

**FINAL  
SUBSEQUENT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
GREEN RIVER RANCH SPECIFIC PLAN AMENDMENT & BUSINESS  
PARK INDUSTRIAL DEVELOPMENT AND  
RELOCATION OF PROPOSED CONSTRAINED LINKAGE 1**

**SCH NO. 2022080640  
CITY OF CORONA, CALIFORNIA**



January 2025



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**SCH NO. 2022080640  
CITY OF CORONA, CALIFORNIA**

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**January 2025**



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## 1.0 INTRODUCTION AND BACKGROUND

### 1.1 BACKGROUND INFORMATION, APPROVED AND MODIFIED PROJECT SUMMARY

The current ±165.0-acre Green River Ranch Specific Plan (GRRSP) Planning Area is located below the foothills of the Santa Ana Mountains adjacent to the western boundary of the City of Corona (City). The City is generally situated southwest of the City of Riverside, south of the City of Norco, and northwest of the City of Lake Elsinore. The GRRSP Planning Area is located south of SR 91, southwest of Dominguez Ranch Road, and southeast of Fresno Road. Green River Road bisects a small portion of the Planning Area in an east-west alignment.

The City first approved the GRRSP in 2001 and certified an Environmental Impact Report (EIR), State Clearinghouse #99091143. The GRRSP as currently approved guides development of up to 8.12 acres of general commercial land uses, 45.64 acres of Mixed-Use land uses, 13.37 acres of Hotel/Mixed-Use/Office land uses, and 98.2 acres of Estate Residential land use (32 dus) in the Planning Area. After approval of the GRRSP, the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) was approved in 2004 by Riverside County. The GRRSP Planning Area is overlain by four Criteria Cells (1702, 1704, 1811, and 1812) and Proposed Constrained Linkage 1 (PCL-1) as defined by the WR-MSHCP.

The Project Applicant, PSIP WR Green River, LLC, seeks approval of a General Plan Amendment, Specific Plan Amendment, Tentative Tract Map, and Precise Plan to rearrange and change the previously approved GRRSP land uses, slightly modify the Planning Area boundary, designate a large portion of the site as Open Space for permanent preservation in compliance with the WR-MSHCP, and develop 746,167 square-feet of industrial building area within the proposed Business Park Industrial (BPI) designated portions of the proposed GRRSP as amended. The proposed reconfigured and changed land uses include 5.5 acres of General Commercial uses on proposed PA 4; ±49.31 acres of BPI uses on proposed PAs 1, 2, and 3; and ±103.73 acres of Open Space on proposed PA 6. The proposed changes to the GRRSP and development of the BPI PAs represent the “Modified Project” or “proposed Project” under scrutiny in this Subsequent EIR (SEIR). A detailed description of these proposed Modified Project is provided in Section 3.2 of the Draft SEIR.

Table 1.A summarizes the Approved Project and Modified Project land use acreages and development quantities by land use type.

**Table 1.A: Comparison of the Approved Project and Modified Project Land Uses**

<b>Land Use</b>	<b>Approved Project Acreage</b>	<b>Modified Project Acreage</b>
General Commercial	8.12	5.5
Mixed-Use/Business Park Industrial	45.64	49.31
Hotel/Mixed-Use/Office	13.37	0
Estate Residential	98.2	0
Open Space	0	103.73

Over the past 20 years since the WR-MSHCP was approved, discussions regarding the existing location of PCL-1 have occurred because of several known constraints associated with its alignment. The four Criteria Cells (1702, 1704, 1811, and 1812) and PCL-1 that currently overlay the GRRSP Planning Area are intended to connect Core Area A to the north (Prado Basin/Santa Ana River) with Core Area B to the south (Cleveland National Forest). Proposed Constrained Linkage 2 (PCL-2) is located further to the east, and both PCL-1 and PCL-2 are intended to connect Core Areas A and B. To this end, Regional Conservation Authority (RCA) purchased the property known as B Canyon located adjacent to and west of the GRRSP Planning Area for the purposes of relocating PCL-1. At the request of RCA, the City and the Project Applicant agreed to include environmental analysis of the relocation of PCL-1 to the alternate B Canyon property alignment. The relocated PCL-1 alignment has been approved by RCA, the U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW). A detailed description of these proposed Relocated PCL-1 Project is provided in Section 3.3 of the Draft SEIR.

## **1.2 REGULATORY PURPOSE OF THE SEIR (DRAFT AND FINAL SEIR)**

The SEIR (the Draft and Final SEIR) provides information to the City and other public agencies, the general public, and decision makers regarding the potential environmental impacts from the construction and operation of the Modified Project and Relocation of PCL-1 Project. The purpose of the public review of the SEIR is to allow agencies and members of the public to comment on the adequacy of the environmental analysis in terms of compliance with the California Environmental Quality Act (CEQA).

The purpose of the SEIR is to make necessary changes to the previously Certified EIR that evaluated the Approved Project necessary to provide an updated and comprehensive evaluation of the Modified Project in its changed condition. In general, an SEIR assesses the changes in the environmental

significance conclusions originally reached in a previous EIR attributable to either: 1) change in a project; 2) change in the circumstance under which a project is undertaken; or 3) introduction of new information of substantial importance that was not known at the time the previous EIR was certified. Specifically, one of the following three criteria in CEQA State Guidelines Sections 15162 must be met in order for a lead agency to prepare a subsequent EIR:

1. There are substantial changes in the project which require major revisions to the previous EIR due to new significant impacts or a substantial increase in the severity of previously identified significant effects [Section 15162 (a)(1)].
2. There are substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the previous EIR due to new significant impacts or a substantial increase in the severity of previously identified significant effects [Section 15162 (a)(2)].
3. There is new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified that shows any of the following [Section 15162 (a)(3)]:
  - (a) The project will have one or more significant effects not discussed in the previous EIR.
  - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR.
  - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
  - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The prior CEQA approval was certified by the City as Lead Agency. This SEIR has been prepared for the Modified Project to address the first and second criteria found in Section 15162 (i.e., change in a project; changed circumstances under which the project is undertaken), because the Modified Project differs from the Approved Project analyzed in the prior environmental documentation and the Project must comply with the habitat conservation provision of the WR-MSHCP. The City has determined that preparation of a SEIR is appropriate, because changes to the Certified EIR are necessary to make it adequately apply to the Modified Project. As noted previously, the SEIR also contains project level impact analysis of the Relocated PCL-1 Project as a separate but related project.

In accordance with Section 15089, the lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments

made by the public and agencies and to make minor revisions to the text of the Draft EIR. Pursuant to Section 15132, a Final EIR must contain the following:

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

This Final SEIR has been prepared in accordance with the requirements of the Sections 15088, 15089 and 15132. The Draft SEIR, public comments received providing comment on the Draft SEIR, corrections and additions to the Draft SEIR, the Lead Agency's responses to those comments, and a Mitigation Monitoring and Reporting Program (MMRP) collectively comprise the Final SEIR for the Modified Project. More detailed information regarding the Modified Project and the Relocated PCL-1 Project and their potential environmental effects are provided in the Draft SEIR. The Draft SEIR is incorporated by reference into the Final SEIR and is bound separately.

This Final SEIR is organized into four main chapters, as follows:

- **Chapter 1.0: Introduction and Background.** This chapter provides background information regarding previous approvals and previous environmental review, a summary of the Modified Project and Relocated PCL-1 Project, the purpose of the SEIR, the focus of the SEIR, and a summary of the Draft SEIR public review period.
- **Chapter 2.0: Responses to Comments.** This chapter lists all persons, organizations and public agencies commenting on the Draft SEIR, provides a copy of all written comments received, and presents a response to each comment contained in the letters.
- **Chapter 3.0: Errata and Additions to the Draft SEIR.** This chapter presents the revisions made to the Draft SEIR text based on comments received from the public and agencies and other corrections to update information or to correct minor, inadvertent textual errors.
- **Chapter 4.0: Updated Mitigation Monitoring and Reporting Program.** This chapter presents the revised Mitigation Monitoring and Reporting Program (MMRP) for the Modified Project with mitigation measures presented in final format. Any changes to mitigation measures from the Draft SEIR to the Final SEIR as a result of errata changes are shown in Final SEIR Chapter 3.0. Note the Relocated PCL-1 Project does not produce any environmental impacts and therefore no mitigation measures are required.

### **1.3 SEIR FOCUS**

The focus of an SEIR is the analysis of impacts associated with the Modified Project that have been determined to be potentially greater than the Approved Project or new significant impacts. An evaluation of environmental impacts comparing impacts from the Approved Project to those from the Modified Project was provide as part of the conclusion for each impact topic. The Modified Project was found to produce two more severe impacts in comparison to the Approved Project regarding Air Quality (AQMP Consistency) and Transportation (VMT) and no feasible mitigation is available to mitigate such impacts. Although it was determined the Modified Project would not result in a new impact and would not increase the severity of an impact for all other topics, minor changes to mitigation measures are required to reflect changes proposed by the Modified Project or to update the measures to reflect current best practices.

An SEIR need contain only the information necessary to make the prior environmental documentation adequate for the Modified Project as revised (Section 15162). Additionally, an SEIR may be circulated in accordance with CEQA Section 15087 by itself without recirculating the prior environmental documentation. When the Lead Agency decides whether to approve a proposed Project, the decision-making body shall consider the prior environmental documentation as revised by the SEIR. A finding under Section 15091 must be made for each significant effect shown in the prior environmental documentation as revised in the SEIR.

As noted previously, the SEIR also contains project level impact analysis of the Relocated PCL-1 Project as a separate but related project.

### **1.4 PUBLIC REVIEW PERIOD**

A notice of preparation (NOP) was distributed to members of the public and public agencies for a 30-day review period from August 29, 2022 to September 28, 2022. The NOP requested input from recipients regarding the scope and content of the environmental information to be included in the Draft SEIR for the Modified Project. At the conclusion of the review period, four (4) agencies and numerous individual members of the public provided comments on the NOP. A summary of the agency/public comment letters was shown in Draft SEIR Table 2-2, as well as the location in the Draft SEIR that addressed the issues raised. The NOP and the NOP response letters are included in Draft SEIR Appendix A.

A Notice of Completion (NOC) of the Draft SEIR was filed with the State Clearinghouse, and the Notice of Availability (NOA) of the Draft SEIR was filed with the County Clerk on October 11, 2024. The Draft SEIR was circulated for public review for a period of 45 days, from October 11, 2024 to November 25, 2024. Copies of the NOA and Draft SEIR were distributed to the State Clearinghouse

and copies of the NOA were distributed to members of the public and public agencies. Copies of the Draft SEIR were also made available for public review at the City Planning and Development Department, the City's website, and area libraries. A total of sixteen (17) comment letters/emails were received during the public review period. Comments were received from local, State and regional agencies/utilities; an advocacy group; Native American Indian tribes; and members of the public. The written comment letters/emails received are included in Chapter 2.0 of this Final SEIR along with responses to comments pertaining to environmental impacts associated with the proposed Modified Project and Relocation of PCL-1.

The Lead Agency contact person for the proposed project:

Sandra Vanian, Planning Manager  
City of Corona  
Planning and Development Department  
400 S. Vicentia Avenue  
Corona, California 92882

## 2.0 RESPONSES TO COMMENTS

### 2.1 INTRODUCTION

The Draft Supplemental Environmental Impact Report (Draft SEIR) was circulated for public review for a period of 45 days, from October 11, 2024 to November 25, 2024. Seventeen (17) comment letters/emails were received during the public review period. Comments were received from five (5) local, State and regional agencies/utilities; one (1) advocacy group; two (2) Native American Indian tribe; and nine (9) homeowners.

Pursuant to Section 15088 of the California Environmental Quality Act (CEQA) Guidelines, the City of Corona (City) as Lead Agency has reviewed all comments received during the public comment period for the Draft SEIR. A list of all commenting parties, copies of all written comment letters, and responses to each relevant comment pertaining to the Draft SEIR are included in this chapter. Pursuant to Section 15088(a), comments raising significant environmental issues have been responded to. Comments were not responded to that provide information or request information not relevant to the environmental document or impact analyses, do not pertain to the adequacy or completeness of the Draft SEIR, or do not raise environmental issues. The comment letters are numbered alphanumerically based on the date received. Individual comments are numbered along the right-hand margin of each letter. The City's responses to each comment follow each letter, and are referenced by the designated letter and comment number.

Section 15088 states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed

- in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.
- d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
- 1) Revise the text in the body of the EIR; or
  - 2) Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Final SEIR clarifies, amplifies, or makes insignificant modifications to the Draft SEIR. The information provided does not constitute significant new information and does not constitute changes to the text of the Draft SEIR that would otherwise require recirculation of the document. (See CEQA Guidelines Section 15088.5 and Chapter 3.0 in this Final SEIR.)

## **2.2 COMMENTS RECEIVED**

The following list of entities commented on the Draft SEIR. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is numbered alphanumerically as shown below.

- Letter A – City of Chino Hills, letter dated October 17, 2024.
- Letter B – Riverside County Flood Control and Water Conservation District, letter dated October 21, 2024.
- Letter C – Paul Ramlo, email dated October 28, 2024.
- Letter D – Northwest Mosquito and Vector Control District, letter dated November 4, 2024.
- Letter E – Riverside Transit Agency, email dated November 12, 2024.
- Letter F – Southern California Gas Company, email dated November 13, 2024.
- Letter G – Advocates for the Environment, letter dated November 14, 2024.
- Letter H - Montenero Community Association, letter dated November 19, 2024.

- Letter I - Ileana Alvarez, email dated November 20, 2024.
- Letter J - Jennifer and Michael Campbell, email dated November 20, 2024.
- Letter K - Francesca Da Sacco, email dated November 20, 2024.
- Letter L - John Fox, email dated November 20, 2024.
- Letter M - Kim Ishiki, email dated November 20, 2024.
- Letter N – Amy Jasman, email dated November 20, 2024.
- Letter O – Niko Todorov, email dated November 21, 2024.
- Letter P – Pechanga Band of Indians, email dated November 25, 2024.
- Letter Q - Soboba Band of Luiseno Indians, email dated November 24, 2024.

## **2.3 RESPONSES TO COMMENTS**

Responses to each comment letter are provided on the following pages. An alphanumeric letter number is provided in the upper right corner of each comment letter, and individual comments that pertain to the environmental analysis presented in the Draft SEIR are numbered along the right-hand margin of each letter. The City’s responses to each comment are referenced by the numbers in the margins.



October 17, 2024

14000 City Center Drive  
Chino Hills, CA 91709  
(909) 364-2600  
[www.chinohills.org](http://www.chinohills.org)

Sandra Vanian, Planning Manager  
City of Corona, Planning and Development Department  
400 S. Vicentia Avenue  
Corona, CA 92882

**Subject: Comments on Draft Subsequent EIR for the Green River Ranch Specific Plan Amendment and Realignment of Proposed Constrained Linkage 1 (PCL-1)**

Dear Ms. Vanian,

Thank you for the opportunity to comment on the above-mentioned SEIR. The City of Chino Hills values the importance of maintaining biodiversity and habitat linkages through the Puente-Chino Hills and Prado Basin areas. As the proposed project is very near to the southwestern edge of Chino Hills State Park, it provides an important link from the Santa Ana Mountains to the large open space areas within the State Park and adjacent lands.

While the SEIR details the benefits of the proposed Specific Plan Amendment, including the preservation of additional open space land, as well as the larger land area dedicated to a realignment of PCL-1, it is unclear from the analysis as to where the physical linkage will be to facilitate the movement of wildlife from the south side of State Route 91 (SR-91) to the north with the proposed alignment. The current alignment of PCL-1 leads to a large overpass of SR-91 that, while crossing over the BNSF rail line, is physically wide to facilitate the movement of wildlife underneath the freeway. The only area with a physical connection underneath the freeway adjacent to the new alignment is a small passage that also includes numerous physical barriers, such as walls and fences. The City requests that the analysis provide additional information on how the realigned PCL-1 will serve to provide a better connection between the Santa Ana Mountains and the Chino-Puente Hills areas to facilitate the movement of wildlife, in order to retain or enhance biodiversity.

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A-1  
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Thank you again for the opportunity to comment on the Draft SEIR. If you have additional questions, please contact me at [nliguori@chinohills.org](mailto:nliguori@chinohills.org) or (909) 364-2740.

Sincerely,

Nicholas Liguori, AICP  
Community Development Director

## **Response to Comment Letter A: City of Chino Hills**

**October 17, 2024**

**Comment A-1.** Commenter acknowledges the benefits of the proposed Project including preservation of additional open space land and the larger area to be dedicated to PCL-1 as relocated. Commenter states it is unclear where the physical wildlife corridor linking the south side of SR-91 to the north side of SR-91 will be located, and suggests the only linkage across the freeway in the location of the proposed PCL-1 realignment is a small passage that includes numerous physical barriers such as walls and fences. Commenter requests additional analysis be provided to explain how the proposed PCL-1 realignment will better serve as a connection between the Santa Ana Mountains and the Chino-Puente Hills for the purposes of benefiting biodiversity.

**Response to A-1.** Wildlife movement under SR-91 via the PCL-1 realignment is currently achieved at two undercrossings. The B Canyon undercrossing consists of a culvert that is approximately 340 feet long, 12 feet high and 12 feet wide. Future Caltrans improvement plans for SR-91 at this location are under study. A second undercrossing, a vehicle access tunnel, is located approximately 1,600 feet from the B Canyon undercrossing. The vehicle access tunnel is approximately 170 feet long, 16 feet wide, and 14 feet high. Based on accessibility to these undercrossings, the B Canyon undercrossing is considered to be the primary undercrossing for wildlife. In contrast, the southern portion of the existing PCL-1 alignment crosses a series of steep, east-west canyons and ridgelines in conflict with the goal of north-south movement; the alternate PCL-1 alignment is far less constrained with no movement constraints existing between the Cleveland National Forest and the B Canyon undercrossing at the SR-91. North of the SR-91, the railroad spans the Santa Ana River and adjacent access roads allowing wildlife to pass under the railroad tracks. The existing culvert at B Canyon undercrossing is currently large enough to accommodate movement. The culvert would be further increased by future Caltrans SR-91 improvements planned at the B Canyon location.

Wildlife movement impacts associated with Relocated PCL-1 are discussed in the Draft SEIR, Impact BIO-4. As presented on pages 5-27 and 5-28, "... the alternate PCL-1 alignment is superior to the existing PCL-1 alignment in achieving connection between the Santa Ana Mountains and the Chino Hills. The reasons for this superiority are because it is not impacted by the high volume of traffic on Green River Road; it crosses SR-91 rather than running alongside the freeway for a stretch of approximately 1,200 feet; wildlife would navigate the BNSF railroad line from SR-91 instead of navigating both obstacles sequentially; wildlife could use the existing footbridge across the Santa and River; and it leads to Aliso Canyon, which is the largest canyon in Chino Hills State Park, and it leads to Aliso Canyon, which is the largest canyon in Chino Hills State Park, and therefore is a natural travel corridor for mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), and other wildlife. Therefore, this conservation

configuration would provide superior biological value in comparison to the existing alignment of PCL-1 through further enhancement of the movement of wildlife.”

