

# CITY OF WILDOMAR CORNERSTONE COMMUNITY CHURCH CONSTRUCTION PROJECT FINAL ENVIRONMENTAL IMPACT REPORT

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SCH No. 2013111005



*Lead Agency:*

CITY OF WILDOMAR  
23873 CLINTON KEITH ROAD, SUITE 201  
WILDOMAR, CA 92595

**SEPTEMBER 2014**



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CITY OF WILDOMAR  
CORNERSTONE COMMUNITY CHURCH  
DRAFT ENVIRONMENTAL IMPACT REPORT

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STATE CLEARINGHOUSE NO. 2013111005

*Lead Agency:*

CITY OF WILDOMAR  
23873 CLINTON KEITH ROAD, SUITE 201  
WILDOMAR, CA 92595

**SEPTEMBER 2014**



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# **1.0 – INTRODUCTION**

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This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Wildomar (City) is the lead agency for the environmental review of the proposed Cornerstone Community Church Construction Project (proposed project; project). The City has the principal responsibility for approving the project. This Final EIR assesses the expected environmental impacts resulting from approval and implementation of the proposed project, as well as responds to comments received on the Draft EIR.

### 1.3 ORGANIZATION AND SCOPE OF THE FINAL EIR

This Final EIR is organized in the following manner:

#### SECTION 1.0 – INTRODUCTION

Section 1.0 provides an overview of the EIR process to date and what the Final EIR is required to contain.

#### Section 2.0 – COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Section 2.0 provides a list of commenters, copies of written comments (coded for reference), and the responses to those comments made on the Draft EIR.

#### Section 3.0 – MINOR REVISIONS TO THE DRAFT EIR

Section 3.0 provides a list of minor edits made to the Draft EIR as a result of comments received and other staff-initiated changes.

### 1.1 BACKGROUND AND PURPOSE OF THE EIR

#### BACKGROUND OF ENVIRONMENTAL REVIEW PROCESS OF THE PROJECT

The following is an overview of the environmental review process for the proposed Cornerstone Church Construction Project that led to the preparation of this Final EIR.

#### Notice of Preparation

The Notice of Preparation (NOP) for the Draft EIR was submitted for public review on November 1, 2013, with the review period ending on December 2, 2013. A scoping meeting was held on November 18, 2013, to solicit input from interested agencies and the public. The City received several comment letters on the NOP and during the public scoping meeting. The NOP comments are provided in **Appendix 2.0** of the Draft EIR and summarized in Section 1.0 Introduction of the Draft EIR.

#### Draft EIR

The Draft EIR was released for public and agency review on June 24, 2014, with the 45-day review period ending on August 7, 2014. The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. The Draft EIR was provided to interested public agencies and the public and was made available for review at City offices, and on the City's website. ([www.cityofwildomar.org](http://www.cityofwildomar.org))

## **1.0 INTRODUCTION**

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### **Final EIR**

The City received 5 comment letters from public agencies, interest groups, and the public regarding the Draft EIR. This document responds to the comments received by the City on the proposed project, as required by CEQA. This document also contains minor edits to the Draft EIR, which are included in Section 3.0, Minor Revisions to the Draft EIR. This document constitutes the Final EIR.

### **Certification of the Final EIR/Project Consideration**

The City will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the City may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if it: (1) shows a good faith effort at full disclosure of environmental information; and (2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may take action to adopt, revise, or reject the proposed project. A decision to approve the proposed project would be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

## **1.2 INTENDED USES OF THE EIR**

The EIR is intended to evaluate the environmental impacts of the project to the greatest extent possible. This EIR, in accordance with CEQA Guidelines Section 15126, should be used as the primary environmental document to evaluate all planning and permitting actions associated with the project. Please refer to Section 2.0, Project Description, of the Draft EIR for a detailed discussion of the proposed project.

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## **2.0 – COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR**

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## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

### 2.1 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR.

Letter	Agency, Organization, or Individual	Date
A	Department of Fish and Wildlife	August 4, 2014
B	Pechanga Cultural Resources	August 7, 2014
C	Governor's Office of Planning and Research	August 7, 2014
1	John Garrett	July 5, 2014
2	Johnson & Sedlack	August 7, 2014

### 2.2 COMMENTS AND RESPONSES

#### REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204).

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

State CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the Draft EIR, those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR.

#### RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments.

Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strikeout~~ for deleted text). The responses to comments were prepared by City staff and PMC.

## Letter A



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
407 West Line Street  
Bishop, CA 93514  
www.wildlife.ca.gov

**EDMUND G. BROWN JR., Governor**  
**CHARLTON H. BONHAM, Director**



August 4, 2014

Mr. Matthew C. Bassi  
City of Wildomar  
23873 Clinton Keith Road, Suite 201  
Wildomar, CA 92595

Subject: Draft Environmental Impact Report  
Cornerstone Community Church  
State Clearinghouse No. 2013111005

Dear Mr. Bassi,

The California Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Cornerstone Community Church (project) [State Clearinghouse No. 2013111005]. The Department is responding to the DEIR 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).

### Project Description

The proposed project includes a Planning Action (PA) to modify the existing Public Use Permit (PUP) 778 for the Cornerstone Community Church. The modification proposes development on 20.37 acres of the 63.41 acre project site; the remaining 43.25 acres will be left undisturbed. The project proposes the construction of a preschool, administrative office building, kitchen, and new parking lots at the existing church. As part of the project, a new approximately 1,900-lineal-foot sewer line will be constructed in Monte Vista Drive to connect to an existing Elsinore Valley Municipal Water District sewer manhole. Construction of the new sewer line will allow for the abandonment of the existing on-site septic tanks.

The Department offers the following comments and recommendations and requests that these comments and recommendations be addressed by the Lead Agency prior to adoption of the Final Environmental Impact Report (FEIR):

*Conserving California's Wildlife Since 1870*

## Letter A Continued

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1. The project is located within the MSHCP burrowing owl (BUOW) additional survey area (MSHCP section 6.3.2). The DEIR states that focused surveys for BUOW were completed in April and May of 2013. No BUOW were observed during the surveys, however suitable habitat is present on site. The Department is uncertain of the proposed start date of construction activities, but assumes that at least two-three years may elapse prior to construction (re: Mitigation Measure 3.3.1 states that within two years of groundbreaking, surveys will be completed for two plant species). Due to the potential for a considerable lapse in time between completion of the 2013 focused surveys and construction, the Department requests that new focused surveys for BUOW (following the "Burrowing Owl Survey Instructions for the Western Riverside MSHCP") be completed within the twelve month period prior to construction. The Department requests the updated focused surveys for BUOW be incorporated into Mitigation Measure 3.3.2.

A-1

Mitigation Measures 3.3.2a and MM 3.3.2b includes reference to excluding owls from burrow during the non-breeding season using either passive relocation or active translocation. Please note that the Department does not recommend excluding the owls from the site using passive relocation unless there are suitable burrows available within 100 meters of the closed burrows (Trulio 1995, CDFG 2012) and the relocation area is protected through a long-term conservation mechanism (e.g., conservation easement). If owls are found to be present onsite, we recommend that the project proponent develop a conservation strategy in cooperation with the Department, the US Fish and Wildlife Service, and the Regional Conservation Authority in accordance with the Department's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012).

2. 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) prohibit the take of all birds and their nests. 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.

A-2

## Letter A Continued

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Mitigation Measure 3.3.2d proposes conducting preconstruction surveys “during the migratory bird nesting season (March 15-August 15)...within 14 days of construction initiation.” Because some species of raptors (e.g., owls) may commence nesting activities in January, the Department encourages the Lead Agency to complete nesting bird surveys regardless of time of year to ensure compliance with all applicable laws related to nesting birds and birds of prey. Furthermore, not all bird species nest in vegetation; some species nest directly on the ground. The Department recommends that pre-construction surveys be required no more than three days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner. The Department requests that the Lead Agency revise Mitigation Measure 3.3.2d to reflect these comments.

A-2  
cont.

3. The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or “entity”) must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department’s issuance of an LSA Agreement is a “project” subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments.

A-3

The DEIR identifies four ephemeral drainages in the southern portion of the project area, one of which appears to be located in the immediate vicinity of the proposed new parking lot in the eastern portion of the project area. Project grading may result in the loss of riparian habitat from proposed vegetation disturbance or removal. The Department recommends that if project activities have the potential to impact these areas, either directly through equipment movement, or indirectly through soil placement, that the project proponent submit a notification of LSA. The Department further recommends that construction Best Management Practices (BMPs) be installed and regularly monitored to ensure that sediment does not enter Department jurisdictional waters.

Please note that the Department’s criteria for determining the presence of jurisdictional waters are more comprehensive than the MSHCP criteria in Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools). The following information will be required for the processing of a Notification and the Department recommends incorporating this information into the CEQA document to avoid subsequent documentation and project delays.

## Letter A Continued

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Please note that failure to include this analysis in the project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue a LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the project:

- A) Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
- B) A discussion of avoidance and minimization measures to reduce project impacts; and,

A-3  
cont.

Please note that the project is also subject to the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2), and if impacts to these areas cannot be avoided a Determination of Biologically Equivalent or Superior Preservation (DBESP) may be required. Additional information regarding section 6.1.2 of the MSHCP may be found here: <http://rctlma.org/Portals/0/mshcp/volume1/sec6.html#6.1.2>

A discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance. Please refer to Section 15370 of the CEQA Guidelines for the definition of mitigation.

We recommend that the FEIR address the concerns of the Department listed in this letter. Thank you for the opportunity to provide comments on the DEIR for the proposed Cornerstone Community Church (SCH No. 2013111005). Please contact Rose Banks with questions regarding this letter and further coordination on project permitting needs at (760) 873-4412 or [Rose.Banks@wildlife.ca.gov](mailto:Rose.Banks@wildlife.ca.gov).

Sincerely,



Heidi A. Sickler  
Senior Environmental Scientist

cc: State Clearinghouse, Sacramento

### Literature Cited

California Department of Fish and Game (CDFG) 2012. Staff report on burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: [http://www.dfg.ca.gov/wildlife/nongame/survey\\_monitor.html](http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html)

## **Letter A Continued**

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Trulio, L.A. 1995. Passive Relocation: A Method to Preserve Burrowing Owls on Disturbed Sites. *Journal of Field Ornithology* 66(1):99-106.

**Comment Letter A**  
**Department of Fish and Wildlife**  
**August 4, 2014**

- A-1 The commenter states that the time period between burrowing owl surveys that were completed for the project and the actual construction start date was too great and that new surveys should be completed within the twelve month period prior to the construction start date. The commenter continues and provides a suggested change to mitigation measures MM 3.3.2a and MM 3.3.2b. .

The following change will be made to Mitigation Measure 3.3.2a on page 3.3-28:

Focused surveys shall be conducted within 12 months prior to construction activities. These surveys shall be conducted in accordance with the *Burrowing Owl Survey Instructions for the Western Riverside MSHCP* (March 29, 2006).

In addition, pPer MSHCP Species-Specific Objective 6, preconstruction presence/absence surveys for burrowing owl within the survey area, where suitable habitat is present, will be conducted for all covered activities through the life of the building permit. Surveys will be conducted within 30 days prior to disturbance. Take of active nests will be avoided. ~~Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present outside the nesting season.~~ If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed.

Surveys shall be completed for occupied burrowing owl burrows within all construction areas and within 500 feet (150 meters) of the project work areas (where possible and appropriate based on habitat). All occupied burrows will be mapped on an aerial photo.

The following change will be made to Mitigation Measure 3.3.2b on page 3.3-28:

If burrowing owls are found to be present onsite, the project proponent shall develop a conservation strategy in cooperation with CDFW, USFWS and the Regional Conservation Authority in accordance with CDFW's *Staff Report on Burrowing Owl Mitigation* (2012) prior to any groundbreaking activities.

~~If burrowing owls are identified during the survey period, the City shall require the project applicant to take the following actions to offset impacts prior to ground disturbance:~~

~~Active nests within the areas scheduled for disturbance or degradation shall be avoided from February 1 through August 31, and a minimum 250 foot (75 meter) buffer shall be provided until fledging has occurred. Following fledging, owls may be passively relocated by a qualified biologist.~~

~~If impacts on occupied burrows in the non nesting period are unavoidable, on site passive relocation techniques may be used if approved by the CDFW to encourage owls to move to alternative burrows outside of the impact area. However, no occupied burrows shall be disturbed during the nesting season. A qualified biologist must verify through noninvasive methods that the burrow is no longer occupied.~~

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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~~If relocation of the owls is approved for the site by the CDFW, the City shall require the developer to hire a qualified biologist to prepare a plan for relocating the owls to a suitable site. The relocation plan must include all of the following:~~

- ~~• The location of the nest and owls proposed for relocation.~~
- ~~• The location of the proposed relocation site.~~
- ~~• The number of owls involved and the time of year when the relocation is proposed to take place.~~
- ~~• The name and credentials of the biologist who will be retained to supervise the relocation.~~
- ~~• The proposed method of capture and transport for the owls to the new site.~~
- ~~• A description of site preparation at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one time or long term vegetation control).~~
- ~~• A description of efforts and funding support proposed to monitor the relocation.~~

~~If paired owls are present within 160 feet (50 meters) of a temporary project disturbance (e.g., parking areas), active burrows shall be protected with fencing/cones/flagging and monitored by a qualified biologist throughout construction to identify losses from nest abandonment and/or loss of reproductive effort. Any identified loss shall be reported to the CDFW.~~

- A-2 The commenter notes that it is the project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey and provides a listing of the applicable laws. The commenter continues and suggests additions to mitigation measure MM 3.3.2d. -.

The following change will be made to Mitigation Measure 3.3.2d on page 3.3-29:

Migratory Bird Surveys. If clearing and/or construction activities will occur, within undisturbed portions of the project site, during the migratory bird nesting season (~~March 15~~ January 1 through August 15), preconstruction surveys to identify active migratory bird nests shall be conducted by a qualified biologist within ~~44~~ 3 days of construction initiation. Focused surveys must be performed by a qualified biologist for the purposes of determining presence/absence of active nest sites within the proposed impact area and a 200-foot buffer (if feasible). Note that the City will require preconstruction nesting surveys during the nesting season only.

If active nest sites are identified within 200 feet of project activities, the applicant shall impose a limited operating period (LOP) for all active nest sites prior to commencement of any project construction activities to avoid construction- or access-related disturbances to migratory bird nesting activities. An LOP constitutes a period during which project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur and will be imposed within 100 feet of any active nest sites until the nest is deemed inactive. Activities permitted within and the size (i.e., 100 feet) of LOPs may be adjusted through consultation with the CDFW.

- A-3 The commenter states the California Department of Fish and Wildlife (DFW) is responsible for issuing a Lake and Streambed Alteration (LSA) Agreement per Section 1602 of the Fish and Game Code. The commenter continues and states to facilitate the issuance of a

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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LSA, an environmental document should fully identify the potential impacts, mitigation, monitoring and reporting commitments for impacted lakes, streams and riparian resources.

One of the ephemeral drainages located in the southern portion of the site is located immediately south of a proposed water quality basin. As previously reported, none of the ten riparian habitats described under the Riparian Forest/Woodland/Shrub Vegetation Association heading in the MSHCP were mapped within or alongside the banks of any ephemeral drainage present on the site. A recent survey was conducted to confirm these findings. The location of the ephemeral drainage (Riparian/Riverine Area) has been plotted onto an aerial photograph (see Figure 1). The project footprint showing the location of the basin is also shown on this map.

Project grading will not then result in the loss of riparian habitat from proposed vegetation disturbance or removal. Project activities do not have the potential to impact this area, either directly through equipment movement, or indirectly through soil replacement. Submitting a Notification of Lake or Streambed Alteration to the Department is not required in this case.

Cut-grading to create the basin will occur in a south-to-north direction away from the drainage channel, and no fill materials will be placed in this area. Placement of the outlet structure will occur a distance above any streambed associated with this drainage.

The proposed project will incorporate erosion control requirements from the San Diego Regional Water Quality Control Board to ensure that disturbed surfaces will not be left without erosion control measures in place from October 1 through April 15.

Best management practices (BMPs) will also be used to ensure that siltation and erosion are minimized during construction. Construction Guidelines and Standard BMPs are set forth in Section 7.5.3 and Appendix C of the MSHCP, Volume 1. Impacts 3.3.3 and 3.3.4 also address this topic and provide mitigation that would be followed if disturbance would occur. Mitigation measure MM 3.3.3 addresses a no-net-loss of riparian vegetation associated with the feature, as well as potential methods for mitigation, such as restoration or purchase of credits. Mitigation measures MM 3.3.4a and MM 3.3.4b require a jurisdictional delineation and no-net-loss of any features deemed jurisdictional and require a 1602 permit as well as CWA Section 404 and 401 permits as needed.

The commenter states a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required for project with unavoidable impacts to drainages. As shown above the proposed project will avoid any riparian vegetation and would therefore not require preparation of a DBESP.

The commenter states that the implementation of the proposed project could conflict with the provisions of the Western Riverside County MSHCP. This would be considered a **potentially significant** impact.

The MSHCP protects and preserves certain habitats and species in the region. The MSHCP delineates particular areas of concern through the identification of specific areas known as Criteria Cells. Areas identified as Criteria Cells typically contain certain restrictions on development and land alterations. The PSA is not within a Criteria Cell or any other special conservation area. A full analysis of the proposed project's consistency with the MSHCP can be found in **Appendix 3.3**.

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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The proposed project is located within the Burrowing Owl Survey Area (Figure 6-4 of the MSHCP). A nesting season survey was conducted and a report was prepared, following the guidelines provided in the MSHCP (**Appendix 3.3**).

Section 6.1.2 of the MSHCP addresses preservation of riparian, riverine, vernal pool, and fairy shrimp habitats. The proposed project may result in onsite improvements that will have direct permanent impacts to MSHCP riverine/riparian habitat within the PSA. Impacts to the riverine/riparian area may occur from construction of a parking lot. In order to comply with Section 6.1.2, the project proponent shall prepare and submit a Determination of Biologically Equivalent or Superior Preservation (DBESP) to the City. Off-site mitigation could be in the form of purchased mitigation credits from the Elsinore-Murrieta-Anza Resource Conservation District (EMARCD).

A final component of the MSHCP is Mitigation Fee Areas, which are land areas that occur within the MSHCP and require a fee for development activities to occur. These fees are utilized to fund the minimization to certain endemic species. The proposed project is located within the MSHCP Mitigation Fee Area (Riverside County Ordinance 810.2) and the Stephens' Kangaroo Rat Mitigation Fee Area (Riverside County Ordinance 663). A standard condition for the proposed project includes the payment of these fees to comply with the overlying habitat conservation plan (the MSHCP).

As demonstrated in the analysis by Principe and Associates (2013a) (see **Appendix 3.3**), the proposed project is consistent with the MSHCP. With adherence to the standard conditions and requirements, any impacts will be less than significant with mitigation incorporated. In addition, implementation of mitigation measures **MM 3.3.2a** and **MM 3.3.2b** included above will result in the project having **no impact** with regard to the MSHCP.

## Letter B



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

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

Chairperson:  
Mary Bear Magee

Vice Chairperson:  
Darlene Miranda

Committee Members:  
Evie Gerber  
Bridgett Barcello Maxwell  
Richard B. Searce, III

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Planning Specialist:  
Tuba Ebru Ozdil

Cultural Analyst:  
Anna Hoover

August 7, 2014

**VIA E-MAIL and USPS**

Mr. Matthew Bassi  
Planning Director  
City of Wildomar  
23873 Clinton Keith Road, Ste 201  
Wildomar, CA 92595

**Re: Pechanga Tribe Comments on the Notice of Availability of a Draft Environmental Impact Report for the Cornerstone Community Church Project, PA12-0194**

Dear Mr. Bassi:

This comment letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). If you have not done so already, please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archaeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

The Tribe thanks the City of Wildomar and the Developer for providing mitigation to preserve and protect any sensitive Luiseño cultural resources and traditional landscapes that could be impacted and to require both archaeological and Pechanga tribal monitoring during earthmoving activities. The State and Federal governments have mandated that cultural resources must be appropriately mitigated for within the confines of development projects. The Tribe appreciates the active role the City takes to maintain the significant history of the Tribe and California.

**DRAFT ENVIRONMENTAL IMPACT REPORT MITIGATION MEASURES**

The Pechanga Band is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to tribal cultural resources. The

*Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need*

## Letter B Continued

Pechanga Comment Letter to the City of Wildomar  
Re: Pechanga Tribe Comments on PA12-0194  
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Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

The Tribe is in receipt of the Draft Environmental Impact Report (DEIR) and the Project archaeological study. The proposed Project is located in a sensitive region of Luiseño territory and the Tribe believes that the possibility for recovering subsurface resources during ground-disturbing activities is high.

Based upon the information provided to the Tribe, there are no known cultural resources located within the Project boundaries. Therefore, the sensitivity of this Project lies with the potential to impact subsurface, unknown cultural resources during earthmoving activities. At this time, the Tribe thanks the City of Wildomar for working closely with us to develop appropriate and adequate mitigation measures. These are identified in the DEIR as MM3.5.2A-D and MM3.5.4A-C and have been copied below for reference. We request that these mitigation measures, with the few minor edits proposed, be incorporated into the final DEIR, as Conditions of Approval and in any other final environmental documents approved by the City for this Project.

**MM 3.5.2a** If during grading or construction activities cultural resources are discovered on the project site, work shall be halted immediately within 50 feet of the discovery and the resources shall be evaluated by a qualified archeologist and the Pechanga Tribe (Tribe). Any unanticipated cultural resources that are discovered shall be evaluated ~~and a~~ in the final report prepared by the qualified archeologist. The report shall include a list of the resources discovered, documentation of each site/locality, and interpretation of the resources identified, and for identified resources. In the event the significant resources are recovered and if the qualified archaeologist and the Tribe determines the resources to be historic or unique, avoidance and/or mitigation would be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2 and the Cultural Resources Treatment and Monitoring Agreement required by mitigation measure ~~CU-23.5.2b~~. This mitigation measure shall be incorporated in all construction contract documentation.

**MM 3.5.2b** At least 30 days prior to seeking a grading permit, the project applicant(s) shall contact the Pechanga Tribe to notify the Tribe of grading, excavation, and the monitoring program and to coordinate with the City of Wildomar and the Tribe to develop a Cultural Resources Treatment and Monitoring Agreement. The agreement shall include, but not be limited to, outlining provisions and requirements for

B-1

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## Letter B Continued

Pechanga Comment Letter to the City of Wildomar  
Re: Pechanga Tribe Comments on PA12-0194  
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Page 3

addressing the treatment of cultural resources; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site; and establishing on-site monitoring provisions and/or requirements for professional Tribal monitors during all ground-disturbing activities. A copy of this signed agreement shall be provided to the Planning Director and Building Official prior to the issuance of the first grading permit

**MM 3.5.2c** If inadvertent discoveries of subsurface archaeological resources are discovered during grading, work shall be halted immediately within 50 feet of the discovery. The developer, the project archeologist, and the Tribe shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. If the developer and the Tribe cannot agree on the significance of or the mitigation for such resources, these issues will be presented to the City of Wildomar Planning Director. The Planning Director shall make the determination based on the provisions of CEQA with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Pechanga Tribe. Notwithstanding any other rights available under the law, the decision of the Planning Director shall be appealable to the City of Wildomar. In the event the significant resources are recovered and if the qualified archaeologist determines defined by relevant state and local law, avoidance and mitigation would be required pursuant to and consistent with Public Resources Code Section 21083.2 and CEQA Guidelines Sections 15064.5 and 15126.4.

**B-1  
cont.**

**MM 3.5.2d** To address the possibility that cultural resources may be encountered during grading or construction, a qualified professional archeologist shall monitor all construction activities that could potentially impact archaeological deposits (e.g., grading, excavation, and/or trenching). However, monitoring may be discontinued as soon as the qualified professional is satisfied that construction will not disturb cultural and/or paleontological Archaeological resources. A final mitigation monitoring report shall be prepared by the archaeologist documenting any resources found, their treatment, ultimate disposition, new or updated site records and any other pertinent information associated with the Project. Final copies of the report will be submitted to the City of Wildomar, the Developer, the Eastern Information Center and the Pechanga Tribe.

