1). GMZ water quality objectives are 560 mg/L for total dissolved solids and 6.2 mg/L for nitrate-nitrogen. The beneficial uses of this GMZ are Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Industrial Service Supply (IND), and Industrial Process Supply (PROC); and
 - State the Project's intentions for the two onsite wells, with their respective casing construction measurements (camera survey) and depths to groundwater. Any abandonment must be conducted according to California Well Standards.
2. Please discuss whether the brownfield designation was established by the California Department of Toxic Substances Control (DTSC) or another agency, along with the expected level of remediation and waste management from that agency. During the

1990s, aside from the cover of the three CKD disposal areas, facilities supporting the plant also underwent regulatory closure. The RCC was regulated from 1978 to 1998 under Regional Board Order No. 78-27, Waste Discharge Requirements (WDRs), for the discharges of:

- Groundwater (i.e., "wastewater") pumped from the limestone quarry to the "West Riverside Canal" located outside the property;
- Sanitary wastes treated by an onsite package treatment plant, prior to discharge into a subsurface disposal system (the package plant may not have been built); and
- Boiler blowdown of hot mineralized water (used to heat the kilns) into a surface impoundment ("brine pond" or "boiler blowdown disposal pond").

Monitoring reports consistently indicated that effluent concentrations for all discharges did not pose a significant threat to water quality, and therefore Order No. 78-27 was rescinded on May 29, 1998.

The surface impoundment had a plastic liner to contain the boiler discharge, and it also provided secondary containment for an aboveground storage tank (AST) containing fuel oil to heat the boiler. In 1990, RCC staff suspended boiler use but retained the AST. Under Regional Board oversight, the surface impoundment and soil beneath it was excavated, analyzed, and properly disposed of. Several rounds of soil samples for metals, hydrocarbons, and electrical conductivity confirmed clean closure, which was approved by a Regional Board staff letter on June 15, 1995.

Following excavation and confirmation sampling, a clay layer and thick polyester liner was installed in the impoundment site, now redesigned per AGT regulations to contain both a spill and simultaneous precipitation from a storm. It appears that the proposed Project may build over the impoundment, AGT, and other disposal sites noted above. The Riverside County Department of Environmental Health should be consulted regarding any dismantling of the AGT. While the Regional Board does not require further closure plans or approval for changes to the RCC facility--aside from stormwater permits--our staff is available to consult with other agencies and Project participants.

3. The DEIR should incorporate and respond to the February 7, 1991, "Crestmore Quarry Mining and Reclamation Plan." This was RCC's projection for an onsite industrial park, and for a preserved wildlife refuge in Crestmore Lake and ephemeral wetlands found within the Commercial Quarry. The DEIR should discuss all germane requirements of the California Surface Mining and Reclamation Act (SMARA) and how the 1991 plan may need revision accordingly. Any revised reclamation plan should be included as a DEIR appendix.

Regional Board staff believe that the dedication of Crestmore Lake for wildlife use, along with dedications of any other surface expressions of groundwater or captured stormwater, would support the following beneficial uses listed in the Basin Plan: Wildlife Habitat (WILD), Warm Freshwater Habitat (WARM), Groundwater Recharge (GWR), Non-Contact Water Recreation (REC2), and potentially, Rare, Threatened, and Endangered Species (RARE). While we would consider trails to observation platforms as

components of REC2, a beneficial use including muscle-powered watercraft or swimming (Water Contact Recreation, REC1) would appear unsafe in reportedly deep Crestmore Lake.

4. The NOP states that jurisdictional delineations with actual impacted acreage will be studied by the DEIR. It is possible that Crestmore Lake may be identified as having a federal nexus, i.e., identified as waters of the United States subject to regulation by the United States Army Corps of Engineers (USACOE). If the Project will cause material to be dredged from, or filled into, federally jurisdictional waters, then a Clean Water Act (CWA) Section 404 permit is required and a prerequisite CWA Section 401 Water Quality Standards Certification is required from the Regional Board. Such disturbance requires mitigation that, at a minimum, replaces the full function and value of the water quality standards of the impacted water body through the Certification process. A wildlife refuge use would not appear to require construction disturbance in the Lake.

Where the USACOE rules that a water body does not fall under its jurisdiction, the Regional Board may still determine that waste discharge requirements (WDRs) and associated mitigation are necessary for protection of isolated wetlands as waters of the State. A Lake and Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife may be necessary as well.

5. On August 2, 2016, Regional Board staff recorded for this closed facility a Notice of Termination of the State Water Resources Control Board (SWRCB) General Industrial Activities Storm Water Permit (SWRCB Order No. 2014-0057-DWQ, NPDES No. CAS000001). Any need for such coverage for the final Project will be evaluated by Regional Board staff. Also, the DEIR should assure that the Project will implement all relevant portions of Regional Board Order No. RB8-2010-0033, NPDES Permit No. CAS 618033, "*Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County within the Santa Ana Region Area-Wide Urban Runoff Management Program*" (and subsequent renewals thereof), also known as the "Riverside County municipal separate storm sewer system" permit, or "Riverside County MS4," available at http://www.waterboards.ca.gov/santaana/board/decisions/adopted_orders/orders/2010/10_33_RC_MS4_Permit_01_29_10.pdf.
6. The Project must be enrolled under the SWRCB Construction General Permit, Order No. 2009-0009-DWQ (effective July 17, 2012), and generate a Storm Water Pollution Prevention Plan establishing BMPs for Project construction/post-construction runoff. A Notice of Intent (NOI), with the appropriate fees for Project coverage under this Permit, must be submitted to the SWRCB at least 30 days prior to the initiation of construction activity at the site. Information about this permit program can be found at http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml.

If you have any questions, please contact Glenn Robertson at (951) 782-3259 and glenn.robertson@waterboards.ca.gov , or me at (951) 782-4995 and terri.reeder@waterboards.ca.gov .

Sincerely,

Handwritten signature of Terri S. Reeder in cursive, followed by the word "for" in a simple font.

Terri S. Reeder, Chief
Basin Planning Coastal Waters Section

cc: State Clearinghouse

Dina Kourda, California Department of Toxic Substances Control, Cypress office –
dina.kourda@dtsc.ca.gov

Jeff Brandt, California Department of Fish and Wildlife, Ontario office –
jeff.brandt@wildlife.ca.gov

Stephanie J. Hall, U.S. Army Corps of Engineers, Los Angeles office –
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Karin Cleary-Rose, U.S. Fish and Wildlife Service, Palm Springs office –
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Mark Wills, Riverside County Flood Control and Water Conservation District, Riverside –
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Greg Reyes, Riverside County Department of Environmental Health –
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Drive H: Grobertson/Data/CEQA/CEQA Responses/Riverside County/City of Jurupa Valley/NOP-City of Jurupa Valley-Agua Mansa
Commerce Park SP, former Riverside Cement Co Quarry.docx

SIGN-IN SHEET

Scoping Meeting for the Agua Mansa Commerce Park Specific Plan Environmental Impact Report (EIR) Thursday, July 27, 2017

Please print clearly:

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9.		
10.		