For these reasons, the Draft SEIR page 3.4.4-11 correctly concludes the Modified Project’s impacts to and consistency with the MSHCP are the same as identified in the Prior EIR and the level of impact (less than significant with mitigation) remains unchanged. No changes to the Draft SEIR are required.

JASON E. UHLEY  
General Manager-Chief Engineer



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RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

259388

October 21, 2024

City of Corona  
Planning Department  
Post Office Box 940  
Corona, CA 92882-0940

Attention: Sandra Vanian

Re: Green River Ranch Specific Plan  
Amendment & Business Park Industrial  
Development Project, APNs 101-180-014,  
101-180-015, 101-180-017, 101-180-034,  
101-180-035, 101-180-037, 101-180-038 and  
101-190-034

The Riverside County Flood Control and Water Conservation District (District) does not usually review land divisions/land use cases or provide State Division of Real Estate letters/flood hazard reports for projects that are located within incorporated cities. Exceptions are made for cases with items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees).

The District's review is based on the above-referenced project transmittal, received October 4, 2024. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely, \_\_\_\_\_. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation,

Re: Green River Ranch Specific Plan  
Amendment & Business Park Industrial  
Development Project, APNs 101-180-014,  
101-180-015, 101-180-017, 101-180-034,  
101-180-035, 101-180-037, 101-180-038 and  
101-190-034

259388

and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, \_\_\_\_\_. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- The District's previous comments are still valid.

**GENERAL INFORMATION**

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document, and/or Mitigation Monitoring and Reporting Program, and with all other federal, state, and local environmental rules and regulations that may apply, such as, but not limited to, the Multiple Species Habitat Conservation Plan (MSHCP), Sections 404 and 401 of the Clean Water Act, California Fish and Game Code Section 1602, and the Porter Cologne Water Quality Control Act. The District's action associated with the subject project triggers evaluation by the District with respect to the applicant's compliance with federal, state, and local environmental laws. For this project, the Lead Agency is the agency in the address above, and the District is a Responsible Agency under CEQA. The District, as a Co-permittee under the MSHCP, needs to demonstrate that all District related activities, including the actions identified above, are consistent with the MSHCP. This is typically achieved through determinations from the CEQA Lead Agency (if they are also a Co-permittee) for the project. For the MSHCP, the District's focus will be particular to Sections 6.1.2, 6.1.3, 6.1.4, 6.3.2, 7.3.7, 7.5.3, and Appendix C of the MSHCP. Please include consistency determination statements from the Lead Agency/Co-permittee for the project for each of these sections in the CEQA document. The District may also require that an applicant provide supporting technical documentation for environmental clearance.

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B-1  
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This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

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B-2  
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If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

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B-3  
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Very truly yours,



AMY MCNEILL  
Engineering Project Manager

## **Response to Comment Letter B: Riverside County Flood Control and Water Conservation District**

**October 21, 2024**

**Comment B-1.** Commenter summarizes the responsibilities of the Project proponent regarding compliance with mitigation measures defined in the CEQA document and MMRP as well as all other applicable federal, State, and local rules and regulations including the WR-MSHCP, Sections 404 and 401 of the Clean Water Act, California Fish and Game Code Section 1602, and the Porter Cologne Water Quality Control Act. Commenter also notes they are a Responsible Agency per CEQA regarding the Project's compliance with federal, State, and local environmental laws.

**Response to B-1.** The requirements of CEQA including the mitigation measures contained in the SEIR as detailed in the MMRP presented in Chapter 4.0 of this Final SEIR, habitat protection features afforded by the WR-MSHCP, and other applicable rules and regulations are acknowledged. These measures and regulations are obligatory and understood, the City routinely ensures a project applicant complies with these compulsory provisions. The City also acknowledges use of the mitigation measures contained in the MMRP and the adherence to the procedures prescribed by applicable federal, State and local regulations will enable Commenter to perform their role as a Responsible Agency. No changes to the Draft SEIR are required.

**Comment B-2.** Commenter notes the Project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board and clearance for grading, recordation, or other final approval should not be given until the City has determined that the Project has been granted a permit or is shown to be exempt.

**Response to B-2.** Comment acknowledged, these procedures are obligatory and understood. Section 4.11 of the Draft SEIR prescribes ten mitigation measures from the previously Certified EIR that are applicable to the Modified Project as well as one new mitigation measure. These mitigation measures ensure compliance with the broad range of obligatory hydrology, drainage and water quality rules and regulations are adhered to including project-specific measures contained in the hydrology, drainage and water quality reports prepared for the Modified Project. No changes to the Draft SEIR are required.

**Comment B-3.** Commenter states the Project Applicant should provide backup studies, calculations, plans, and other information required to meet Federal Emergency Management Agency (FEMA) requirements if a mapped floodplain is involved.

**Response to B-3.** The Project is not located in a mapped floodplain and a Conditional Letter of Map Revision and a Letter of Map Revision is not required. No changes to the Draft SEIR are required.

**Subject:** FW: Green River horse property development  
**Date:** Thursday, October 31, 2024 at 12:52:23 PM Pacific Daylight Time  
**From:** Sandra Vanian  
**To:** Raymond Hussey  
**Attachments:** image001.png, image002.png, image003.png, image004.png

Ray, below is the city's response to a written comment on the draft SEIR for Green River Ranch.

Sincerely,  
Sandra Vanian,  
Planning Manager

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**From:** Sandra Vanian  
**Sent:** Thursday, October 31, 2024 12:51 PM  
**To:** ramlo.paul@gmail.com  
**Cc:** Joanne Coletta <Joanne.Coletta@CoronaCA.gov>; Jim Steiner <Jim.Steiner@coronaca.gov>  
**Subject:** FW: Green River horse property development

Mr. Ramlo,

Thank you for your response to the city's Notice Of Availability regarding the draft Green River Ranch Specific Plan Subsequent EIR (EIR). My name is Sandra Vanian and I am the Planning Manager for the Planning and Development Department. I am also the planner overseeing the project.

In response to your question of what a "significant" impact really means, it is a term that is used in the California Environmental Quality Act (CEQA) when it comes to assessing a development's impact on the environment when compared to thresholds established by a regulatory agency on certain areas of the environment. Environmental reports prepared under CEQA cover multiple areas of discussion, such as biological resources, air quality, transportation, geological, etc. Each of these categories is regulated by a different agency and each agency establishes an operating threshold. Technical studies associated with the project are prepared to determine if a project would operate within those thresholds or exceed it. If a project exceeds an adopted threshold, even when a project implements mitigation measures to try and meet the threshold, CEQA considers this to be a significant impact instead of a less than significant impact. Basically, all projects have a change to the environment, it is just a matter of the project operating within established thresholds or in some cases above the threshold.

With respect to air quality, there are pollutant emissions emitted daily in our lives and these daily emission thresholds are established by the South Coast Air Quality Management District. Emissions come from mobile activities, such as passenger vehicles, trucks, and construction activity, and stationary operations such as landscape maintenance, the use of electricity in daily operations, the use of certain chemicals in a business (manufacturing process) or home (cleaning products, pesticides, etc.), exterior building coatings, and the like.

The air quality analysis prepared for the revised Green River Ranch project indicated the project would exceed certain pollutant emissions associated with the project's operations. In the original EIR prepared for the Green River Ranch Specific Plan in 2001, pollutant

emissions associated with future project operations already disclosed that the thresholds for stationary source emissions and mobile source emissions would be exceeded. The subsequent EIR prepared for the revised Green River Ranch project continues to show that pollutants associated with stationary and mobile source emissions would be exceeded even with mitigation. Therefore, the city needs to identify this as a significant impact.

Unlike the 2001 EIR, the 2024 subsequent EIR includes a health risk assessment regarding the exposure to toxic air contaminants, which includes exposure to diesel particulate matter as a result of heavy-duty diesel trucks accessing the site on nearby sensitive receptors. The assessment specifically looked at the nearest home (4341 San Viscaya Circle) to the project site. The revised project's potential cancer risk is estimated to be 5.14 in one million. This is less than SCAQMD's cancer risk threshold which is 10 in one million. As such, the revised project will not cause a significant human health or cancer risk to the nearby residential community.

As for the transportation impacts, CEQA revised this evaluation sometime in 2018 and requires the city to evaluate vehicle miles traveled instead of level of service impacts like in the 2001 EIR. Metric vehicle miles traveled (VMT) measures the number of "miles" traveled by vehicles associated with the project. The daily VMT that is expected to be generated by this project is 62.0, which exceeds the city's daily VMT threshold of 40.6. The VMT is about getting more individuals to travel less miles in passenger vehicles. The EIR proposes mitigation measures (ride share programs, carpooling, etc.) to help reduce the project's daily VMT, but there is no amount of feasible mitigation that can fully reduce the project's VMT down to the city's threshold. Therefore, this is considered a significant and unavoidable impact. However, the number of daily vehicular trips generated by the revised project compared to the original specific plan decreased by 61% (2001 project showed 11,207 daily trips and the revised project shows 4,370 daily trips). It is easier to understand vehicular trips than vehicle miles traveled because trips can be counted, which people can relate to.

You are correct that an EIR is not always easy to understand, hopefully the information in this email is easier to understand and helpful. In 2001 the project was entitled for future development so development is imminent.

If you have additional questions, please email me or call me at (951) 279-3553.

Sincerely,



**Sandra Vanian**  
**Planning Manager**  
**P:** (951) 279-3553  
400 South Vicentia Avenue  
Corona, CA 92882  
[www.coronaca.gov](http://www.coronaca.gov)



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**From:** Paul Ramlo <[ramlo.paul@gmail.com](mailto:ramlo.paul@gmail.com)>  
**Sent:** Monday, October 28, 2024 3:27 PM  
**To:** Joanne Coletta <[Joanne.Coletta@CoronaCA.gov](mailto:Joanne.Coletta@CoronaCA.gov)>  
**Cc:** Jim Steiner <[Jim.Steiner@coronaca.gov](mailto:Jim.Steiner@coronaca.gov)>  
**Subject:** Green River horse property development

Some people who received this message don't often get email from [ramlo.paul@gmail.com](mailto:ramlo.paul@gmail.com). [Learn why this is important](#)

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

Good afternoon Joanne. My name is Paul Ramlo and I am the HOA board president for the Montenero community in Corona. Our neighborhood is located in the hills abutting the Green River Road Horse Ranch Development. I wanted to reach out to you regarding a recent notice that was sent out to the neighborhood concerning the EIR for this project. Jim and I briefly spoke last week regarding the project and he recommended I reach out to you for clarification on some concerns.

As the board president, I am the recipient of many neighbors complaints and concerns regarding issues in our community. That of course includes their concerns over the horse ranch project. At Jim's recommendation, I wanted to reach out to you and seek clarification so that I can Address homeowner concerns with a little more certainty.

The neighborhood recently received the notification of the EIR meeting and of the published document online. Many of the homeowners have a great concern over the verbiage in the letter, which stated "implementation of the proposed project would result in significant and unavoidable impacts to air quality and transportation." This verbiage alone can be very alarming to people and has obviously caused great concern in the neighborhood. I recognize that certain words are traditionally used in these types of reports and since I am not an EIR expert, I figured I would reach out to someone who might be able to clarify or at least expand on what a "significant" impact would really look like.

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C-1  
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As I'm sure you are aware of, our neighborhood, especially cherished and benefited from the beautiful horse property that we have had had at the base of our neighborhood for so many years. Many of us are very concerned over the impact this development will have not only on air quality and traffic congestion, but more importantly, our home values. Any information you can share with me on the process of approving this type of project would be greatly appreciated. As you might assume, there are many neighbors that simply would like the property to remain undeveloped. I know that may be a very unrealistic expectation.

Thank you in advance for your time.

Paul Ramlo  
Montenero neighborhood HOA President

## **Response to Comment Letter C: Paul Ramlo**

**October 31, 2024**

**Comment C-1.** Commentor requests clarification regarding the Draft SEIR finding of “implementation of the proposed project would result in significant and unavoidable impacts to air quality and transportation.”

**Response to C-1.** As included in the email thread above showing Comment Letter C from the Commenter, the City previously responded to Commenter’s request for clarification regarding the definition of a “significant and unavoidable impact” as well as clarification regarding the specific air quality and transportation impact found in the Draft SEIR to be significant and unavoidable impact. That response is reproduced here verbatim, and no changes to the Draft SEIR are required.

In response to your question of what a “significant” impact really means, it is a term that is used in the California Environmental Quality Act (CEQA) when it comes to assessing a development’s impact on the environment when compared to thresholds established by a regulatory agency on certain areas of the environment. Environmental reports prepared under CEQA cover multiple areas of discussion, such as biological resources, air quality, transportation, geological, etc. Each of these categories is regulated by a different agency and each agency establishes an operating threshold. Technical studies associated with the project are prepared to determine if a project would operate within those thresholds or exceed it. If a project exceeds an adopted threshold, even when a project implements mitigation measures to try and meet the threshold, CEQA considers this to be a significant impact instead of a less than significant impact. Basically, all projects have a change to the environment, it is just a matter of the project operating within established thresholds or in some cases above the threshold.

With respect to air quality, there are pollutant emissions emitted daily in our lives and these daily emission thresholds are established by the South Coast Air Quality Management District. Emissions come from mobile activities, such as passenger vehicles, trucks, and construction activity, and stationary operations such as landscape maintenance, the use of electricity in daily operations, the use of certain chemicals in a business (manufacturing process) or home (cleaning products, pesticides, etc.), exterior building coatings, and the like. The air quality analysis prepared for the revised Green River Ranch project indicated the project would exceed certain pollutant emissions associated with the project’s operations. In the original EIR prepared for the Green River Ranch Specific Plan in 2001, pollutant emissions associated with future project operations already disclosed that the thresholds for stationary source emissions

and mobile source emissions would be exceeded. The subsequent EIR prepared for the revised Green River Ranch project continues to show that pollutants associated with stationary and mobile source emissions would be exceeded even with mitigation. Therefore, the city needs to identify this as a significant impact.

Unlike the 2001 EIR, the 2024 subsequent EIR includes a health risk assessment regarding the exposure to toxic air contaminants, which includes exposure to diesel particulate matter as a result of heavy-duty diesel trucks accessing the site on nearby sensitive receptors. The assessment specifically looked at the nearest home (4341 San Viscaya Circle) to the project site. The revised project's potential cancer risk is estimated to be 5.14 in one million. This is less than SCAQMD's cancer risk threshold which is 10 in one million. As such, the revised project will not cause a significant human health or cancer risk to the nearby residential community.

As for the transportation impacts, CEQA revised this evaluation sometime in 2018 and requires the city to evaluate vehicle miles traveled instead of level of service impacts like in the 2001 EIR. Metric vehicle miles traveled (VMT) measures the number of "miles" traveled by vehicles associated with the project. The daily VMT that is expected to be generated by this project is 62.0, which exceeds the city's daily VMT threshold of 40.6. The VMT is about getting more individuals to travel less miles in passenger vehicles. The EIR proposes mitigation measures (ride share programs, carpooling, etc.) to help reduce the project's daily VMT, but there is no amount of feasible mitigation that can fully reduce the project's VMT down to the city's threshold. Therefore, this is considered a significant and unavoidable impact. However, the number of daily vehicular trips generated by the revised project compared to the original specific plan decreased by 61% (2001 project showed 11,207 daily trips and the revised project shows 4,370 daily trips). It is easier to understand vehicular trips than vehicle miles traveled because trips can be counted, which people can relate to.



# NORTHWEST MOSQUITO AND VECTOR CONTROL DISTRICT

PUBLIC HEALTH GOVERNMENT AGENCY

November 4<sup>th</sup>, 2024

President  
Clint Lorimore  
City of Eastvale

Planning & Housing Commission  
400 South Vicentia Ave  
Corona, CA 92882

Vice President  
Dale Welty  
City of Canyon Lake

Re: Green River Ranch Specific Plan Amendment & Business Park Industrial Development SEIR

Secretary  
Nancy Jimenez-Hernandez  
City of Corona

Members of the Planning & Housing Commission:

Trustee  
Katherine Aleman  
City of Norco

On behalf of Northwest Mosquito and Vector Control District in Corona, CA, I am hoping to relay our requests to the Planning & Housing Commission regarding development of Green River Ranch. We hope that these comments and requests will be considered regardless of the amendment status as any industrial, commercial, or residential land use change has the potential to modify and/or create habitat conducive to vector breeding. Additionally, land use changes along urban-undeveloped zones can increase incidence of human exposure to disease vectors such as rodents and ticks, particularly along wildlife corridors. Northwest MVCD is seeking the integration of some mitigation efforts and/or ongoing coordination to access areas of concern for vector surveillance and control.

Trustee  
Gary Bradley, Ph.D.  
City of Riverside

Disease-spreading mosquitoes are a major threat in our state. In 2003, California saw its first cases of West Nile virus; since then, there have been over 8,000 human West Nile cases statewide. A new challenge arose in 2010, the arrival and establishment of invasive mosquitoes capable of transmitting pathogens like dengue and Zika virus. This threat was fully realized in 2023 and 2024 with a total of 14 local transmissions of dengue in Southern California, a first in the state's history. Mosquito larvae require stagnant water to complete their life cycle, growing from egg to adult in 5-10 days. Our agency routinely finds mosquito breeding sources on residential, commercial, industrial, and associated easement spaces due to water retention programs and drainage issues. We request maintained access for inspection and potential treatment of the riparian habitats mentioned in 4.7.2A and that any restoration plans would include ensuring the steady flow of water through these spaces. Additionally, we request that mosquito breeding mitigation methods will also be considered when designing the drainage fills, detention basins, dikes, and drains described in 4.11.1-3. If the drainage/retention structures unavoidably hold stagnant water for 5 or more days, we respectfully request coordination for continued access and inspection of these spaces.

Trustee  
Guillermo Silva  
City of Jurupa Valley

Trustee  
T. Steven Su, M.D., Ph.D.  
County of Riverside

Trustee  
Brian Tisdale  
City of Lake Elsinore

Mark Breidenbaugh Ph.D.  
District Manager

Angela Caranci, Ph.D.  
Assistant District Manager

↑ D-1  
↓ D-2

1966 Compton Ave. • Corona, CA 92881-3318 • (951) 340-9792 • FAX (951) 340-2515  
Email: [office@northwestmvcd.org](mailto:office@northwestmvcd.org)  
[www.northwestmvcd.org](http://www.northwestmvcd.org)

With the adoption of SB 1251 in 2024, vector control districts will now be granted access to utility vaults for inspection and treatment of standing water. Utility vaults are enclosures above or below ground owned by an electrical utility provider and water accumulation can be a byproduct of the design. Our agency has observed mosquito breeding in vaults, with conclusive evidence of increased human bite exposure in surrounding homes and public spaces. Land use planning could assist in lessening the burden of coordination and inspection efforts between vector control agencies and utility companies by considering the placement of utility vaults to prevent collection of water from runoff and/or irrigation, pertinent to Utilities Threshold UTL-1: Impacts from Relocation or New/Expanded Utilities.

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Lastly, Northwest MVCD supports the retention of the wildlife corridor that this development takes into consideration. However, as mentioned, the interface between undeveloped and urbanized spaces can increase human exposure to vectors of disease. Our agency has noted increased rodent activity in newly developed housing tracts throughout the City of Corona and would therefore encourage developers to integrate rodent exclusion measures during planning, phasing, and implementation of this development project. Similarly, wildlife thoroughfares can also be associated with the movement or introduction of tick and flea populations, which may harbor diseases of medical and veterinary importance. Our agency requests that access be maintained to undeveloped sections for surveillance efforts, particularly those abutting residential spaces, and that development and construction staff are educated on the potential safety risks associated with tick-borne diseases in Southern California.