**MM 3.5.4a** If human remains are encountered, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable time frame ~~24 hours~~. Subsequently, the Native American Heritage

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## Letter B Continued

Pechanga Comment Letter to the City of Wildomar  
Re: Pechanga Tribe Comments on PA12-0194  
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Page 4

Commission shall identify the “most likely descendant” within ~~24 hours~~ a reasonable timeframe of receiving notification from the coroner. The most likely descendant shall then have 48 hours to make recommendations and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

**MM 3.5.4b** All cultural materials, with the exception of sacred items, burial goods, and human remains, which will be addressed in the Cultural Resources Treatment and Monitoring Agreement required by mitigation measure 3.5.2b, that are collected during the grading monitoring program and from any previous archeological studies or excavations on the project site shall be curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to the Pechanga Tribe’s curation facility, which meets the standards set forth in 36 CRF Part 79 for federal repositories.

**MM 3.5.4c** All sacred sites, should they be encountered within the project site, shall be avoided and preserved as the preferred mitigation, if feasible as determined by a qualified professional in consultation with the Pechanga Tribe. To the extent that a sacred site cannot be feasibly preserved in place or left in an undisturbed state, mitigation measures shall be required pursuant to and consistent with Public Resources Code Section 21083.2 and CEQA Guidelines Sections 15064.5 and 15126.4.

The Pechanga Tribe appreciates the consultation efforts and provided mitigation and we look forward to continuing to work together with the City of Wildomar in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 or at [ahoover@pechanga-nsn.gov](mailto:ahoover@pechanga-nsn.gov) once you have had a chance to review these comments if you have any comments or concerns. Thank you.

Sincerely,



Anna Hoover  
Cultural Analyst

Cc Pechanga Office of the General Counsel  
Mark Teague, PMC

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians  
Post Office Box 2183 • Temecula, CA 92592*

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**B-1  
cont.**

### Comment Letter B Pechanga Cultural Resources

Note to reader: For convenience the Pechanga Tribe is included in the list of public agencies that the City of Wildomar contacts during preparation of environmental documents. The City understands that the Tribe is independent, and is not an agency of the State of California. The City regularly consults with the tribe in the evaluation of impacts to cultural resources. In this instance the tribe was sent a copy of the notice of preparation on October 28, 2013, and the draft EIR on June 23, 2014. The City received correspondence from the Ana Hoover on December 26, 2013 regarding a desire to participate in the environmental process, and of course this letter requesting minor changes to the wording of mitigation measures.

B-1. The commenter provides suggestions for changes to mitigation measure **MM 3.5.2a** of the DEIR.

Based on the commenter's suggestions, the following change will be made to mitigation measure **MM 3.5.2a** on page 3.5-12:

If during grading or construction activities cultural resources are discovered on the project site, work shall be halted immediately within 50 feet of the discovery and the resources shall be evaluated by a qualified archeologist and the Pechanga Tribe (Tribe). Any unanticipated cultural resources that are discovered shall be evaluated ~~and a~~ in the final report prepared by the qualified archeologist. The report shall include a list of the resources discovered, documentation of each site/locality, and interpretation of the resources identified, and the method of preservation and/or recovery for identified resources. In the event the significant resources are recovered and if the qualified archaeologist and the Tribe determines the resources to be historic or unique, avoidance and/or mitigation would be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2 and the Cultural Resources Treatment and Monitoring Agreement required by mitigation measure ~~CUL-23.5.2b~~.

The commenter provides suggestions for mitigation measure **MM 3.5.2d** of the DEIR.

Based on the commenter's suggestions, the following change will be made to mitigation measure **MM 3.5.2d** on page on page 3.5-13:

To address the possibility that cultural resources may be encountered during grading or construction, a qualified professional archeologist shall monitor all construction activities that could potentially impact archaeological deposits (e.g., grading, excavation, and/or trenching). However, monitoring may be discontinued as soon the qualified professional is satisfied that construction will not disturb cultural and/or ~~paleontological~~ Archaeological resources. A final mitigation monitoring report shall be prepared by the archaeologist documenting any resources found, their treatment, ultimate disposition, new or updated site records and any other pertinent information associated with the Project. Final copies of the report will be submitted to the City of Wildomar, the Developer, the Eastern Information Center and the Pechanga Tribe.

The commenter provides suggestions for mitigation measure **MM 3.5.4a** of the DEIR.

Based on the commenter's suggestions, the following change will be made to mitigation measure **MM 3.5.4a** on page 3.5-16:

## **2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR**

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If human remains are encountered, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a ~~reasonable time frame~~ 24 hours. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant" within ~~24 hours~~ a reasonable timeframe of receiving notification from the coroner. The most likely descendant shall then have 48 hours to make recommendations and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

August 7, 2014

RECEIVED

AUG 11 2014

CITY OF WILDOMAR

Matthew C. Bassi  
City of Wildomar  
23873 Clinton Keith Road, Suite 201  
Wildomar, CA 92595

Subject: Cornerstone Church Construction Project (Planning Application No. 12-0194)  
SCH#: 2013111005

Dear Matthew C. Bassi:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 6, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency  
1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

### Document Details Report State Clearinghouse Data se

**SCH#** 2013111005  
**Project Title** Cornerstone Church Construction Project (Planning Application No. 12-0194)  
**Lead Agency** Wildomar, City of

**Type** EIR Draft EIR

**Description** The proposed project comprises the following actions by the City of Wildomar:

1. Public Use Permit 778, Revised Permit No. 5 - Amendment to the previously submitted PUP 778. The modification will allow for the construction of a preschool (17,135 sf), administrative office building (23,024 sf), maintenance building (2,438 sf), sports field lighting, signage, and new parking lots at the existing church.
2. Grading Permit - A grading permit will need to be prepared for the property development. The proposed project estimates approximately 49,000 cubic yards of cut and fill, but does not anticipate the need for import or export of fill material.
3. Building Permit - Building permits will be needed to allow construction.
4. Encroachment Permit - Encroachment permits will be needed for any construction that will occur on public property or within publicly held easements.

The construction anticipated to occur over two phases. As part of the project, a new approximately 1,900-lineal-foot sewer line will be constructed in Monte Vista Drive to connect to an existing Elsinore Valley Municipal Water District sewer line at Canyon Drive. By connecting the sewer, the proposed project can abandon the existing on-site septic tanks.

#### Lead Agency Contact

**Name** Matthew C. Bassi  
**Agency** City of Wildomar  
**Phone** 951 677-7751 x213  
**email**  
**Address** 23873 Clinton Keith Road, Suite 201  
**City** Wildomar **State** CA **Zip** 92595  
**Fax**

#### Project Location

**County** Riverside  
**City** Wildomar  
**Region**  
**Lat / Long**  
**Cross Streets** Monte Vista Drive & Via Carnaghi Lane  
**Parcel No.** Various  
**Township** 6S **Range** 4W **Section** 36 **Base**

#### Proximity to:

**Highways** I-15  
**Airports** No  
**Railways** No  
**Waterways** Various  
**Schools** No  
**Land Use** R-R, Rural Residential / BP, Business Park

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Water Quality; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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### Document Details Report State Clearinghouse Data

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*Date Received* 06/23/2014    *Start of Review* 06/23/2014    *End of Review* 08/06/2014

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
407 West Line Street  
Bishop, CA 93514  
www.wildlife.ca.gov

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



CEAF  
8/6/14  
E

August 4, 2014

Mr. Matthew C. Bassi  
City of Wildomar  
23873 Clinton Keith Road, Suite 201  
Wildomar, CA 92595



Subject: Draft Environmental Impact Report  
Cornerstone Community Church  
State Clearinghouse No. 2013111005

Dear Mr. Bassi,

The California Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Cornerstone Community Church (project) [State Clearinghouse No. 2013111005]. The Department is responding to the DEIR 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).

### Project Description

The proposed project includes a Planning Action (PA) to modify the existing Public Use Permit (PUP) 778 for the Cornerstone Community Church. The modification proposes development on 20.37 acres of the 63.41 acre project site; the remaining 43.25 acres will be left undisturbed. The project proposes the construction of a preschool, administrative office building, kitchen, and new parking lots at the existing church. As part of the project, a new approximately 1,900-lineal-foot sewer line will be constructed in Monte Vista Drive to connect to an existing Elsinore Valley Municipal Water District sewer manhole. Construction of the new sewer line will allow for the abandonment of the existing on-site septic tanks.

The Department offers the following comments and recommendations and requests that these comments and recommendations be addressed by the Lead Agency prior to adoption of the Final Environmental Impact Report (FEIR):

*Conserving California's Wildlife Since 1870*

Draft Environmental Impact Report  
Cornerstone Community Church  
SCH No. 2013111005  
Page 2

1. The project is located within the MSHCP burrowing owl (BUOW) additional survey area (MSHCP section 6.3.2). The DEIR states that focused surveys for BUOW were completed in April and May of 2013. No BUOW were observed during the surveys, however suitable habitat is present on site. The Department is uncertain of the proposed start date of construction activities, but assumes that at least two-three years may elapse prior to construction (re: Mitigation Measure 3.3.1 states that within two years of groundbreaking, surveys will be completed for two plant species). Due to the potential for a considerable lapse in time between completion of the 2013 focused surveys and construction, the Department requests that new focused surveys for BUOW (following the "Burrowing Owl Survey Instructions for the Western Riverside MSHCP") be completed within the twelve month period prior to construction. The Department requests the updated focused surveys for BUOW be incorporated into Mitigation Measure 3.3.2.

Mitigation Measures 3.3.2a and MM 3.3.2b includes reference to excluding owls from burrow during the non-breeding season using either passive relocation or active translocation. Please note that the Department does not recommend excluding the owls from the site using passive relocation unless there are suitable burrows available within 100 meters of the closed burrows (Trullio 1995, CDFG 2012) and the relocation area is protected through a long-term conservation mechanism (e.g., conservation easement). If owls are found to be present onsite, we recommend that the project proponent develop a conservation strategy in cooperation with the Department, the US Fish and Wildlife Service, and the Regional Conservation Authority in accordance with the Department's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012).

2. 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) prohibit the take of all birds and their nests. 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.

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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Draft Environmental Impact Report  
Cornerstone Community Church  
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Mitigation Measure 3.3.2d proposes conducting preconstruction surveys "during the migratory bird nesting season (March 15-August 15)...within 14 days of construction initiation." Because some species of raptors (e.g., owls) may commence nesting activities in January, the Department encourages the Lead Agency to complete nesting bird surveys regardless of time of year to ensure compliance with all applicable laws related to nesting birds and birds of prey. Furthermore, not all bird species nest in vegetation; some species nest directly on the ground. The Department recommends that pre-construction surveys be required no more than three days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner. The Department requests that the Lead Agency revise Mitigation Measure 3.3.2d to reflect these comments.

3. The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments.

The DEIR identifies four ephemeral drainages in the southern portion of the project area, one of which appears to be located in the immediate vicinity of the proposed new parking lot in the eastern portion of the project area. Project grading may result in the loss of riparian habitat from proposed vegetation disturbance or removal. The Department recommends that if project activities have the potential to impact these areas, either directly through equipment movement, or indirectly through soil placement, that the project proponent submit a notification of LSA. The Department further recommends that construction Best Management Practices (BMPs) be installed and regularly monitored to ensure that sediment does not enter Department jurisdictional waters.

Please note that the Department's criteria for determining the presence of jurisdictional waters are more comprehensive than the MSHCP criteria in Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools). The following information will be required for the processing of a Notification and the Department recommends incorporating this information into the CEQA document to avoid subsequent documentation and project delays.

Draft Environmental Impact Report  
Cornerstone Community Church  
SCH No. 2013111005  
Page 4

Please note that failure to include this analysis in the project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue a LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the project:

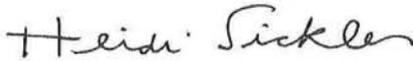
- A) Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
- B) A discussion of avoidance and minimization measures to reduce project impacts; and,

Please note that the project is also subject to the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2), and if impacts to these areas cannot be avoided a Determination of Biologically Equivalent or Superior Preservation (DBESP) may be required. Additional information regarding section 6.1.2 of the MSHCP may be found here: <http://rctlma.org/Portals/0/mshcp/volume1/sec6.html#6.1.2>

A discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance. Please refer to Section 15370 of the CEQA Guidelines for the definition of mitigation.

We recommend that the FEIR address the concerns of the Department listed in this letter. Thank you for the opportunity to provide comments on the DEIR for the proposed Cornerstone Community Church (SCH No. 2013111005). Please contact Rose Banks with questions regarding this letter and further coordination on project permitting needs at (760) 873-4412 or [Rose.Banks@wildlife.ca.gov](mailto:Rose.Banks@wildlife.ca.gov).

Sincerely,



Heidi A. Sickler  
Senior Environmental Scientist

cc: State Clearinghouse, Sacramento

**Literature Cited**

California Department of Fish and Game (CDFG) 2012. Staff report on burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: [http://www.dfg.ca.gov/wildlife/nongame/survey\\_monitor.html](http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html)

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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Cornerstone Community Church  
SCH No. 2013111005  
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Trulio, L.A. 1995. Passive Relocation: A Method to Preserve Burrowing Owls on Disturbed Sites. *Journal of Field Ornithology* 66(1):99-106.

### **Comment Letter C**

#### **Governor's Office of Planning and Research**

This letter does not raise any environmental issues and therefore, does not require a response. Additionally, the letter from the Department of Fish and Wildlife included as an attachment to Letter C, is identical to Letter A, which is found in this FEIR. As such, all environmental issues raised in Letter C from the Department of Fish and Wildlife are addressed in Letter A, of this FEIR.

# Letter 1

Comments on

## Cornerstone Church Project DEIR (Planning Application No. 12-0194)

Date: 5 July 2014

Submitted by:

John Garrett  
32581 Alderbrook Road  
Wildomar, CA

**Summary:** Wildomar Municipal Code Section 8.64 introduced standards for new lighting and requires a review of existing lighting with the approval of major projects. I believe the Cornerstone Church Project DEIR (herein "DEIR") is deficient because it fails to specify that all new lighting and existing lighting must comply with Wildomar Lighting Ordinance 8.64.

1-1

### **Reregarding New Facilities**

Table ES-1 mentions lighting of new facilities:

Impact 3.1.3 The proposed project will include the installation of **athletic field lighting** and **parking lot lighting**, which will result in new source of nighttime light. Impacts will be less than significant with mitigation incorporated.

PS MM 3.1.3 To prevent spillover lighting onto the residential property directly adjacent to and south of the maintenance building parking lot, the applicant shall **install shielded, fully cutoff lighting at the southern boundary of the maintenance building parking lot and southwest boundary of the upper parking lot**. The plan for the cut-off shielding shall be shown on the construction drawings and operational prior to use of the parking lot. The effectiveness of the cutoff shall be measured to ensure that lighting of the adjacent area does not exceed 0.6 horizontal foot candles. Additional modification of the lighting standards may include movement away from the property line, lowering in height, change of the type of light bulb or any other physical method necessary to reach this standard.

DEIR deficiencies:

## Letter 1 Continued

- I infer from the bolded text in passage 3.1.3 that full cut-off shielding is proposed for only the southern boundary of one parking lot and the southwest boundary of another parking lot. The DEIR is deficient in that all parking lot lighting must use full cut off fixtures and will be low-pressure sodium or of a color temperature of 3500K or lower. 1-2
- The DEIR proposes no constraints on lighting mounted on the new buildings. The DEIR is deficient in that all building-mounted lighting must be fully shielded. The use of low-pressure sodium or choice of color temperature will depend on how the project distributes it's allowable white light under 8.64.90. 1-3
- I infer from passage 3.1.3 that mitigation for stadium lighting is not mentioned (e.g., "prior to use of the parking lot"). Since stadium lighting has a great potential to affect neighboring properties, a spillover standard should be mentioned specifically for this type of lighting. 1-4

The executive summary, under Additional Landscaping and Lighting, says the following:

"As part of the overall site improvements, pedestrian and safety lighting will be installed **similar to the existing church**. In addition, parking lot lighting will be provided."

DEIR deficiencies:

- The existing church lighting is not an acceptable standard for new lighting under 8.64. The DEIR is deficient and needs to state that all new lighting of the new facilities will conform to Municipal Code 8.64. 1-5

### Existing Facilities

Municipal Code 8.64.020 requires that existing lighting be brought into compliance with Ordinance 8.64 as part of "...all new construction, additions, and alterations to land uses, developments, buildings, structures, or light fixtures..."

The DEIR mentions an existing parking lot:

Executive Summary, Modification to Existing and Creation of New Parking Areas: An existing unimproved "lower" parking lot will be paved and will also provide drive access to the new upper parking lot. Improvements at the lower parking lot will result in 64 additional parking spaces. When complete, the project will result in 390 new parking spaces resulting in a total number of 701 parking spaces on site. 1-6

Cornerstone routinely lights this parking lot with portable-generator construction style lighting.

## Letter 1 Continued

This routine use must discontinue. New permanent lighting conforming to Ordinance 8.64 should be used instead. If temporary lighting is needed, it must conform to 8.64.040 Temporary Lighting Exemptions.

**1-6  
cont.**

The current facilities also have building and area lighting that fail to meet the shielding requirements of Ordinance 8.64.

The current facilities also has two signs that fail to meet the color temperature and curfew requirements of Ordinance 8.64.

**1-7**

DEIR deficiencies:

- The DEIR is deficient in not addressing the need for proper illumination for the existing lower parking lot. Failing to address this will encourage the current use of temporary lighting which is the worst type of lighting for this application: high glare spillover reaches the I-15 Freeway and can't be safe for pedestrians among vehicle traffic.
- The DEIR is deficient in that it fails to address existing area and building mounted lights that need to be considered in lumen caps defined under 8.64.090.
- The DEIR is deficient in that it fails to specify that Ordinance 8.64.120 (Illumination of Signs) requires that the color temperature of the CORNERSTONE signs be 4400 k or lower and are subject to a 10:00 pm (residential) or 11:00 pm (commercial) curfew.

**1-8**

**1-9**

**1-10**

### Comment Letter 1

John Garrett

- 1-1 The commenter states that the Cornerstone Church Project DEIR is deficient because it fails to specify that all new lighting and existing lighting must comply with Wildomar Lighting Ordinance 8.64.

CEQA requires an analysis of a proposed project's environmental impacts, including light and glare impacts, based on existing conditions. Existing conditions have been determined to be the environmental conditions exist at the time the Notice of Preparation (NOP) is published (CEQA Guidelines Section 15125(a)). CEQA requires analysis of potential "new" light and glare impacts caused by a proposed project. CEQA does not require an analysis of existing light and glare impacts, nor require mitigation of the existing impacts.

Compliance with City ordinances is required of all projects in Wildomar and it is not necessary to establish compliance with ordinances through a mitigation measure or condition of approval. While there is no mitigation measure, all new lighting and existing lighting must comply with Wildomar Lighting Ordinance 8.64. Section 8.64.020 requires that major improvements to a project bring all lighting on site into compliance with the code. This project qualifies as a major improvement because of the increase in total parking spaces as described in the project description. This is already required by City ordinance and therefore it is not necessary to require these standards through a mitigation measure in the DEIR. The requirement is included as a condition of approval for the proposed project. On Page 3.1-6 the DEIR states that all lighting allowed by the ordinance must be fully shielded if feasible and partially shielded in all other cases, and must be focused to minimize spill light into the night sky and onto adjacent properties. Additionally, page 3.1-6 states that light pollution is regulated by Chapter 8.64 of the Wildomar Municipal Code. Compliance with the City's Light Pollution Ordinance will reduce nighttime lighting from the project site.

- 1-2 The commenter states that the DEIR is deficient in that all parking lot lighting must use full cut off fixtures and will be low-pressure sodium or of a color temperature of 3500K or lower. However, page 3.1-6 explains that according to the photometric plan, the maintenance building parking lot is anticipated to result in an illumination increase between 2.0 and 5.7 horizontal footcandles along its southern boundary and to increase 3.2 horizontal footcandles along its southwest boundary. Therefore, mitigation measure MM 3.1.3 only applies to the southern boundary of one parking lot and the southwest boundary of another parking lot in order to prevent spillover lighting onto the residential property directly adjacent to and south of the maintenance building parking lot. Section 8.64.020 of the Wildomar Code requires that all lighting on site be brought into compliance with major improvements. As the Section 8.64.090-1 B of the Wildomar Code requires full cut-off lighting and as noted above all lighting must be brought into compliance with the code, there is no need for additional mitigation.

- 1-3 The commenter states that the DEIR proposes no constraints on lighting mounted on the new buildings. The commenter suggests that the DEIR is deficient in that all building-mounted lighting must be fully shielded and that the use of low pressure sodium or choice of color temperature will depend on how the project distributes it's allowable white light under 8.64.90. As the City of Wildomar has an established Light Pollution Code, and all lighting must be evaluated at the time of building plan review and be consistent with Code, there is no need to establish a mitigation measure to ensure lighting fixtures

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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are consistent with the Code. On page 3.1-7 of the Draft EIR the Light Pollution Code is referenced in regard to the limitation of light fixture and size of bulbs for the development and states that compliance with the Light Pollution ensures that impacts from lighting are less than significant.

- 1-4 The commenter states that a spillover standard should be mentioned specifically for stadium lighting. However, page 3.1-6 of the Draft EIR states that the intensity of the proposed athletic field lighting was predicted on a photometric plan prepared for the proposed project and attached to the DEIR. The photometric plan was conducted based on the assumption that each of the proposed lighting poles will be fully shielded and directed to specifically illuminate only the athletic fields. Considering the attributes of the proposed lighting, the photometric plan demonstrates that the operation of the field lighting will result in an increase constant nighttime illumination along Monte Vista Drive, no other area outside of the boundaries of the proposed project will be affected. Therefore, neighborhood properties will not be affected.
- 1-5 The commenter states that the existing church lighting is not an acceptable standard for new lighting under 8.64. The commenter adds that the DEIR is deficient and needs to state that all new lighting of the new facilities will conform to Municipal Code 8.64. See response 1-2, per the Municipal Code all lighting on the project site must be brought up to code with a major improvement.
- 1-6 The commenter states that new permanent lighting conforming to Ordinance 8.64 should be used to light the lower parking lot at the Church and if temporary lighting is used for the lower parking lot, it should conform with Section 8.64.040 Temporary Lighting Exemptions. The commenter does not present any inadequacies with the DEIR with this statement. Comment noted. See response 1-2, per the Municipal Code all lighting on the project site must be brought up to code with a major improvement.
- 1-7 The commenter states that the current facilities have building and area lighting that fail to meet the shielding requirement of Ordinance 8.64. The commenter also states that the current facilities have two signs that fail to meet the color temperature and curfew requirement of Ordinance 8.64. The commenter does not discuss any inadequacies of the Draft EIR with this statement. Comment noted. See response 1-2, per the Municipal Code all lighting on the project site must be brought up to code with a major improvement. Note that shielded lights are exempt from the lumen cap of the ordinance pursuant to section
- 1-8 The commenter states that the DEIR is deficient in not addressing the need for proper illumination for the existing lower parking lot. As discussed in response 1-1, CEQA does not require an analysis of existing lighting conditions, including light and glare from an existing lighted parking lot. Comment noted. The commenter is referred to response 1-1, per the Municipal Code all lighting on the project site must be brought up to code with a major improvement.
- 1-9 The commenter states that the DEIR is deficient in that it fails to address existing area and building mounted lights that need to be considered in lumen caps defined under 8.64.090. . As discussed in response 1-1, CEQA does not require an analysis of existing lighting conditions, including light and glare from an existing area and building mounted lights. Comment noted. The commenter is referred to response 1-1, per the Municipal Code all lighting on the project site must be brought up to code with a major improvement.

- 1-10 The commenter states that the DEIR is deficient in that it fails to specify that Ordinance 8.64.120 requires that the color temperature of the CORNERSTONE signs be 4400k or lower and are subject to a 10:00 pm (residential) or 11:00 pm (commercial) curfew. As discussed in response 1-1, CEQA does not require an analysis of existing lighting conditions, including light and glare from an existing sign. Comment noted. See response 1-2, per the Municipal Code all lighting on the project site must be brought up to code with a major improvement.

## Letter 2

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VIA U.S. MAIL AND EMAIL

August 7, 2014

Matthew Bassi  
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***RE: Comments on Draft EIR for the Cornerstone Community Church Project, PUP 778  
Revised Permit No. 5 (Planning Application No. 12-0194)***

Greetings:

On behalf of the concerned area residents, we hereby submit these comments on the Draft EIR for the Cornerstone Community Church Project, PUP 778 Revised Permit No. 5 (the "project") and in opposition to the project.

The California Environmental Quality Act (CEQA) was adopted as a disclosure and transparency document. The theory is that by providing a document that adequately describes the environmental consequences of a project to decision makers and the public, the decision makers will make a rational decision based upon the true environmental consequences of the project and if they do not, the electorate can hold them accountable for their decisions. The core of this statutory structure is the adequacy of the document as an informational document.

The EIR fails to adequately evaluate project impacts to/from aesthetics, health risks, biology, geology/soils, land use/planning, noise, traffic, and cumulative impacts. (Public Res. C. § 21002.1(a), (e); State CEQA Guidelines § 15128, 15126, 15123) Traffic and noise impacts are severely understated and fail to provide a real picture of this Project's effects. Geology/soils impacts rely on outdated studies prepared only for surficial modifications for parking lot construction. Impacts from the demolition of existing structures onsite are also overlooked throughout the majority of the EIR.

Overall, the EIR for this project fails as an informational document. The EIR misleads decisionmakers and the public as to the extent and severity of the Project's environmental effects. The EIR is also often conclusory, making findings without evidentiary support as to the

## Letter 2 Continued

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extent of project impacts or the infeasibility of potential mitigation or alternatives. The findings are not supported by substantial evidence in the record.

CEQA also requires that where feasible mitigation exists which can substantially lessen the environmental impacts of a project, **all feasible mitigation** must be adopted. In this way CEQA goes beyond its informational role to require that projects substantively lessen their negative effects on the environment. It is critical to proper drafting of an EIR that all feasible mitigation measures be required of a project. This has not been done with this project. Additional mitigation is feasible and should be required of this project, particularly given the project's impacts from traffic and noise on nearby rural residential uses.

Moreover, all mitigation measures required in the EIR must be fully enforceable and certain to occur. This proposed mitigation here is vague, uncertain, and improperly defers need studies and mitigation measures (e.g. preparation of a geological/ soils study). This is unacceptable.

The EIR also fails to evaluate an adequate range of reasonable alternatives but rather only alternatives that create minor alterations to the proposed project. Additional alternatives should be considered that are feasible and achieve most project objectives such as moving the preschool offsite, developing a smaller administration building, or otherwise reducing the scope of the project.

Of the alternatives considered in the EIR, Alternative 2 should be deemed the environmentally superior alternative where it reduces most project impacts while achieving the majority of project objectives.

The EIR does not disclose whether any future development onsite is reasonably foreseeable. Given the history of the growth of the church, if there is an inkling of future plans for expansion, such expansion and its effects should be considered in the EIR.

### **Project Summary**

Cornerstone Community Church began as Public Use Permit 600 approved in 1988 as a single building on approximately 7 acres. The church currently has six buildings totaling approximately 84,730 square feet on approximately 63.51 acres. The church campus also contains three parking lots with space for up to 435 cars, a sports field accommodating both baseball and football, a quadrangle in the center of the church buildings, and landscaping throughout the site. The church includes Cornerstone Christian School, which is a pre-kindergarten through 12<sup>th</sup> grade school with approximately 240 students. School hours are typically 7:45 a.m. to 3:00 p.m. weekdays. In addition to the students, approximately 100 church and school employees are onsite on school days.

The church presently holds two services on Saturday (5:00 p.m. and 6:30 p.m.) that typically draw up to 500 worshipers for each service. Three Sunday services are held (9:00 a.m., 10:20 a.m. and 11:40 a.m.) that typically draw a total up to 1,000 worshipers for each service.

Cornerstone Community Church Construction Project (Planning Application No. 12-0194), would modify existing Riverside County Public Use Permit 778 as follows: Phase 1: (a)

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construction of a new one story 17,315- square-foot preschool and daycare building for 170 children, (b) construction of a new 2,438-square-foot maintenance building, and (c) two new parking areas (east side), and (d) paving an existing unimproved parking area; Phase 2: construction of a new three-story 23,024-square-foot administration building, which includes a 1,365-squarefoot institutional kitchen facility. It is possible that both phases would be built simultaneously

As part of this development, the Project would also require demolition of the former home and outbuildings south of the existing paved parking lot east of Via Carnaghi Lane; and demolition of paved parking area. Two water quality basins would be constructed. Via Carnaghi Lane would be paved; however an exception to City Standards, City of Wildomar Road Standard No. 105, would be required to allow two, 12-foot travel lanes but no on-street parking or sidewalks. A new sewer line would be built to connect approximately 1,800 feet north on Monte Vista Dr. and conveyed to EVMWD. The septic tanks would be abandoned.

### Aesthetics

The EIR wrongly fails to consider whether the project would have a significant impact by substantially damaging scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. I-15 is eligible to be designated as a state scenic highway. Regardless, the project may damage scenic resources where open space and views of the mountains currently pervade in the area.

The finding that the project will have no impact on a scenic vista is unsupported. As noted in the EIR, drivers on I-15 can view open space and the mountains from the highway. The project will reduce these views. Views from neighboring rural residential properties will likewise be impacted by the project. The fact that no scenic vista has been officially designated does not definitively show no impact on a scenic vista will occur. The EIR notably fails to provide any photos of existing views/ vistas from adjacent residences or roadways, and/or mock-ups of how the project will impact those views and the visual character of the site. There is no evidence for finding no impact to scenic vistas.

Likewise, there is no evidence supporting the finding of less than significant impacts to damaging scenic resources or the visual character of the area and surroundings. To the contrary, the project proposes developing parking lot on existing open space areas where satellite imaging shows rock outcroppings. The project also proposes to build a 3-story administrative building in a rural residential area in front of local hills and open space. The likelihood of significant aesthetic impacts is high and has not been well evaluated or disclosed in this EIR.

Impacts from lighting are also likely significant. The project proposes the installation of seven lighting poles for the field: four of the proposed lighting poles will be 60 feet tall and the remaining three lighting poles will be 70 feet tall. The EIR presumes these lights will be fully shielded and in use only the 81 days per year that the temporary lights are currently used. There is no basis for the assumptions that the fields will continue to be used only 81 days per year. To the contrary, permanent field lighting would render the fields more available for use at night without hindrance.

2-1

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The EIR should either evaluate the use of the fields at nights regularly, or a mitigation measure should be adopted requiring field lighting be fully shielded and limiting night use of the fields to the presumed 81 nights per year. In addition, mitigation should be adopted limiting the hours during which such lighting may be used, ie. field lighting shall not occur after 10pm. Parking lot lighting should also be limited to hours of church operation. Absent adoption of these requirements as mitigation, aesthetic impacts from lighting should be deemed significant.

2-1  
cont.

### **Air Quality**

The Executive Summary, p. ES-2, states project impacts are considered cumulatively considerable and significant and unavoidable. Table ES-1, however, states that all air quality impacts including cumulative impacts will be less than significant. This inconsistency must be addressed. If air quality impacts are significant, all feasible mitigation must be adopted to reduce these effects.

2-2

The following mitigation should be adopted for the project:

### Construction

1. Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.
2. Install and maintain trackout control devices in effective condition at all access points where paved and unpaved access or travel routes intersect (eg. Install wheel shakers, wheel washers, and limit site access.)
3. All roadways, driveways, sidewalks, etc., shall be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
4. Pave all construction roads.
5. Limit fugitive dust sources to 20 percent opacity.
6. Require a dust control plan for earthmoving operations.
7. When materials are transported off-site, all material shall be covered, effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
8. All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers utilizing reclaimed water trucks if visible soil materials are carried to adjacent streets.
9. The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite.
10. Post a publicly visible sign with the telephone number and person to contact regarding

2-3

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- dust complaints. This person shall respond and take corrective action within 24 hours.
11. Extend grading period sufficiently to reduce air quality impacts below a level of significance.
  12. The simultaneous disturbance of the site shall be limited to five acres per day.
  13. Any vegetative cover to be utilized onsite shall be planted as soon as possible to reduce the disturbed area subject to wind erosion. Irrigation systems required for these plants shall be installed as soon as possible to maintain good ground cover and to minimize wind erosion of the soil.
  14. Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered three times daily.
  15. Any site access points within 30 minutes of any visible dirt deposition on any public roadway shall be swept or washed.
  16. A high wind response plan shall be formulated for enhanced dust control if winds are forecast to exceed 25 mph in any upcoming 24-hour period.
  17. Implement activity management techniques including a) development of a comprehensive construction management plan designed to minimize the number of large construction equipment operating during any given time period; b) scheduling of construction truck trips during non-peak hours to reduce peak hour emissions; c) limitation of the length of construction work-day period; and d) phasing of construction activities.\*
  18. Develop a trip reduction plan to achieve a 1.5 AVR for construction employees
  19. Require high pressure injectors on diesel construction equipment.\*
  20. Restrict truck operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicles.\*
  21. Require the use of CARB certified particulate traps that meet level 3 requirements on all construction equipment.\*
  22. Utilize only CARB certified equipment for construction activities.\*
  23. Restrict engine size of construction equipment to the minimum practical size.\*
  24. Use electric construction equipment where technically feasible.\*
  25. Use methanol-fueled pile drivers.\*
  26. Install catalytic converters on gasoline-powered equipment.\*
  27. All forklifts shall be electric or natural gas powered.\*
  28. Suspend use of all construction equipment operations during second stage smog alerts.\*

2-3  
cont.

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29. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.\*
30. Reroute construction trucks away from congested streets and sensitive receptor areas.\*
31. Configure construction parking to minimize traffic interference.\*
32. Prior to the issuance of a grading and building permit, the applicant shall submit verification that a ridesharing program for the construction crew has been encouraged and will be supported by the contractor via incentives or other inducements.\*
33. Minimize construction worker trips by requiring carpooling and providing for lunch onsite, and/or provide shuttle service to food service establishments/commercial areas for the construction crew.\*
34. Provide shuttle service to transit stations/multimodal centers for the construction crew.\*
35. Require the use of Zero-VOC paints, coatings, and solvents.

(\* Would reduce impacts to GHGs as well)

### Operation

1. Provide bus services to students of the preschool and existing school.\*
2. Provide shuttle service from existing multi-modal centers and/or locales with clusters of congregants to/from weekend services to reduce single occupancy vehicle trips.\*
3. Implement a carpool/vanpool program for the school and church to reduce single occupancy vehicle trips.\*
4. Reschedule weekend services to provide a minimum of one hour between each service in order to reduce traffic congestion and queuing in the project vicinity.\*
5. All buildings shall be constructed to LEED Platinum standards.\*
6. Buildings shall exceed Title 24 requirements by 15%.\*
7. Orient 75 percent of buildings to face either north or south (within 30 degrees of N/S) and plant trees and shrubs that shed their leaves in winter nearer to these structures to maximize shade to the building during the summer and allow sunlight to strike the building during the winter months.\*
8. Design buildings for passive heating and cooling and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.\*
9. Construct photovoltaic solar or alternative renewable energy sources sufficient to provide 100% of all electrical usage for the entire project.\*
10. Install solar water heating systems to generate all hot water requirements.\*

**2-3  
cont.**

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11. Utilize only electrical equipment for landscape maintenance. Install electrical outlets on project buildings for this purpose.\*
12. Plant shade trees in parking areas to provide minimum 50% cover to reduce evaporative emissions from parked vehicles.\*
13. Plant at least 50 percent low-ozone forming potential (Low-OFP) trees and shrubs, preferably native, drought-resistant species, to meet city landscaping requirements.\*
14. Plant Low-OFP, native, drought-resistant, tree and shrub species, 20% in excess of that already required by city or county ordinance. Consider roadside, sidewalk, and driveway shading.\*
15. Provide grass paving, tree shading, or reflective surface for unshaded parking lot areas, driveways, or fire lanes that reduce standard black asphalt paving by 10% or more.\*
16. Provide direct, safe, attractive pedestrian access from project to transit stops and adjacent development.\*
17. Provide safe, direct bicycle access to adjacent bicycle routes.\*
18. Connect bicycle lanes/paths to city-wide network.\*
19. Provide a display case or kiosk displaying transportation information in a prominent area accessible to residents.

(\* Would reduce impacts to GHGs as well)

### Health Risks

Health risks to students from locating the project adjacent to I-215 are not evaluated in the EIR. California Air Resources Board currently recommends a school setback of at least 500 ft- 1000 feet from major roadways to protect the public from exposure to traffic emissions where children are particularly at risk of health impacts. (e.g. Air Quality And Land Use Handbook: A Community Health Perspective (April 2005) California Environmental Protection Agency & California Air Resources Board, <<http://www.arb.ca.gov/ch/handbook.pdf>> p. 8-15; <<http://www.arb.ca.gov/research/health/healthup/march07.pdf>>) SCAQMD likewise expresses concern about the myriad health effects of air pollution on children. (The Health Effects Of Air Pollution On Children (Fall 2000) SCAQMD <<http://www.aqmd.gov/docs/default-source/students/health-effects.pdf?sfvrsn=0>>)

While usually CEQA does not require evaluation of the existing environment on the project, an exception exists where the project would bring development and people to an area and expose them to a potentially dangerous situation. Here, the project would increase the number of children and amount of time such children are exposed to diesel emissions along these roadways, thereby exposing sensitive receptors to substantial pollutant concentrations and justifying *detailed* evaluation in the EIR. These potential health risk effects justify consideration of an off-site alternative for the preschool.

2-3  
cont.

2-4

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### Biological Resources

Three special status species plants have the potential to occur on the project site in addition to eight special status wildlife species. MM3.3.1 improperly defers needed studies regarding impacts to white rabbit-tobacco and/or bottle liver. There is no reason a qualified biologist cannot conduct a preliminary evaluation at present, particularly where groundbreaking is proposed to occur within 2 years.

The EIR states at p. 3.3-13 that burrowing owl is covered under the MSHCP. Proposed conservation under the MSHCP does not adequately conserve burrowing owl; specific survey and conservation requirements are needed. The EIR should be amended to reflect these requirements and disclose the project's potential to significantly impact burrowing owls. Mitigation measures 3.3.2a and 3.3.2b inadequately mitigate for impacts to the burrowing owl where they fail to cite more stringent mitigation required if 3 or more breeding pairs of owls are found onsite.

Four ephemeral drainages are located in the southern portion of the site. The EIR fails to provide any detail about these drainages including any investigation into whether they support riparian habitat. No jurisdictional delineation has yet been completed on the drainage in the area of the proposed parking lot, but the EIR concludes it may meet the definition of waters of the US due to its apparent connection to Murrieta Creek. The biological report states the waters also meet the definition of Waters of the State. This information must be evaluated and obtained prior to project approval so the public and decisionmakers are made aware of the real environmental impacts of the project. MM3.3.3, 3.3.4a, and 3.3.4b improperly defer these needed evaluations.

2-5

The EIR also fails to consider cumulative impacts to jurisdictional waters and/or wetland communities. These impacts must be evaluated in the EIR.

Critical gnatcatcher habitat is located adjacent to the site. The EIR fails to disclose the distance to this habitat from the proposed development, or how impacts to this habitat will be avoided. In addition, Figure 3.3-2 discloses coastal California gnatcatcher has previously been recorded within the project site. Impacts to the gnatcatcher and its habitat must be evaluated in the EIR and all feasible mitigation adopted to reduce impacts to this species.

### Climate Change/GHGs

The EIR evaluates impacts from GHGs against a 3,000 MT CO<sub>2</sub>e threshold, not the more stringent 1,400 MT CO<sub>2</sub>e proposed SCAQMD threshold. Moreover, the EIR fails to consider that the project is not a new project but will add to existing CO<sub>2</sub>e emissions at the site. The EIR should disclose the total GHGs for the Church with the addition of the proposed project, in addition to disclosing the project's individual effects. The above cited air quality mitigation should be adopted to reduce the project's GHG emissions.

2-6

### Cultural Resources

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The site has not been evaluated for potential archaeological or paleontological impacts by any archaeologist or paleontologist on the basis that the site is already developed. The parking areas, however, extend to undeveloped portions of the site that will require grading and ground disturbing activities. Moreover, additional grading/ depth will be required for, e.g. the preschool and administrative building compared to that required for parking lot or merely graded surfaces.

2-7

In addition, as set forth below, some blasting and other significant earthwork may be necessary to develop structures on the site. Evaluation of potential archaeological and paleontological impacts in the EIR is thus essential, and has not occurred. The EIR must be appropriately updated and recirculated.

### Geology/Soils

No project-specific geotechnical report has been prepared for the project to account for potential impacts of developing buildings onsite, or for the footprint currently proposed for development. A project specific geotechnical report must be prepared and incorporated into any EIR, and the EIR recirculated, to ensure that geological impacts are evaluated and mitigated. MM 3.6.2 improperly defers a needed geotechnical study to provide the public and decisionmakers with information concerning this Project's geological impacts where there is no reason to delay this analysis.

Reliance on the 2006 report prepared for the site is improper for several reasons. The report is outdated as it was prepared seven years prior to the NOP for this project. The report also does not evaluate geologic conditions for this proposed project's building footprint.

The 2006 report evaluated only surficial site conditions and only for development of a parking lot; there was no evaluation of the geotechnical feasibility or capacity of developing structures onsite. Subsurface exploration was not conducted. To the contrary, the report states, "This office should be notified if structures, foundation loads, grading, and/or other details different from those presented herein are proposed..." Simply stated, the report did not consider or evaluate development of a 3-story building, preschool, or maintenance building onsite—only parking. A new geotechnical report must be prepared and the EIR recirculated with this new information.

2-8

The 2006 report nevertheless discloses issues not considered in the EIR. For instance, the report states that "bedrock may be very hard, and special techniques, such as blasting, may be required" to achieve cuts into the granitic hills. If blasting is potentially needed for this project, that is a project characteristic that must be evaluated and disclosed both in the geology/ soils section and with respect to noise and vibration impacts. The report also states oversized rock is anticipated to be exported off-site. If oversized rock is to be exported because of cuts made in bedrock, this should be considered in the EIR. The EIR must be significantly amended and recirculated with this information.

In addition, Figure 3.6-1 shows the project site within close proximity to the fault zone of the Glen Ivy North Fault, yet the EIR fails to state how close this fault zone lies to the site. This information and potential impacts from faulting/ earthquakes should be detailed in the EIR.

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### Hydrology/ Water Quality

Appendices D, E, and G-H; and all Exhibits A-J listed relied on in DEIR Appendix 3.7 Hydrology and Water Quality are omitted from the study. Absent these appendices and exhibits, it is impossible to discern if the conclusions of the hydrology and water quality study and EIR are supported by evidence. It is also impossible to determine if mitigation is sufficient. These appendices and exhibits must be incorporated and the EIR recirculated with new opportunity for public review.

2-9

### Noise

#### Construction

The EIR fails to quantify actual construct noise levels expected at neighboring sensitive receptors during project construction. Without this information, it is impossible to determine the extent of construction noise impacts and the ability of mitigation measures to reduce such effects. The EIR is extremely conclusory with respect to construction noise impacts and the ability of mitigation to reduce such effects below a level of significance. For instance, the EIR finds any noise associated with roadway paving will be reduced below significance through the incorporation of mitigation. Likewise construction of the maintenance building (adjacent to residences) and the administration building. There is simply no evidence these effects will be adequately reduced even with incorporation of the mitigation proposed where the EIR fails to first detail the extent of noise impacts and then detail the efficacy of proposed mitigation.

The EIR states that without an adopted construction noise standards, the project cannot generate noise in excess of established standards. This is simply untrue where the City has adopted noise standards in general that can be applied to construction impacts.

2-10

The EIR fails to evaluate construction noise impacts on the existing school uses. These impacts are likely significant given the proximity of proposed construction.

Construction noise impacts should be deemed significant absent evidence showing such effect have adequately been mitigation below a level of significance. Additional mitigation should be adopted for such effects.

Mitigation limiting construction to non-school hours to reduce impacts to the existing school uses should be adopted. In addition, temporary noise curtains with an STC rating of at least 30 should be placed around the existing school building.

In lieu of temporary noise curtains with a minimum STC rating of 20 installed near adjacent residences, the City should require noise curtains of an STC rating of at least 30 and/or installation of a permanent noise wall as soon as possible to reduce both construction and operational noise effects. Installation of significant landscaping adjacent to the parking areas to reduce noise at nearby residences should also be required. The EIR states temporary and/or permanent noise attenuation would likely be ineffective, but fails to provide any reasoning or evidence to back up this conclusory statement. This mitigation is feasible and would reduce temporary and permanent noise impacts to adjacent residences. (Sound Transmission Class

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Guidance, Noise Notebook Chapter 4 Supplement, US Department of Housing and Urban Development, <[http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_16419.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16419.pdf)>, [STC rating of Exterior Walls from 39-63]) Such mitigation should be required.

MM3.8.1 is uncertain to reduce noise impacts and is unenforceable by the City. The measure requires only the preparation of a noise control plan, not necessarily implementation of the measures set forth in that plan. The measures should each be required as project mitigation. They may also be included in a noise control plan for purposes of demonstrating that the construction supervisor has been notified of such measures. Hence noise mitigation should be re-worded to require the following:

1. Construction equipment staging areas shall be located as distant as possible from nearby sensitive receptors
2. Construction equipment shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
3. Stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.
4. All construction activity including staging and haul truck deliveries shall be limited to between the hours of 6 am and 6pm between June and September, and the hours of 7 am to 6 pm between October and May.
5. Haul routes that do not pass noise-sensitive dwellings shall be preferred and utilized so long as such haul routes do not substantially increase vehicle miles travelled.
6. Frame mounted temporary noise curtains with a minimum STC rating of 20 shall be installed near the noise-sensitive residential receiver locations. The noise curtains shall be installed without any gaps or openings on the Project boundary between the noise-sensitive receiver and the construction activities.
7. 15 days prior to commencement of construction, the construction supervisor shall provide written notification of planned activities to the City of Wildomar; to each of the property owners along Via Carnaghi Lane; and to the home at 34520 Monte Vista Drive.
8. The construction supervisor shall maintain a complaint log noting date, time, complainant's name, nature of the complaint, and any corrective action taken. A copy of the complaint log shall be provided to the City on a daily basis. The Project manager shall publish and distribute to the potentially affected community a phone number that is attended during active construction working hours for use by the disturbed public to register complaints.
9. Each of these measures shall be drafted in a "Noise control plan" submitted to the city for review and approval prior to issuance of grading permits. The construction supervisor shall ensure compliance with the noise control plan. The City shall also conduct periodic inspections at its discretion to ensure compliance.

2-10  
cont.

In the Project Description portion of the EIR, the EIR states that cut/fill will balance onsite and no fill will be imported. To the contrary, page 3.8-26 of the Noise section states that fill material will be imported as a base for the pavement at Via Carnaghi Lane. This discrepancy must be resolved. If import of fill is required, impacts to/from noise, traffic, air quality, etc. must be reevaluated accounting for these construction truck trips, dust, and other effects.

Operation

2-11

## Letter 2 Continued

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Guidance, Noise Notebook Chapter 4 Supplement, US Department of Housing and Urban Development, <[http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_16419.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16419.pdf)>, [STC rating of Exterior Walls from 39-63]) Such mitigation should be required.

MM3.8.1 is uncertain to reduce noise impacts and is unenforceable by the City. The measure requires only the preparation of a noise control plan, not necessarily implementation of the measures set forth in that plan. The measures should each be required as project mitigation. They may also be included in a noise control plan for purposes of demonstrating that the construction supervisor has been notified of such measures. Hence noise mitigation should be re-worded to require the following:

1. Construction equipment staging areas shall be located as distant as possible from nearby sensitive receptors
2. Construction equipment shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
3. Stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.
4. All construction activity including staging and haul truck deliveries shall be limited to between the hours of 6 am and 6pm between June and September, and the hours of 7 am to 6 pm between October and May.
5. Haul routes that do not pass noise-sensitive dwellings shall be preferred and utilized so long as such haul routes do not substantially increase vehicle miles travelled.
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2-10  
cont.

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Operation

2-11

## Letter 2 Continued

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The EIR fails to disclose total operational noise expected at the property line and at adjacent residences, instead parsing out the noise expected with each portion of the project. The EIR also fails to adequately evaluate the impact on adjacent residences from parking lot noise, particularly where the nearest adjacent residence will be encircled by parking and thus subject to noise from several parking areas at once. The EIR must analyze noise impacts from several sources occurring simultaneously.