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D-4  
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We are thankful for the opportunity to share our comments and concerns regarding the Green River Ranch Specific Plan Amendment & Business Park Industrial Development SEIR. Northwest MVCD staff are and will remain available for any future questions or concerns regarding vector activity and would readily provide any additional information or support sought to mitigate the threat of vector-borne diseases.  
Sincerely,

Angela Caranci, PhD  
Assistant District Manager/Vector Ecologist  
Northwest Mosquito and Vector Control District  
acaranci@northwestmvcd.org



# NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN TO PROPERTY OWNERS that the Planning and Housing Commission of the City of Corona, California, will conduct a public hearing to receive testimony, oral or written on the following. Our records indicate that you are the owner/occupant of property located within 500 feet of the proposed project site. You are encouraged to attend and comment on the application(s) described below. If you have written comments that you wish to be included in the staff report, please deliver them to the Planning and Housing Commission Secretary on or before Wednesday prior to the meeting.

<b>MEETING DATE:</b>	<b>November 25, 2024</b>
<b>MEETING TIME:</b>	<b>6:00 PM</b>
<b>PLACE:</b>	<b>City Hall, Council Chambers 400 S. Vicentia Avenue, Corona CA 92882</b>

**GPA2020-0002:** General Plan Amendment to change the land use designation of 5.5 acres located north of Green River Road and west of Dominguez Ranch Road from Mixed Use II (Industrial & Commercial) to General Commercial, and change the land use designations on the south side of Green River Road and west of Dominguez Ranch Road from General Commercial, Mixed Use II (Industrial & Commercial), and Estate Residential to 49.31 acres of Mixed Use II (Industrial & Commercial), 20.39 acres of Estate Residential, and 83.34 acres of Open Space-General.

**SPA2020-0006:** Specific Plan Amendment to the Green River Ranch Specific Plan to reorganize General Commercial and Estate Residential zoning districts and planning areas, delete the Mixed Use and Hotel/Mixed/Commercial zoning districts, and add the Business Park Industrial and Open Space General zoning districts.

**TTM 37963:** Tentative Tract Map application to subdivide 154.50 acres located on the south side of Green River Ranch Road and west of Dominguez Ranch Road into five numbered lots for industrial purposes, one numbered lot for residential purpose, and two lettered lots for street purposes.

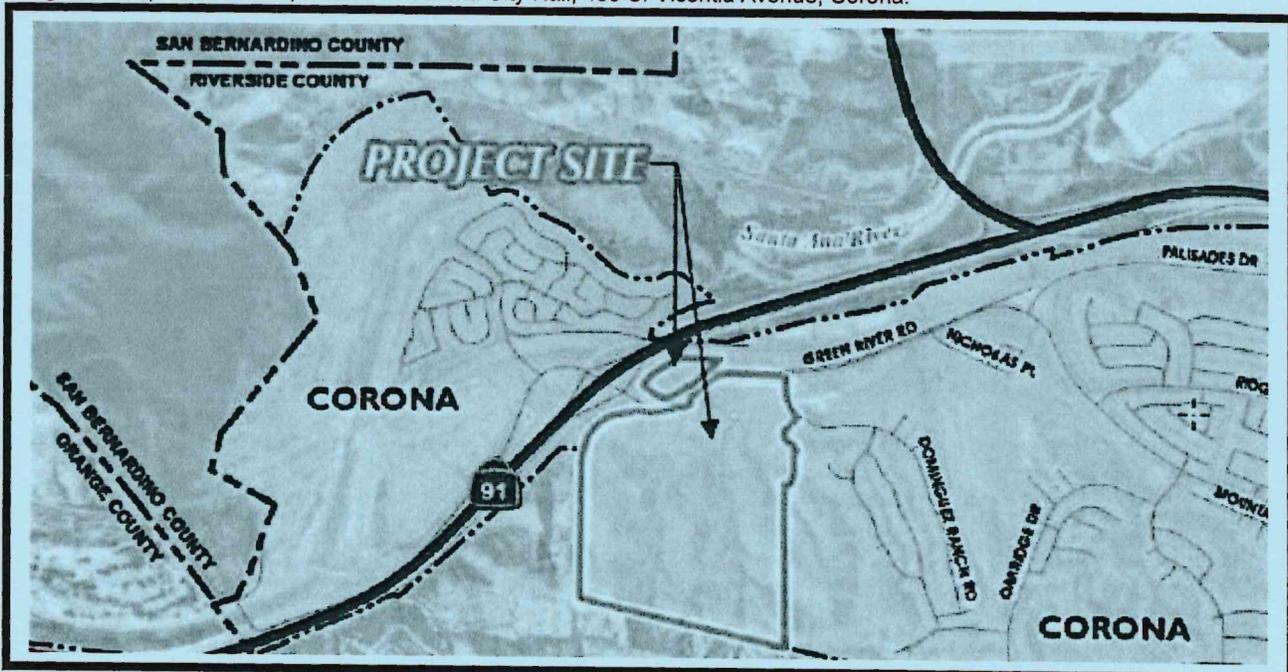
**PP2020-0004:** Precise Plan application to review the site plan, architecture, landscaping and other features associated with the proposed development of five industrial warehouse buildings totaling 746,167 square feet in the proposed Business Park Industrial (BPI) zoning district within the Green River Ranch Specific Plan, located on the south side of Green River Road and west of Dominguez Ranch Road.

(Applicant: PSIP WR Green River LLC)

Contact Planner: Sandra Vanian  
Phone: (951) 736-2262

E-mail: Sandra.Vanian@CoronaCA.gov  
Fax: (951) 279-3550

**California Environmental Quality Act (CEQA)** – In accordance with Section 15162 of the State Guidelines for Implementing the California Environmental Quality Act (CEQA), the City of Corona, as the lead agency under CEQA, prepared a Draft Subsequent Environmental Impact Report (SEIR) to the Green River Ranch Specific Plan Final Environmental Impact Report which was approved and certified by the City of Corona on February 7, 2001. The Draft Subsequent EIR was prepared to address the potential environmental impacts of the proposed changes to the Green River Ranch Specific Plan land uses and the development of a 37.82-acre industrial park proposed within the Green River Ranch Specific Plan. The Draft SEIR also addresses the relocation of Proposed Constrained Linkage 1 (PCL-1) of the Riverside County Multiple Species Habitat Conservation Plan as a separate but related project. The Draft SEIR was prepared in accordance with CEQA, and submitted to the State Clearinghouse (SCH # 2022080640) and advertised to the general public on October 11, 2024 for public comment for a period of 45 days. The public comment period on the Draft SEIR closes November 25, 2024. The Draft SEIR is available for download from the City of Corona's website at [www.CoronaCa.gov/government/departments/community-development/planning-division](http://www.CoronaCa.gov/government/departments/community-development/planning-division). A physical copy of the Draft SEIR is available for viewing at the Planning Division public counter, located at Corona City Hall, 400 S. Vicentia Avenue, Corona.



If you challenge any decision regarding the above proposal in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice or in written correspondence delivered to the Planning and Housing Commission at, or prior to, the public hearing.

Mailing Address: Planning and Development Department ♦ 400 South Vicentia Avenue ♦ Corona, CA 92882

## **Response to Comment Letter D: Northwest Mosquito and Vector Control District**

**November 4, 2024**

**Comment D-1.** Commenter requests that maintained access to riparian areas mentioned in 4.7.2A of the Draft SEIR be granted for the purposes of mosquito abatement.

**Response to D-1.** The City assumes Commenter's reference is to Mitigation Measure 4.7.2A. The City recognizes the public health benefits from control of mosquito breeding habitat, but there is no substantial evidence showing that the Project may cause a potentially significant impact on public health as a result of vectors. Further, if the Project Applicant chooses to comply with this mitigation via onsite replacement/restoration, the intent would be to create riparian oak woodland habitat and streams. Such restoration would not include creation of small lakes, ponds or large flat areas prone to ponding and therefore creation of mosquito habitat would not occur. No changes to the Draft SEIR are required.

**Comment D-2.** Commenter requests that mosquito breeding habitat control measures be included in the drainage and water quality structures as mentioned in 4.11.1-3.

**Response to D-2.** The City assumes Commenter's reference is to Mitigation Measures 4.11.1A through 4.11.3D. Similar to the prior comment, the City recognizes the public health benefits from control of mosquito breeding habitat, but there is no substantial evidence showing that the Project may cause a potentially significant impact on public health as a result of vectors. Nonetheless, the City will work with the Project Applicant to design the on-site drainages and basins so that captured water does not remain standing for more than five days provided the primary drainage and flood retention function of these structures is not compromised. No changes to the Draft SEIR are required.

**Comment D-3.** Commenter requests that utility vaults be designed and located to prevent collection of runoff and irrigation water.

**Response to D-3.** There is no substantial evidence showing that the Project may cause a potentially significant impact on public health as a result of vectors. Nonetheless, the City will work with the Project Applicant to design and located on-site utility vaults to prevent the collection of runoff and irrigation water and the creation of standing water. No changes to the Draft SEIR are required.

**Comment D-4.** Commenter supports the expansion of biological habitat and the wildlife corridor benefits afforded by Relocated PCL-1. Commenter notes "the interface between undeveloped and urbanized spaces can increase the exposure to vectors of disease." Commenter has noted increased

rodent activity in new housing tracts and therefore recommends rodent exclusion measures by included in the development project. Commenter also notes wildlife corridors near development can introduce undesirable tick and flea populations that can harbor human and animal diseases. Commenter request that they be provided with maintained access to these undeveloped areas for surveillance, especially in the areas abutting residential spaces.

**Response to D-4.** Please see the City’s related response to Comment A-1. Again, the City recognizes the public health benefits from control of unwanted rodents, ticks and fleas, but there is no substantial evidence showing that the Project would increase vector or rodent populations or that the Project may cause a potentially significant impact on public health as a result of animals occupying natural open space, including vectors and rodents. A majority of the undeveloped open space areas will be dedicated to the Western Riverside County Regional Conservation Authority (RCA) as part of the habitat conservation assemblage function of the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP). The intent of these areas is to provide sensitive plant and wildlife species with protected native habitat blocks to ensure their long-term survival. The City suggests Commenter coordinate with the RCA regarding maintained access for vector surveillance on the property that will be conveyed to the RCA. RCA’s access to the open space including for any maintenance needs will be available from Fresno Road. No changes to the Draft SEIR are required.

**Subject:** FW: GPA2020-0002, SPA2020-0006, TTM 37963, PP2020-0004  
**Date:** Tuesday, November 12, 2024 at 10:03:10 AM Pacific Standard Time  
**From:** Sandra Vanian  
**To:** Raymond Hussey

Ray, please see below.

Sincerely,  
Sandra Vanian,  
Planning Manager

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**From:** Mauricio Alvarez <malvarez@riversidetransit.com>  
**Sent:** Tuesday, November 12, 2024 9:51 AM  
**To:** Sandra Vanian <sandra.vanian@coronaca.gov>  
**Subject:** GPA2020-0002, SPA2020-0006, TTM 37963, PP2020-0004

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

Good Morning Sandra,

Thank you for including RTA in the notice of the public hearing for the proposed warehouse project on Green River Rd & Dominguez Ranch Road. After further review, there are no comments to submit for this particular project.

Thank you,

**Mauricio Alvarez, MBA**

Planning Analyst  
Riverside Transit Agency  
p: 951.565.5260 | e: [malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)  
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)  
1825 Third Street, Riverside, CA 92507

## **Response to Comment Letter E: Riverside Transit Agency**

**November 14, 2024**

**Comment E-1.** Commenter states they have no comments regarding the project.

**Response to E-1.** No response required.

**Subject:** FW: 11/13/24-GPA2020-0002:SPA2020-0006:TTM 37963:PP2020-0004:  
**Date:** Wednesday, November 13, 2024 at 12:23:03 PM Pacific Standard Time  
**From:** Sandra Vanian  
**To:** Raymond Hussey  
**Attachments:** 20241113113647.pdf

Ray, below is a response from SoCalGas for the Green River Ranch project.

Sincerely,  
Sandra Vanian,  
Planning Manager

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**From:** SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>  
**Sent:** Wednesday, November 13, 2024 12:01 PM  
**To:** Sandra Vanian <sandra.vanian@coronaca.gov>  
**Cc:** SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>  
**Subject:** 11/13/24-GPA2020-0002:SPA2020-0006:TTM 37963:PP2020-0004:

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

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

Hello,

I just reviewed the documents regarding **GPA2020-0002:SPA2020-0006:TTM 37963:PP2020-0004:**

SoCalGas Distribution does have facilities in the area. Please note on case to have Developer contact 811 / USA at [DigAlert | Utility Locating California | Underground Wire & Cable Locator](#) prior to any excavation / demolition activities so we can Locate & Mark out our facilities. **Any excavation activity within ten (10) feet of our High-Pressure facilities will require a SoCalGas employee standby.**

If the Developer needs new gas service, please have them contact our Builder Services group to begin the application process as soon as practicable, at <https://www.socalgas.com/for-your-business/builder-services>.

**To avoid delays in processing requests and notifications, please have all Franchise corespondence sent to our Utility Request inbox, at [SCGSERegionRedlandsUtilityRequest@semprautilities.com](mailto:SCGSERegionRedlandsUtilityRequest@semprautilities.com)**

I cover the **Southeast Region – Redlands** [SCGSERegionRedlandsUtilityRequest@semprautilities.com](mailto:SCGSERegionRedlandsUtilityRequest@semprautilities.com) would be your contact for requests in the southeastern ends of LA County, Riverside County, San Bernardino & Imperial Counties.

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↑ F-2  
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**Southeast Region - Anaheim** office which is all of Orange County and the southern ends of Los Angeles County; therefore, any Map and/or Will Serve Letter requests you have in these areas please send them to [AtlasRequests/WillServeAnaheim@semprautilities.com](mailto:AtlasRequests/WillServeAnaheim@semprautilities.com)

**Northwest Region – Compton HQ** For West and Central LA County, your Map Request and Will Serve Letters, will go to [SCG-ComptonUtilityRequest@semprautilities.com](mailto:SCG-ComptonUtilityRequest@semprautilities.com)

**Northwest Region - Chatsworth**

For any requests from the northern most parts of LA County all the way up to Visalia, San Luis Obispo, Fresno and Tulare you would contact [NorthwestDistributionUtilityRequest@semprautilities.com](mailto:NorthwestDistributionUtilityRequest@semprautilities.com)

**Transmission**

For Transmission requests, please contact SoCalGas Transmission, at [SoCalGasTransmissionUtilityRequest@semprautilities.com](mailto:SoCalGasTransmissionUtilityRequest@semprautilities.com)

READ MORE .....

**MINOR STREET IMPROVEMENT PROJECTS: (CHIP SEAL, SLURRY SEAL, GRIND & OVERLAY)**

**Please notify Southern California Gas Company 4 months prior to start of pavement projects for the gas company to complete leak survey & repair leaks if found.**

**MAJOR STREET IMPROVEMENT PROJECTS: (PROJECTS REQUIRING EXCAVATIONS GREATER THAN 9 INCHES, WIDENING OF EXISTING STREETS, INSTALLING NEW CURBS & GUTTERS, BUS PADS, TRAFFIC SIGNALS, REALIGNMENT, GRADE SEPARATION, ETC.)**

**&**

**PIPELINE PROJECTS: (STORM DRAIN, WATERLINE, WATER, SEWER, ELECTRICAL, TELECOMMUNICATIONS, ETC.)**

**Please provide Southern California Gas Company with your signed designed plans**

**with gas company facilities posted on your designs plans, 4-6 months prior to start of construction for possible relocation of SCG medium pressure facilities and 9-12 months for possible relocation of SCG high pressure facilities.**

This time is needed to analyze plans and to design required alterations to any conflicting SCG gas facilities. Please keep us informed of any and all pre-construction meetings, construction schedules, etc., so that our work can be scheduled accordingly. Potholing may be required to determine if a conflict exists between the proposed development and our facilities. If, for any reason, there are SCG facilities in conflict, and a request to be relocated is needed, it is important to send the request in writing. Please include all required information below:

- **A Signed “Notice to Owner” request on Official Letterhead from the City, County, and/or company.**
- **Name, Title and Project Number.**

- **Address, Location, Start Date, Parameters & Scope of Entire Job/Project.**
- **Copy of Thomas Guide Page and/or Google Map Screenshot Highlighting Project Area.**
- **Requestor Company's Contact Name, Title, Phone Number, Email, and other pertinent information.**

Thank you,  
Josh Rubal  
Lead Planning Associate  
Distribution Planning & Project Management  
Redlands HQ - Southeast Region  
(213) 231-7978 Office  
[SCGSERegionRedlandsUtilityRequest@semprautilities.com](mailto:SCGSERegionRedlandsUtilityRequest@semprautilities.com)

## **Response to Comment Letter F: Southern California Gas Company**

**November 13, 2024**

**Comment F-1.** Commenter notes gas facilities are located in the project area and for the developer to contact USA DigAlert prior to excavation and demolition activities so that SoCalGas can locate and mark their facilities. Commenter also notes activity within ten (10) feet of their high-pressure facilities will require a SoCalGas employee standby.

**Response to F-1.** Comment acknowledged; SoCalGas's construction practices are understood. The City routinely ensures that project applicants comply with SoCalGas's construction practices for the hazard prevention and safety benefits they promote. No changes to the Draft SEIR are required.

**Comment F-2.** For new gas service, Commenter notes the Developer should contact SoCalGas Builder Services Group to begin the application process as soon as practicable.

**Response to F-2.** Comment acknowledged. This comment does not address the environmental analysis contained in the Draft SEIR. The project applicant (developer) has been advised of SoCalGas's application process. No changes to the Draft SEIR are required.

November 14, 2024

# Advocates for the Environment



Sandra Vanian  
Planning Manager  
City of Corona – Planning & Development Department  
400 S. Vicentia Ave., Ste. 120  
Corona, CA 92882

A non-profit public-interest law firm  
and environmental advocacy organization

Via U.S. Mail and email to [Sandra.Vanian@CoronaCa.gov](mailto:Sandra.Vanian@CoronaCa.gov)

Re: Comments on the Draft Subsequent Environmental Impact Report for the Green River Ranch Specific Plan Amendment and Industrial Business Park Project, SCH No. 2022080640

Dear Ms. Vanian:

Advocates for the Environment submits the comments in this letter regarding the Draft Subsequent Environmental Impact Report (EIR) for the Green River Ranch Specific Plan Amendment and Industrial Business Park Project (**Project**). The Project Site is located near the cross streets of Dominguez Ranch Road and Green River Road in the City of Corona (**City**), in Riverside County. The Project would involve developing 5.5 acres of “General Commercial” uses, 49.52 acres of “Business Park Industrial” (**BPI**), up to 32 “Estate Residential” lots on 20.39 acres, 83.55 acres of “Open Space General” land uses, and 1.44 acres of roads, all on the 160.4-acre Project Site. We have reviewed the EIR released in October 2024 and submit comments regarding the sufficiency of the EIR’s Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**).

## ***The City Should Require the Project to be Net-Zero***

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions.

It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now



G-1

FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that “achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.” (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: “it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed ... in order to meet our GHG and air quality targets.” (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.)

Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would help protect the City and the Applicant from CEQA GHG litigation.

G-1 cont'd

## **CEQA GHG Significance Analysis**

The EIR derived its GHG significance thresholds from the CEQA Appendix G Guidelines: whether the Project would generate GHG emissions that may have a significant impact, and whether the Project would conflict with an applicable plan, policy, or regulation for the reduction of GHG emissions. (EIR, p. 4.8-17.) The City used CalEEMod to quantify the net Project’s annual emissions, which were reported to be 19,208.02 metric tons of carbon dioxide equivalent (**MTCO<sub>2e</sub>**) per year. (EIR, p. 4.8-19.) The EIR concluded that the Project’s GHG emissions would be less than significant after mitigation. (EIR, p. 4.8-20.)

### **Consistency with Identified Applicable Plans**

The EIR includes a discussion of the City of Corona Climate Action Plan (**CAP**) and the 2022 Scoping Plan as evidence that the Project would not conflict with any applicable plan, policy, or regulation for GHG emissions reductions. This significance analysis violates CEQA by failing to provide the necessary information to analyze the Project's consistency with the CAP, overlooking the Project’s conflict with the 2022 Scoping Plan, and failing to acknowledge and analyze all applicable plans for the reduction of GHGs. This Project is inconsistent with several applicable plans that were excluded. As a result, this significance analysis violates CEQA by being deficient and misleading in several areas.

G-2

## Failure to provide information needed to analyze consistency with the CAP

CEQA requires that EIRs include enough information to fully inform decision-makers and the public. Here, the EIR fails to include critical information necessary for assessing the project's consistency with the CAP. Specifically, the EIR does not detail the GHG reduction measures that the Project, will implement to meet the mandated 100-point requirement in the CAP or how the points will be apportioned. This omission hinders a comprehensive evaluation of the project's environmental impacts and violates CEQA, which requires full disclosure of relevant information to inform decision-makers and the public. Without this information, it remains unclear whether the Project aligns with the GHG reduction goals set forth by the CAP.

The Project chooses to demonstrate consistency through the CAP's point system rather than adhering to an established numerical threshold of significance for GHG emissions. As a result of this chosen threshold, the project proposes MM GHG 1. According to this measure, prior to issuing a building permit, the applicant shall provide documentation demonstrating that the improvements and/or buildings include the measures from the CAP screening tables (Appendix C to the CAP), as needed to achieve a minimum of 100 points for both the residential and non-residential portions. Alternatively, specific measures may be substituted for other measures that achieve an equivalent amount of GHG reductions, subject to review. (DEIR, p. 4.8-21.) While the EIR claims that incorporation of this mitigation measure will result in less than significant emissions, it does not provide sufficient information to analyze the extent of GHG emissions reductions that the 100 points would achieve.

Neither the EIR nor the Appendix provide a copy of the CAP screening tables or specify which measures the project will commit to in order to reach the required 100-point minimum; instead, the EIR defers the selection of these measures to a future date. Mixed-use projects, such as this one, must complete both Table 1 and Table 2 of the CAP (CAP Appendix C, p. 6). However, both tables are missing from the EIR. As it currently stands, the language of MM GHG 1 defers the selection of the measures needed to achieve the 100 points for both the residential and non-residential portions of the project. The EIR withholds critical information from the general public by deferring these details to the future, leaving the public without a clear understanding of how GHG reductions will be achieved.

Furthermore, the requirement to identify specific measures for achieving the 100 points is especially pertinent because the CAP mandates that mixed-use projects when filling out table 1 and 2 are required to proportion the points identical to the proportioning of the mix of uses. (CAP Appendix C, p. 6). The EIR fails to provide this crucial information. To ensure consistency with the CAP, the selected measures must be detailed to confirm they are appropriately proportioned to reflect the project's mixed-use nature. Without this information, the project may allocate points arbitrarily between the two tables, potentially resulting in inadequate GHG emission reductions.

This lack of information not only undermines transparency but also makes it difficult to ascertain whether the selected measures would effectively contribute to GHG emissions reductions.

G-3

By failing to provide the necessary details, the EIR violates CEQA’s mandates for full disclosure, thereby jeopardizing the integrity of the efforts aimed at achieving meaningful GHG reduction goals.

G-3  
cont'd

### **Inadequate Commitment to the CAP**

The inclusion of an alternative provision in MM GHG-1 undermines the project’s commitment to the CAP’s GHG reduction goals. While the measure requires the project applicant to demonstrate compliance with the CAP GHG Emissions Screening Tables to achieve a minimum of 100 points, it also allows for the substitution of specific measures with alternatives that purportedly achieve equivalent GHG reductions. (DEIR, p. 4-8-21.) This flexibility introduces uncertainty and potential inconsistency in how GHG reductions are realized. The flexibility undermines the integrity of the consistency analysis because it is unclear which CAP measures would have been chosen for the Project and it is difficult to calculate the associated GHG reductions with the measures in the screening tables. MM GHG-1 is therefore vague and unenforceable, in violation of CEQA.

G-4

### **The Project Would be Inconsistent with the 2022 Scoping Plan**

The DEIR asserted that the Project would not conflict with the 2022 Scoping Plan. Yet, there are some policies in the 2022 Scoping Plan that the Project would not adhere to. The 2022 Scoping Plan sets a goal for 50% of all industrial energy demand to be electrified by 2045 (2022 CARB Scoping Plan, p. 77).<sup>1</sup> The EIR makes no showing that the Project is consistent with this goal. The 2022 CARB Scoping Plan also places particular emphasis on decarbonizing industrial facilities by “displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions” (2022 CARB Scoping Plan, p. 208). Again, the Project does not appear to be consistent with this goal, based on the analysis provided in the EIR. The Project creates a conflict with the 2022 Scoping Plan by its heavy reliance on diesel fuel in its operations. (See EIR, p. 4.6-19 [noting an estimate of over a million gallons of combined diesel and gasoline consumed annually for operations.]) Accordingly, the Project would have a significant GHG impact under the City’s chosen significance threshold.

G-5

### **The EIR Should Have Analyzed All Applicable Plans**

The City chose, as its second GHG threshold, whether the Project would “conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.” (EIR, p. 4.8-18.) This language requires that the EIR analyze the Project’s consistency with all other applicable plans, not just the plans that the City prefers to analyze.

G-6

An agency must consider a project’s GHG impact over time to reasonably evaluate the full extent of environmental impact as CEQA requires. The EIR did not account for the Project’s lifespan,

<sup>1</sup> 2022 Scoping Plan located at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

which is presumed to be 30 years due to the construction impact being amortized over a 30-year period. (EIR, p. 4.8-19.) Therefore, the Project must show consistency with long-term State GHG goals, including Executive Order B-55-18 (EO B- 55-18), and the 2017 CARB Scoping Plan.

EO B-55-18 requires the State of California to achieve carbon neutrality—net zero GHG emissions—by 2045. The Project is inconsistent with EO B-55-18 because it does not prohibit the use of gasoline, diesel, and natural gas. In fact, the Project would use diesel-powered equipment during construction, and require five emergency diesel-powered fire pumps during operations. (EIR, p. 4.6-18; Appendix I p, 54.) Burning non-renewable fuels, such as diesel, results in substantial GHG emissions, preventing the Project from ever achieving carbon neutrality, unless it enters into agreements with the applicant and/or future tenant to ensure that fossil fuel use is on track to be eliminated by 2045. Thus, the Project would conflict with EO B-55-18. As stated by the City’s chosen threshold, conflict with *any* applicable policy would be a significant GHG impact.

The 2017 Scoping Plan was developed to help California comply with SB 32, which mandates a 40% reduction in GHG emissions below 1990 levels by 2030 (Health & Safety Code § 38566). The EIR does not explain how the Project aligns with these objectives or the 2050 goal of reducing emissions by 80% below 1990 levels. Moreover, the 2017 Scoping Plan sets statewide per capita GHG emissions targets of 6 MTCO<sub>2e</sub> by 2030 and 2 MTCO<sub>2e</sub> by 2050 (CARB Scoping Plan, p. 99).

With the Project’s per-service population GHG emissions of around 17 MTCO<sub>2e</sub>/capita, the Project significantly overshoots the 2050 target.<sup>2</sup> Further, there is no evidence that the Project would implement measures to reach the target by 2050. Given that this reduction must be achieved within the Project’s operational lifespan, it is evident that the Project will remain inconsistent with the 2017 Scoping Plan’s long-term goals. Therefore, the Project’s GHG impact is significant under the second threshold because it directly conflicts with established plans for reducing GHG emissions.

Consequently, because the Project is inconsistent with applicable plans for the reduction of GHGs, it is significant under the second threshold.

G-6  
cont'd

### MM GHG-1 is Improperly Deferred

A lead agency must describe and analyze proposed mitigation measures in the EIR and cannot defer to a later time the discussion of mitigation measures—including the potential impact of any mitigation measures taken. Here, MM GHG-1, which defers the decision on particular measures from the Screening Tables to implement until just prior to the issuance of a building permit. (EIR, p. 4.8-21.) This is improper deferral because the City is required to identify the specific, enforceable measures during the preparation of the EIR, and MM GHG-1 does not enforce achieving 100 points on the Screening Tables because it allows for an alternative in which specific measures may be “substituted for other measures,” without identifying any standards for determining appropriate

G-7

<sup>2</sup> 19,208.02 MTCO<sub>2e</sub> ÷ 1,125 employees = 17.07 MTCO<sub>2e</sub>/service population

substitutions. Thus, the discussion of MM GHG-1 did not demonstrate that it could reduce the Project's GHG impact to a less than significant level, let alone the fair share which is required for cumulative GHG impact.

↓  
G-7  
cont'd

## Conclusion

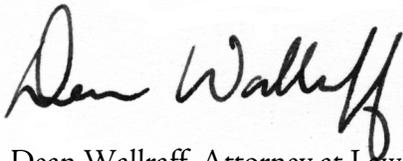
In conclusion, the Project would have a significant GHG impact under the chosen threshold of consistency with applicable plans because the Project is not consistent with applicable plans, policies, and regulations for the reduction of GHGs. The Project's impacts are therefore significant, under the threshold adopted by the City. MM GHG-1 is an inadequate mitigation measure to reduce the Project's GHG impact because it is unenforceable and improperly deferred.

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G-8

Please put Advocates for the Environment on the list of interested parties to receive updates about the progress of this potential project approval. We make this request under Public Resources Code, section 21092.2.

↑  
G-9  
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Sincerely,



Dean Wallraff, Attorney at Law  
Executive Director, Advocates for the Environment

## **Response to Comment Letter G: Advocates for the Environment**

**November 14, 2024**

**Comment G-1.** Commenter suggests the Project’s potential impacts due to GHG emissions should have relied on a net-zero significance threshold because buildings generate a large portion of global GHG emissions. Commenter notes State policy intended to achieve net zero by 2045, identifies two residential developments in other parts of California that were able to achieve net zero as a result of successful legal challenges from environmental groups, and repackages their suggestion that the Project Applicant be held to a net-zero significance threshold in response to this threat of lawsuit. Commenter provides several citations to the California Air Resources Board (CARB) 2022 Scoping Plan, and again repackages their opinion that it “would not only be the right thing for the City to do, but also would help protect the City and the Applicant from CEQA GHG litigation.”

**Response to G-1.** The City acknowledges CARB’s “net-zero” 2045 target for the State; however, there is no requirement at this time for individual developments to achieve a net-zero GHG contribution on a project-by-project basis. The Project would conform with all existing and future applicable GHG emissions reductions policies and regulations and includes mitigation that would control and reduce GHG emissions to the extent feasible and consistent with City requirements. In this manner, the Project promotes attainment of CARB’s statewide net-zero target. In addition, it is noted that the two developments cited by Commenter as achieving net zero emissions both consist of mixed-use residential development projects, and neither of these developments include business park industrial warehouse buildings like the buildings proposed as part of the Green River Ranch project.

The Commenter is referred to Draft SEIR Table 4.8-1, which shows that 74.6% of the Project’s overall GHG emissions would be due to mobile source emissions (14,336.03 CO<sub>2</sub>e mobile sources ÷ 19,208.02 CO<sub>2</sub>e all sources = 0.746). Neither the Project Applicant nor the City have the ability to regulate emissions from tailpipes, as the federal government and the State are the only entities capable of regulating tailpipe emissions. Moreover, it would not be feasible to impose a requirement that all of the Project’s heavy-duty trucks must be fully electric vehicles.

Commenter is referred to the three page memorandum prepared by Urban Crossroads, titled, "Infeasibility of All-Electric Trucks Memorandum," and dated October 16, 2024, which follows these responses to comment letter G (Urban Crossroads, 2024). As noted therein, there is not enough electrical grid power to sustainably charge medium- and heavy-duty trucks. For example, a trucking company in Joliet, Illinois attempted to electrify 30 trucks at their terminal. Shortly after this plan was implemented, local officials shut it down because it was found this relatively small number of trucks demanded more electricity to recharge than needed to power

the entire City of Joliet.<sup>1</sup> Similarly and even more relevant because of its location in California, a company attempted to electrify 12 forklifts which require significantly less power than trucks. Local power utilities told the California company that it was not possible.<sup>2</sup> In a May 2023 report by Resources for the Future, titled *Medium- and Heavy-Duty Vehicle Electrification: Challenges, Policy Solutions, and Open Research Questions*, the report states that medium- and heavy-duty electric vehicles (“MHDEVs”) charging (which may exceed several megawatts [MWs] of demand for large fleets) could destabilize electricity distribution systems.<sup>3</sup> Additionally, due to logistical and operational barriers, MHDEVs are not comparable to diesel vehicles in model options, range, recharge time, payloads, and maintenance.<sup>4</sup> MHDEVs currently have a range of below 200 miles, versus more than 1,000 miles for diesel vehicles.<sup>5</sup> And recharge times are substantially longer than diesel refueling. A clean diesel truck spends approximately 15 minutes, refuels anywhere in the country, and can travel approximately 1,200 miles before refueling.<sup>6</sup> Current long-haul battery electric trucks can travel approximately 150-330 miles and can take up to 10 hours to charge.<sup>7</sup> Fleets without a charging depot will need to rely on public charging stations because significant investment must be made prior to widespread public charging is available for truck recharging.<sup>8</sup> In addition to the barriers described above, zero-emission trucks are much more costly to fleet owners. A new, clean-diesel long-haul tractor typically costs in the range of \$180,000 to \$200,000.<sup>9</sup> In comparison, a comparable battery-electric tractor with only a quarter of the range and thus requiring frequent and long hours of charging costs upwards of \$480,000.<sup>10</sup> In addition, each charging station installation can exceed \$100,000,<sup>11</sup> and public charging stations and required infrastructure for such charging is not widely available.<sup>12</sup>

There is a significant constraint in sourcing enough raw minerals needed to produce the lithium-ion batteries used in zero-emission trucks. Tens of millions of tons of cobalt, graphite, lithium, and nickel will need to be produced estimated to take up to 35 years to acquire all the minerals needed to generate enough truck batteries for current levels of global production.<sup>13</sup> Expanding

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<sup>1</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>2</sup> Id.

<sup>3</sup> [https://media.rff.org/documents/Report\\_23-03\\_v3.pdf](https://media.rff.org/documents/Report_23-03_v3.pdf)

<sup>4</sup> Id.

<sup>5</sup> Id.

<sup>6</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>7</sup> Id.

<sup>8</sup> [https://media.rff.org/documents/Report\\_23-03\\_v3.pdf](https://media.rff.org/documents/Report_23-03_v3.pdf)

<sup>9</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>10</sup> Id.

<sup>11</sup> [https://media.rff.org/documents/Report\\_23-03\\_v3.pdf](https://media.rff.org/documents/Report_23-03_v3.pdf)

<sup>12</sup> <https://www.ccjdigital.com/alternative-power/battery-electric/article/15545697/charging-forward-with-electric-truckcharging-stations>

<sup>13</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

capacity and sourcing this amount of material creates unknown and unanticipated environmental effects, that in some respects could exceed the emissions of current clean-diesel trucks.<sup>14</sup>

California's zero-emission trucking regulations have been challenged by numerous other states as an unconstitutional restraint on interstate commerce, and are at least partially unenforceable while the legal challenges are pending, and could ultimately be determined to be unlawful. In January 2025, the California Air Resources Board (CARB), recognizing the challenges, withdrew its request for a waiver from the U.S. Environmental Protection Agency for its Advanced Clean Fleets Rule which would have phased out diesel trucks in the State.<sup>15</sup> Further, Southern Californian Edison (SCE) is already challenged to provide electrical capacity throughout its service area, and aggressive implementation of EV truck charging would exacerbate challenges in providing additional capacity. Accordingly, imposing a requirement to use fully electric trucks is infeasible.

Additionally, the SEIR demonstrates why, with mitigation, the Project's GHG emissions will be less than significant. CEQA does not require the imposition of mitigation for insignificant impacts. (State CEQA Guidelines 15126.6(a)(3).) Thus, no further mitigation is required, and no changes to the Draft SEIR are required.

**Comment G-2.** Commenter correctly notes the Draft SEIR includes an analysis of the Project's consistency with the City's Climate Action Plan (CAP) and the 2022 State Scoping Plan as evidence that the Project would not conflict with any applicable plan, policy, or regulation for GHG emissions reductions. Commenter asserts the Draft SEIR significance analysis violates CEQA by failing to provide the necessary information to analyze the Project's consistency with the CAP, overlooking the Project's conflict with the 2022 Scoping Plan, and failing to acknowledge and analyze all applicable plans for the reduction of GHGs including inconsistencies with several applicable plans that were excluded. Commenter asserts the Draft SEIR significance analysis violates CEQA by being deficient and misleading in several areas.

**Response to G-2.** The assertions contained in Comment G-2 summarize the assertions presented previously in comments G-3 through G-6. Those comments and responses are presented below.

**Comment G-3.** Commenter asserts the Draft SEIR "fails to include critical information necessary for assessing the project's consistency with the CAP." Specifically, Commenter suggests the Draft SEIR does not detail the GHG reduction measures that will be selected by the Project Applicant to meet the CAP's 100-point requirement. Commenter correctly notes Mitigation Measure GHG-1 requires prior

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<sup>14</sup> Id.

<sup>15</sup> <https://www.truckinginfo.com/10234488/california-abandons-advanced-clean-fleets-rule>

to issuance of each building permit that the applicant provide documentation demonstrating the improvements and/or building measures contained in the CAP screening tables to be implemented and thus attain the CAP's 100-point requirement. Commenter notes neither the EIR nor the Appendix provide a copy of the CAP screening tables or specify which measures the project will commit to in order to reach the required 100-point minimum; instead, deferring selection of these measures to a future date. Commenter concludes that this omission hinders a comprehensive evaluation of the project's consistency with the CAP, violating CEQA's requirement for full disclosure, calling into question the Project's consistency with the GHG reduction goals set forth by the CAP.