Noise from church and school patrons, and sports field event attendees, will cause a substantial part of this Project's noise. The EIR fails to consider noise *from people* caused as a result of the project, focusing only on traffic, HVAC, etc. The operational noise assessment should be re-prepared, and the EIR recirculated, accounting for this omission.

The noise calculations in the EIR likely understate project noise where noise at peak hours is averaged over 24 hours and where the EIR relies on average daily traffic volumes to estimate traffic noise. Noise during school drop-off and pick-up, and noise during church activities is likely to be far louder than disclosed in the EIR. The EIR should evaluate operational noise during these peak hours, e.g. around 7:45 am and 3:00 pm weekdays for school drop off and pick up; for Saturday services at 5 and 6:30 pm; and for Sunday services at 9 am, 10:20am, and 11:40 am.

The EIR inappropriately characterizes repeated noise events from use of the field and other activities as temporary/periodic. Since such events are regularly held (more often than once a week) and are not "one-time" events, the noise impacts of parking lot noise and sports field activity should be deemed a significant permanent operational impact. Moreover, as discussed above, there is no basis for the assumption such events will not increase with the additional accessibility of permanent lighting and nearby parking.

Pursuant to the first significance standard, the project would contribute to the exposure of people to traffic noise in excess of standards if the project would add to existing exceedences of traffic noise thresholds. There is no 3dBA limit. This should be considered a significant effect of the project.

The EIR also applies a 3dBA increase criteria to determine whether a significant increase in ambient noise has occurred, despite previously detailing that a 1.5 dBA increase is significant where noise levels exceed 65 dBA. A 1.5 dBA increase should be deemed significant where noise is above 65dBA.

The traffic noise assessment fails to evaluate noise on Via Carnaghi Lane. Noise on Via Carnaghi will likely be significantly increased by the project and result in exceedences of traffic noise thresholds at adjacent residences. This omission of must be remedied, and the EIR recirculated to incorporate noise impacts on Via Carnaghi Lane.

Noise impacts from operation of the preschool to adjacent sensitive receptors is not well considered in the EIR. Instead the EIR focuses on impacts on the preschool from existing noise. The noise impacts to adjacent receptors and with respect to the City's noise threshold from the

2-11  
cont.

## Letter 2 Continued

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addition of these students and from additional car trips during school hours must be evaluated in the EIR.

2-11  
cont.

With respect to mitigation for noise impacts, additional mitigation should be incorporated to limit the hours of project operation. Permits should be required for special events occurring outside the Project's normal operating hours.

### Land Use/Planning

The project presents *substantial* conflicts with surrounding rural residential land uses, general plan designations, and zoning designations. Significant consideration should be given to the impacts of the 63-space parking lot off Via Carnaghi Lane and drive to upper parking area, which essentially hems in the existing rural residential property at APN 357-210-040 and would also impact APN 367-210-037 and adjacent properties. Such development would without a doubt result in a constant nuisance to the existing properties from noise, traffic, air quality, etc.

No parking lot should be allowed to be slotted between the existing rural residential properties. Alternatives suggested in this letter (e.g. reducing cars to the project by shuttles/ carpooling, expanding time between services, etc.) should be considered to meet the project's parking needs.

2-12

If the 63-space parking lot is allowed, the lot should not be lighted and should be limited to use as overflow parking. Mature trees, hedges, etc. and sound walls which achieve an STC rating of at least 40 should be installed on the property lines between the parking lot and residences to reduce noise and other impacts to these Project neighbors.

Conflicts with the existing equestrian uses adjacent to the site must also be addressed in the EIR, and are not. There is no consideration of the impact of project development, traffic, noise, etc. on the maintenance of these uses.

### Traffic

The EIR relies on an improper baseline to assess traffic impacts. The baseline should be taken from the time of issuance of the NOP, here 2013. Yet all traffic counts are from a year prior, 2012, and are thus outdated and improper for use in the EIR. Traffic counts and estimates therefrom must be updated to reflect current traffic conditions.

The traffic impact evaluation in the EIR fails entirely to evaluate impacts to roadway segments and capacity, looking only at intersection delays. This is a huge omission in the EIR. Impacts to roadway segments and capacity on I-215, Via Carnaghi Lane, Monte Vista Drive, Baxter Road, and Bundy Canyon Road must be evaluated.

2-13

Also, the EIR fails to evaluate impacts at the intersection of Via Carnaghi Lane and project driveways. These intersections must be considered in the EIR, especially where traffic will potentially block neighbors' residential access.

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The EIR and Traffic Study state that a longer PM peak hour was considered for analysis to account for church activities. However, the longer PM peak hour begins at 4 pm, an hour after school concludes on weekdays. No traffic counts were conducted for ~3 pm hour when the school lets out. Traffic at pm peak may be greater if this hour is considered, particularly since this weekday traffic will likely coincide with higher ambient traffic volumes. The PM peak also fails to account for traffic during field events, since the PM peak hour concludes at 7pm before the field events end.

In addition, the am peak hour fails to account for Sunday traffic volumes from 9am-12pm as the traffic counts were collected on a Thursday (May 17, 2012). This additional data is needed given the project's use, and development of additional administrative and school facilities and parking to better accommodate these uses.

The EIR applies an unsupported standard of significance for whether a significant impact occurs pursuant to the Riverside County traffic study guidelines. The language "as measured by 50 or more peak hour trips" is the basis for determining the scope of the traffic study, not for determining whether the project reduces roadway operation below acceptable levels at the intersections included in the traffic study. If a roadway operates at acceptable levels and the project reduces such operation to unacceptable levels through the addition of *any* traffic, the impact should be deemed significant pursuant to the second standard of significance.

The EIR also omits to state a cumulative traffic impact would occur where the project's cumulative contribution causes an intersection with a previously acceptable LOS to operate below an acceptable LOS. (p. 3.10-11)

The EIR states that traffic impacts will be considered significant and unmitigated where, despite paying fair share fees, full funding is not reasonably assured. (p.3.10-11). These impacts should also be considered significant and unmitigated where funding is reasonably assured but timely development is not reasonably assured, as the measures would not be implemented sufficient to meet the needs of the project.

Construction traffic impacts are not considered in terms of substantially increasing traffic or conflicting with LOS standards, but are only regarding emergency access. The increased delays and traffic volume during project construction must be evaluated and disclosed in the EIR.

The EIR does not evaluate impacts from the exception to City Standards, City of Wildomar Road Standard No. 105, to allow two, 12-foot travel lanes but no on-street parking or sidewalks on Via Carnaghi Lane. Impacts to pedestrian use/facilities (standard of significance 6) may occur as a result of this exception, as well as hazards from people walking in the roadway. The EIR must analyze these potential effects.

MM3.10.1 requires only pro rata share of improvements despite the fact that the impacts caused are project specific, not cumulative. The City should require the Project complete the listed traffic improvements before issuance of occupancy or building permits:

1. Install a traffic signal at I-15 Southbound Ramps/Baxter Road (Intersection #2)
2. Install a traffic signal at I-15 Northbound Ramps/Baxter Road (Intersection #4)

2-13  
cont.

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- 3. Install a traffic signal at Monte Vista Drive/Bundy Canyon Road (Intersection #5)
- 4. Install a traffic signal at Monte Vista Drive/Baxter Road (Intersection #9)

2-13  
cont.

There is no evidence MM 3.10.3 will reduce construction traffic impacts below a level of significance. Any TMP must prohibit construction traffic and haul trips during peak hours. Flag persons should also be utilized.

### Alternatives

#### Project Objectives

This project fails to meet its own objectives; and objectives could be easily met with less environmentally harmful alternatives. The project proposes to “Expand the existing school capabilities by adding a preschool building on the same site to take advantage of existing infrastructure.” Existing infrastructure, however, will not be used. New sewer will be added, new parking will be added, new water quality basins will be added, a new administration building would be constructed, and Via Carnaghi Lane would be paved. It is difficult to see that the preschool would take advantage of existing infrastructure given these facts.

The project objectives further include, “Expand and improve parking opportunities at the church to compensate for the loss of parking associated with construction of the preschool and ease on-site congestion between services”; and “provide for a future administration building to enable a more efficient configuration of school resources.” Neither of these objectives would be needed absent the proposed preschool expansion.

2-14

The project also proposes to increase efficiency and quiet by eliminating the use of generator powered field lighting. Unfortunately, additional traffic, construction, substantial new lighting in parking areas etc., undermine any gains made on the efficiency and quiet front. This objective could be more easily and better be achieved by merely installing field lighting without constructing the remainder of the proposed project. It surely does not justify the detrimental environmental effects of the other facets of this project.

#### Alternatives Considered in the EIR

Alternative 4 was deemed the environmentally superior alternative despite the fact that Alternative 2-No Upper Parking Lot- accomplishes all but one of the project objectives while reducing seven of the impact categories compared to the one reduced by Alternative 4. Alternative 2 should be adopted in lieu of the project and should be deemed the environmentally superior alternative. As stated in the EIR, the increased traffic impacts of Alternative 2, its one negative effect, could be remediated by the church extending the time between services. Compared to the significant environmental effects of the developing this upper parking lot, this option seems entirely preferable.

Table 4.0-1 in the EIR erroneously states project traffic impacts will be less than significant with mitigation incorporated. This was not the conclusion of the traffic section, which found impacts significant and unavoidable.

#### Additional Feasible Alternatives that should be Considered in a Recirculated EIR

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The EIR should consider an alternative that reduces project density and thereby reduces the need for additional parking spaces—e.g. no preschool, maintenance building, and/or 3-story administrative office building; or reduced size preschool, maintenance, and/or administrative office buildings.

The EIR should consider an off-site alternative for the preschool in an area with sufficient existing infrastructure. This would allow use of the proposed preschool site in its existing state for parking. The EIR states that this alternative was infeasible because it would account for on-site features of the school. While true, this alternative could take advantage of other existing infrastructure including: buildings, sewer, roads, etc. Consideration of this alternative is justified to reduce traffic, noise, air quality, and other impacts. This alternative would also reduce land use and health risk impacts from siting a preschool next to a highway.

2-14  
cont.

The EIR should consider an alternative that develops parking in the area of the proposed maintenance building; and the maintenance building in the area of the proposed parking lot off of Via Carnaghi Lane without additional parking adjacent to the rural residential homes. Such an alternative would reduce noise impacts to the homes associated with 64- space parking lot.

An alternative developing a smaller administration building should also be considered to reduce aesthetic impacts, as well as impacts from construction. There is no explanation of why a 3-story building is needed to “enable a more efficient configuration of school resources,” particularly in this rural residential area proximate to I-15.

### Segmentation

Since its approval in 1988, the church has gone from a single building on 7 acres to six buildings totaling approximately 84,730 square feet on approximately 63.51 acres and seeking to further expand with this project. Prior expansions and development have been accomplished with successive alterations which alone qualified in the City’s estimation for mitigated negative declarations, not full review via an EIR. The EIR should disclose if any further expansions are reasonably foreseeable. If so, the EIR should evaluate the impacts of those future expansions. The project appears to be making such future growth more accessible- connecting to sewer, expanding parking, building a 3 story- administrative facility, permanently lighting the sports field, etc. If this project is not the “end game” at the site, the public and decision makers should be informed of that fact and the potential effects of any foreseeable future development on the project site.

2-15

### Conclusion

In sum, the EIR omits significant information and analysis regarding the potential impacts of the project that must be remedied. In addition, a variety of mitigation measures are feasible for the project and should be incorporated in any later EIR. Additional alternatives capable of meeting this project’s objectives with far fewer environmental consequences should also be considered. The EIR should be amended to incorporate this information and recirculated for public review.

## Letter 2 Continued

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Thank you for your consideration of these comments.

Sincerely,

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

Raymond W. Johnson  
JOHNSON & SEDLACK

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### Additional Attachments & Electronic Citations

1. *Diesel and Health in America: the Lingering Threat*, Clean Air Task Force, February 2005, <[http://www.catf.us/resources/publications/files/Diesel\\_Health\\_in\\_America.pdf](http://www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf)>
2. "AQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning," <[http://www.aqmd.gov/prdas/aqguide/doc/aq\\_guidance.pdf](http://www.aqmd.gov/prdas/aqguide/doc/aq_guidance.pdf)>, May 6, 2005.
3. U.S. Department of Transportation, Federal Highway Administration. (August 2006) *Construction Noise Handbook, Chapter 4.0 Construction Noise Criteria and Descriptors*.  
<[http://www.fhwa.dot.gov/environment/noise/construction\\_noise/handbook/index.cfm](http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/index.cfm)>
4. U.S. Department of Transportation, Federal Highway Administration. (August 2006) *Construction Noise Handbook, Chapter 9.0 Construction Equipment Noise Levels and Ranges*.  
<[http://www.fhwa.dot.gov/environment/noise/construction\\_noise/handbook/index.cfm](http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/index.cfm)>
5. U.S. Department of Housing and Urban Development. (March 1985) *The Noise Guidebook*. <<https://www.onecpd.info/resource/313/hud-noise-guidebook/>>
6. Suter, Dr. Alice H., Administrative Conference of the United States. (November 1991) *Noise and Its Effects*. <<http://www.nonoise.org/library/suter/suter.htm>>
7. Electronic Library of Construction Occupational Safety and Health (November/December 2002) *Construction Noise: Exposure, Effects, and the Potential for Remediation; A Review and Analysis*.  
<[http://www.elcosh.org/document/1434/d000054/Construction%2BNoise%253A%2BExposure%252C%2BEffects%252C%2BAnd%2Bthe%2BPotential%2Bfor%2BRemediation%253B%2BA%2BReview%2Band%2BAnalysis.html?show\\_text=1](http://www.elcosh.org/document/1434/d000054/Construction%2BNoise%253A%2BExposure%252C%2BEffects%252C%2BAnd%2Bthe%2BPotential%2Bfor%2BRemediation%253B%2BA%2BReview%2Band%2BAnalysis.html?show_text=1)>

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**RAYMOND W. JOHNSON, Esq. AICP**  
26785 Camino Seco  
Temecula, CA 92590  
(951) 506-9925  
(951) 506-9725 Fax  
(951) 775-1912 Cellular

**Johnson & Sedlack**, an Environmental Law firm representing plaintiff environmental groups in environmental law litigation, primarily CEQA.

### **City Planning:**

#### Current Planning

- Two years principal planner, Lenexa, Kansas (consulting)
- Two and one half years principal planner, Lee's Summit, Missouri
- One year North Desert Regional Team, San Bernardino County
- Twenty-five years subdivision design: residential, commercial and industrial
- Twenty-five years as applicants representative in various jurisdictions in: Missouri, Texas, Florida, Georgia, Illinois, Wisconsin, Kansas and California
- Twelve years as applicants representative in the telecommunications field

#### General Plan

- Developed a policy oriented Comprehensive Plan for the City of Lenexa, Kansas.
- Updated Comprehensive Plan for the City of Lee's Summit, Missouri.
- Created innovative zoning ordinance for Lenexa, Kansas.
- Developed Draft Hillside Development Standards, San Bernardino County, CA.
- Developed Draft Grading Standards, San Bernardino County.
- Developed Draft Fiscal Impact Analysis, San Bernardino County

#### Environmental Analysis

- Two years, Environmental Team, San Bernardino County
  - Review and supervision of preparation of EIR's and joint EIR/EIS's
  - Preparation of Negative Declarations
  - Environmental review of proposed projects
- Eighteen years as an environmental consultant reviewing environmental documentation for plaintiffs in CEQA and NEPA litigation

### **Representation:**

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- Represented various clients in litigation primarily in the fields of Environmental and Election law. Clients include:
  - Sierra Club
  - San Bernardino Valley Audubon Society
  - Sea & Sage Audubon Society
  - San Bernardino County Audubon Society
  - Center for Community Action and Environmental Justice
  - Endangered Habitats League
  - Rural Canyons Conservation Fund
  - California Native Plant Society
  - California Oak Foundation
  - Citizens for Responsible Growth in San Marcos
  - Union for a River Greenbelt Environment
  - Citizens to Enforce CEQA
  - Friends of Riverside's Hills
  - De Luz 2000
  - Save Walker Basin
  - Elsinore Murrieta Anza Resource Conservation District

### **Education:**

- B. A. Economics and Political Science, Kansas State University 1970
- Masters of Community and Regional Planning, Kansas State University, 1974
- Additional graduate studies in Economics at the University of Missouri at Kansas City
- J.D. University of La Verne. 1997 Member, Law Review, Deans List, Class Valedictorian, Member Law Review, Published, Journal of Juvenile Law

### **Professional Associations:**

- Member, American Planning Association
- Member, American Institute of Certified Planners
- Member, Association of Environmental Professionals

### **Johnson & Sedlack, Attorneys at Law**

26785 Camino Seco  
Temecula, CA 92590  
(951) 506-9925

12/97- Present

Principal in the environmental law firm of Johnson & Sedlack. Primary areas of practice are environmental and election law. Have provided representation to the Sierra Club, Audubon Society, AT&T Wireless, Endangered Habitats League, Center for Community Action and Environmental Justice, California Native Plant Society and numerous local environmental groups. Primary practice is writ of mandate under the California Environmental Quality Act.

### **Planning-Environmental Solutions**

26785 Camino Seco  
Temecula, CA 92590

8/94- Present

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(909) 506-9825

Served as applicant's representative for planning issues to the telecommunications industry. Secured government entitlements for cell sites. Provided applicant's representative services to private developers of residential projects. Provided design services for private residential development projects. Provided project management of all technical consultants on private developments including traffic, geotechnical, survey, engineering, environmental, hydrogeological, hydrologic, landscape architectural, golf course design and fire consultants.

**San Bernardino County Planning Department**

Environmental Team  
385 N. Arrowhead  
San Bernardino, CA 92415  
(909) 387-4099

6/91-8/94

Responsible for coordination of production of EIR's and joint EIR/EIS's for numerous projects in the county. Prepared environmental documents for numerous projects within the county. Prepared environmental determinations and environmental review for projects within the county.

**San Bernardino County Planning Department**

General Plan Team  
385 N. Arrowhead  
San Bernardino, CA 92415  
(909) 387-4099

6/91-6/92

Created draft grading ordinance, hillside development standards, water efficient landscaping ordinance, multi-family development standards, revised planned development section and fiscal impact analysis. Completed land use plans and general plan amendment for approximately 250 square miles. Prepared proposal for specific plan for the Oak Hills community.

**San Bernardino County Planning Department**

North Desert Regional Planning Team  
15505 Civic  
Victorville, CA  
(619) 243-8245

6/90-6/91

Worked on regional team. Reviewed general plan amendments, tentative tracts, parcel maps and conditional use permits. Prepared CEQA documents for projects.

**Broadmoor Associates/Johnson Consulting**

229 NW Blue Parkway  
Lee's Summit, MO 64063  
(816) 525-6640

2/86-6/90

Sold and leased commercial and industrial properties. Designed and developed an executive office park and an industrial park in Lee's Summit, Mo. Designed two

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additional industrial parks and residential subdivisions. Prepared study to determine target industries for the industrial parks. Prepared applications for tax increment financing district and grants under Economic Development Action Grant program. Prepared input/output analysis of proposed race track. Provided conceptual design of 800 acre mixed use development.

**Shepherd Realty Co.**

Lee's Summit, MO

6/84-2-86

Sold and leased commercial and industrial properties. Performed investment analysis on properties. Provided planning consulting in subdivision design and rezoning.

**Contemporary Concepts Inc.**

Lee's Summit, MO

9/78-5/84

Owner

Designed and developed residential subdivision in Lee's Summit, Mo. Supervised all construction trades involved in the development process and the building of homes.

**Environmental Design Association**

Lee's Summit, Mo.

Project Coordinator

6/77-9/78

Was responsible for site design and preliminary building design for retirement villages in Missouri, Texas and Florida. Was responsible for preparing feasibility studies of possible conversion projects. Was in charge of working with local governments on zoning issues and any problems that might arise with projects. Coordinated work of local architects on projects. Worked with marketing staff regarding design changes needed or contemplated.

**City of Lee's Summit, MO**

220 SW Main

Lee's Summit, MO 64063

Community Development Director

4/75-6/77

Supervised Community Development Dept. staff. Responsible for preparation of departmental budget and C.D.B.G. budget. Administered Community Development Block Grant program. Developed initial Downtown redevelopment plan with funding from block grant funds. Served as a member of the Lee's Summit Economic Development Committee and provided staff support to them. Prepared study of available industrial sites within the City of Lee's Summit. In charge of all planning and zoning matters for the city including comprehensive plan.

**Howard Needles Tammen & Bergendoff**

9200 Ward Parkway

Kansas City, MO 64114

(816) 333-4800

Economist/Planner

5/73-4/75

## Letter 2 Continued

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Responsible for conducting economic and planning studies for Public and private sector clients. Consulting City Planner for Lenexa, KS.

Conducted environmental impact study on maintaining varying channel depth of the Columbia River including an input/output analysis. Environmental impact studies of dredging the Mississippi River. Worked on the Johnson County Industrial Airport industrial park master plan including a study on the demand for industrial land and the development of target industries based upon location analysis. Worked on various airport master plans. Developed policy oriented comprehensive plan for the City of Lenexa, KS. Developed innovative zoning ordinance heavily dependent upon performance standards for the City of Lenexa, KS.

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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### Comment Letter 2 Johnson & Sedlack

- 2-1 The commenter states that the EIR wrongly fails to consider whether the project would have a significant impact by substantially damaging scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

As a point of clarification, page 3.1-5 of the DEIR identifies that Interstate 15 is “eligible” as a state designated scenic highway. However, at this time, Interstate 15 is not a state designated scenic highway. Additionally, as stated on page 3.1-5, there are no other federal, state, or local designation recognizing the project site or any land adjacent to the project site as a scenic resource or vista.

Page 3.1-5 of the DEIR states that, “Construction of the proposed school building, administration building, maintenance building, and parking lots will alter the existing visual character of the area by potentially requiring the removal of some existing trees and naturally occurring vegetation and by creating new buildings that will be seen from Interstate 15, Monte Vista Drive, and some adjacent properties. However the construction of these facilities will not require the removal of any tree, rock outcropping, or historic building that has been recognized as a scenic resource, and the proposed buildings will not block any scenic view or resource.”

Considering the comment regarding rock outcroppings, as part of the EIR analysis, a site visit was completed on March 13, 2012. No prominent rock outcroppings were observed during this visit. Additionally, an aerial photograph included in the Draft EIR as Figure 2.0-2 does not show any satellite imagery of ‘rock outcroppings’ associated with the upper parking lot area. Finally, Google Earth<sup>1</sup> was used to further investigate the potential for “rock outcroppings” on the project site. This investigation looked at the project site from approximately 2,000 feet above the earth surface, as well as, “street view” from Monte Vista Drive along the whole western boundary of the project site. Additionally, street view from the upper parking lot was also used to observe the surrounding hills. No prominent rock outcroppings were observed in the Google Earth investigation.

The City of Wildomar General Plan identifies outcroppings in the Santa Ana Mountains and the Gavilan Hills mountainous areas and also in the Menifee Valley area. The proposed project site is not located near to the areas that have identified rock outcroppings and the proposed project is not identified as an area that has prominent visual rock outcroppings that is considered a scenic resource. Therefore, the proposed project will not remove outcroppings that are considered visual resources.

Based on the information provided above, the DEIR is considered adequate in its analysis of the potential for the project to damage scenic resources within a state scenic highway regarding rock outcroppings.

The commenter also declares that the finding that the project will have no impact on a scenic vista is unsupported stating that project would reduce the views of the open space and mountains from the highway and neighboring residential areas.

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<sup>1</sup> Google Earth. 2014. Imagery date 1/12/2013. Street view date 10/2013. Accessed: September 24, 2014.

## 2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

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However, page 3.1-5 supports the claim that the proposed project will have no impact on any scenic vista. The EIR states that while Interstate 15 which is directly west of the project site, is eligible to be designated as a scenic highway, it has not yet been recognized as such (Caltrans 2014). In addition, there is no other federal, state, or local designation recognizing the project site or any land adjacent to the project site as a scenic resource or vista. Therefore, it is unnecessary to provide photos of existing views if no scenic resource or vista has been officially designated.

Additionally, the proposed parking lots are flat, and will not block any views from existing homes on Via Carnighi Lane. Further, because I-15 is approximately 20 feet below the elevation of the project site, the new parking lots will not be visible from I-15. The commenter is incorrect in the assertion that the office building will block views of the hills. The 3-Story office building is set into an existing landscaped slope that leads to an open space area between the existing classroom building and the church itself. There are no homes within any line of sight of the office building and the existing church buildings are taller than the proposed office building.