**Response to G-3.** In accordance with CEQA, environmental review of a development project's impacts from GHG emissions can be streamlined through lead agency approval of a "qualified" GHG reduction plan that includes an evaluation process whereby a project found to be consistency with the plan is considered to have a less than significant impact associated with GHG emissions. This significance determination is clearly spelled out in CEQA Guidelines Section 15064.4 (b)(3) whereby "the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable."

The City's CAP meets the definition of qualified plan because it is based on a baseline GHG emissions inventory, includes a methodology for tracking and reporting future GHG emissions, provides recommendations for GHG reduction strategies in support of these efforts, and meets the goals and objectives of the State's long-term climate goals or strategies. As correctly stated by the Commenter and as described on pages 4.8-11 and 4.8-12 of the Draft SEIR, the City's CAP utilizes a point system to determine consistency. Regardless of project type or size, each development project must implement various GHG reduction measures contained in the CAP's Screening Tables that equal 100 points. In the case of the proposed Project, these measures will be identified at the time of each building permit. In this way the ultimate tenant can select what measures to add in the design and construction of their project to result in 100 points. The City's CAP point system was designed such that 100 points of reduction measures would reduce a development project's GHG emissions and together with GHG reduction from other development projects and enable the City to meet the State's mandated GHG reduction goals.

The 100-point system is not deferred mitigation because it meets the three conditions discussed in CEQA Guidelines Section 15126.4 that allows for the details of a mitigation measure to be developed after project approval. The three conditions are when a lead agency: (1) commits itself to the mitigation; (2) adopts specific performance standards the mitigation will achieve; and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation

measure. The 100-point system meets these three conditions and has been used in numerous other local qualified CAPs throughout the State including several in the region such as Riverside County, San Bernardino County, City of Ontario, City of Chino, City of Colton. No changes to the Draft SEIR are required.

**Comment G-4.** Commenter questions the alternative provision contained in MM GHG-1, asserting it undermines the project's commitment to the CAP's GHG reduction goals. Commenter claims by allowing the substitution of measures to meet the 100-point value, the flexibility creates uncertainty and the potential for inconsistency in how GHG reductions are obtained in violation of CEQA.

**Response to G-4.** The intent of the alternate provision contained in MM GHG-1 is to allow for flexibility in the selection of the specific GHG reduction measures. This flexibility does not create uncertainty because it requires the City's Building Division to review and approve such alternate measures. The purpose of this flexibility is to allow for GHG reduction measures that were not envisioned at the time the CAP was prepared. For example, new and emerging technologies, new materials, etc. No changes to the Draft SEIR are required.

**Comment G-5.** Commenter asserts that the Project would conflict with the State 2022 Scoping Plan because several goals are not discussed in the Draft SEIR. These include goals for: shifting to 50% of all industrial energy demand to electric by 2045; and decarbonizing industrial facilities by "displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions." Commenter asserts the Project's heavy reliance on diesel fuel in its operations estimated at a million gallons of combined diesel and gasoline consumed annually. Commenter concludes the Project would have a significant GHG impact under the City's significance threshold.

**Response to G-5.** As discussed in response to comment G-3, the City has a qualified CAP. The City's CAP is consistent with the State Scoping Plan and meets the long-term climate goals and strategies contained therein. (See Response to Comment G-3, above.) No changes to the Draft SEIR are required.

**Comment G-6.** Commenter asserts that the Draft SEIR failed to analyze all applicable plans.

**Response to G-6.** As discussed in response to comment G-3, the City has a qualified CAP which ensures that GHG emission are comprehensively addressed. (See Response to Comment G-3, above.) No changes to the Draft SEIR are required.

**Comment G-7.** Commenter asserts that MM GHG-1 constitutes improper deferral of mitigation.

**Response to G-7.** As discussed in response to comment G-3, the City's CAP 100-point system is not deferred mitigation. Deferred mitigation does not include measures that are selected after project approval provided the City: (1) commits itself to the mitigation; (2) adopts specific performance standards the mitigation will achieve; and (3) identifies the type(s) of potential

action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. The 100-point system meets these three conditions. (See Response to Comment G-3, above.) No changes to the Draft SEIR are required.

**Comment G-8.** Commenter concludes by summarizing the previously made assertions presented in comments G-1 through G-7. These are: the Project would have a significant GHG impact under the chosen threshold of consistency with applicable plans because the Project is not consistent with applicable plans, policies, and regulations for the reduction of GHGs and the Project's impacts are significant under the threshold adopted by the City; and MM GHG-1 is an inadequate mitigation measure to reduce the Project's GHG impact because it is unenforceable and improperly deferred.

**Response to G-8.** These assertions were previously addressed in responses to comments G-1 through G-7. No changes to the Draft SEIR are required.

**DATE:** October 16, 2024  
**TO:** Tracy Zinn, T&B Planning  
**FROM:** Haseeb Qureshi, Urban Crossroads, Inc.

## **INFEASIBILITY OF ALL-ELECTRIC TRUCKS MEMORANDUM**

This memorandum discusses how although all-electric trucks may be physically available, albeit not in sufficient quantity, there are further economic and infrastructure related constraints that make including a mitigation measure requiring all trucks accessing the Project site to be zero emissions—wholly infeasible today, and likely well into the future.

### **ZERO-EMISSION ELECTRIC TRUCKS ARE CURRENTLY INFEASIBLE**

#### **A. ELECTRIC GRID CAPACITY IS INSUFFICIENT**

The first major issue that makes requiring all trucks accessing the Project site to be zero-emissions infeasible, is that there is not enough electrical grid power to sustainably charge these trucks. For example, one trucking company tried to electrify just 30 trucks at a terminal in Joliet, Illinois. Shortly after this plan began, local officials shut it down, commenting that it would draw more electricity than is needed to power the entire city.<sup>1</sup> Even more relevant, a California company attempted to electrify 12 forklifts, which require significantly less power than trucks.<sup>2</sup> Local power utilities told the California company that it was not possible.<sup>3</sup> In a May 2023 report by Resources for the Future, titled *Medium- and Heavy-Duty Vehicle Electrification: Challenges, Policy Solutions, and Open Research Questions*, the report states that MHDEV charging (which may exceed several MWs of demand for large fleets) could destabilize electricity distribution systems.<sup>4</sup> Therefore, significant investments into the grid, transmission system, and generation capacity is required.<sup>5</sup> If the Project requires each and every truck entering the facility to be zero-emissions this will put a significant strain on California's power grid; one the grid cannot handle in the short-term, must less sustain in the long run.

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<sup>1</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>2</sup> Id.

<sup>3</sup> Id.

<sup>4</sup> [https://media.rff.org/documents/Report\\_23-03\\_v3.pdf](https://media.rff.org/documents/Report_23-03_v3.pdf)

<sup>5</sup> Id.

## **B. LOGISTICS AND OPERATION BARRIERS ARE VAST**

Not only can local and state electrical infrastructure not sustain fully electric trucks, the logistical and operational barriers of using such trucks is also extremely prohibitive. To gain widespread use, Medium- and heavy-duty electric vehicles (“MHDEVs”) must be comparable to diesel vehicles in model options, range, recharge time, payloads, and maintenance.<sup>6</sup> However, MHDEVs generally have ranges below 200 miles, versus more than 1,000 miles for diesel vehicles.<sup>7</sup> Additionally recharge times are substantially longer than diesel refueling. For example, a clean diesel truck can spend 15 minutes fueling anywhere in the country and then travel about 1,200 miles before fueling again.<sup>8</sup> In contrast, today’s long-haul battery electric trucks have a range of about 150-330 miles and can take up to 10 hours to charge.<sup>9</sup>

Moreover, fleets without a charging depot will need to rely on public charging stations. Unfortunately, significant investment must first be made before widespread public charging is feasible.<sup>10</sup> Lastly, weight of MHDEVs is also a significant issue that will lead to increased operational barriers. Battery-electric trucks, which run on two approximately 8,000 pound lithium ion batteries, are far heavier than clean diesel trucks.<sup>11</sup> Because trucks are subject to strict federal and state weight limits, as seen by weighing stations throughout California and the United States, requiring zero-emission battery electric trucks will significantly decrease the payload of each truck, thus requiring more trucks to be in the road and increasing both traffic congestion and tailpipe emissions.<sup>12</sup>

## **C. ZERO-EMISSION TRUCKS ARE COST PROHIBITIVE**

In addition to the barriers described above, the simple fact is that zero-emission trucks are currently too cost prohibitive for most fleet owners. A new, clean-diesel long-haul tractor typically costs in the range of \$180,000 to \$200,000.<sup>13</sup> Meanwhile, a comparable battery-electric tractor—with a quarter of the range and thus requiring frequent and long hours of charging—costs upwards of \$480,000.<sup>14</sup> This \$300,000 upcharge is cost prohibitive for the overwhelming majority of truck carriers as more than 95% of trucking companies are small businesses operating ten (10) trucks or fewer.<sup>15</sup> Enacting the mitigation CARB requests will push many truck carriers out of business, tighten capacity, and causing severe price inflation for all goods.<sup>16</sup> Not only does the trucks themselves pose a financial burden, so does the installation of a charging station, which can exceed \$100,000.<sup>17</sup> As stated previously, many small trucking businesses will thus be

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<sup>6</sup> Id.

<sup>7</sup> Id.

<sup>8</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>9</sup> Id.

<sup>10</sup> [https://media.rff.org/documents/Report\\_23-03\\_v3.pdf](https://media.rff.org/documents/Report_23-03_v3.pdf)

<sup>11</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>12</sup> Id.

<sup>13</sup> Id.

<sup>14</sup> Id.

<sup>15</sup> Id.

<sup>16</sup> Id.

<sup>17</sup> [https://media.rff.org/documents/Report\\_23-03\\_v3.pdf](https://media.rff.org/documents/Report_23-03_v3.pdf)

required to use public charging stations, in which the infrastructure for such charging is not widely available.<sup>18</sup>

#### **D. SOURCING MATERIAL IS SCARCE AND CAUSES ENVIRONMENTAL EFFECTS**

Finally, if the above challenges were not enough, there is a significant constraint in sourcing enough raw minerals needed to produce the lithium-ion batteries used in these zero-emission trucks. For example, tens of millions of tons of cobalt, graphite, lithium, and nickel will need to be produced.<sup>19</sup> It is estimated that it could take up to 35 years to acquire all the minerals needed to generate enough truck batteries for current levels of global production.<sup>20</sup> Additionally, expanding capacity and sourcing this amount of material creates massive environmental effects, that in some respects could exceed the emissions of current clean-diesel trucks.<sup>21</sup>

#### **IT WILL LIKELY TAKE SEVERAL DECADES UNTIL ZERO-EMISSION TRUCKS ARE FULLY FEASIBLE**

Although no one is for certain, it is estimated that it will take several decades to reach a point where zero-emission trucks are fully feasible, and thus allow project applicants to require the mitigation CARB suggests. This is illustrated by CARB's own goals, to require all trucks entering a California port to be zero-emission by 2035, and for 'last-mile' delivery trucks and vans to be zero-emission by 2040.<sup>22</sup> By setting these dates, which are 12 and 17 years in the future, CARB is acknowledging that current infrastructure and costs make requiring exclusively zero-emission trucks infeasible in the next decade. Significant investment in public charging, battery size, battery sourcing, battery range, and electric grid capacity must begin now, in order to meet the goals set by CARB. If these significant investments mentioned previously are not made soon, it is unlikely CARB will meet the set dates and goals established.

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<sup>18</sup> <https://www.ccjdigital.com/alternative-power/battery-electric/article/15545697/charging-forward-with-electric-truck-charging-stations>

<sup>19</sup> <https://www.trucking.org/news-insights/heavy-dose-reality-electric-truck-mandates>

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> <https://ww2.arb.ca.gov/news/california-takes-bold-step-reduce-truck-pollution>

Ms. Sandra Vanian  
City of Corona Planning & Development Department  
400 South Vincentia Ave  
Corona, CA 92882

Dear Sandra and Corona City Council Members

Re: Subsequent Draft Environmental Impact Report October 11, 2024, Green River Ranch Specific Plan

As Board Members of the Montenero Community Association a residential community of 241 homes immediately adjacent to The Green River Ranch Specific plan, we strongly object to the amendments & rezoning described in the City’s Notice of Hearing planned for November 25, 2024 including GPA 2020-002, SPA 2020-006, TTM 37963, and PP 2020-004.

While we acknowledge that private developers and landowners enjoy the right to develop their property and enjoy profit from doing the same, the revisions and rezoning requested to the original plan approved back in 2001 is radically different from the 2024 plan which will have severe and irreversible environmental impact on our collective environment & transportation. This has been stated and clarified in subsequent conversations with you.

While your hearing notice indicated that it was distributed to residents within 500 feet of the project area, this notification, while being the absolute minimum requirement, does not take into account other Homeowners Associations and communities in our area which will be impacted by the traffic flow which is already at a critical stage and had they been notified, would likely want to weigh in on this project plan. Further, it is somewhat misleading to characterize an auto trip as equivalent to that of an 18-wheeler carrying freight.

The Green River Ranch Project area is unique in that there is no additional access for commuters from Chino, Riverside, South Corona, and in fact, any commuters traveling on the 91 freeway to Orange County or Los Angeles because of the unique topography including the mountains, river, Prado Dam and the railroad. In fact, there is probably no other locale that presents so many traffic chokepoints.

As you know, Gavin Newsom recently signed AB98 into law which restricts Industrial developments of this type so close to homes, and he did that for a reason. While this project could “ fall under the radar” because of the deadlines for the enforcement of the



new provisions of AB98, it doesn't mean you should approve this rezoning; particularly since you already aware of the state's intent. Also, the State of California is intent on building more homes, which would certainly be better than an industrial warehouse project with 18 wheelers in our community..

H-3 cont'd

It seems it would be most prudent for all involved for City Council to deny this particular rezoning application and perhaps revert to a project with a smaller footprint or a project that actually benefits the City of Corona and is a true gateway into our city. As I remember most of the community was not opposed to restaurants, a hotel, and boutique gift shops and homes which would benefit us vs creating such an adverse environmental impact.

H-4

By supporting this project, it seemed like the city was mostly interested in job creation, but it also seems that most of the potential "prospects" for utilizing this industrial space are already here in the City of Corona anyway , which would not create many "net/new" jobs here , but would create a miasma of environmental and traffic issues.

We are available for discussion at your convenience.

Paul Ramlo, President

Mike Serle, Vice President

Wael Elatar, Treasurer

Martha Domingues, Secretary

Jon Hettinger, Member at Large

## **Response to Comment Letter H: Montenero Community Association Board**

**November 19, 2024**

**Comment H-1.** Commenter states the revisions and rezoning requested to the original plan approved back in 2001 is radically different from the proposed Project, and asserts the proposed Project will result in severe and irreversible environmental impacts on our collective environment and transportation.

**Response to H-1.** Commenter should note that the Project proposes both planning level changes to the entire GRRSP as well as a development proposal to construct the planning areas proposed for BPI land. The types of GC and BPI land uses proposed are currently allowed uses in the existing/approved GRRSP. However, the distribution of those land uses is proposed to be changed as compared to the existing/approved GRRSP, and would slightly expand the Specific Plan boundary. Additionally, the proposed Project would designate a large portion of the site as open space for permanent preservation for compliance with the Western Riverside County MSHCP.

Regarding the assertion that the proposed Project will result in severe and irreversible environmental impacts on our collective environment and transportation, these comments were previously addressed in response to comment letter C. As contained in the prior response from the City regarding air quality, the air quality analysis prepared for the proposed GRRSP project indicated the project would exceed certain pollutant significance standards associated with the project's operations and no mitigation is available to fully mitigate these impacts. Therefore, this is considered a significant and unavoidable impact. This is the same conclusion reached for the approved project in the 2001 EIR. Regarding transportation impacts, the 2001 EIR evaluated transportation impacts based on traffic congestions and vehicular delay to motorists. This metric for evaluating a project's transportation impacts was abolished by CEQA and replaced with use of a vehicle miles traveled (VMT) metric. VMT measures the number of "miles" traveled by vehicles associated with a project, and VMT impacts are mitigated by measures that get more individuals to travel less miles in passenger vehicles or switch mode of travel to non-vehicles. The Draft SEIR proposes mitigation measures (ride share programs, carpooling, etc.) to help reduce the project's daily VMT, but there is no amount of feasible mitigation that can fully reduce the project's VMT impact to less than significant. Therefore, this too is considered a significant and unavoidable impact. Commenter should note that the number of daily vehicular trips generated by the proposed Project compared to the original specific plan decreases by 61%. No changes to the Draft SEIR are required.

**Comment H-2.** Commenter states the hearing notice indicated that it was distributed to residents within 500 feet of the project area, and asserts this being the minimum requirement it does not take into account other HOAs and communities in our area which will be impacted by the traffic flow. Traffic flow and congestion is already at a critical stage in the area and had the notice area been expanded other would likely provide comment on the project. Commenter also asserts it is misleading to characterize an auto trip as equivalent to that of an 18-wheeler carrying freight.

**Response to H-2.** CEQA notices are distributed using one of several methods allowed by law, including the option of mailing the CEQA notices to the owners or occupants of parcels contiguous to the Project site. Public meeting notices are distributed pursuant to requirements imposed by other public transparency statutes that may have requirements that differ from those imposed by CEQA. Here, the City distributed its CEQA Notice of Availability of the Draft SEIR to properties within 500-feet of the Project site, which exceeds the requirements of CEQA. Additionally, the City posted the Notice of Availability at the County Clerk's Office and on the State Clearinghouse's website, which provided additional and far broader public notification of the proposed Project. Through these multiple public noticing processes, the City exceeded CEQA's requirements and solicited comments from any interested parties.

The Planning Commission public hearing notice was sent out 20 days prior to the hearing date of 11/25/24, and was sent separately from the NOA notice. The hearing notice was distributed to the same parties as the NOA notice, which included property owners and occupants located within a 500-ft radius of the project site, agencies, neighboring jurisdictions, and interested parties. The City also distributed the notice beyond the 500-ft radius by including all of the residents that reside within the Montenero community located adjacent to the project site. Most of the properties within the Montenero community are situated beyond the 500-ft radius, and therefore the City exceeded its own public hearing noticing requirements.

Regarding transportation impacts, the Draft SEIR fully analyzed potential cumulative traffic impacts arising from the proposed Project together with other existing and probable projects based on CEQA's required metric of Vehicle Miles Traveled (VMT). Based on that analysis, the Draft SEIR concludes that cumulative traffic impacts are significant and unavoidable, even with the imposition of all feasible mitigation. That said, it should be noted that the number of trips associated with the proposed Project is substantially fewer than the number of trips associated with the existing approved Green River Ranch Specific Plan, in part due to the reduction in commercial space building area. Specifically, the proposed Project would generate 61% fewer trips per day, 53% fewer trips in the a.m. peak hour and 60% fewer trips in the p.m. peak hour.

Finally, the EIR does not assume that a passenger car is equivalent to an 18-wheel truck. Although traffic studies often use the term “passenger car equivalent” or PCE when referring to trucks, that does not mean that passenger cars are treated the same as 18-wheel trucks. To the contrary, PCEs are commonly and widely utilized in traffic engineering to provide a conversion rate between trucks and cars. Specifically, for analysis purposes, an 18-wheel truck may be analyzed as equivalent to 2.0, 2.5, 3.0 or even 4.0 passenger automobiles in certain calculations. No changes to the Draft SEIR are required.

**Comment H-3.** Commenter states the State recently approved AB 98 that restricts industrial developments from being too close to homes. Also, Commenter notes the State is intent on building more homes, and suggests more homes would be better than an industrial warehouse project in our community.

**Response to H-3.** AB 98 was signed into law in 2024, but it does not apply to Projects that are already in process by local agencies. In general, this law may, in certain circumstances, impose state-wide building design and location regulations on new or expanded “logistics uses” of 250,000 sf or greater located within 900 feet of sensitive receptors (i.e., residences, schools, daycare center, parks, nursing homes, hospitals). Key provisions include: installation of energy-saving features such as solar panels and electric vehicle charging stations; transition to zero-emission forklifts by 2030; establishment of buffer zones between warehouses and sensitive areas such as homes, schools and parks; and establishment of truck routes that avoid residential areas. The proposed Project includes one building greater than 250,000 sf, Building 1 located in the western portion of the site, but is already more than 900 feet from the Sierra Del Oro neighborhood. Further, the Project will incorporate solar panels, and also provide over 83-acres of open space. Even if the provision of AB 98 were in effect right now, the provisions would not be applicable to the proposed Project. No changes to the Draft SEIR are required.

**Comment H-4.** Commenter suggests the City Council should deny the proposed Project and revert to a project with a smaller footprint or a project that, from the Commenter’s perspective, benefits Corona. Commenter suggests that most of the community is not opposed to restaurants, a hotel, and boutique gift shops and homes. Commenter suggests the City is mostly interested in job creation, but most of the potential “prospects” for utilizing this industrial space are already located in the City which would not create many “net/new” jobs, but would create environmental and traffic issues.

**Response to H-4.** Commenter raises comments regarding the type of land use proposed and speculation regarding City intent to promote job creation, which does not pertain to the analysis contained in the Draft SEIR and therefore a response is not necessary. No changes to the Draft SEIR are required.

**Subject:** Green River Ranch Plan

**Date:** Wednesday, November 20, 2024 at 5:58:57 PM Pacific Standard Time

**From:** ileana alvarez

**To:** Sandra Vanian

You don't often get email from ileanaae@yahoo.com. [Learn why this is important](#)

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

Hello Sandra,

My name is Ileana Alvarez, I'm a residen of corona in sierra del oro and I am writting this email to inform you that I'm agains any ammendments to the Green River Ranch Specific plan that increase traffic, noise pollution, light pollution, create carbon emission, increase exhaust or emissions from buildings, etc.

↑  
I-1  
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Feel free to reach out to me if you have any qustions

Ileana Alvarez

714-507-9756

752 Meridian Cir.

Corona, Ca

## **Response to Comment Letter I: Ileana Alvarez**

**November 20, 2024**

**Comment I-1.** Commenter states they oppose the proposed Project that increases traffic, noise pollution, light pollution, creates carbon emissions, increases exhaust or emissions from buildings, etc.

**Response to I-1.** Commenter states opposition to the Project and generally notes several environmental topics that would be affected. The comment does not provide any specific detail. Commenter is referred to the detailed analysis of these topical areas provided in the Draft SEIR Sections 4.1 Aesthetics (light pollution), 4.3 Air Quality, 4.8 Greenhouse Gas Emissions, 4.13 Noise, and 4.17 Transportation. No changes to the Draft SEIR are required.

**Subject:** FW: Green River Ranch Development

**Date:** Thursday, November 21, 2024 at 11:01:16 AM Pacific Standard Time

**From:** Sandra Vanian

**To:** Raymond Hussey

Ray, here's another one.

Sincerely,  
Sandra Vanian,  
Planning Manager

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**From:** jennifer3115 <jennifer3115@sbcglobal.net>

**Sent:** Wednesday, November 20, 2024 8:06 PM

**To:** Sandra Vanian <sandra.vanian@coronaca.gov>

**Subject:** Green River Ranch Development

You don't often get email from [jennifer3115@sbcglobal.net](mailto:jennifer3115@sbcglobal.net). [Learn why this is important](#)

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

Hi Sandra,

I live at 3725 Foxplain in SDO. I am deeply disappointed in the plan to build MORE industrial buildings. This development has zero positive effects for the local community and so many negative impacts. I understand the need for development but West Corona needs Shopping and Retail and Grocery not more industrial buildings. We are trapped in West Corona and only have one sub par Grocery store, zero quality restaurants and no shopping. The traffic is so bad we can't even get to south Corona, Anaheim Hills, or Chino Hills without strategically planning these trips around high traffic times. I don't understand why we can't have a restaurant and Retail area like other cities do. Eastvale has many of these types of sites. And is still developing. West Corona does not need more industrial, gas stations, starbucks, or Jack in the Box. We need a quality Retail and restaurants center where community can come together.

J-1

Please reconsider this industrial plan

Thank you

Jennifer and Michael Campbell

Original Homeowners 1987

Sent from my Verizon, Samsung Galaxy smartphone

## **Response to Comment Letter J: Jennifer and Michael Campbell**

**November 20, 2024**

**Comment J-1.** Commenter expresses disappointment in the plan to build more industrial buildings, asserts the proposal has zero positive effects for the local community, and alleges that it creates many negative impacts. Commenter states they understand the need for development but West Corona needs shopping, retail and groceries and not more industrial buildings. Commenter states West Corona is served by one subpar grocery store, zero quality restaurants, and no shopping. Commenter notes existing traffic conditions are congested to the point access to services in south Corona, Anaheim Hills, or Chino Hills is difficult. Commenter notes other cities have good service opportunities such as Eastvale. Commenter concludes West Corona does not need more industrial, gas stations, coffee shops, or fast food; rather what is needed is a quality retail and restaurant center where the community can frequent.

**Response to J-1.** Commenter states opposition to the proposed land uses envisioned by the Project and generally states existing traffic congestion makes accessing retail and restaurant services difficult. The comments do not address specific details pertaining to the analysis of environmental impacts in the Draft SEIR. No changes to the Draft SEIR are required.

**Subject:** Fwd: Public Comment - Green River Ranch Specific Plan Amendment & Business Park Industrial Development

**Date:** Wednesday, November 20, 2024 at 6:20:17 PM Pacific Standard Time

**From:** Francesca & Pietro

**To:** Sandra Vanian

You don't often get email from dasacco@gmail.com. [Learn why this is important](#)

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

Hello Sandra,

If you could change the last sentence of my public comment below to " I ask that the zoning changes Not Be Approved and Greatly Negatively Impact the Community of SDO and Corona, Thank You." from "The zoning changed should not be approved and greatly negatively impact the SDO and Coorona." Autocorrect changed my last sentence to improper grammar as I was rushing to make sure my public comment was sent by today to be included in the staff report for the Commission Meeting on 11/25, and just found out about the meeting and having to send it to be included in the report to staff by today, the Wed. before the meeting.

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K-1  
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Thank you for your help and time.

Best Regards,

Francesca Da Sacco

----- Forwarded message -----

From: **Francesca & Pietro** <[dasacco@gmail.com](mailto:dasacco@gmail.com)>

Date: Wed, Nov 20, 2024 at 6:00PM

Subject: Public Comment - Green River Ranch Specific Plan Amendment & Business Park Industrial Development

To: <[sandra.vanian@coronaca.gov](mailto:sandra.vanian@coronaca.gov)>

Hello Sandra Vanian,

I am sending the following public comments to be included to the staff and planning commission for the Public meeting on 11/25

As a resident of Sierra Del Oro I have serious concerns about this project being approved and the rezoning requests being prospectively approved by staff, City Council, and Corona's planning commission. In 2022 My Husband & I attended the Developer Scoping Meeting where a presentation from the Developer was given. It contained the proposals approved in 2001 & what the developer wanted/wants now, to change zoning to make it an industrial park which includes 5 large Industrial Warehouses with 746,167 Sq. Ft. & a bunch of semi loading and unloading docks & 1,200 parking spaces as part of the rezoning.

Resident after resident voiced many concerns about/against the zoning changes & negative effects it would have on the environment, wildlife, community of SDO, traffic issues, safety issues, infrastructure issues & many other negative impacts to residents of Corona. Some of the main concerns were the amount of increased traffic this will inevitably bring to our community which already struggles w/ serious traffic issues. We already have a serious risk of being locked in our communities whenever there is a traffic accident on the freeway, or heaven forbid if a serious emergency hit! I have personally had to cancel Drs. appts and other appt. in the past because of being locked in my community because of traffic issues, construction, or accidents. This proposal is alarming considering the traffic

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ramifications alone, and the fact that our infrastructure cannot handle this.

K-3  
cont'd

There were also many concerns regarding the environmental impact, wildlife, pollution, air quality, & a big concern I had which is how can a proper and accurate Environmental Impact Report be done when they don't know what corporations or companies will be using these large industrial warehouses, or what they will be used for? I asked this question directly to the project presenter at the scoping meeting in 2022 and he did not have an answer, and said "It just is"! When I look at pieces of the environmental report which I just received the links, and haven't really had time to properly review. The report from a few links I clicked on looks unfinished with statements like "Our area does not handle this so we don't know, or an expert was contacted and they said they weren't aware of a certain issue but then provides multiple other people to contact that might have information or a different answer. Some of these reports are based on information that was done 25 years ago and are outdated, for example the earthquake fault report. There is a fault that runs directly under this project, and the last report was done 25 years ago in 1999.

K-4

K-5

It's also really disappointing that we signed up on multiple lists that were provided at the original original scoping meeting in 2022 and never received 1 update. I'm guessing we aren't the only ones that didn't get updates since the original meeting was jam packed. Multiple Corona Employees at the meeting said we would be updated if we signed up for the list. My husband and I signed up on multiple lists and did not receive any updates except for one from the developer yesterday 11/19/24 that included an updated PDF of their proposal with no mention of the Public Meeting on 11/25, or public comment, only that it's ready to go forward for approval. We also were never sent the public notice for the Public Hearing where residents can comment for 11/25 th meeting. I just found out today by accident when I signed up to be notified. I also made public comments previously in the last meeting, and did not see them in the public comments section on your website. The people at the meeting were told their comments would be made public and a part of the project. I was also told that in an email, but when I look on the website I don't see my comments or the comments of many people that spoke at the initial scoping meeting.

K-6

K-6

Sugar coating this development by promoting the trade off for allowing the zoning changes to large industrial warehouses and getting the top 80 acres of the property changed to open space instead of building estate houses on it, and still include some residential towards the top is not a fair trade off or any excuse to allow for this selling out of SDO, and the residents quality of life. Is the land at the top even feasible to be built on at this point considering the severe fire danger right there, possible landslides, an earthquake fault that resides right under it... Not to mention the dangerous grading conditions? I remember the day the construction worker died from grading Sierra Bella a sad day for our community that I will never forget, and the fact that a worker died building that development on grades that were "deemed safe", but proved deadly for the gentleman that lost his life grading for estate houses in the SDO foothills.... Also seems like a really unfair trade for 746,000+ sq feet in industrial warehouses with a bunch of semi loading docs... and the selling out of our community in SDO and Corona.

K-7

K-7

I am not opposed to development in Corona, but this is the absolute wrong place to change zoning to 746,000+ sq feet of industrial warehouse park. The current infrastructure cannot handle this type of industrial warehouse park, and the zoning changes negatively affect the quality of life of the residents of SDO, including huge safety risks for the residents of SDO. This environmental impact report is not accurate since it is based on certain data over that is outdated and over 25 years old. And the companies /corporations that could be moving in have not even been identified which greatly impacts this report. The zoning changed should not be approved and greatly negatively impact the SDO and Corona.

K-8

K-8

Best Regards,

Francesca Da Sacco

## **Response to Comment Letter K: Francesca Da Sacco**

**November 20, 2024**

**Comment K-1.** Commenter provides a correction to a typo contained in a previous comment.

**Response to K-1.** The clarification corrects a minor typo, no response is necessary. No changes to the Draft SEIR are required.

**Comment K-2.** Commenter notes many residents expressed concerns about the proposed Project during the public scoping meeting and negative effects it would have on the environment, wildlife, SDO, traffic issues, safety issues, infrastructure issues and others.

**Response to K-2.** Commenter states general opposition to the Project, generally notes several environmental topics that would be affected, and generally notes other perceived negative issues associated with the Project. Commenter is referred to the detailed analysis of the environmental topical areas provided in the Draft SEIR Sections 4.4 Biological Resources, 4.9 Hazards and Hazardous Materials, 4.17 Transportation, and 4.19 Utilities and Service Systems. The remaining comments do not address the environmental analysis contained in the Draft SEIR or do not provide any specific detail. No changes to the Draft SEIR are required.

**Comment K-3.** Commenter reiterates several of the concerns about the Project that were brought up during the public scoping meeting including increased traffic, the allegedly negative effect Project traffic will have on existing traffic congestion in the Project area, exacerbated access concerns this congestion will create in general and during emergency situations, and concerns regarding overloaded infrastructure that will be exacerbated by the introduction of Project traffic.

**Response to K-3.** As discussed in the Draft SEIR Section 4.9 Hazards and Hazardous Materials, page 4.19, the proposed Project would be designed, constructed, and maintained in accordance with applicable standards associated with vehicular and emergency access, which would ensure that access would be properly provided for adequate emergency access and evacuation to and from the proposed Project. In addition, the proposed Project would install an additional westbound lane on Green River Road between the main project access ( Street "A") the SR-91 Eastbound on-ramp. During Project construction, any activities that could temporarily restrict vehicular traffic on public roadways would be required to implement a Traffic Management Plan as part of building permit approval to ensure adequate access is maintained. The Draft SEIR concluded compliance with existing regulations for emergency access and evacuation plus the additional roadway and Project access roads to be installed by the Project would ensure impacts related to emergency access and response would be less than significant and no mitigation required.

As discussed in the Draft SEIR Section 4.9 Hazards and Hazardous Materials, pages 4.9-20 and 4.9-21, estimated trip generation for the proposed Project would be substantially lower than the trip generation for the project as approved in 2001. For example, the proposed Project would generate 61% fewer trips per day, 53% fewer trips in the a.m. peak hour and 60% fewer trips in the p.m. peak hour. Regarding concerns expressed about traffic congestion in the Project area, this congestion is an existing condition not created by the proposed Project. Because of the substantially reduced quantity of trips estimated for the proposed Project in comparison to the project as originally approved, the Draft SEIR concluded impacts associated with physical interference with an adopted emergency response plan would be less than significant in the same manner as concluded for the original project approval. No changes to the Draft SEIR are required.

**Comment K-4.** Commenter reiterates prior concerns expressed during the public scoping meeting regarding "... the environmental impact, wildlife, pollution, air quality ..." associated with the proposed Project. Also, Commenter questions the adequacy and accuracy of the SEIR given the end user of the BPI development is not known.

**Response to K-4.** Commenter does not present specific questions or concerns regarding the Draft SEIR's analysis of impacts associated with "the environmental impact," wildlife, pollution, and air quality. Commenter is referred to the comprehensive and detailed analysis of impacts contained in Draft SEIR Sections 4.3 Air Quality, 4.4 Biological Resources, and 4.9 Hazards and Hazardous Materials.

It is assumed Commenter's question regarding the end user of the proposed Project specifically refers to the proposed BPI Development Project. The end user of many development projects that are analyzed in accordance with CEQA is not known at the time the CEQA compliance document is prepared. This in no way creates an inadequate or inaccurate analysis of potential environmental impacts for two reasons. First, generally speaking about one half of a development project's potential impacts to the environment are directly related to the development project's site including the topics of agricultural and forestry resources, biological resources, cultural resources, geology and soils, minerals, tribal cultural resources, and wildfire. Second, a general or basic land use category is all that is required in order to reasonably estimate the construction and operational activities of a speculative development and therefore the construction and operational impacts attributable to that speculative development. For example, an adequate and accurate estimate and reasonable forecast of the proposed Project's vehicular trips can be made and impact assessment of issues that are wholly or partly related to trips can be made. These categories include air quality, energy, GHG emission, transportation hazards, noise, and transportation. Vehicular trip generation rates for up to nine land use categories in the Institute of Transportation Engineers (ITE) *Trip*

*Generation Manual* are available for selection by a project's traffic engineer to estimate trips for industrial or warehouse projects. For the proposed Project, ITE's trip rates for Industrial Park (ITE Land Use Code 130) and High-Cube Cold Storage Warehouse (ITE Land Use Code 157) were selected. These two land uses represent a reasonable mix of potential industrial and warehousing uses that are anticipated to occupy the proposed BPI planning areas (i.e., PAs 1, 2 and 3). The Industrial Park land use trip generation rates are reasonable, if not conservative, because other land use categories produce less trips. Similarly, the High-Cube Cold Storage Warehouse land use trip generation rates are also reasonable, not conservative, because they result in an estimate of trucks that account for up to 111,925 s.f. of cold storage use that is permitted by the proposed GRRSPA. Refer to GRRSPA Table 2, Permitted Uses, that limits cold storage to a maximum of 111, 925 sf. No changes to the Draft SEIR are required.

**Comment K-5.** Commenter acknowledges not having time to properly review the Draft SEIR, yet notes a report contains a statement that reads "Our area does not handle this so we don't know, or an expert was contacted and they said they weren't aware of a certain issue but then provides multiple other people to contact that might have information or a different answer." Commenter notes some reports are based on information from 25 years ago and are outdated, for example a 1999 report that identifies an earthquake fault running directly under the proposed Project.

**Response to K-5.** It is not clear what report or reports Commenter is referring to regarding the statement "Our area does not handle this so we don't know, or an expert was contacted and they said they weren't aware of a certain issue but then provides multiple other people to contact that might have information or a different answer." Regarding the earthquake fault comment, known earthquake faults tend to be stable geographic features that do not change over the course of time, such that the findings contained from the 1999 report are valid. No changes to the Draft SEIR are required.

**Comment K-6.** Commenter expresses disappointment in having signed up on "... multiple lists that were provided at the original scoping meeting in 2022" and having never received one update.

**Response to K-6.** Regarding the CEQA process, following the issuance of the City's Notice of Preparation/Scoping Meeting in 2022, there have been no updates or notices distributed to the public other than the Notice of Availability (NOA) distributed in October 2022 that the Draft SEIR is available for review. At the time the NOA was distributed, Commenter was not on the CEQA distribution list for the proposed Project. No changes to the Draft SEIR are required.

**Comment K-7.** Commenter appears to express a complaint that the City is "sugar coating" the proposed Project land use changes because they are "... not a fair trade off or any excuse to allow for this selling out of SDO, and the residents quality of life." Commentor also questions the feasibility of developing

the area proposed for Estate Residential considering severe wildland fire danger, possible landslides, earthquake faults, and dangerous grading conditions. Commenter suggests it is an ... unfair trade for 746,000+ sq feet in industrial warehouses with a bunch of semi loading docs... and the selling out of our community in SDO and Corona.”

**Response to K-7.** The City’s EIR presents a complete and good-faith analysis of the potential environmental impacts that may result from the Project. During the Planning Commission hearing for the proposed Project on November 25, 2024, it was determined that the proposed Estate Residential would be changed to Open Space because of the overlying high wildland fire zone and therefore development of estate homes in this area will not occur. Regarding the “unfair trade” comment, the Draft SEIR does not advocate for or against a project; therefore, this comment does not address the environmental impacts of the proposed Project. No changes to the Draft SEIR are required.