Further, no scenic vistas or views have been identified within proximity to the project site. As such, the proposed project would not result in impacts to these features. The proposed project will be consistent with existing architectural elements currently found on site and will also adhere to the City of Wildomar design review process to ensure conformity with the existing buildings onsite and to stay within the height requirements allowed by the R-R zoning district.

Based on the information provided above, the DEIR is considered adequate in its analysis of the potential for the project to damage scenic resources.

The commenter continues and states that the analysis for visual impacts from lighting the athletic field should require mitigation measures for shielding and time limits on the lighting of the field and parking areas.

As to usage of the sports field, the information on was provided by the applicant and the limitation on usage to 81 days is included as a condition of approval. As noted on page 3.1-6, the sports field currently has lighting provided by portable generators. The new lighting standards are evaluated in the photometric plan included as Appendix 3.1 to the Draft EIR. In the analysis of impact 3.1.3, the applicant has stated that the addition of permanent lighting will not increase the number of days of use of the athletic field. There is no evidence to suggest that field usage will increase through the replacement of the existing portable lighting sources with permanent lighting fixtures.

Impacts of the project on night lighting are discussed in Section 3.1 Aesthetics and Visual Resources of the EIR. That section evaluates the lighting impacts of the proposed project, and includes a photometric plan included as Appendix 3.1 of the Draft EIR. Lighting on the project site is also subject to City of Wildomar Municipal Code Section 8.64 Light Pollution. The commenter is also referred to Response 1-1 for further information regarding this issue.

- 2-2 The commenter notes that page ES-2 states that project air quality impacts are considered cumulatively considerable and significant and unavoidable. Table ES-1, however, states that all air quality impacts including cumulative impacts will be less than significant. The commenter is correct and this inconsistency will be addressed. The commenter is referred to Section 3.0 of this FEIR for this revision. As shown in Section 3.2 Air Quality of the Draft EIR, both the direct and cumulative impacts of the proposed project are less than significant.

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2-3 The commenter suggested a list of mitigation measures to be adopted for the project. The suggested mitigation measures: 3, 4, 6 and 7 are already listed under SCAQMD Rules 403 and 403.1 in Section 3.2 Air Quality of the DEIR and required of the project without the need to include them as mitigation measures. Section 3-2 Air Quality of the Draft EIR determined that the Air Quality impacts associated with the proposed project are less than significant. As such, the additional mitigation measures listed by the commenter are not necessary to reduce air quality impact to a less than significant level. The typographical error on page ES-2 of the DEIR is corrected in Section 3.0 Revisions to the Draft EIR, in this Final EIR. Attachment B, "Responses to Suggested Mitigation Measures from Letter 2," includes responses to the suggested mitigation measures included in this comment.

2-4 The commenter states that health risks to students from locating the project adjacent to I-215 are not evaluated in the DEIR. As a point of clarification, the closest portion of the preschool is located approximately 300 feet east of I-15 and is not near I-215. Interstate 15 between Bundy Canyon Road and Baxter Road. The commenter also noted that the project would increase the number of children and amount of time such children are exposed to diesel emissions along roadways, thereby exposing sensitive receptors to substantial pollutant concentrations and justifying detailed evaluation in the DEIR. The primary pollutant of concern sourced from I-15 is diesel particulate matter (diesel PM). The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminant emission levels that exceed applicable standards). Health-related risks associated with diesel PM emissions are primarily linked to long-term exposure and the associated risk of contracting cancer. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of pre-school attendance. Pre-school students can attend the Cornerstone Church Pre-School beginning at the age of three through their entering kindergarten, which would typically equal 2 years of pre-school attendance.

In addition, as stated in Section 4.0, Alternatives, of the Draft EIR, decision makers and the public are presented with Alternative 4, that if implemented would move the proposed preschool to the upper parking lot which is approximately 600 feet east of the proposed project pre-school site and thus farther from I-15.

Toxic air contaminant impacts to sensitive receptors are considered to be **less than significant**.

2-5 The commenter states that mitigation measure MM3.3.1 improperly defers needed studies regarding impacts to special-status plants not covered by the MSHCP. However, the mitigation measure gives detailed instructions for mitigation, should special-status plants be found in areas proposed for disturbance. Suitable habitat for the plant species is present within the footprint of disturbance.

As a result of this statement, the following changes will be made to the first paragraph of MM 3.3.1 on page 3.3-26:

**MM 3.3.1** Within two years of groundbreaking in undisturbed portions of the site, the applicant shall retain a qualified biologist to conduct ~~a preliminary evaluation to determine if suitable habitat for white rabbit tobacco and/or bottle liver occurs within the disturbance footprint. If suitable habitat is identified, focused surveys shall be conducted~~ to determine the presence/absence of special-

status plant species with potential to occur in and adjacent to (within 100 feet, where appropriate) the proposed impact area, including new construction access routes. These surveys shall be conducted in accordance with CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (2009). These guidelines require that rare plant surveys be conducted at the proper time of year when rare or endangered species are both evident and identifiable. Field surveys shall be scheduled to coincide with known flowering periods, and/or during appropriate developmental periods that are necessary to identify the plant species of concern.

The commenter states that the EIR does not properly reflect burrowing owl survey and conservation requirements as stated under the MSHCP. The commenter also states that the EIR does not disclose the project's potential to significantly impact burrowing owls and that it inadequately mitigates for impacts to burrowing owl, specifically if 3 or more breeding pairs are found onsite. However, the EIR states on page 3.3-27 that impacts to special-status wildlife species (including burrowing owl) would be considered potentially significant. The EIR goes on to say that project compliance with the MSHCP fully mitigates for burrowing owl, which is true. It goes on to say: "To ensure compliance with the requirements of the MSHCP, additional surveys are required for burrowing owl and coastal California gnatcatcher. Therefore, mitigation measures **MM 3.3.2a** through **MM 3.3.2c** shall be implemented to ensure MSHCP compliance". Thus, the EIR does state the project's potential to significantly impact burrowing owl, it also lays out the additional surveys and requirements that are necessary to ensure compliance with the MSHCP. In regards to commenter's statement about inadequate mitigation, please refer to revisions made to MM3.3.2a and MM 3.3.2b in the response to Comment A-1.

The commenter states that the EIR fails to provide details regarding the ephemeral drainages onsite. The commenter also states that information regarding the jurisdiction of these features must be obtained prior to project approval and that mitigation measures MM 3.3.3, MM 3.3.4a, MM 3.3.4b improperly defer these evaluations. As shown in Figure 1 and discussed in response A-3, the proposed project does not impact any wetlands or riparian area. Therefore a jurisdictional delineation is not necessary. A jurisdictional delineation has yet to be done on the project site; however, the aforementioned mitigation measures require a delineation and if features are determined to be impacted, a no net loss of riparian vegetation and jurisdictional waters. Furthermore, please refer to the response and revisions made to Impact 3.3.7 in the response to Comment A-3. This revision will ensure any impacts to water features are consistent with the MSHCP.

The commenter states that the EIR fails to consider cumulative impacts to jurisdictional water and/or wetlands. The following changes will be made to Impact 3.3.8 (Cumulative Impacts) on page 3.3-33:

**Impact 3.3.8** Implementation of the proposed project, in combination with existing, approved, proposed, and reasonably foreseeable development in the immediate area of the proposed project, will result in the conversion of habitat and impact biological resources. This impact is considered **less than cumulatively considerable**.

The City, along with other jurisdictions in western Riverside County, participates in the MSHCP. The MSHCP is designed to protect over 150 species and conserve over 500,000 acres in western Riverside County. Project compliance with the MSHCP and the Stephens' Kangaroo Rat Habitat Conservation Plan fully mitigates for impacts on

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covered species and ensures large segments of natural communities in western Riverside County will be preserved.

Adherence to the standards and conditions, and implementation of mitigation measures **MM 3.3.2.a** and **MM 3.3.2b**, ensure the project will be compliant with the MSHCP. In addition, implementation of mitigation measures **MM 3.3.2c** and **MM 3.3.2d** ensures that impacts to coastal California gnatcatchers and other nesting birds are minimized. Furthermore, mitigation measures **MM 3.3.3**, **MM 3.3.4a** and **MM 3.3.4b** ensure that impacts to jurisdictional waterways and associated riparian areas are minimized. Though the development of the proposed project will continue the urbanization of the area, participation in and implementation of the MSHCP will effectively reduce the project's contribution to cumulative impacts to a **less than cumulatively considerable** level.

### Mitigation Measures

Implement mitigation measures **MM 3.3.2a** through **MM 3.3.2d** and **MM 3.3.3**, **MM 3.3.4a** and **MM 3.3.4b**.

The commenter states that the EIR fails to disclose the distance from the proposed development to designated critical habitat for coastal California gnatcatcher and how impacts to this habitat will be avoided. In addition, the commenter states that impacts to the gnatcatcher and its onsite habitat must be evaluated in the EIR. However, the designated critical habitat is adjacent to a portion of the project site that is not planned for development; thus, it will not be impacted by project-related activities. Implementation of mitigation measure MM3.3.2c mitigates for impacts to nesting gnatcatchers. Participation in the MSHCP fully mitigates for all species covered by the plan, including the coastal California gnatcatcher and its habitats, thus, no additional mitigation is required.

- 2-6 The commenter states that the project should have been evaluated for greenhouse gas (GHG) emission based on the more stringent threshold of 1,400 MT CO<sub>2</sub><sup>e</sup> for commercial instead of the 3,000 MT CO<sub>2</sub><sup>e</sup> residential/commercial combined threshold.

As a point of clarification, the thresholds listed in the comment letter and identified in the DEIR are proposed thresholds not yet adopted by the South Coast Air Quality Management District and therefore are not regulatory at this time. In any case, as discussed under Impact 3.4.1, the proposed project's construction related GHG emissions are estimated at 538 MT CO<sub>2</sub><sup>e</sup> annually until construction is completed. Once construction is completed generation of these GHG emissions would cease. Additionally, operational GHG emissions are estimated to be 997.47 MT CO<sub>2</sub><sup>e</sup> annually. Both of these GHG emissions are less than the proposed SCAQMD threshold of 3,000 MT CO<sub>2</sub><sup>e</sup> annually as well as 1,400 MT CO<sub>2</sub><sup>e</sup> annually for commercial projects.

The commenter continues and states that the DEIR should have included the existing project facilities GHG emission in the GHG analysis.

CEQA requires an analysis of a proposed project's environmental impacts, including GHG emissions, based on existing conditions. Existing conditions have been determined to be the environmental conditions exist at the time the Notice of Preparation (NOP) is published (CEQA Guidelines Section 15125(a)). CEQA does not require an analysis of existing GHG emission impacts, nor require mitigation of the existing impacts.

- 2-7 The commenter states that the site should have been evaluated for potential archaeological and paleontological impacts in the currently undeveloped areas that

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would be parking lots. The commenter also states that blasting and other significant earthwork may be necessary to develop structures on the site.

As discussed on page 3.5-1, the Cultural Resources section of the DEIR is based on the Cultural Resources Assessment produced by Jean A. Keller, PhD completed for the project site. Additionally, as identified on page 3.5-11 and 3.5-12 of the DEIR, since the project site is already developed, it is likely that any potential archeological resources at the project site would currently be buried. As a result, the project site has not been investigated by a professional archaeologist. However, excavations could occur in association with development of the proposed project that could affect archeological resources buried within the project site. Therefore, it is possible that project related ground-disturbing activities could uncover previously unknown archeological resources within project boundaries. Accordingly, mitigation measures 3.5.2a and 3.5.2c have been incorporated.

Additionally, page 3.5-13 of DEIR, identifies, that excavations could occur in association with development of the proposed project that could affect paleontological resources buried within the project site. Therefore, it is possible that project-related ground-disturbing activities could uncover previously unknown paleontological resources within project boundaries. Accordingly, mitigation measures MM 3.5.3a, 3.5.3b, and 3.5.3e have been incorporated.

The applicant has indicated that no blasting will be necessary to complete the project. A restriction on blasting is a condition of approval of the proposed project.

- 2-8 The commenter states that no project-specific geotechnical report has been prepared for the project and that mitigation measure MM 3.6.2 improperly defers a subsequent geotechnical study.

The EIR provides extensive discussion and reliance on required future compliance with state and city building codes designed to reduce risk of ground failure, prevent building collapse, and protect public safety. The 2006 Geotechnical Feasibility Study (Appendix 3.6 of the DEIR) also includes recommendations such as the installation and maintenance of drainage devices to prevent slope failure and planting vegetation on slopes to minimize or prevent erosion. Other recommendations include that the project be designed with seismic design parameters due to the proximity of the project site to the Elsinore Fault; building foundation guidelines; and parking lot design. The proposed project is currently designed to meet the recommended parameters through the grading features directing flow around the slope. Compliance with applicable regulatory framework is a common and acceptable practice, under CEQA. Additionally, commitment to such standards and general measures are adequate under CEQA, even though future site-specific investigations and future soils and other reports from registered civil engineers are recommended and required to determine final project foundation and structure design, type and sizing of structural building materials, grading plans, and so on as determined by a case (Oakland Heritage Alliance v. City of Oakland (2011)) with similar mitigation measure requirements to conduct a Geotechnical Report to supplement the existing feasibility study. The outcome of the case resulted in a finding that a subsequent geotechnical study can be required in mitigation measures as long as the details of exactly how mitigation will be achieved under the identified measures pending completion of a subsequent geotechnical study requirements are discussed.

The commenter states that the geotechnical report is outdated and does not evaluate geologic conditions for the proposed project's footprint. The commenter also states that

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the geotechnical feasibility study did not consider the development of a 3-story building, preschool, or maintenance building onsite and only considered the construction of the parking lot. The commenter noted that blasting may be required to achieve cuts in the granite and is a project characteristic that needs to be evaluated and discussed in terms of noise and vibration impacts. The commenter also noted that the geotechnical feasibility report indicated that oversized rocks would have to be exported off site, if cuts were made into granite

With respect to the age of the technical study, conditions on site have not been altered since the geotechnical study was issued and geologic conditions typically do not change in the amount of time since the study was conducted. Additionally, no blasting will be associated with the proposed project. As stated in the EIR, the City considers the previous report adequate to determine that construction of the proposed project is feasible, but will need to approve an update to the geotechnical report prior to issuance of a grading or building permits to identify grading and building practices necessary to ensure stable building conditions. As some of the proposed project features, such as construction of the upper parking lot, will involve cutting into the hillside, an update to the geotechnical report is necessary to ensure that the best management practices for slope stabilization are considered. The study will identify specific design parameters for the project site. Additionally, building plans will be required to incorporate all applicable recommendations of the subsequent geotechnical study and the most updated version of the CBC.

The commenter further noted that Figure 3.6-1 fails to state how close the Glen Ivy North Fault zone lies to the site.

Figure 3.6-1 has been updated to include the site of the proposed project in relation to the Glen Ivy Fault zone. As discussed in the DEIR, the Elsinore and Wildomar faults are Alquist-Priolo faults, meaning that they pose a risk of surface ground rupture as evidenced by previous visible and documented surface fault ruptures along portions of the faults. Although considered an active fault, the Glen Ivy North fault is not categorized as an Alquist-Priolo fault zone. Additionally, no faulting was observed during site reconnaissance conducted by EnGEN. Although some structural damage is typically not avoidable during a large earthquake, the proposed project components would be constructed to meet existing construction ordinances and the CBC in order to protect against building collapse and major injury during a seismic event. The CBC includes specific design measures intended to maximize structural stability in the event of an earthquake.

- 2-9 The commenter states that Appendices D, E, G and H and all Exhibits A-J listed in Appendix 3.7 are missing from the document.

Appendix 3.7 is included on a separate CD (along with all the other Appendices) as a 598-page PDF. Appendix D starts on page 143 of the PDF; Appendix E starts on page 242 of the PDF; Appendix F starts on page 330; and Appendix G starts on page 320 of the PDF. There is no Appendix H in the Hydrology and Water Quality Report. An Appendix H exists in the Preliminary Water Quality Management Plan (WQMP), which was included on a separate CD (along with all of the other Appendices); All the exhibits are found starting on page 330 of the Hydrology and Water Quality Report PDF. All of the technical studies and documents were and are available at Wildomar City Hall and have been throughout the circulation period of the document. The Draft EIR and notice of availability all included methods of contacting the City for information if the commenter believed one or more pieces of information was missing.

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- 2-10 The commenter states that the DEIR fails to quantify actual construction noise levels. The commenter also states that the mitigation measure MM 3.8.1a on page 3.8-27 of the DEIR is uncertain to reduce noise impacts and believes that it is unenforceable by the City as the measure requires only the preparation of a noise control plan, not necessarily implementation of the measures set forth in that plan.

Construction noise is addressed under Impact 3.8.1. As discussed under Impact 3.8.1, Noise levels generated by heavy construction equipment can range from approximately 70 dBA to in excess of 100 dBA when measured at 50 feet. Because actual construction noise cannot be determined until the project is under construction, it is not possible to analyze the actual construction noise of the project. However, these noise levels can be predicted utilizing typical noise levels and usage rates associated with construction equipment, derived from the FHWA Roadway Construction Noise Model (version 1.1). This was done for the project as stated on page 3.8-23 of the DEIR.

All mitigation measures in MM 3.8.1a are enforceable by the City.

The Commenter recommends the following changes to the mitigation measure:

1. Construction equipment staging areas shall be located as distant as possible from nearby sensitive receptors.
2. Construction equipment shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
3. Stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.
4. All construction activity including staging and haul truck deliveries shall be limited to between the hours of 6 am and 6 pm between June and September, and the hours of 7 am to 6 pm between October and May.
5. Haul routes that do not pass noise-sensitive dwellings shall be preferred and utilized so long as such haul routes do not substantially increase vehicle miles travelled.
6. Frame mounted temporary noise curtains with a minimum STC rating of 20 shall be installed near the noise-sensitive residential receiver locations. The noise curtains shall be installed without any gaps or openings on the Project boundary between the noise-sensitive receiver and the construction activities.
7. 15 days prior to commencement of construction, the construction supervisor shall provide written notification of planned activities to the City of Wildomar; to each of the property owners along Via Carnaghi Lane; and to the home at 34520 Monte Vista Drive.
8. The construction supervisor shall maintain a complaint log noting date, time, complainant's name, nature of the complaint, and any corrective action taken. A copy of the complaint log shall be provided to the City on a daily basis. The Project manager shall publish and distribute to the potentially affected community a phone number that is attended during active construction working hours for use by the disturbed public to register complaints.

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9. Each of these measures shall be drafted in a "Noise control plan" submitted to the city for review and approval prior to issuance of grading permits. The construction supervisor shall ensure compliance with the noise control plan. The City shall also conduct periodic inspections at its discretion to ensure compliance.

The proposed changes are included in Section 3.0 Errata in this Final EIR.

In regard to the import of material, the proposed project site does in fact 'balance' and will not require the import or haul of material. The paving of Via Carnighi Lane will result in the need to haul suitable 'base' material for the paving of the roadway. This is different than cut and fill material needed for some construction projects to level the site. In this instance the gravel base material is an essential part of the drainage and structure of the roadway and is therefore part of the construction. All roadway projects would require a similar import of base material to support pavement. The EIR is correct in that the proposed project does not require the import of fill material to level or construct on the project site.

As the project applicant and the operator of the school are the same, the expectation is that the applicant will know best when to construct to avoid conflict with school operations. The applicant will likely construct during non-school periods so as to avoid conflict.

- 2-11 The commenter states that the EIR fails to disclose total operational noise at the property line and at adjacent residences, and instead divides the impact with each portion of the project. The commenter states that noise from the church and school patrons, and sports field event attendees, will cause a substantial part of this Project's noise.

The church, school and sports field represent existing conditions and are included in the ambient noise measurements associated with the project. The proposed project will add a preschool which is close to an existing home on 34520 Monte Vista Drive. As discussed on page 3.8-26 of the Draft EIR, the area of the preschool is already at 72.4 dBA which exceeds the allowable exterior noise level. As noted in the EIR, the playground area is approximately 3 feet below grade, which will shield the playground area from existing noise. This grade differential will also shield the adjacent residence from noise associated with children playing. Any noise associated with the parking lot that will be the site of the preschool will be diminished by the removal of parking spaces to accommodate the preschool. The existing home on 34620 Carnighi Via Lane is adjacent to an existing parking lot, and already subject to noise associated with the existing traffic on the site. The operations of the parking area is discussed beginning on page 3.8-34 of the Draft EIR and indicates that the parking lot noise will be below the 65 dBA limit established by the City. The Draft EIR also includes mitigation measure 3.8.5 on page 3.8-35, that restricts access to the upper parking lot to avoid noise during periods when the church is not in operation.

Additionally, Impact 3.8.3 discusses off-site ambient noise increases due to operational noise from building operations and traffic related noise. As discussed in Impact 3.8.3, operational noise related to building HVAC equipment is reduced to less than 65 dBA with the use of a screening wall. Additionally, as discussed in Impact 3.8.3 potential traffic noise increase will range from 0.0 to 0.4 dBA CNEL; therefore, the proposed project's incremental off-site traffic noise level contributions will be considered barely perceptible (less than 3.0 dBA CNEL). The proposed project will not generate a substantial permanent increase in transportation-related ambient noise levels.

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The commenter states that the noise calculations in the DEIR likely understate the noise levels during the peak hours because the DEIR relies on average daily traffic volumes for the noise assessment.

The City's community noise exposure thresholds are based on a Day-Night Average Level or  $L_{dn}$ .  $L_{dn}$  is defined as the 24-hour  $L_{eq}$  with a 10 dBA "penalty" for noise events that occur during the noise-sensitive hours between 10:00 p.m. and 7:00 a.m. In other words, 10 dBA is "added" to noise events that occur in the nighttime hours to account for increases sensitivity to noise during these hours. Using a peak hour traffic level would not be an accurate depiction of traffic related noise levels over a 24-hour period.

Additionally, the commenter states that the DEIR should use the 1.5 dBA ambient noise level increase in areas where the noise level is above 65dBA.

As discussed above, Impact 3.8.3 identifies that operational noise related to building HVAC equipment is reduced to less than 65 dBA with the use of a screening wall. Additionally, as discussed in Impact 3.8.3 potential traffic noise increase will range from 0.0 to 0.4 dBA CNEL. These levels are all within the acceptable ambient noise criteria of an increase of less than 3.0 dBA as well as less than 1.5 bBA.

The commenter states that noise on Via Carnaghi Lane should have been assessed as part of the DEIR.

As is shown on Table 3.8-11, noise levels with the project on Monte Vista Drive north of Via Carnaghi Lane is at 65 dBA within the right-of-way (ROW) of the Monte Vista roadway. The amount of traffic on Monte Vista Drive, a two lane secondary roadway with an existing average daily traffic count of approximately 2,000 automobiles (see Table 3.8-18), is much greater than the traffic on Via Carnaghi Lane, a one lane dirt road that serves three residences and the existing Church parking lot. If the current traffic volume on Monte Vista Drive does not exceed 65 dBA, the comparatively small amount project related traffic using Via Caraghi Lane would not exceed the City's noise thresholds. Therefore, traffic noise assessment on Via Carnaghi Lane is considered not necessary.

- 2-12 The commenter states that the project presents substantial conflicts with surrounding rural residential land uses, general plan designations, and zoning designations. The commenter goes on to state that significant consideration should be given to the impacts of the 63-space parking lot off Via Carnaghi Lane and drive to upper parking area, which essentially hems in the existing rural residential property at APN 367-210-040 and would also impact APN 367-210-037 and adjacent properties. The proposed project is consistent with the existing land use designations and zoning for the project site and the parcels along Via Carnighi Lane as discussed on page 3.11-1 of the Draft EIR. The noise and light impacts of the upper parking lot are discussed in the EIR, and mitigation recommended for the upper parking lot. Because of the grade difference between the home and the parking lots, there is no effective construction noise mitigation that would reduce impacts to a less than significant level. 'Equestrian' activity in the area are the horses kept at 34620 Via Carnighi Lane. The owner was present at all scoping meetings, met with City staff separately before and during circulation of the Draft EIR, and did not comment on the document. Additionally, horses are kept at 34720 Carneghi Lane. The existing church complex has been established for a number of years. There is no evidence to suggest that the operational uses of the project would conflict with existing equestrian uses.