**Comment K-8.** Commenter reiterates their prior comment they are not opposed to development in Corona, but suggests opposition to the industrial warehouse park. Commenter reiterates their prior comment the current infrastructure cannot handle this type of industrial warehouse park component of the proposed Project. Commenter reiterates their prior comment the proposed land use changes negatively affect the quality of life of SDO residents, including added safety risks. Commenter reiterates their prior comment the Draft SEIR is not accurate since it is based on data over that is outdated and over 25 years old. Commenter reiterates their prior comment the end user of the BPI development is undeveloped and calls into question the conclusions contained in the Draft SEIR. Commenter concludes with the statement that the land use changes should not be approved.

**Response to K-8.** These comments are a summary of Commenter’s prior comments. Commenter is referred to prior responses to comments K-1 through K-7. No changes to the Draft SEIR are required.

**Subject:** Fw: Western Realco proposal to be discussed at 11/25/24 Planning Commission meeting  
**Date:** Wednesday, November 20, 2024 at 5:50:22 PM Pacific Standard Time  
**From:** Sandra Vanian  
**To:** Raymond Hussey

Ray, this came for the Green River Ranch project. Can you take a look the statement regarding conflicting information in the EIR?

Sincerely,  
Sandra Vanian  
Planning Manager

---

**From:** John Fox <mondofox@hotmail.com>  
**Sent:** Wednesday, November 20, 2024 2:42:24 PM  
**To:** Sandra Vanian <sandra.vanian@coronaca.gov>  
**Subject:** Western Realco proposal to be discussed at 11/25/24 Planning Commission meeting

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Hi Sandra,

In case I'm unable to make the meeting, I'd like to submit comments and questions about the proposed project and zoning change for "the horse ranch" property by developer, Western Realco, scheduled to be reviewed by the Planning Commission on Monday, 11/25.

While I generally support the idea of what the developer proposes, I have several concerns:

- The insistence on creating a mostly single-level building pad, necessitating massive earth-moving, creating a pad elevation about 40 feet higher than Green River Road at the northeast corner of the proposed development at the intersection of Green River and Dominguez Ranch Road. ↕ L-1
- What assurance will there be that this will not become a logistics center with diesel trucks coming and going day and night and sitting idling while on-site?The project needs to limit operations to prohibit overnight hours and ensure the property is secure during those hours. The question of overnight operations and security during those hours is due to persistent street racing and congregation of such vehicles at the adjacent Promenade retail mall, of which Corona PD is well aware. ↕ L-2
- Light pollution from rooftop skylights lit day and night. A couple dozen homes in Montenero and everyone exiting the neighborhood will have a view of the project's rooftops. ↕ L-3
- Conflicting claims within the EIR regarding traffic. While the stated intent of the developer is to create jobs in Corona, the EIR states that vehicle trip times associated with the project will be higher than the average for the area, meaning that most traffic to the site will be from outside Corona. ↕ L-4

Although the developer says this project is "not intended" as a logistics center, the design lends itself to that purpose, leading to the chance that a large company could scoop up most or all of the space, using the up to 50 loading docks for trucking distribution. Prevailing winds and the topography of the area mean noise and emissions will naturally flow southeast into the Montenero residential tract. Note that equipment backing up and beeping is already an issue from the 91/71 interchange construction. ↕ L-5  
↕ L-6

While it is natural for new development of any kind to add to traffic, this project will exist in the just about the worst choke point in the city. Every effort needs to be made to ensure that impact is mitigated. I doubt that a dedicated right-turn lane into the new project and an extension of the right turn-only lane onto the new eastbound 91 onramp will help much. That (fourth) lane onto eastbound 91 will need to be isolated from the #3 lane to be effective.

↑  
L-7  
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In spite of any future retail development in the parcel on the north side of Green River Road, this project will be the main gateway welcome into the western entrance to Corona. It can't look like an industrial park. A mostly single-level pad with 750,000 square feet of industrial buildings on this rolling acreage including a chunk of the foothills is truly a case of trying to fit a square peg in a round hole. Pad slopes with plantings that will take decades to mature don't adequately disguise the industrial nature of this project.

↑  
L-8  
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Respectfully submitted,

John Fox  
1300 San Ponte Rd.  
Corona, CA 92882

## **Response to Comment Letter L: John Fox**

**November 20, 2024**

**Comment L-1.** Commenter expresses concerns regarding the BPI single-level building pad, resulting in a pad elevation about 40 feet higher than Green River Road at the northeast corner of the proposed development at the Green River/Dominguez Ranch Road intersection.

**Response to L-1.** The intent of the flat to gently sloping development pads for the BPI land use placed at elevations higher than Green River Road is to create level land areas for development, allowing for landscaped manufactured slopes along Green River Road and at the intersection of Green River Road/Dominguez Ranch Road. Landscaped manufactured slopes serve as visual screening elements that are sensitive to views from Green River Road and SR-91, so that views of the buildings appear set back from the roads. Commenter is referred to Draft SEIR Section 4.1, Figures 4.1-2 and 4.1-3, showing a rendered view of the BPI development from Green River Road and from west of San Ponte Road north of San Viscaya Circle. The building pad elevations are well below the elevations of the steep surrounding hillsides and allow for expansive views of the upslope hillsides further to the north in a manner consistent with the City's Hillside Development Ordinance. Together with implementation of MM 4.6.1M through MM 4.6.1O, aesthetic impacts were determined to be a less than significant. No changes to the Draft SEIR are required.

**Comment L-2.** Commenter expresses concerns regarding assurances that the ultimate BPI end user will not be a logistics center with day and nighttime diesel truck activity and associated idling. Commenter recommends the project be limited to prohibit overnight hour activity, and assurances the property is secure during overnight hours because of alleged persistent street racing and congregation of such vehicle operators at the adjacent Promenade retail mall.

**Response to L-2.** Logistic center buildings are specifically designed for throughput storage, handling, and distribution of goods. Logistics buildings are typically characterized by large open spaces for product storage, multiple loading docks with high clearance for efficient truck access, and optimized layouts including cross-docks to facilitate the smooth flow of inventory. There is no widely accepted minimum size, but logistics buildings are typically larger than 200,000 sf because of the space needed to obtain the characteristics listed above. The BPI development entails five proposed buildings, four of which are approximately 126,000 sf or less which is not typically considered large enough for logistics operations. The fifth proposed on the westernmost portion of the site near Fresno Road building is approximately 286,000 sf which is large enough to accommodate a small logistics operation. Regardless, the proposed Project's buildings would not be restricted from nighttime operations. The Draft SEIR assumed 24-hour operations in order to assess nighttime impacts, if any, including the potential for

nighttime operational noise. Refer to Draft SEIR, Section 4.13, Noise. As discussed on pages 4.13-10 to 4.13-14, the Draft SEIR concluded that the incremental increase in operational noise at night (as well as during the daytime) would be less than significant. Regarding the comment about street racing, this comment does not appear to involve an impact of the Project on the environment, but instead expresses a concern about a perceived baseline condition that is not associated with the Project, which is not an environmental issue subject to the Project's CEQA review. No changes to the Draft SEIR are required.

**Comment L-3.** Commenter expresses concerns regarding potential light pollution from rooftop skylights, because the Commenter believes that a couple dozen homes in Montenero and exiting traffic will have a view of the project's rooftops.

**Response to L-3.** It is not clear if Commenter is addressing rooftop skylights from the Estate Residential (ER) homes or the BPI Development Project. At the Planning Commission hearing held November 25, 2024, it was determined that the ER land use would be eliminated and replaced with Open Space because of the existing Very High Fire Hazard Severity Zone that overlies this portion of Corona. Regarding the BPI Development and General Commercial land uses in PAs 1 through 4, light pollution from skylights was not addressed because skylights are primarily intended to allow light to pass into a building from sunlight, and not for interior light to pass out of a building, and the small amount of light that may pass out of a building through a skylight has no reasonable potential to generate an amount of illumination that would result in significant light pollution.. Impacts from nighttime lighting in the BPI development areas (Specific Plan PAs 1 through 4) associated with parking areas, truck docking areas, commercial signage, and building entrances was addressed in the Draft SEIR, pages 4.1-37 and 4.1-38. The Draft SEIR concluded impacts associated with nighttime lighting would be rendered less than significant with adherence to spillover light reduction measures contained in the City Municipal Code, implementation of project design feature PDF AES-3 regarding glare from windows, and mitigation measures MM 4.6.1M through MM 4.6.1O. No changes to the Draft SEIR are required.

**Comment L-4.** Commenter notes conflicting claims within the Draft SEIR regarding traffic. Commenter suggests the stated intent of the developer is to create jobs in Corona, while the EIR states the Project's vehicle trip lengths will be higher than the average for the area. Commenter asserts most traffic to the site will be from outside Corona.

**Response to L-4.** Commenter correctly notes one of the Project's objectives is to fill employment opportunities by City residents. However, the City as well as the project applicant can not control who fills such jobs and where they live, even with the implementation of efforts to encourage the hiring of City residents. Thus, to ensure that the environmental analysis is conservative, the average driving distance for Project employees cited in the Draft SEIR is

based on traffic modeling data that assumes at least some employees may travel into the City from other areas. The analysis is supported by substantial evidence because it represents a reasonable estimate of trip lengths using the best data available from travel demand traffic modeling. No changes to the Draft SEIR are required.

**Comment L-5.** Commenter suggests the proposed BPI development is not intended to be a logistics center, but the design suggests the development could be used for that purpose and a “large company could scoop up most or all of the space, using the up to 50 loading docks for trucking distribution.”

**Response to L-5.** See response to comment L-2 regarding the type of end user associated with the BPI Development. No changes to the Draft SEIR are required.

**Comment L-6.** Commenter asserts prevailing winds and the topography of the area will result in the generation of additional noise and air pollution emissions from the BPI development that will naturally flow southeast towards the Montenero neighborhood. Commenter notes construction noise from equipment back up beepers related to the nearby SR-91/SR-71 interchange construction project are already an issue.

**Response to L-6.** See response to comment L-2 regarding the less than significant conclusion determined in the Draft SEIR for operational noise impacts. As discussed on pages 4.13-9, the Draft SEIR similarly concluded the incremental increase in construction noise would be less than significant in part because of the noise attenuation over the distance between the Project’s noise sources and the nearest residences. See response to comment L-2 regarding the end user associated with the BPI Development. No changes to the Draft SEIR are required.

**Comment L-7.** Commenter states the proposed Project is located in “about the worst choke point in the city” and every effort needs to be made to ensure that impact is mitigated. Commenter states doubt that the proposed Project’s installation of the dedicated eastbound right-turn lane into the proposed main access driveway on Green River Road and the extension of the westbound right turn-only lane onto the new eastbound 91 onramp will provide benefit. Commenter suggests the fourth lane onto eastbound SR-91 will need to be isolated from the third lane to be effective.

**Response to L-7.** See response to comment H-2 and K-3 regarding traffic congestion. Commenter is referred to the analysis of traffic congestion related issues contained in the Draft SEIR Section 4.9 Hazards and Hazardous Materials. No changes to the Draft SEIR are required.

**Comment L-8.** Commenter states that although the proposed GRRSP Amendment would result in future retail development in the parcel on the north side of Green River Road, the overall Project will become the main western entrance into Corona. Commenter opines the Project “can’t look like an industrial park.” Commenter opines the “mostly single-level pad with 750,000 square feet of industrial buildings on this rolling acreage including a chunk of the foothills is truly a case of trying to fit a square

peg in a round hole.” Commenter opines the proposed pad slopes include landscaping that will take decades to mature and will not adequately disguise the industrial nature of this project.

**Response to L-8.** See response to comment L-1 regarding the view of the Project. The notion of whether or not the Project will be viewed as a good or bad “western entrance into Corona” is not an environmental impact, but a policy consideration to be weighed by the City’s decision-makers. Further, the BPI Development Project complies with all of the specific development and design standards contained in the GRRSP as amended. These development and design standards were initiated by the project applicant, thoroughly reviewed and modified by City staff, and will be implemented by the project applicant subject to final review and approval by the City. No changes to the Draft SEIR are required.

**Subject:** Project on green river.

**Date:** Wednesday, November 20, 2024 at 5:59:35 PM Pacific Standard Time

**From:** Kim Ishiki

**To:** Sandra Vanian

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To whom it may concern,

I oppose to the development on green river. The traffic and congestion, the pollution and emissions are not in the best interest of this neighborhood.

Thank you

Sent from my iPhone

↕ M-1

## **Response to Comment Letter M: Kim Ishiki**

**November 20, 2024**

**Comment M-1.** Commenter expresses opposition to the proposed Project. Commenter states the traffic, congestion, and pollution emissions are not in the best interest of this neighborhood.

**Response to M-1.** Commenter states opposition to the Project and generally notes four environmental topics that would be affected. The comment does not provide any specific detail related to environmental effects. Commenter is referred to the detailed analysis of these topical areas provided in the Draft SEIR Sections 4.3 Air Quality, 4.8 Greenhouse Gas Emissions, 4.9 Hazards and Hazardous Materials, and 4.17 Transportation. No changes to the Draft SEIR are required.

**Subject:** Green River Ranch Specific Plan

**Date:** Wednesday, November 20, 2024 at 5:30:24 PM Pacific Standard Time

**From:** A Jasman

**To:** Sandra Vanian

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I am against any changes to the plans outside of increases to designated open space.

I am against any plans that create noise, that bring truck traffic, create light from signage or lampposts or ambient light from structures.

I am against any plans increasing car traffic either from large employee staffs, delivery trucks, or other traffic.

I am against any structures/businesses that create pollution, steam evaporation, or other visual or non-visual exhaust.

Amy Jasman

23 year Sierra Del Oro resident

2515 Glenbush Cir

Corona, CA 92882

[Yahoo Mail: Search, Organize, Conquer](#)

↕ N-1  
↑  
N-2  
↓

## **Response to Comment Letter N: Amy Jasman**

**November 20, 2024**

**Comment N-1.** Commenter expresses opposition to any changes to the plans outside of increases to designated open space.

**Response to N-1.** The GRRSP as approved would allow up to 501,300 sf of mixed use (office and retail), a 150-room hotel, and 32 estate residences spread across 98.2 acres. The proposed Project would result in 746,167 square-feet of Industrial Business Park land uses; 5.5 acres of General Commercial land uses; and 103.73 acres of Open Space land uses. Overall, the proposed Project would result in reduced environmental impacts because the proposed land uses are less intense than the approved land uses. No changes to the Draft SEIR are required.

**Subject:** FW: Green River Ranch

**Date:** Thursday, November 21, 2024 at 4:52:07 PM Pacific Standard Time

**From:** Sandra Vanian

**To:** Raymond Hussey

Ray, here's a response to the project.

Sincerely,  
Sandra Vanian,  
Planning Manager

---

**From:** Niko Todorov <nttodorov@gmail.com>

**Sent:** Thursday, November 21, 2024 4:47 PM

**To:** Sandra Vanian <sandra.vanian@coronaca.gov>

**Subject:** Green River Ranch

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Dear Sandra,

As a 25 year SDO resident I am against any amendments to the Green River Ranch Specific Plan that increase traffic to an already congested neighborhood, which affects our safety.

↕ O-1

## **Response to Comment Letter O: Niko Todorov**

**November 21, 2024**

**Comment O-1.** Commenter expresses opposition to any amendments to the Green River Ranch Specific Plan that increase traffic to an already congested neighborhood, which affects safety.

**Response to O-1.** Commenter states opposition to the Project, inferring it would generally increase traffic in an already congested neighborhood affecting safety. See response to comment K-3 regarding the effects of the proposed Project on traffic congestion, emergency response, and the fact that fewer trips would be generated by the proposed Project in comparison to the existing approved GRRSP project. In addition, Commenter is referred to the detailed analysis of safety provided in the Draft SEIR Section 4.9 Hazards and Hazardous Materials. No changes to the Draft SEIR are required.



# PECHANGA BAND OF INDIANS

*Pechanga Indian Reservation*

## OFFICE OF THE GENERAL COUNSEL

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**Of Counsel**  
Breann Y.S. Nu'uhiwa  
Laura Miranda

November 25, 2024

SENT VIA EMAIL

Sandra Vanian  
Planning Manager  
City of Corona  
400 S. Vicentia Avenue  
Corona, California 92882  
[Sandra.Vanian@CoronaCA.gov](mailto:Sandra.Vanian@CoronaCA.gov)

**Re: Pechanga Band of Indians Comments on Draft Subsequent Environmental Impact Report for the Green River Ranch Specific Plan Amendment & Business Park Industrial Development and Relocation of Proposed Constrained Linkage 1 (State Clearinghouse No. 2022080640)**

Dear Sandra Vanian,

This letter is written on behalf of the Pechanga Band of Indians (“Pechanga” or the “Tribe”), a federally recognized Indian tribe and sovereign Indian nation, regarding the above referenced Green River Ranch project (the “Project”). Pechanga is the culturally affiliated consulting tribal government for the Project, consulting under both AB 52 and SB 18. The Tribe is writing to urge the City of Corona (“City”) to continue involving the Tribe in the AB 52 and SB 18 consultation processes. The Tribe is also writing to inform the City of the need for the Project’s tribal cultural resources mitigation measures to be revised, such changes shall include naming Pechanga as the monitoring Tribe for the Project. The totality of the proposed revisions to the Mitigation Measures for the Project are enclosed as an attachment to this letter.

### I. PECHANGA IS A CONSULTING TRIBE UNDER RELEVANT LAW

The Tribe is the culturally affiliated consulting tribal government for the Project. The Tribe received AB 52 and SB 18 Notices for the Project dated August 20, 2020, and submitted requests for consultation under AB 52 and SB 18 for the Project on September 11, 2020. On June 30, 2022, the City sent a request for consultation on the Project to the Tribe, and on the same day, the Tribe scheduled a consultation for July 14, 2022. On July 14, 2022, the City and the Tribe engaged in a government-to-government consultation regarding the Project. However, no further consultations occurred following the July 14, 2022, consultation and the Tribe did not receive the draft mitigation measures for review. The Tribe has not received any notices from the City indicating AB 52 or SB



P-1

18 consultation has concluded, and the Tribe requests to remedy the lack of communication in the time since the July 14, 2022, consultation meeting by continuing to engage in consultation for this Project as soon as possible.

II. PECHANGA IS THE CLOSEST CULTURALLY AFFILIATED TRIBAL GOVERNMENT TO THE PROJECT SITE

The Project is within the Luiseño (hereafter “*Payómkawish*”) Ancestral Territory. *Payómkawish* Ancestral Territory is defined according to the Tribe’s Creation History and oral tradition, and includes all of Western Riverside County and northwestern San Diego County. The aboriginal territory is determined by Pechanga oral tradition (i.e., songs and historical accounts) and is defined by place names, rock art, pictographs, petroglyphs, and an extensive artifact record. The northern border of the territory follows the Santa Ana River and covers the western slopes of the San Jacinto Mountains to the east. At Idyllwild, the territory boundary turns to the south, includes Aguanga, and then extends east again to the middle of San Jose de Valle (Warner Valley). At Lake Henshaw it turns southwest, and incorporates portions of Escondido, all of San Marcos, and Batiquitos Lagoon. The Pacific Ocean is the western border and it encompasses the coastal areas of Carlsbad, Oceanside, and all of Camp Pendleton. The southern Channel Islands, San Clemente, Santa Catalina, San Nicolas, and Santa Barbara Islands are also included. At the northern border of Camp Pendleton, *Payómkawish* territory curves east and skirts the ridgeline of the Santa Ana Mountains up to the northern boundary, the Santa Ana River.