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The commenter also states that if the 63-space parking lot is allowed, the lot should not be lighted and should be limited to use as overflow parking. Comment noted.

- 2-13 The commenter states, "The EIR relies on an improper baseline to assess traffic impacts. The baseline should be taken from the time of issuance of the NOP, here 2013. Yet all traffic counts are from a year prior, 2012, and are thus outdated and improper for use in the EIR. Traffic counts and estimates must be updated to reflect current traffic conditions." The timing of the traffic counts was reviewed and approved by the City Engineer as part of the traffic scoping agreement included in Appendix 3.10 of the Draft EIR. The City has not had substantial growth in the short period between the collection of traffic counts in May 2012 and the issuance of the NOP in October 2013. It is typical for writing of an EIR to take some time and the collection of data to occur prior to the issuance of notices and draft documents. The TIA evaluates project impacts at 2017 and accounts for area-wide growth as discussed on page 3.10-22 of the Draft EIR.

The commenter also states that the traffic evaluation in the EIR fails entirely to evaluate impacts to roadway segments and capacity, while looking only at intersection delays. Roadway segment analysis is not a requirement for the City of Wildomar. The City recognizes that average daily traffic volumes are intended as guidelines for planning purposes and are not affected by such factors as intersections (spacing, configuration, and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic), and pedestrian bicycle traffic. The more detailed peak-hour intersection analysis explicitly accounts for factors that affect roadway capacity. Therefore, roadway segment widening is typically only recommended if the peak-hour intersection analysis indicates the need for additional through lanes.

The commenter states that roadway segments and capacity on I-215, Via Carnaghi Lane, Monte Vista Drive, Baxter Road, and Bundy Canyon Road must be evaluated. The intersection of Via Carnaghi Lane and Monte Vista Drive was evaluated in the Draft EIR (Intersection 8 in Table 3.10-3 of the Draft EIR). Analysis of the I-215 freeway mainline was deemed unnecessary because the project site is approximately 7 road miles west of Interstate 215 and is anticipated to contribute fewer than 50 peak-hour trips.

The commenter states that the EIR fails to evaluate impacts at the intersection of Via Carnaghi Lane and project driveways. The City did not deem operational analysis of private driveways along Via Carnaghi Lane necessary, as the traffic volume at the driveway locations is very low. Temporary blockage of access is discussed in the Draft EIR in Impact 3.10.3 beginning on page 3.10-42. Note that the impact is considered significant and the project is required to develop a traffic management plan (TMP) in mitigation measure MM 3.10.3.

Additionally, the commenter states that no traffic counts were conducted for the 3 PM hour when the school lets out. The PM peak hour of 4 PM also fails to account for traffic during field events, since the PM peak hour concludes at 7 PM before the field events end. However, while school traffic peaks between 2 and 3 PM, the traffic on the adjacent streets is much lower than what is typically observed during the hours of 4 to 6 PM. As such, the higher volumes generated by the school would not result in a higher volume than what was evaluated in the traffic analysis due to the lack of commuter traffic during these early hours. Similarly, traffic volumes on the adjacent streets are typically lower after 7 PM when there are fewer commuters. As such, higher traffic generators that let out after these hours

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(such as the field events) will not result in higher volumes when observed with adjacent street traffic.

The commenter states that the AM peak hour fails to account for Sunday traffic volumes from 9 AM to 12 PM, as the traffic counts were collected on a Thursday. However, as provided in Appendix 3.1 of the traffic impact analysis, the counts collected on Sunday were also performed on May 20, 2012, between the hours of 8 AM and 12 PM to determine the morning peak due to church services. As noted in the Draft EIR on page 3.10-14, after review of the TIA data, the City Engineer determined that analysis of a Sunday peak hour was unnecessary.

The commenter states that the language “as measured by 50 or more peak hour trips” is the basis for determining the scope of the traffic study, not for determining whether the project reduces roadway operations below acceptable levels at the intersections included in the traffic study. In response, the 50 peak-hour trips threshold is utilized by several jurisdictions to identify study areas because it is understood to be the threshold at which a project may potentially impact intersections. Projects contributing less than 50 peak-hour trips to a study area intersection are not required for analysis because the likelihood of the project creating an impact is nominal. For this reason, the City uses the threshold of 50 peak-hour trips in determining significance.

The commenter writes that the EIR also omits to state a cumulative traffic impact would occur where the project’s cumulative contribution causes an intersection with a previously acceptable LOS to operate below an acceptable LOS. The commenter is incorrect; standards of significance 1 and 2, on page 3.10-10 of the Draft EIR, address project impacts to an existing level of service.

The commenter then states that the construction traffic impacts are not considered in terms of substantially increasing traffic or conflicting with LOS standards, but are only regarding emergency access. Therefore, the increased delays and traffic volumes during project construction must be evaluated and disclosed in the EIR. Temporary disruption of traffic along Monte Vista Drive and Via Carnighi Lane is discussed in the Draft EIR in Impact 3.10.3 beginning on page 3.10-42. Note that the impact is considered significant and the project is required to develop a traffic management plan (TMP) in mitigation measure MM 3.10.3.

The commenter states that the EIR fails to analyze the exception to City standards, City of Wildomar Road Standard No. 105, to allow two 12-foot travel lanes but no on-street parking or sidewalks on Via Carnighi Lane. The commenter is incorrect; the exception is analyzed in Impact 3.10.2 of the Draft EIR beginning on page 3.10-41.

The commenter concludes that mitigation measure MM 3.10.1 requires only pro rata share of improvements despite the fact that impacts caused are project specific, not cumulative, and states new mitigation measures the City should require the project to complete. However, the impacts at I-15 Southbound Ramps/Baxter Road and I-15 Northbound Ramps/Baxter Road are currently deficient under existing conditions. As shown in Table 3.10-16 of the Draft EIR, the project is responsible for only a portion of the impact. As a result, the City may only require that the project contribute its fair share of the cost of improvements to these intersections.

2-14 The commenter states that the project fails to meet its own objectives in its proposal to expand the existing school capabilities by adding a preschool building on the same site to

## **2.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR**

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take advantage of existing infrastructure. According to commenter, this is contradictory because existing infrastructure will not be used with the addition of new sewer, buildings, and parking lot and the pavement of Via Carnaghi Lane. The commenter does not discuss the adequacy of the DEIR with this comment. Infrastructure in this instance also includes the main school buildings with administrative, kitchen, and gymnasium, in addition to parking lots, driveways and electrical power on the site.

The commenter continues and states that the expansion of parking and the future administration building objectives would not be necessary absent the proposed preschool expansion. The commenter does not discuss the adequacy of the DEIR with this comment. Comment noted.

The commenter also states that construction and additional traffic and substantial new lighting in parking areas associated with the proposed project offsets any reduction in noise associated with existing generator powered lighting with the addition of field lighting. The commenter suggests that installing only the field lighting without constructing the remainder of the project. The commenter does not discuss the adequacy of the DEIR with this comment. Comment noted.

The commenter states that Alternative 4 was considered the environmentally superior alternative despite the fact the Alternate 2 accomplishes all but one of the project objectives. Alternative 2 should be adopted in lieu of the project and should be deemed the environmentally superior alternative.

As stated in the DEIR, while Alternative 2 – Removing the Upper Parking Lot would reduce some of the project impacts, removing the upper parking lot from the project would result in significantly less parking. This could result in overflow onto Via Carnaghi Lane and Monte Vista Drive. The resulting congestion could also result in more vehicle idling time as church members wait for others to leave in order to find parking. Operational changes to the church services, such as extending the time between services, might alleviate some of the congestion; however, this would be at the expense of reducing opportunities for fellowship and visitation between members. The DEIR determined that Alternative 3 the No Maintenance Building Parking Lot alternative is the environmentally superior alternative because it meets all of the project objectives and is the least disruptive to the proposed project site plan and design.

The commenter provides a number of additional alternatives that should be considered in a Recirculated EIR; 1) a reduced density alternative, 2) an off-site preschool alternative, 3) an alternative parking area alternative, and 4) a smaller administration building alternative.

The DEIR considered a total of six alternatives, two of which were rejected as infeasible, an off-site preschool alternative and a reduced project size alternative. An EIR is not required to analyze every suggested alternative. Section 15126.6 of the CEQA Guidelines discusses the requirements for alternatives analysis. Section 15126.6(a) states:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision

making and public participation. An EIR is not required to consider alternatives which are infeasible.”

As stated on page 4.0-1, the alternatives analyzed in the DEIR were ultimately chosen based on each alternative’s ability to feasibly attain the basic project objectives while avoiding or reducing one or more of the project’s significant effects. The analysis provides readers with adequate information to compare the effectiveness of identified mitigation or significant adverse impacts and to enable readers to make decisions about the project. CEQA requires EIRs to address a reasonable range of reasonable alternatives, not all potential alternatives.

- 2-15 The commenter states that the public and decisions makers should be informed if there are any additional future plans for expansion at the site. Section 2.0 of the Draft EIR includes the entire project description. The project is discussed in two phases beginning on page 2.0-7 of the Draft EIR. The DEIR analyzes the project as proposed. No other future development of the project site has been proposed or insinuated by the project proponent.



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## **3.0 – REVISIONS TO DRAFT EIR**

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### 3.1 INTRODUCTION

This section includes text revisions and other edits to the DEIR. These modifications resulted from comments received during the DEIR public review period.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis. Changes are provided in revision marks (underline for new text and ~~strikeout~~ for deleted text) and are organized by section of the DEIR.

### 3.2 REVISIONS TO THE DEIR

As a result of the comments received, the following changes have been made to the Draft EIR. However, none of this information requires recirculation of the EIR. Recirculation is required when significant new information is added to an EIR after circulation but before final certification. This new information must include significant changes to the project or environmental setting, or a substantial new adverse impact, or a feasible project alternative or mitigation measure that would clearly reduce the impact but will not be implemented on which the public and other agencies must have an opportunity to evaluate and comment (see Public Resources Code (PRC) Section 21091.1; 14 California Code of Regulations (CCR or Guidelines) Section 15088.5; *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 447). The information here only adds to that already discussed in the EIR for purposes of clarification. Conflicting information, including that submitted by experts, does not require recirculation (*Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74, 97). Recirculation is not required when changes merely clarify, amplify, or make small modifications (see 14 CCR Section 150833.5(b)). The agency's determination on recirculation is presumed to be correct unless the challenger can show that determination is not supported by substantial evidence (*Western Placer Citizens for an Agricultural & Rural Environment v. County of Placer* (2006) 144 Cal. App. 4th 890, 903).

### ES EXECUTIVE SUMMARY

The following changes to the text have been made on page ES-2, sixth paragraph:

Of the potential environmental impacts discussed in Section 3.0 of the DEIR, project impacts resulting from ~~air quality~~ temporary construction noise are considered ~~cumulatively considerable and~~ significant and unavoidable. CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance.

The following changes have been made to Table ES-1:

<b>Biological Resources</b>			
<p><b>Impact 3.3.1</b> Implementation of project-related activities could result in substantial adverse effects, either directly or through habitat modifications, to special-status plant species, which would be considered a <b>potentially significant</b> impact.</p>	<p>PS</p>	<p><b>MM 3.3.1</b> Within two years of groundbreaking in undisturbed portions of the site, the applicant shall retain a qualified biologist to conduct a preliminary evaluation to determine if suitable habitat for white rabbit tobacco and/or bottle liver occurs within the disturbance footprint. <del>If suitable habitat is identified, focused surveys shall be conducted</del> to determine the presence/absence of special-status plant species with potential to occur in and adjacent to (within 100 feet, where appropriate) the proposed impact area, including new construction access routes. These surveys shall be conducted in accordance with CDFW <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i> (2009). These guidelines require that rare plant surveys be conducted at the proper time of year when rare or endangered species are both evident and identifiable. Field surveys shall be scheduled to coincide with known flowering periods, and/or during appropriate developmental periods that are necessary to identify the plant species of concern.</p> <p>If any state- or federally listed CNPS List 1 or CNPS List 2 plant species are found in or adjacent to (within 100 feet) proposed impact areas during the surveys, these plant species shall be avoided to the greatest extent possible. Any special-status plant species that are identified adjacent to the PSA, but not proposed to be disturbed by the project, shall be protected by barrier fencing to ensure that construction activities and material stockpiles do not impact any special-status plant species. These avoidance areas shall be identified on project plans.</p>	<p>LS</p>

		<p>If project-related impacts will result in the loss of greater than 10 percent of occupied habitat for a special-status species, then compensatory mitigation shall be required for all impacts that exceed the 10 percent threshold. For example, if 18 percent of occupied habitat will be impacted, then compensatory mitigation shall only be required for the 8 percent that exceeds the 10 percent threshold. Compensatory mitigation for permanent impacts to special-status plant species shall include the preservation of occupied habitat at a 1:1 ratio (i.e., one acre preserved for each acre impacted). Compensation for temporary impacts shall include the preservation of occupied habitat at a 0.5:1 ratio. Preservation areas may include undisturbed areas of the site that will be preserved and managed in perpetuity, offsite mitigation lands, or a combination of both. The preserved habitat shall be of equal or greater habitat quality to the areas impacted in terms of soil features, extent of disturbance, vegetation structure, and contain extant populations of the same or greater size as the area impacted.</p> <p>A report of special-status plants observed during focused surveys, as well as avoidance, minimization, and mitigation measures to be implemented shall be prepared and submitted to the City of Wildomar Planning Department at the time of application for the City's review and approval.</p> <p><i>Timing/Implementation: Prior to approval of grading permits</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning Department</i></p>	
<p><b>Impact 3.3.2</b> Implementation of project-related activities could result in substantial adverse effects, either directly or through habitat modifications, to special-status wildlife species, which would be considered a <b>potentially significant</b> impact.</p>	<p>PS</p>	<p><b>MM 3.3.2a</b> <u>Focused surveys shall be conducted within 12 months prior to construction activities. These surveys shall be conducted in accordance with the <i>Burrowing Owl Survey Instructions for the Western Riverside MSHCP</i> (March 29, 2006).</u></p>	<p>LS</p>

**3.0 REVISIONS TO THE DRAFT EIR**

		<p><del>In addition, per MSHCP Species-Specific Objective 6, preconstruction presence/absence surveys for burrowing owl within the survey area, where suitable habitat is present, will be conducted for all covered activities through the life of the building permit. Surveys will be conducted within 30 days prior to disturbance. Take of active nests will be avoided. <u>Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present outside the nesting season.</u> If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed.</del></p> <p>Surveys shall be completed for occupied burrowing owl burrows within all construction areas and within 500 feet (150 meters) of the project work areas (where possible and appropriate based on habitat). All occupied burrows will be mapped on an aerial photo.</p> <p><i>Timing/Implementation: Within 30 days prior to any vegetation removal or ground-disturbing activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Public Works Departments</i></p> <p><b>MM 3.3.2b</b> <u>If burrowing owls are found to be present on-site, the project applicant shall develop a conservation strategy in cooperation with the CDFW, the USFWS, and the Regional Conservation Authority in accordance with the CDFW's Staff Report on Burrowing Owl Mitigation (2012).</u></p> <p><del>If burrowing owls are identified during the survey period, the City shall require the project applicant to take the following actions to offset impacts prior to ground disturbance:</del></p> <p><del>Active nests within the areas scheduled for disturbance or degradation shall be avoided from February 1 through August 31, and a minimum 250 foot (75 meter) buffer shall be provided until fledging has occurred. Following fledging, owls may be passively</del></p>	
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		<p><del>relocated by a qualified biologist.</del></p> <p><del>If impacts on occupied burrows in the non-nesting period are unavoidable, on-site passive relocation techniques may be used if approved by the CDFW to encourage owls to move to alternative burrows outside of the impact area. However, no occupied burrows shall be disturbed during the nesting season. A qualified biologist must verify through noninvasive methods that the burrow is no longer occupied.</del></p> <p><del>If relocation of the owls is approved for the site by the CDFW, the City shall require the developer to hire a qualified biologist to prepare a plan for relocating the owls to a suitable site. The relocation plan must include all of the following:</del></p> <ul style="list-style-type: none"> <li><del>• The location of the nest and owls proposed for relocation.</del></li> <li><del>• The location of the proposed relocation site.</del></li> <li><del>• The number of owls involved and the time of year when the relocation is proposed to take place.</del></li> <li><del>• The name and credentials of the biologist who will be retained to supervise the relocation.</del></li> <li><del>• The proposed method of capture and transport for the owls to the new site.</del></li> <li><del>• A description of site preparation at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one time or long term vegetation control).</del></li> <li><del>• A description of efforts and funding support proposed to monitor the relocation.</del></li> </ul> <p><del>If paired owls are present within 160 feet (50 meters) of a temporary project disturbance (e.g., parking areas), active burrows shall be</del></p>	
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**3.0 REVISIONS TO THE DRAFT EIR**

		<p><del>protected with fencing/cones/flagging and monitored by a qualified biologist throughout construction to identify losses from nest abandonment and/or loss of reproductive effort. Any identified loss shall be reported to the CDFW.</del></p> <p><i>Timing/Implementation: Prior to any vegetation removal or ground-disturbing activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Public Works Departments</i></p> <p><b>MM 3.3.2c</b> Prior to any construction occurring in Riversidean sage scrub during the breeding season for the coastal California gnatcatcher (February 15 through August 30), a protocol-level survey shall be conducted by a USFWS-approved biologist. Surveys shall be conducted in accordance with the USFWS <i>Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Guidelines</i> dated February 28, 1997. Surveys in which the species is not detected are considered valid for one year and should be repeated within one year of work commencing.</p> <p>If surveys document the absence of coastal California gnatcatcher, no additional avoidance or minimization measures are required. If surveys document the presence of this species, construction in Riversidean sage scrub shall be limited to the non-nesting season (September 1 through February 15).</p> <p><i>Timing/Implementation: Within 30 days prior to any vegetation removal or ground-disturbing activities affecting Riversidean sage scrub</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Public Works Departments</i></p> <p><b>MM 3.3.2d</b> <b>Migratory Bird Surveys.</b> If clearing and/or construction activities will occur, within undisturbed portions of the project site,</p>	
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		<p>during the migratory bird nesting season (<del>March 15</del> <u>January 1</u> through August 15), preconstruction surveys to identify active migratory bird nests shall be conducted by a qualified biologist within <del>14</del> <u>3</u> days of construction initiation. Focused surveys must be performed by a qualified biologist for the purposes of determining presence/absence of active nest sites within the proposed impact area and a 200-foot buffer (if feasible).</p> <p>If active nest sites are identified within 200 feet of project activities, the applicant shall impose a limited operating period (LOP) for all active nest sites prior to commencement of any project construction activities to avoid construction- or access-related disturbances to migratory bird nesting activities. An LOP constitutes a period during which project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur and will be imposed within 100 feet of any active nest sites until the nest is deemed inactive. Activities permitted within and the size (i.e., 100 feet) of LOPs may be adjusted through consultation with the CDFW.</p> <p><i>Timing/Implementation: Prior to the initiation of construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Public Works Department</i></p>	
<b>Cultural Resources</b>			
<p><b>Impact 3.5.2</b> Implementation of the proposed project could result in a substantial adverse change in the significance of an archaeological resource, as well as the potential disturbance of currently undiscovered cultural resources (i.e., prehistoric archaeological sites, historical archaeological sites, and isolated artifacts and features).</p>	<p>PS</p>	<p><b>MM 3.5.2a</b> If during grading or construction activities cultural resources are discovered on the project site, work shall be halted immediately within 50 feet of the discovery and the resources shall be evaluated by a qualified archeologist and the Pechanga Tribe (Tribe). Any unanticipated cultural resources that are discovered shall be</p>	<p>LS</p>

**3.0 REVISIONS TO THE DRAFT EIR**

		<p>evaluated <del>and a</del> in the final report prepared by the qualified archeologist. The report shall include a list of the resources discovered, documentation of each site/locality, and interpretation of the resources identified, and the method of preservation and/or recovery for identified resources. In the event the significant resources are recovered and if the qualified archaeologist and the Tribe determines the resources to be historic or unique, avoidance and/or mitigation would be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2 and the Cultural Resources Treatment and Monitoring Agreement required by mitigation measure <del>CUL-2</del> <b>MM 3.5.2b</b>.</p> <p>This mitigation measure shall be incorporated in all construction contract documentation.</p> <p><i>Timing/Implementation: As a condition of project approval, and implemented during ground-disturbing construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Building and Planning Departments</i></p> <p><b>MM 3.5.2b</b> At least 30 days prior to seeking a grading permit, the project applicant(s) shall contact the Pechanga Tribe to notify the Tribe of grading, excavation, and the monitoring program and to coordinate with the City of Wildomar and the Tribe to develop a Cultural Resources Treatment and Monitoring Agreement. The agreement shall include, but not be limited to, outlining provisions and requirements for addressing the treatment of cultural resources; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any</p>	
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		<p>cultural resources, sacred sites, and human remains discovered on the site; and establishing on-site monitoring provisions and/or requirements for professional Tribal monitors during all ground-disturbing activities. A copy of this signed agreement shall be provided to the Planning Director and Building Official prior to the issuance of the first grading permit</p> <p><i>Timing/Implementation: Prior to the issuance of a grading permit</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Engineering and Planning Departments</i></p> <p><b>MM 3.5.2c</b> If inadvertent discoveries of subsurface archaeological resources are discovered during grading, work shall be halted immediately within 50 feet of the discovery. The developer, the project archeologist, and the Tribe shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. If the developer and the Tribe cannot agree on the significance of or the mitigation for such resources, these issues will be presented to the City of Wildomar Planning Director. The Planning Director shall make the determination based on the provisions of CEQA with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Pechanga Tribe. Notwithstanding any other rights available under the law, the decision of the Planning Director shall be appealable to the City of Wildomar. In the event the significant resources are recovered and if the qualified archaeologist determines the resources to be historic or unique as defined by relevant state and local law, avoidance and mitigation would be required pursuant to and consistent with Public Resources Code Section 21083.2 and CEQA</p>	
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		<p>Guidelines Sections 15064.5 and 15126.4.</p> <p><i>Timing/Implementation: As a condition of project approval, and implemented during ground-disturbing construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Engineering and Planning Departments</i></p> <p><b>MM 3.5.2d</b> To address the possibility that cultural resources may be encountered during grading or construction, a qualified professional archeologist shall monitor all construction activities that could potentially impact archaeological deposits (e.g., grading, excavation, and/or trenching). However, monitoring may be discontinued as soon the qualified professional is satisfied that construction will not disturb cultural and/or <del>paleontological</del> <u>archaeological</u> resources. <u>A final mitigation monitoring report shall be prepared by the archaeologist documenting any resources found, their treatment, ultimate disposition, new or updated site records and any other pertinent information associated with the project. Final copies of the report will be submitted to the City of Wildomar, the developer, the Eastern Information Center, and the Pechanga Tribe.</u></p> <p><i>Timing/Implementation: As a condition of project approval, and implemented during ground-disturbing construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Engineering and Planning Departments</i></p>	
<p><b>Impact 3.5.4</b> No human remains have been identified within the project site; however, implementation of the proposed project could result in the inadvertent disturbance of currently undiscovered human remains. Any discovery of human remains would trigger state law governing the treatment of human remains.</p>	<p>PS</p>	<p><b>MM 3.5.4a</b> If human remains are encountered, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from</p>	<p>LS</p>

		<p>disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a <del>reasonable time frame</del> <u>24 hours</u>. Subsequently, the Native American Heritage Commission shall identify the “most likely descendant” within <del>24 hours</del> <u>a reasonable time frame</u> of receiving notification from the coroner. The most likely descendant shall then have 48 hours to make recommendations and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.</p> <p><i>Timing/Implementation: As a condition of project approval, and implemented during ground-disturbing construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Engineering and Planning Departments</i></p> <p><b>MM 3.5.4b</b> All cultural materials, with the exception of sacred items, burial goods, and human remains, which will be addressed in the Cultural Resources Treatment and Monitoring Agreement required by mitigation measure 3.5.2b, that are collected during the grading monitoring program and from any previous archeological studies or excavations on the project site shall be curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to the Pechanga Tribe’s curation facility, which meets the standards set forth in 36 CRF Part 79 for federal repositories.</p> <p><i>Timing/Implementation: As a condition of project approval, and implemented during ground-disturbing construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Engineering and Planning Departments</i></p>	
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**3.0 REVISIONS TO THE DRAFT EIR**

		<p><b>MM 3.5.4c</b> All sacred sites, should they be encountered within the project site, shall be avoided and preserved as the preferred mitigation, if feasible as determined by a qualified professional in consultation with the Pechanga Tribe. To the extent that a sacred site cannot be feasibly preserved in place or left in an undisturbed state, mitigation measures shall be required pursuant to and consistent with Public Resources Code Section 21083.2 and CEQA Guidelines Sections 15064.5 and 15126.4.</p> <p><i>Timing/Implementation: As a condition of project approval, and implemented during ground-disturbing construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Engineering and Planning Departments</i></p>	
<b>Noise</b>			
<p><b>Impact 3.8.1</b> The completed proposed project may expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</p>	PS	<p><b>MM 3.8.1a</b> Prior to the issuance of grading permits, the project applicant shall submit a construction-related noise control plan to the City for review and approval. <del>The plan shall:</del></p> <ul style="list-style-type: none"> <li><del>• Depict the location of construction equipment staging areas.</del></li> <li><del>• Require that construction contractors equip construction equipment (fixed or mobile) with properly operating and maintained mufflers consistent with manufacturers' standards.</del></li> <li><del>• Require that the construction contractor place stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.</del></li> <li><del>• Describe other noise control measures that will be implemented during project-related construction activities.</del></li> <li><del>• Specify that all construction activity, including staging and haul truck</del></li> </ul>	LS

		<p><del>deliveries, is subject to the same hours specified for construction equipment (i.e., between the hours of 6 a.m. and 6 p.m. during the months of June through September, and between the hours of 7 a.m. and 6 p.m. during the months of October through May). Where alternative routes are available that would not substantially increase vehicle miles traveled, the plan shall denote haul routes that do not pass noise sensitive land uses or residential dwellings. The construction-related noise control plan shall also incorporate any other restrictions imposed by City staff.</del></p> <ul style="list-style-type: none"> <li><del>• Indicate the location of frame mounted temporary noise curtains. The noise curtains shall be installed near the noise-sensitive residential receiver locations to shield the neighboring homes from construction noise. Noise control curtains shall provide a minimum STC (Sound Transmission Class) rating of 20. The temporary noise curtains shall be installed without any gaps or openings on the project boundary between the noise-sensitive receiver and the construction activities.</del></li> <li>• <u>Construction equipment staging areas shall be located as far away as possible from nearby sensitive receptors.</u></li> <li>• <u>Construction equipment shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.</u></li> <li>• <u>Stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.</u></li> <li>• <u>All construction activity including staging and haul truck deliveries shall be limited</u></li> </ul>	
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**3.0 REVISIONS TO THE DRAFT EIR**

		<p><u>to the hours of 6 a.m. to 6 p.m. between June and September, and the hours of 7 a.m. to 6 p.m. between October and May.</u></p> <ul style="list-style-type: none"> <li>• <u>Haul routes that do not pass noise-sensitive dwellings shall be preferred and utilized so long as such haul routes do not substantially increase vehicle miles traveled.</u></li> <li>• <u>Frame-mounted temporary noise curtains with a minimum STC rating of 20 shall be installed near the noise-sensitive residential receiver locations. The noise curtains shall be installed without any gaps or openings on the project boundary between the noise-sensitive receiver and the construction activities.</u></li> <li>• <u>Fifteen (15) days prior to commencement of construction, the construction supervisor shall provide written notification of planned activities to the City of Wildomar, to each of the property owners along Via Carnaghi Lane, and to the home at 34520 Monte Vista Drive.</u></li> <li>• <u>The construction supervisor shall maintain a complaint log noting date, time, complainant's name, nature of the complaint, and any corrective action taken. A copy of the complaint log shall be provided to the City on a daily basis. The project manager shall publish and distribute to the potentially affected community a phone number that is attended during active construction working hours for use by the disturbed public to register complaints.</u></li> <li>• <u>Each of these measures shall be drafted in a noise control plan submitted to the City for review and approval prior to issuance of grading permits. The construction supervisor shall ensure compliance with the noise control plan. The City shall also</u></li> </ul>	
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		<p><u>conduct periodic inspections at its discretion to ensure compliance.</u></p> <p><del>The construction supervisor shall provide written notification of planned activities to the City of Wildomar and to each of the property owners located along Via Carnaghi Lane and the home at 34520 Monte Vista Drive 15 days prior to commencement of each phase of construction.</del></p> <p><del>The construction supervisor shall maintain a complaint log noting date, time, complainant's name, nature of the complaint, and any corrective action taken. A copy of the complaint log shall be provided to the City on a daily basis. The project manager shall publish and distribute to the potentially affected community, a phone number that is attended during active construction working hours for use by the disturbed public to register complaints.</del></p> <p><del>The construction supervisor shall ensure compliance with the noise control plan, and the City shall conduct periodic inspections at its discretion.</del></p> <p><i>Timing/Implementation: During construction activities</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Building and Planning Departments</i></p> <p><b>MM 3.8.1b</b> The project applicant shall provide a "windows closed" condition, requiring a means of mechanical ventilation and standard dual-glazed windows with a minimum Sound Transmission Class (STC) rating of 30 for classrooms, libraries, and other noise-sensitive rooms in the preschool building.</p> <p><i>Timing/Implementation: Prior to a certificate of occupancy of the preschool (as part of building permit requirements)</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Building Departments</i></p> <p><b>MM 3.8.1c</b> For the preschool building, the project</p>	
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**3.0 REVISIONS TO THE DRAFT EIR**

		<p>applicant shall ensure that exterior walls have a minimum STC rating of 46. Typical walls with this rating will have 2x4 studs or greater, 16-inch o.c. with R-13 insulation, a minimum 7/8-inch exterior surface of cement plaster, and a minimum interior surface of 1/2-inch gypsum board. Interior wall finish shall be at least 1/2-inch-thick gypsum wallboard or plaster. Ceilings shall be finished with gypsum board or plaster that is at least 1/2 inch thick. The roof system should have minimum 1/2-inch plywood sheathing that is well sealed to form a continuous barrier with a minimum insulation of R-19.</p> <p><i>Timing/Implementation: Prior to a certificate of occupancy of the preschool (as a part of building permit requirements)</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Building Departments</i></p> <p><b>MM 3.8.1d</b> All window and door assemblies used throughout the preschool shall be free of cutouts and openings and shall be well fitted and well weather-stripped.</p> <p><i>Timing/Implementation: Prior to a certificate of occupancy of the preschool (as a part of building permit requirements)</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Building Departments</i></p> <p><b>MM 3.8.1e</b> The project applicant shall prepare a final noise analysis prior to obtaining building permits for the preschool and submit the analysis to the City for review and approval. This analysis will finalize the noise requirements based on precise grading plans and actual building design specifications. If the noise analysis shows that the exterior noise levels at the preschool playground will exceed 70 dBA, the project applicant shall provide attenuation such as a noise barrier along the western property line, noise barrier or façade extensions along the</p>	
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		<p>southern face of the preschool building, or other measures recommended by the acoustical expert to ensure the outdoor play area noise level is below 70 dBA.</p> <p><i>Timing/Implementation: Prior to occupancy of the preschool</i></p> <p><i>Enforcement/Monitoring: City of Wildomar Planning and Building Departments</i></p>	
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### 1.0 INTRODUCTION

No revisions.

### 2.0 PROJECT DESCRIPTION

No revisions.

### 3.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

No revisions.

#### 3.1 AESTHETICS AND VISUAL RESOURCES

No revisions.

#### 3.2 AIR QUALITY

No revisions.

#### 3.3 BIOLOGICAL RESOURCES

The following changes to the text have been made on page 3.3-26:

- MM 3.3.1** Within two years of groundbreaking in undisturbed portions of the site, the applicant shall retain a qualified biologist to conduct ~~a preliminary evaluation to determine if suitable habitat for white rabbit tobacco and/or bottle liver occurs within the disturbance footprint.~~ If suitable habitat is identified, focused surveys shall be conducted to determine the presence/absence of special-status plant species with potential to occur in and adjacent to (within 100 feet, where appropriate) the proposed impact area, including new construction access routes. These surveys shall be conducted in accordance with CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (2009). These guidelines require that rare plant surveys be conducted at the proper time of year when rare or endangered species are both evident and identifiable. Field surveys shall be scheduled to coincide with known flowering periods and/or during appropriate developmental periods that are necessary to identify the plant species of concern.

The following changes to the text have been made on page 3.3-28:

- MM 3.3.2a** Focused surveys shall be conducted within 12 months prior to construction activities. These surveys shall be conducted in accordance with the *Burrowing Owl Survey Instructions for the Western Riverside MSHCP* (March 29, 2006).

In addition, pPer MSHCP Species-Specific Objective 6, preconstruction presence/absence surveys for burrowing owl within the survey area, where suitable habitat is present, will be conducted for all covered activities through the life of the building permit. Surveys will be conducted within 30 days prior to disturbance. Take of active nests will be avoided. ~~Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present~~

~~outside the nesting season. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed.~~

Surveys shall be completed for occupied burrowing owl burrows within all construction areas and within 500 feet (150 meters) of the project work areas (where possible and appropriate based on habitat). All occupied burrows will be mapped on an aerial photo.

**MM 3.3.2b**

If burrowing owls are found to be present on-site, the project applicant shall develop a conservation strategy in cooperation with the CDFW, the USFWS, and the Regional Conservation Authority in accordance with the CDFW's Staff Report on Burrowing Owl Mitigation (2012).

~~If burrowing owls are identified during the survey period, the City shall require the project applicant to take the following actions to offset impacts prior to ground disturbance:~~

~~Active nests within the areas scheduled for disturbance or degradation shall be avoided from February 1 through August 31, and a minimum 250-foot (75-meter) buffer shall be provided until fledging has occurred. Following fledging, owls may be passively relocated by a qualified biologist.~~

~~If impacts on occupied burrows in the non-nesting period are unavoidable, on-site passive relocation techniques may be used if approved by the CDFW to encourage owls to move to alternative burrows outside of the impact area. However, no occupied burrows shall be disturbed during the nesting season. A qualified biologist must verify through noninvasive methods that the burrow is no longer occupied.~~

~~If relocation of the owls is approved for the site by the CDFW, the City shall require the developer to hire a qualified biologist to prepare a plan for relocating the owls to a suitable site. The relocation plan must include all of the following:~~

- ~~• The location of the nest and owls proposed for relocation.~~
- ~~• The location of the proposed relocation site.~~
- ~~• The number of owls involved and the time of year when the relocation is proposed to take place.~~
- ~~• The name and credentials of the biologist who will be retained to supervise the relocation.~~
- ~~• The proposed method of capture and transport for the owls to the new site.~~
- ~~• A description of site preparation at the relocation site (e.g., enhancement of existing burrows, creation of artificial burrows, one-time or long-term vegetation control).~~

### 3.0 REVISIONS TO THE DRAFT EIR

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- ~~• A description of efforts and funding support proposed to monitor the relocation.~~

~~If paired owls are present within 160 feet (50 meters) of a temporary project disturbance (e.g., parking areas), active burrows shall be protected with fencing/cones/flagging and monitored by a qualified biologist throughout construction to identify losses from nest abandonment and/or loss of reproductive effort. Any identified loss shall be reported to the CDFW.~~

The following changes to the text have been made on page 3.3-29:

**MM 3.3.2d Migratory Bird Surveys.** If clearing and/or construction activities will occur, within undisturbed portions of the project site, during the migratory bird nesting season (~~March 15~~ January 1 through August 15), preconstruction surveys to identify active migratory bird nests shall be conducted by a qualified biologist within ~~44~~ 3 days of construction initiation. Focused surveys must be performed by a qualified biologist for the purposes of determining presence/absence of active nest sites within the proposed impact area and a 200-foot buffer (if feasible).

If active nest sites are identified within 200 feet of project activities, the applicant shall impose a limited operating period (LOP) for all active nest sites prior to commencement of any project construction activities to avoid construction- or access-related disturbances to migratory bird nesting activities. An LOP constitutes a period during which project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur and will be imposed within 100 feet of any active nest sites until the nest is deemed inactive. Activities permitted within and the size (i.e., 100 feet) of LOPs may be adjusted through consultation with the CDFW.

The following additions to the text have been made on page 3.3-32:

Implementation of the proposed project could conflict with the provisions of the Western Riverside County MSHCP. This would be considered a **potentially significant** impact.

The MSHCP protects and preserves certain habitats and species in the region. The MSHCP delineates particular areas of concern through the identification of specific areas known as Criteria Cells. Areas identified as Criteria Cells typically contain certain restrictions on development and land alterations. The PSA is not within a Criteria Cell or any other special conservation area. A full analysis of the proposed project's consistency with the MSHCP can be found in **Appendix 3.3**.

The proposed project is located within the Burrowing Owl Survey Area (Figure 6-4 of the MSHCP). A nesting season survey was conducted and a report was prepared, following the guidelines provided in the MSHCP (**Appendix 3.3**).

Section 6.1.2 of the MSHCP addresses preservation of riparian, riverine, vernal pool, and fairy shrimp habitats. The proposed project may result in on-site improvements that will have direct permanent impacts to MSHCP riverine/riparian habitat within the PSA. Impacts to the riverine/riparian area may occur from construction of a parking lot. In order to comply with MSHCP Section 6.1.2, the project applicant shall prepare and submit a Determination of Biologically Equivalent or Superior Preservation (DBESP) to the

City. Off-site mitigation could be in the form of purchased mitigation credits from the Elsinore-Murrieta-Anza Resource Conservation District (EMARCD).

A final component of the MSHCP is Mitigation Fee Areas, which are land areas that occur within the MSHCP and require a fee for development activities to occur. These fees are utilized to fund the minimization to certain endemic species. The proposed project is located within the MSHCP Mitigation Fee Area (Riverside County Ordinance 810.2) and the Stephens' Kangaroo Rat Mitigation Fee Area (Riverside County Ordinance 663). A standard condition for the proposed project includes the payment of these fees to comply with the overlying habitat conservation plan (the MSHCP).

As demonstrated in the analysis by Principe and Associates (2013a) (see **Appendix 3.3**), the proposed project is consistent with the MSHCP. With adherence to the standard conditions and requirements, any impacts will be less than significant with mitigation incorporated. In addition, implementation of mitigation measures **MM 3.3.2a** and **MM 3.3.2b** included above will result in the project having **no impact** with regard to the MSHCP.

The following additions to the text have been made on pages 3.3-33 and 3.3-34:

**Impact 3.3.8** Implementation of the proposed project, in combination with existing, approved, proposed, and reasonably foreseeable development in the immediate area of the proposed project, will result in the conversion of habitat and impact biological resources. This impact is considered **less than cumulatively considerable**.

The City, along with other jurisdictions in western Riverside County, participates in the MSHCP. The MSHCP is designed to protect over 150 species and conserve over 500,000 acres in western Riverside County. Project compliance with the MSHCP and the Stephens' Kangaroo Rat Habitat Conservation Plan fully mitigates for impacts on covered species and ensures large segments of natural communities in western Riverside County will be preserved.

Adherence to the standards and conditions, and implementation of mitigation measures **MM 3.3.2.a** and **MM 3.3.2b**, ensure the project will be compliant with the MSHCP. In addition, implementation of mitigation measures **MM 3.3.2c** and **MM 3.3.2d** ensures that impacts to coastal California gnatcatchers and other nesting birds are minimized. Furthermore, mitigation measures **MM 3.3.3**, **MM 3.3.4a**, and **MM 3.3.4b** ensure that impacts to jurisdictional waterways and associated riparian areas are minimized. Though the development of the proposed project will continue the urbanization of the area, participation in and implementation of the MSHCP will effectively reduce the project's contribution to cumulative impacts to a **less than cumulatively considerable** level.

#### Mitigation Measures

Implement mitigation measures **MM 3.3.2a** through **MM 3.3.2d**, **MM 3.3.3**, and **MM 3.3.4a** and **MM 3.3.4b**.

### 3.4 CLIMATE CHANGE

No revisions.

### 3.0 REVISIONS TO THE DRAFT EIR

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#### 3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

The following changes to the text have been made on page 3.5-12:

- MM 3.5.2a** If during grading or construction activities cultural resources are discovered on the project site, work shall be halted immediately within 50 feet of the discovery and the resources shall be evaluated by a qualified archeologist and the Pechanga Tribe (Tribe). Any unanticipated cultural resources that are discovered shall be evaluated ~~and a~~ in the final report prepared by the qualified archeologist. The report shall include a list of the resources discovered, documentation of each site/locality, and interpretation of the resources identified, and the method of preservation and/or recovery for identified resources. In the event the significant resources are recovered and if the qualified archaeologist and the Tribe determines the resources to be historic or unique, avoidance and/or mitigation would be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2 and the Cultural Resources Treatment and Monitoring Agreement required by mitigation measure ~~CUL-2~~ **MM 3.5.2b**.

The following changes to the text have been made on page 3.5-13:

- MM 3.5.2d** To address the possibility that cultural resources may be encountered during grading or construction, a qualified professional archeologist shall monitor all construction activities that could potentially impact archaeological deposits (e.g., grading, excavation, and/or trenching). However, monitoring may be discontinued as soon the qualified professional is satisfied that construction will not disturb cultural and/or ~~paleontological~~ archaeological resources. A final mitigation monitoring report shall be prepared by the archaeologist documenting any resources found, their treatment, ultimate disposition, new or updated site records, and any other pertinent information associated with the project. Final copies of the report will be submitted to the City of Wildomar, the developer, the Eastern Information Center, and the Pechanga Tribe.

The following changes to the text have been made on page 3.5-16:

- MM 3.5.4a** If human remains are encountered, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within ~~a reasonable time frame~~ 24 hours. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant" within ~~24 hours~~ a reasonable time frame of receiving notification from the coroner. The most likely descendant shall then have 48 hours to make recommendations and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

3.6 GEOLOGY AND SOILS

No revisions.

3.7 HYDROLOGY AND WATER QUALITY

No revisions.

3.8 NOISE

The following changes to the text have been made on page 3.8-27:

Mitigation Measures

**MM 3.8.1a** Prior to the issuance of grading permits, the project applicant shall submit a construction-related noise control plan to the City for review and approval. ~~The plan shall:~~

- ~~• Depict the location of construction equipment staging areas.~~
- ~~• Require that construction contractors equip construction equipment (fixed or mobile) with properly operating and maintained mufflers consistent with manufacturers' standards.~~
- ~~• Require that the construction contractor place stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.~~
- ~~• Describe other noise control measures that will be implemented during project related construction activities.~~
- ~~• Specify that all construction activity, including staging and haul truck deliveries, is subject to the same hours specified for construction equipment (i.e., between the hours of 6 a.m. and 6 p.m. during the months of June through September, and between the hours of 7 a.m. and 6 p.m. during the months of October through May). Where alternative routes are available that would not substantially increase vehicle miles traveled, the plan shall denote haul routes that do not pass noise sensitive land uses or residential dwellings. The construction related noise control plan shall also incorporate any other restrictions imposed by City staff.~~
- ~~• Indicate the location of frame mounted temporary noise curtains. The noise curtains shall be installed near the noise sensitive residential receiver locations to shield the neighboring homes from construction noise. Noise control curtains shall provide a minimum STC (Sound Transmission Class) rating of 20. The temporary noise curtains shall be installed without any gaps or openings on the project boundary between the noise sensitive receiver and the construction activities.~~
- Construction equipment staging areas shall be located as far away as possible from nearby sensitive receptors.

### 3.0 REVISIONS TO THE DRAFT EIR

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- Construction equipment shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
- Stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.
- All construction activity including staging and haul truck deliveries shall be limited to the hours of 6 a.m. to 6 p.m. between June and September, and the hours of 7 a.m. to 6 p.m. between October and May.
- Haul routes that do not pass noise-sensitive dwellings shall be preferred and utilized as long as such haul routes do not substantially increase vehicle miles traveled.
- Frame-mounted temporary noise curtains with a minimum STC rating of 20 shall be installed near the noise-sensitive residential receiver locations. The noise curtains shall be installed without any gaps or openings on the project boundary between the noise-sensitive receiver and the construction activities.
- Fifteen (15) days prior to commencement of construction, the construction supervisor shall provide written notification of planned activities to the City of Wildomar, to each of the property owners along Via Carnaghi Lane, and to the home at 34520 Monte Vista Drive.
- The construction supervisor shall maintain a complaint log noting date, time, complainant's name, nature of the complaint, and any corrective action taken. A copy of the complaint log shall be provided to the City on a daily basis. The project manager shall publish and distribute to the potentially affected community a phone number that is attended during active construction working hours for use by the disturbed public to register complaints.
- Each of these measures shall be drafted in a noise control plan submitted to the City for review and approval prior to issuance of grading permits. The construction supervisor shall ensure compliance with the noise control plan. The City shall also conduct periodic inspections at its discretion to ensure compliance.

~~The construction supervisor shall provide written notification of planned activities to the City of Wildomar and to each of the property owners located along Via Carnaghi Lane and the home at 34520 Monte Vista Drive 15 days prior to commencement of each phase of construction.~~

~~The construction supervisor shall maintain a complaint log noting date, time, complainant's name, nature of the complaint, and any corrective action taken. A copy of the complaint log shall be provided to the City on a daily basis. The project manager shall publish and distribute to the potentially affected community, a phone number that is attended during active construction working hours for use by the disturbed public to register complaints.~~

~~The construction supervisor shall ensure compliance with the noise control plan, and the City shall conduct periodic inspections at its discretion.~~

#### 3.9 PUBLIC SERVICES AND UTILITIES

The following changes to the second paragraph on page 3.9-5 under Impact 3.9.1.1:

The Cornerstone Christian School at the proposed project site has a current enrollment of ~~225~~ 240 students, and those students are supported by 45 faculty members, resulting in a ratio of one faculty member for every five students.

#### 3.10 TRAFFIC AND CIRCULATION

No revisions.

#### 3.11 EFFECT FOUND TO NOT BE SIGNIFICANT

No revisions.

#### 4.0 ALTERNATIVES

No revisions.

#### 5.0 OTHER CEQA ANALYSIS

No revisions.

#### 6.0 ABBREVIATIONS

No revisions.

#### 7.0 REPORT PREPARERS

No revisions.



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# **ATTACHMENT A**

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Marsha Swanson, Mayor  
Ben Benoit, Mayor Pro Tem  
Bob Cashman, Council Member  
Bridgette Moore, Council Member  
Timothy Walker, Council Member



23873 Clinton Keith Rd, Ste. 201  
Wildomar, CA 92595  
951.677.7751 Phone  
951.698.1463 Fax  
[www.CityofWildomar.org](http://www.CityofWildomar.org)

**TO:** Reviewing Agencies and Other Interested Parties  
**FROM:** Matthew C. Bassi, Planning Director  
**DATE:** June 20, 2014  
**SUBJECT:** **City of Wildomar Cornerstone Community Church Draft Environmental Impact Report (Planning Application No. 12-0194)**

The City of Wildomar ("City") is the Lead Agency for the preparation and review of an Environmental Impact Report (EIR) for the Cornerstone Community Church project. The proposed project comprises the following actions by the City of Wildomar:

1. Public Use Permit 778, Revised Permit No. 5 – Amendment to the previously submitted PUP 778. The modification will allow for the construction of a preschool (17,135 s.f.), administrative office building (23,024 s.f.), maintenance building (2,438 s.f.), sports field lighting, signage, and new parking lots at the existing church.
2. Grading Permit – A grading permit will need to be prepared for the property development. The proposed project estimates approximately 49,000 cubic yards of cut and fill, but does not anticipate the need for import or export of fill material.
3. Building Permit – Building permits will be needed to allow construction.
4. Encroachment Permit – Encroachment permits will be needed for any construction that will occur on public property or within publicly held easements.

The construction is anticipated to occur over two phases. As part of the project, a new approximately 1,900-lineal-foot sewer line will be constructed in Monte Vista Drive to connect to an existing Elsinore Valley Municipal Water District sewer line at Canyon Drive. By connecting to the sewer, the proposed project can abandon the existing on-site septic tanks.

The City is requesting comments on the Draft EIR for the proposed project. This notice is being sent to responsible agencies, trustee agencies, and other interested parties along with a copy of the Draft EIR on CD. The public response period for the Draft EIR will begin on **Tuesday, June 24, 2014 and end on Thursday, August 7, 2014.** Written comments can be provided to Matthew C. Bassi, Planning Director, City of Wildomar, 23837 Clinton Keith Road, Suite 201, Wildomar, CA 92595. Comments can also be emailed to me at [mbassi@cityofwildomar.org](mailto:mbassi@cityofwildomar.org).

The Planning Commission is tentatively scheduled to review the proposed project and the DEIR at their October 1, 2014 meeting, and the City Council is tentatively scheduled to review the proposed project at their November 12, 2014 meeting. Should you have any questions or require additional information, please contact me at the above address, or telephone 951-677-7751(extension 213).

Sincerely,

  
Matthew C. Bassi  
Planning Director

Enclosure-Draft EIR on CD

# City of Wildomar Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044  
(916) 445-0613 state.clearinghouse@opr.ca.gov

SCH # 2013111005

PROJECT TITLE Cornerstone Community Church (Planning Application No. 12-0194) Environmental Impact Report (EIR)	
LEAD AGENCY City of Wildomar	CONTACT PERSON Matthew C. Bassi, Planning Director
STREET ADDRESS 23873 Clinton Keith Road, Suite 201	PHONE 951/677-7751, Ext. 213
CITY Wildomar	ZIP CODE COUNTY 92595 Riverside

## PROJECT LOCATION

COUNTY Riverside	CITY/NEAREST COMMUNITY City of Wildomar	
CROSS STREETS Monte Vista Drive & Via Carnaghi Lane	ZIP CODE 92595	TOTAL ACRES 63.51
ASSESSOR'S PARCEL NUMBER 367-210-008, 018, 034, 035, 039, 041, 043, and 367-140-008	SECTION 36	TOWNSHIP RANGE 6 South 4 West
WITHIN 2 MILES: STATE HIGHWAY NUMBER Interstate 15	AIRPORTS None within 2 miles; closest airport is Skylark Field in Lake Elsinore (3 miles northwest)	SCHOOLS Ronald Reagan Elementary School (2 miles southeast)
RAILWAYS None	WATERWAYS None	

## DOCUMENT TYPE

CEQA	<input type="checkbox"/> NOP <input type="checkbox"/> Early Cons <input type="checkbox"/> Neg Dec <input checked="" type="checkbox"/> Draft EIR	<input type="checkbox"/> Supplement/Subsequent EIR (Prior SCH No.) _____ <input type="checkbox"/> Other	NEPA	<input type="checkbox"/> NOI <input checked="" type="checkbox"/> Draft EIS <input type="checkbox"/> FONSI	OTHER	<input type="checkbox"/> Joint Document <input type="checkbox"/> Final Document <input type="checkbox"/> Other _____
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## LOCAL ACTION TYPE

<input type="checkbox"/> General Plan Update	<input type="checkbox"/> Specific Plan Amendment	<input type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input checked="" type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input checked="" type="checkbox"/> Site Plan	<input type="checkbox"/> Land Division (Subdivision, etc.)	<input type="checkbox"/> Other

## DEVELOPMENT TYPE

<input type="checkbox"/> Residential	Units _____	Acres _____	Employees _____	<input type="checkbox"/> Transportation	Type _____
<input checked="" type="checkbox"/> Office	Sq. ft. 23,024	Acres _____	Employees _____	<input type="checkbox"/> Mining	Mineral _____
<input type="checkbox"/> Shopping/Commercial	Sq. ft. _____	Acres _____	Employees _____	<input type="checkbox"/> Waste Treatment	Type _____
<input type="checkbox"/> Industrial	Sq. ft. _____	Acres _____	Employees _____	<input type="checkbox"/> Hazardous Waste	Type _____
<input checked="" type="checkbox"/> Educational	Sq. ft. 17,315				
<input checked="" type="checkbox"/> Other Maintenance Building	Sq. ft. 2,438				
<input type="checkbox"/> Recreational				<input type="checkbox"/> Water Facilities	Type _____ MGD _____
				<input type="checkbox"/> Power	Type _____ Watts _____

## FUNDING

Federal \$ _____	State \$ _____	Total \$ _____
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## PROJECT ISSUES DISCUSSED IN DOCUMENT

<input checked="" type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Flood Plain/Flooding	<input checked="" type="checkbox"/> Schools/Universities	<input type="checkbox"/> Water Supply
<input type="checkbox"/> Agricultural Land	<input type="checkbox"/> Forest Land/Fire Hazard	<input type="checkbox"/> Septic Systems	<input type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Geological/Seismic	<input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading	<input type="checkbox"/> Wildlife
<input checked="" type="checkbox"/> Archaeological/Historical	<input type="checkbox"/> Minerals	<input checked="" type="checkbox"/> Solid Waste	<input type="checkbox"/> Growth Inducing
<input type="checkbox"/> Coastal Zone	<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Toxic/Hazardous	<input type="checkbox"/> Land Use
<input checked="" type="checkbox"/> Drainage/Absorption	<input checked="" type="checkbox"/> Population/Housing Balance	<input checked="" type="checkbox"/> Traffic/Circulation	<input checked="" type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Economic/Jobs	<input checked="" type="checkbox"/> Public Services/Facilities	<input type="checkbox"/> Vegetation	<input type="checkbox"/> Other _____
<input type="checkbox"/> Fiscal	<input type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Water Quality	

PRESENT LAND USE/ZONING/GENERAL PLAN DESIGNATION: R-R, Rural Residential/BP, Business Park.

## PROJECT DESCRIPTION:

The proposed project comprises the following actions by the City of Wildomar:

1. Public Use Permit 778, Revised Permit No. 5 – Amendment to the previously submitted PUP 778. The modification will allow for the construction of a preschool (17,135 s.f.), administrative office building (23,024 s.f.), maintenance building (2,438 s.f.), sports field lighting, signage, and new parking lots at the existing church.
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3. Building Permit – Building permits will be needed to allow construction.
4. Encroachment Permit – Encroachment permits will be needed for any construction that will occur on public property or within publicly held easements.

The construction is anticipated to occur over two phases. As part of the project, a new approximately 1,900-lineal-foot sewer line will be constructed in Monte Vista Drive to connect to an existing Elsinore Valley Municipal Water District sewer line at Canyon Drive. By connecting to the sewer, the proposed project can abandon the existing on-site septic tanks.

**REVIEWING AGENCIES CHECKLIST**

- Resources Agency
- Boating & Waterways
- Coastal Conservancy
- Colorado River Board
- Conservation
- Fish and Wildlife
- Forestry & Fire Protection
- Office of Historic Preservation
- Parks and Recreation
- Reclamation Board
- San Francisco Bay Conservation & Development Commission
- Water Resources
- Business, Transportation & Housing**
- Aeronautics
- California Highway Patrol
- CALTRANS District # 8
- Department of Transportation Planning (headquarters)
- Housing & Community Development
- Food & Agriculture Health & Welfare
- Health Services \_\_\_\_\_

**State & Consumer Services**

- General Services
- Environmental Protection Agency**
- Air Resources Board
- California Waste Management Board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- SWRCB: Water Quality
- SWRCB: Water Rights
- Regional WQCB # 8 (San Ana Region)
- Regional WQCB # 9 (San Diego Region)

**Youth & Adult Corrections**

- Corrections
- Independent Commissions & Offices**
- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency

- Other U. S. Army Corps of Engineers, San Diego District
- Other U. S. Fish & Wildlife Services

**PUBLIC REVIEW PERIOD**

Starting Date Tuesday, June 24, 2014

Ending Date Thursday, August 7, 2014

Signature



Matthew C. Bassi, Planning Director  
City of Wildomar Planning Department

Date June 23, 2014

**Consultant:**  
Consulting Firm: Pacific Municipal Consultants  
Address: 6020 Cornerstone Court West, Suite 260  
City/State/Zip: San Diego, CA 92128  
Contact: Mark Teague, AICP  
Phone: (858) 453-3602, ext. 15201

**Lead Agency:**  
Matthew C. Bassi, Planning Director  
City of Wildomar  
23837 Clinton Keith Road, Suite 201  
Wildomar, CA 92595  
Phone: (951) 677-7751

**For SCH Use Only:** \_\_\_\_\_  
Date Received at SCH \_\_\_\_\_  
Date Review Starts \_\_\_\_\_  
Date to Agencies \_\_\_\_\_  
Date to SCH \_\_\_\_\_  
Clearance Date \_\_\_\_\_  
Notes:

Army Corps of Engineers  
Environmental Resources Branch  
915 Wilshire Boulevard  
Los Angeles, CA 90017  
Attn: Eric Stein

California Dept. of Fish & Wildlife  
3602 Inland Empire Blvd. #C-220  
Ontario, CA 91764  
Attn: Leslie MacNair

U.S. Fish & Wildlife Services  
Ecological Svcs – Carlsbad Field Off.  
2177 Salk Avenue- Suite 250  
Carlsbad, CA 92008-7385  
Attn: Michelle Shaughnessy

Riverside County Flood Control Dist.  
1995 Market Street  
Riverside, CA 92501  
Attn: Shaheen Mooaman

Riverside County Transportation Dept  
4080 Lemon Street, 8th Floor  
Riverside, CA 92502  
Attn: Farah Khorashadi, Division Mgr.

Western Riverside County  
Regional Conservation Authority  
Riverside Center Building  
3403 10th Street, Suite 320  
Riverside, CA 92501

Riverside County Fire Department  
2300 Market St., Ste. 150  
Riverside, CA 92501  
Attn: Dan Wagner

WRCOG  
4080 Lemon St. 3rd Floor, MS1032  
Riverside, CA 92501-3609  
Attn: Rick Bishop, Executive Director

Riverside County Env. Health Dept.  
4065 County Circle Dr. #104  
Riverside, CA 92503  
Attn: Brent Casey

South Coast AQMD  
21865 East Copley Drive  
Diamond Bar, CA 91765-4182  
Attn: Steve Smith, Program  
Supervisor Local Government- CEQA

San Diego RWQCB Region (9)  
2375 Northside Drive, Suite #100  
San Diego, CA 92108  
Attn: Program Director

Santa Ana RWQCB Region 8  
3737 Main Street, Suite 500  
Riverside, CA 92501  
Attn: Mark G. Adelson

Lake Elsinore Unified School District  
545 Chaney Street  
Lake Elsinore, CA 92530  
Attn: Doug Kimberly

Elsinore Valley Municipal Water Dist.  
31315 Chaney Street  
Lake Elsinore, CA 92531  
Attn: Imad Baiyasi, Project Mgr.

Pechanga Band of Luiseno Indians  
Cultural Resources Department  
12705 Pechanga Road  
Temecula, CA 92593  
Attn: Anna Hoover

Southern Calif Assoc of Governments  
818 West 7<sup>th</sup> St, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435  
Attn: Intergovernmental Review

Southern California Edison  
Third Party Environmental Review  
2244 Walnut Grove Ave. Quad 4C472A  
Rosemead, CA 91770  
Attn: Karen Cadavona

Southern California Edison  
Local Government Affairs  
24487 Prielipp Road  
Rosemead, CA 91770  
Attn: Jeremy Goldman

California Dept. of Transportation  
464 W. 4<sup>th</sup> Street, MS 725  
San Bernardino, CA 92401  
Attn: Dan Kopulsky, Chief Planner

City of Lake Elsinore Planning Dept.  
130 S. Main Street  
Lake Elsinore, CA 92530  
Attn: Richard MacHott, Acting  
Planning Manager

City of Murrieta Planning Department  
24601 Jefferson Avenue  
Murrieta, CA 92562  
Attn: Cynthia Kinser, City Planner

City of Menifee, Planning Department  
29714 Haun Road  
Menifee, CA 92586  
Attn: Planning Director

Cal-Tech/Mount Palomar Observatory  
1200 E. California Road, M.S. 105-24  
Pasadena, CA 91125  
Attn: Robert Brucato, Asst. Director

Marty Nicholson  
24910 Las Brisas Road Suite 110  
Murrieta, CA 92562

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26785 Camino Seco  
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Temecula, CA 92591

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Wildomar, CA 92595

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34720 Via Carnaghi Lane  
Wildomar, CA 92595

Jesse & Monica Munoz  
34620 Via Carnaghi Lane  
Wildomar, CA 92595

Mary Flores  
PO Box 1329  
Upland, CA 91785

Jeff Rosen  
Senior Associate Pastor  
Cornerstone Community Church  
34570 Monte Vista Drive  
Wildomar, CA 92595

Larry Markham  
Markham Development Management  
Group  
41635 Enterprise Circle North  
Temecula, CA 92590

**NOTICE OF AVAILABILITY FOR PUBLIC REVIEW OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF WILDOMAR CORNERSTONE COMMUNITY CHURCH PROJECT**

A Draft Environmental Impact Report (DEIR) has been prepared by the City of Wildomar for the Cornerstone Community Church. The DEIR is available for public review and can be downloaded from the City of Wildomar website at [www.cityofwildomar.org](http://www.cityofwildomar.org) on June 24, 2014. A printed copy of the Cornerstone Community Church DEIR will also be available for review at Wildomar City Hall, 23873 Clinton Keith Rd., Suite 201, Wildomar, CA 92595 (8 am – 5 pm, Monday – Thursday).

The proposed project comprises the following actions by the City of Wildomar:

1. Public Use Permit 778, Revised Permit No. 5 – Amendment to the previously submitted PUP 778. The modification will allow for the construction of a preschool (17,135 sf), administrative office building (23,024 sf), maintenance building (2,438 sf), sports field lighting, signage, and new parking lots at the existing church.
2. Grading Permit – A grading permit will need to be prepared for the property development. The proposed project estimates approximately 49,000 cubic yards of cut and fill, but does not anticipate the need for import or export of fill material.
3. Building Permit – Building permits will be needed to allow construction.
4. Encroachment Permit – Encroachment permits will be needed for any construction that will occur on public property or within publicly held easements.

The construction is anticipated to occur over two phases. As part of the project, a new approximately 1,900-lineal-foot sewer line will be constructed in Monte Vista Drive to connect to an existing Elsinore Valley Municipal Water District sewer line at Canyon Drive. By connecting to the sewer, the proposed project can abandon the existing on-site septic tanks.

The DEIR identifies impacts that require mitigation in the following topic areas: Aesthetics; Biological Resources; Cultural Resources; Geology and Soils; Hydrology and Water Quality; Noise; and Transportation and Circulation. Significant and unavoidable impacts have been identified for project related construction noise. The proposed project site is not on any of the sites enumerated under Section 65962.5 of the Government Code, is not a hazardous waste facility, land designated as hazardous waste property, or a designated hazardous waste disposal site as reported on the California Department of Toxic Substance Control EnviroStor website. <http://www.envirostor.dtsc.ca.gov/public/>.

In accordance with Sections 15072(a) and (b) of the CEQA Guidelines, this Public Notice is posted to officially notify the public, public agencies, responsible and trustee agencies, that the required 45-day public review period will commence on Tuesday, June 24, 2014 and conclude on Thursday, August 7, 2014. Any written comments (via email or letter) on the DEIR must be submitted no later than 5 p.m. on August 7, 2014. Written comments may be mailed to: Matthew C. Bassi, Planning Director, City of Wildomar Planning Department, 23873 Clinton Keith Road, Suite 201, Wildomar, CA 92595. Email comments can be sent to [mbassi@cityofwildomar.org](mailto:mbassi@cityofwildomar.org).

Posted: June 24, 2014

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# **ATTACHMENT B**

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## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

The following refers to Comment Letter 2 and the list of recommended mitigation measures concerning air quality impacts.

<p>1. Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.</p>	<p>The access road from Monte Vista through the project site is paved as it is also the main Church driveway and parking lot. Therefore the construction of the preschool building will occur on a paved roadway. The only other access to the project site is from the unpaved public Via Carnighi Roadway. This public road will be paved as part of the project. As the only public access to the project is from an unpaved road, there is no value in establishing a ‘gravel pad’ to prevent tracking of mud onto public roads.</p>
<p>2. Install and maintain track out control devices in effective condition at all access points where paved and unpaved access or travel routes intersect (eg. Install wheel shakers, wheel washers, and limit site access.)</p>	<p>See 1. Above.</p>
<p>3. All roadways, driveways, sidewalks, etc., shall be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.</p>	<p>The area for the proposed preschool is already paved. The parking lots and roadway will be paved as part of the project.</p>
<p>4. Pave all construction roads.</p>	<p>See 3. Above. All construction roads will be paved.</p>
<p>5. Limit fugitive dust sources to 20 percent opacity.</p>	<p>Required by SCAQMD Rule 403.</p>
<p>6. Require a dust control plan for earthmoving operations.</p>	<p>Required by SCAQMD Rule 403.</p>
<p>7. When materials are transported off-site, all material shall be covered, effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.</p>	<p>Required by SCAQMD Rule 403.</p>
<p>8. All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers utilizing reclaimed water trucks if visible soil materials are carried to adjacent streets.</p>	<p>Street sweeping to avoid track-out is required by SCAQMD Rule 403.</p>
<p>9. The contractor or builder shall designate a person or persons to monitor the dust</p>	<p>The owner and applicant is on site and will be available</p>

## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

control program and to order increased watering, as necessary, to prevent transport of dust offsite.	at all times during construction.
10. Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 24 hours.	The owner and applicant is on site and will be available at all times during construction.
11. Extend grading period sufficiently to reduce air quality impacts below a level of significance.	The air quality impact associated with construction is already below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR
12. The simultaneous disturbance of the site shall be limited to five acres per day.	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
13. Any vegetative cover to be utilized onsite shall be planted as soon as possible to reduce the disturbed area subject to wind erosion. Irrigation systems required for these plants shall be installed as soon as possible to maintain good ground cover and to minimize wind erosion of the soil.	Required by SCAQMD Rule 403. Further the City will require that all landscaping be in place prior to occupancy or completion of each project feature. As the primary construction activity involves paving, the pavement itself will minimize erosion. Erosion during construction is also addressed through the water quality management plan required as MM 3.7.1 and included as Appendix 3.7 to the Draft EIR.
14. Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered three times daily.	Required by SCAQMD Rule 403.
15. Any site access points within 30 minutes of any visible dirt deposition on any public roadway shall be swept or washed.	Street sweeping to avoid track-out is required by SCAQMD Rule 403.
16. A high wind response plan shall be formulated for enhanced dust control if winds are forecast to exceed 25 mph in any upcoming 24-hour period.	Required by SCAQMD Rule 403.
17. Implement activity management techniques including a) development of a comprehensive construction management plan designed to minimize the number of large construction equipment operating during any given time period; b) scheduling of construction truck trips during non-peak hours to reduce peak hour emissions; c) limitation of the length	The construction will occur primarily on private land and will not affect access to adjacent properties. Access to Via Carnighi Lane and to Monte Vista during pavement of the roadway and installation of the sewer line, will be managed through a Traffic Management Plan (TMP) required as MM 3.10.3 and discussed on page 3.10-42 of the Draft EIR. In addition, the air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on

## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

of construction work-day period; and d) phasing of construction activities.*	page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
18. Develop a trip reduction plan to achieve a 1.5 AVR for construction employees	Traffic impacts from construction activities are less than significant therefore this measure is not necessary. In addition, the air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
19. Require high pressure injectors on diesel construction equipment.*	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
20. Restrict truck operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicles.*	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
21. Require the use of CARB certified particulate traps that meet level 3 requirements on all construction equipment.*	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
22. Utilize only CARB certified equipment for construction activities.*	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
23. Restrict engine size of construction equipment to the minimum practical size.*	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
24. Use electric construction equipment where technically feasible.*	The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.
25. Use methanol-fueled pile drivers.*	No pile driving will occur as part of the project.
26. Install catalytic converters on gasoline-powered equipment.*	Any gasoline-powered equipment is already required to have catalytic converters installed pursuant to CARB's Large Spark-Ignition Engine Fleet Requirements Regulation.
27. All forklifts shall be electric or natural gas powered.*	No forklifts are anticipated for use at the project site.

## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

<p>28. Suspend use of all construction equipment operations during second stage smog alerts.*</p>	<p>According to a 2008 report prepared by the SCARB, there has not been a stage 2 smog alert since the 1980's. The air quality impacts associated with this project were determined to be less than significant therefore there is no reason to include this measure. <a href="http://www.arb.ca.gov/research/health/healthup/feb08.pdf">http://www.arb.ca.gov/research/health/healthup/feb08.pdf</a></p>
<p>29. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.*</p>	<p>Very little construction equipment is necessary for the project. As shown on page 3.2-15 in Table 3.2-5 of the Draft EIR a small amount of heavy equipment is needed over the phases of the project. The nature of the grading equipment is such that it would be moved to the site once, used during construction, then removed following construction. As the equipment would not enter/exit the site regularly there is no need for a dedicated turn lane.</p>
<p>30. Reroute construction trucks away from congested streets and sensitive receptor areas.*</p>	<p>The preschool construction will occur in the parking lot of the Church however the paving of Via Carnighi and the parking lots will be adjacent to sensitive receptors. The access to the site is from Monte Vista which is a Secondary Arterial and I-15. It is not possible to provide an alternative or more efficient method of access to the site.</p>
<p>31. Configure construction parking to minimize traffic interference.*</p>	<p>No construction will occur in areas that will affect off-site parking. Also see MM 3.10.3 that requires preparation of a Traffic Management Plan for construction in Monte Vista Drive.</p>
<p>32. Prior to the issuance of a grading and building permit, the applicant shall submit verification that a ridesharing program for the construction crew has been encouraged and will be supported by the contractor via incentives or other inducements.*</p>	<p>The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.</p>
<p>33. Minimize construction worker trips by requiring carpooling and providing for lunch onsite, and/or provide shuttle service to food service establishments/commercial areas for the construction crew.*</p>	<p>The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation..</p>
<p>34. Provide shuttle service to transit stations/multimodal centers for the construction crew.*</p>	<p>The air quality impact associated with construction is below the threshold of significance as shown in Table 3.2-6 of Impact 3.2.1 on page 3.2-16 of the Draft EIR There is no need to add this as provision as mitigation.</p>

## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

35. Require the use of Zero-VOC paints, coatings, and solvents. (* Would reduce impacts to GHGs as well)	The project will comply with SCAQMD Rule 1113 Architectural Coatings.
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## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

The following refer to the commenter's suggestions regarding greenhouse gas emissions.

1. Provide bus services to students of the preschool and existing school.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
2. Provide shuttle service from existing multi-modal centers and/or locales with clusters of congregants to/from weekend services to reduce single occupancy vehicle trips.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
3. Implement a carpool/vanpool program for the school and church to reduce single occupancy vehicle trips.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
4. Reschedule weekend services to provide a minimum of one hour between each service in order to reduce traffic congestion and queuing in the project vicinity.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
5. All buildings shall be constructed to LEED Platinum standards.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
6. Buildings shall exceed Title 24 requirements by 15%.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
7. Orient 75 percent of buildings to face either north or south (within 30 degrees of N/S) and plant trees and shrubs that shed their leaves in winter nearer to these structures to maximize shade to the building during the summer and allow sunlight to strike the building during the winter months.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
8. Design buildings for passive heating and cooling and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
9. Construct photovoltaic solar or alternative renewable energy sources sufficient to provide 100% of all electrical usage for the entire project.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
10. Install solar water heating systems to generate all hot water requirements.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR

## ATTACHMENT B

### Response to Suggested Mitigation Measures from Letter 2

	therefore there is no need for this measure.
11. Utilize only electrical equipment for landscape maintenance. Install electrical outlets on project buildings for this purpose.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
12. Plant shade trees in parking areas to provide minimum 50% cover to reduce evaporative emissions from parked vehicles.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
13. Plant at least 50 percent low-ozone forming potential (Low-OFP) trees and shrubs, preferably native, drought-resistant species, to meet city landscaping requirements.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
14. Plant Low-OFP, native, drought-resistant, tree and shrub species, 20% in excess of that already required by city or county ordinance. Consider roadside, sidewalk, and driveway shading.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
15. Provide grass paving, tree shading, or reflective surface for unshaded parking lot areas, driveways, or fire lanes that reduce standard black asphalt paving by 10% or more.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
16. Provide direct, safe, attractive pedestrian access from project to transit stops and adjacent development.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
17. Provide safe, direct bicycle access to adjacent bicycle routes.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
18. Connect bicycle lanes/paths to city-wide network.*	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.
19. Provide a display case or kiosk displaying transportation information in a prominent area accessible to residents. (* Would reduce impacts to GHGs as well)	The project GHG emissions was determined to be less than significant as discussed in section 3.4 of the Draft EIR therefore there is no need for this measure.