*a. The Phase I Cultural Resources Assessment Confirms the Project is Within Payómkawish Territory.*

The Project boundary is directly south of several *Payómkawish* place names, and the surrounding area includes rock art (pictographs and petroglyphs), village complexes, and *Payómkawish* tribal cultural resources. The Phase I Cultural Resources Assessment for the Project confirms that the Project is located within *Payómkawish* Ancestral Territory, stating that “the project is located well within the borders of ethnographic Luiseño territory.” (Appendix F, DSEIR, 2.0-11).

*b. The Pechanga Indian Reservation is the closest Indian Reservation to the Project.*

In 2007, former BLM lands in the Meadowbrook area of the County were transferred to Pechanga, and in 2016, those lands were placed into federal trust for the Tribe. This property is considered a discontinuous portion of the Pechanga Indian Reservation, and is located 23.5 miles from the Project area. This property was transferred to the Tribe to protect the large village complex that covers the entire property. Cultural elements at Meadowbrook are very similar to several sites within the City of Corona’s boundary, including rock art designs and burial practices.

*c. Pechanga has Decades of Experience Monitoring Projects within the Boundaries of the City of Corona.*

Pechanga has over forty (40) years of experience in working with various types of construction projects throughout its territory and within the City of Corona’s boundary. The combination of Tribal knowledge, ethnohistory, recorded sites, history, and experience, accompanied with the knowledge of culturally and religiously sensitive areas within territory, shows decisively that Pechanga is the appropriate culturally affiliated consulting tribal government for the Project.

P-1  
Cont'd

III. THE LEAD AGENCY PROPOSED MITIGATION MEASURES ARE LEGALLY INSUFFICIENT AND CONTRARY TO EXISTING LAW

The mitigation measures as proposed will not bring the project into compliance with CEQA, but will actually violate CEQA requirements concerning tribal cultural resources and tribal consultation. The mitigation measures will not bring project effects to a level below significance. Specifically, as written, the mitigation measures are contradictory between the CEQA environmental categories of cultural resources/unique archaeological resources and tribal cultural resources, which are two (2) separate categories of resources under CEQA. What is legally appropriate for an archaeological resource in terms of identification, analysis, and treatment is not culturally appropriate and legally sufficient for tribal cultural resources. Tribal cultural resources must be mitigated for in a culturally appropriate manner (Cal. Pub. Res. Code §§ 21080.3.2, 21082.3, and 21084.3). Although some methods to address tribal cultural resources may utilize archaeological methodology, identification and assessment cannot be accomplished solely through archaeological methods, but must be driven by Tribal knowledge and culturally appropriate methods and programs.

Mitigation Measure CUL-1 (“CUL-1”) appears to be a mitigation measure to address inadvertent finds (CEQA Guidelines § 15064.5(f)). Inadvertent finds may be historical or archaeological resources, but they may also be tribal cultural resources.<sup>1</sup> The Tribe’s position is that all resources encountered on the Project property are tribal cultural resources in addition to possibly being historical resources and archaeological resources (unique or non-unique). As such, mitigation for cultural resources must not contradict or come into conflict with the culturally appropriate mitigation that CEQA intends for tribal cultural resources (Cal. Pub. Res. Code § 21084.3). To prevent erring by applying archaeological methods to tribal cultural resources, it is necessary that all mitigation for cultural resources be mitigation that would be appropriate for tribal cultural resources.

Yet, proposed CUL-1 is in conflict with culturally appropriate mitigation that is required for tribal cultural resources. For example, for culturally appropriate mitigation under CEQA, the Project archaeologist must not have the sole authority to determine the monitoring program for tribal cultural resources or to unilaterally determine the significance of any resources uncovered/discovered in connection with the Project. Furthermore, the Tribe is opposed to any requirement for curation of tribal cultural resources and believes that such a requirement violates State law. The law sets forth that the preference for all cultural/archaeological/tribal cultural resources is avoidance and preservation in place. (Cal. Pub. Res. Code §§ 21084.3, 21083.2). When this is not feasible, culturally appropriate treatment methods are required by CEQA, and these required culturally appropriate methods do not include curation for tribal cultural resources, which may also be historical or archaeological resources.

As the Project is within *Payómkawish* Ancestral Territory, and the Tribe was not involved in the process that led to the current mitigation measure language included in the DSEIR, the mitigation measures must be revised in consultation with Pechanga. There is no sufficient justification pursuant to CEQA to include the group referred to within the DSEIR as the Gabrieleño Band of Mission Indians – Kizh Nation (“Kizh”) in any monitoring, assessment, treatment, or mitigation activities at the Project. Gabrielino territory does not overlap with the Project area. The Tribe has expertise in its own culture and territory (*see* Cal. Pub. Res. Code § 21080.3.1) and has provided sufficient evidence that the Project is within *Payómkawish* Ancestral Territory. This is stated as a

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<sup>1</sup> Pursuant to CEQA, a cultural resource can be a historical resource, an archaeological resource, and a tribal cultural resource. (CEQA Guidelines § 15064.5; Cal Pub. Res. Code § 21074).

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plain fact in the Phase I Cultural Resources Assessment for the Project, which states that the Project is “well within the borders of ethnographic Luiseño territory,” and that Gabrielino people were, along with the Cahuilla people and the Cupeño people, located to the north and east of the Luiseño territory, not at the Project site. (Appendix F, DSEIR, 2.0-11, 12).

The Tribe has a rightful claim to CEQA tribal consultation and monitoring on this Project. No other group, including the Kizh, has a sufficient connection to the Project area to be included within the mitigation measures, and certainly the Kizh have no claim at the exclusion of Pechanga. It is contrary to law to name the Kizh in the mitigation for this Project and the group must be removed. Furthermore, if ancestral Native American human remains are uncovered on the Project property, those ancestral remains will be Luiseño and not Gabrielino. It is wholly inappropriate and contrary to the law to provide the Gabrielino with treatment authority in the DSEIR prior to the state Native American Heritage Commission (“NAHC”) naming a Most Likely Descendant under the California Public Resources Code. Adopting this language within the DSEIR would effectively attempt to divest the NAHC, an authorized State agency, of its mandatory legal obligations. (Cal Pub. Res. Code § 5097.98).

In light of the above legal and factual information, the Tribe has attached revisions to the proposed mitigation measures and expects they will be incorporated into the SEIR as part of CEQA’s requirements for AB 52 tribal consultation.

IV. SCHEDULING A CONSULTATION

The Tribe, as the culturally affiliated consulting tribal government for the Project, is eager to continue government-to-government consultation under AB 52 and SB 18 to ensure the Project includes appropriate mitigation measures necessary to mitigate the risk of the Project causing a substantial adverse change in the significance of a tribal cultural resource. In furtherance of this, Pechanga Cultural Resources Department staff will be reaching out to schedule a consultation meeting at a date and time of mutual availability with the City. Prior to occurrence of the next government-to-government consultation on this Project, Pechanga also requests that the City review the attached mitigation measures as revised by the Tribe.

If you have any questions about the Tribe’s requests in this letter, please reach out to Laura Miranda, Of Counsel for the Pechanga Band of Indians, at [lmiranda@pechanga-nsn.gov](mailto:lmiranda@pechanga-nsn.gov).

Sincerely,



Steve Bodmer

cc:

Pechanga Cultural Resources Department  
Pechanga Office of the General Counsel  
Native American Heritage Commission, [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Merri Lopez-Kiefer, CA DOJ, [merri.lopezkeifer@doj.ca.gov](mailto:merri.lopezkeifer@doj.ca.gov)

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P-2

## Cultural Resources Mitigation Measures

~~CUL-1: Mitigation Monitoring and Reporting Program (MMRP)~~Inadvertent Unanticipated Discoveries of Cultural Resources. As a condition of project approval, and prior to grading permit issuance, a Tribal Cultural Resources/Cultural Resources Mitigation and Monitoring Plan TCR-CRMP MMRP—is ~~recommended~~required to be prepared by the Project archaeologist and the culturally affiliated consulting tribal government that will set forth a Plan to identify for identification of any cultural resources/Tribal Cultural Resources that may be uncovered during gradingany ground-disturbing activities, and subsequently, to identify treatment, including methods to mitigate potential impacts to any discovered archaeological resources evaluated as significant by the project archaeologist and the culturally affiliated consulting tribe. The program to mitigate archaeological resources does not conflict with the program to identify, treat and mitigate Tribal Cultural Resources.

This ~~program~~TCR-CRMP shall include, at least, but not be limited to, the following ~~actions~~provisions:

- 1) Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the lead agency stating that a certified archaeologist has been retained to implement the monitoring program.
- 2) The project applicant shall provide Native American monitoring from the culturally affiliated consulting tribal government during all grading and ground-disturbing activities. ~~when the archaeological monitor identifies undisturbed soil or Native American artifacts. The Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances for purposes of fulfillment of provisions in the TCR-CRMP. and search for cultural materials when the potential exists to encounter prehistoric artifacts.~~
- 3) The certified archaeologist and the culturally affiliated consulting tribal government shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the TCR-CRMP monitoring program.
- 4) ~~During the cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.~~
- 5) ~~Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.~~
- 6) In the event that previously unidentified cultural resources or Tribal Cultural Resources are discovered, the monitors archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant tribal cultural resources or cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist and the culturally affiliated consulting tribal government, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources and Tribal Cultural Resources, a Research Design and Data Recovery Program to mitigate impacts t h e T C R - C R M P shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods address culturally appropriate methods and treatment, including additional steps to mitigate impacts. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely

~~Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.~~

~~75) Before construction activities are allowed to resume in the affected area, the Tribal Cultural Resources/Cultural Resources that cannot be avoided and preserved in place, artifacts shall be will be addressed through the methods and processes identified in the TCR-CRMP. Such methods may include recovered recovery and/or recordation of features recorded—using both culturally appropriate methodology and professional archaeological methods that do not conflict with culturally appropriate mitigation. The project archaeologist and the culturally affiliated consulting tribal government shall determine the methods for data recovery in the TCR-CRMP. ~~amount of material to be recovered for an adequate artifact sample for analysis.~~~~

~~86) All cultural material collected during the grading monitoring program shall be subject to the culturally appropriate treatment and mitigation standards outlined in the TCR-CRMP, which may include reburial on-site in an area that will be protected in perpetuity or relinquishment to the culturally affiliated consulting tribal government for culturally appropriate treatment, processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.~~

~~97) A Phase 4 report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed, in consultation with the culturally affiliated consulting tribal government, and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.~~

~~8) Any historic archaeological material that is not Native American in origin (non-TCR and non-Cultural) shall be curated at an institution meeting the State and federal standards for curation.~~

~~CUL 2: Human Remains—If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant. "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.~~

### Tribal Cultural Resources Mitigation Measures

~~TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.~~

~~1) The project applicant shall provide Native American monitoring from culturally affiliated consulting tribe during all grading and ground-breaking activities associated with the Project. The Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances for tribal cultural resources. A. The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians—Kizh Nation. The monitor shall be retained prior to the commencement of all ground-disturbing activity for the project ~~at all project locations~~ (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-disturbing activity shall include, but is not limited to, all grading activities, archaeological investigations, demolition, pavement removal, subsurface testing of any~~

kind, weed abatement, potholing, auguring, clearing, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring activity logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, Tribal Cultural Resource materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Tribal monitoring activity logs will be provided to the City and Applicant with confidential information not subject to a Public Records Act Request. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude when the culturally affiliated consulting tribe confirms through a written confirmation that all grading and ground-disturbing activities are no longer within archaeological and cultural resources soils. upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground disturbing activities and phases that may involve ground disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. ~~Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.~~

#### TCR-2: ~~Unanticipated Discovery of Human Remains and Associated Funerary Objects.~~

A. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant. "~~most likely descendant.~~" The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

~~AB.~~ Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute, unless there are multiple Ancestral remains comprising a burial site, which may also be a Tribal Cultural Resource. In that case, additional treatment measures and mitigation will be implemented by the MLD and the cultural affiliated consulting tribe.

~~B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.~~

~~C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).~~

~~DC. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the ~~Kizh~~-named MLD determines ~~in its sole discretion~~ that resuming construction activities at that distance is acceptable, and provides the project manager express consent of that determination (along with any other mitigation measures the ~~Kizh~~ monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)~~

~~ED. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. If multiple Native American human remains are uncovered, additional treatment and measures will be required for the site as agreed upon by the MLD and culturally affiliated consulting tribe. Any historic archaeological material that is not Native American in origin (non TCR) shall be curated at a public, non profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.~~

~~FE. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.~~

**TCR-2: Unanticipated Discovery of Tribal Cultural Resources.** As a condition of project approval, and prior to grading permit issuance, a Tribal Cultural Resources/Cultural Resources Mitigation and Monitoring Plan TCR-CRMP MMRP ~~is recommended~~ required to be prepared by the Project archaeologist and the culturally affiliated consulting tribal government that will set forth a Plan ~~to identify~~ for identification of any cultural resources/Tribal Cultural Resources that may be uncovered during ~~grading~~any ground-disturbing activities, and subsequently, to identify treatment, including methods to mitigate potential impacts to any discovered archaeological resources evaluated as significant by the project archaeologist and the culturally affiliated consulting tribe. The program to mitigate archaeological resources does not conflict with the program to identify, treat and mitigate Tribal Cultural Resources.

This ~~program~~-TCR-CRMP shall include, ~~at least, but not be limited to,~~ the following actions-provisions:

- 1) Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the lead agency stating that a certified archaeologist has been retained to implement the monitoring program.
- 2) The project applicant shall provide Native American monitoring from the culturally affiliated consulting tribal government during all grading and ground-disturbing activities. ~~when the archaeological monitor identifies undisturbed soil or Native American artifacts.~~ The Native American monitor shall work in concert with the archaeological monitor to observe ground

disturbances for purposes of fulfillment of provisions in the TCR-CRMP, and search for cultural materials when the potential exists to encounter prehistoric artifacts.

3) The certified archaeologist and the culturally affiliated consulting tribal government shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the TCR-CRMP monitoring program.

4) ~~During the cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.~~

5) ~~Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.~~

64) In the event that previously unidentified cultural resources or Tribal Cultural Resources are discovered, the monitors archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant tribal cultural resources or cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist and the culturally affiliated consulting tribal government, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources and Tribal Cultural Resources, a Research Design and Data Recovery Program to mitigate impacts t h e T C R - C R M P shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods address culturally appropriate methods and treatment, including additional steps to mitigate impacts. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.

75) Before construction activities are allowed to resume in the affected area, the Tribal Cultural Resources/Cultural Resources that cannot be avoided and preserved in place, artifacts ~~shall be~~ will be addressed through the methods and processes identified in the TCR-CRMP. Such methods may include recovered recovery and/or recordation of features recorded—using both culturally appropriate methodology and professional archaeological methods that do not conflict with culturally appropriate mitigation. The project archaeologist and the culturally affiliated consulting tribal government shall determine the methods for data recovery in the TCR-CRMP, amount of material to be recovered for an adequate artifact sample for analysis.

86) All cultural material collected during the grading monitoring program shall be subject to the culturally appropriate treatment and mitigation standards outlined in the TCR-CRMP, which may include reburial on-site in an area that will be protected in perpetuity or relinquishment to the culturally affiliated consulting tribal government for culturally appropriate treatment, processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

97) A Phase 4 report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed, in consultation with the culturally affiliated consulting tribal government, and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.

8) Any historic archaeological material that is not Native American in origin (non-TCR and non-Cultural) shall be curated at an institution meeting the State and federal standards for curation.

MM TCR 3: Procedures for Burials and Funerary Remains:

~~A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.~~

~~B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.~~

~~C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.~~

~~D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24 hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.~~

~~E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.~~

~~F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.~~

~~G. The Tribe will work closely with the project’s qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.~~

## **Response to Comment Letter P: Pechanga Band of Indians**

**November 25, 2024**

**Comment P-1.** Commenter asserts they are the “culturally affiliated consulting tribal government for the Project, consulting under both AB 52 and SB 18” for the Project. Commenter requests that the City continue to include the Tribe in such consultation processes for other future projects. Commenter asserts the City needs to revise the cultural resources and tribal cultural resources mitigation measures contained in the Draft SEIR, and to this end provides the City with suggested revisions to the mitigation measures.

**Response to P-1.** The City acknowledges Commenter is one of several culturally affiliated consulting tribal governments that provide important information regarding tribal cultural resources (TCRs) within the City’s limits and it is understood future consultation processes for CEQA projects will include the Tribe. For this reason, the City consulted with Commenter in accordance with AB 52 and SB 18 during the months of July, August and September 2022. At that time, the City provided Commenter with requested materials including a biological report and grading plans for the Project. Based on discussions during that time period, Commenter agreed to provide draft mitigation measures for the City to review and to consider for incorporation into the Draft SEIR. The City followed up with the Commenter on August 4, 2022 and September 9, 2022 and did not receive a response. Therefore, the City considered consultation to be closed.

The City sent the Commenter the CEQA Notice of Availability regarding the release of the Draft SEIR on October 11, 2024 and the 45-day review period ended November 25, 2024. Commenter requested they be given an extension on the CEQA comment period, but the City communicated to the Commenter that the City would not be extending the CEQA comment period. Commenter then submitted Letter P at the close of the comment period.

The City agrees that Commenter is a tribal government closely affiliated with the geographic area in which the Project site is located. However, Commenter discontinued communications with the City during AB 52 and SB 18 consultation requests in 2022. Another Tribe did consult, and therefore the Draft SEIR mitigation measures were created based on the consulting Tribe’s input. The Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) provided input to the City in 2022 during the consultation process. The Soboba Band of Luiseno Indians (Soboba) also chose not to continue communications during AB 52 and SB 18 consultation requests in 2022; however, Soboba provided comment on the Draft SEIR regarding the cultural resources and tribal cultural resources mitigation measures.

Although the Commenter discontinued consultation in 2002, prior to the time that the Draft SEIR was publicly circulated, the City has carefully reviewed and considered the Commenter's letter and requests. In an effort to address the feedback of all three Tribes who have provided input regarding the Project's mitigation measures, the City has considered the requested changes presented in Commenter's letter and agrees that modifications to the mitigation measures are appropriate, which are intended to reflect the input of all three Tribes. The resulting changes to MMs CUL-1, CUL-2, TCR-1, TCR-2 and TCR-3 are as follows and are also shown in the Errata, Section 3.0, of this Final SEIR. Note that Draft SEIR MM TCR-3 has been eliminated, because it is a repeat of revised MM CUL-2.

**MM CUL-1: Unanticipated Discoveries of Cultural Resources Mitigation Monitoring and Reporting Program (MMRP)** - Prior to issuance of grading permits, a Cultural Resources/Tribal Cultural Resources Mitigation and Monitoring Plan (CR/TCR-MMP) shall be prepared by the Project archaeologist and submitted to the City for dissemination to the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh), Pechanga Band of Indians (Pechanga), and Soboba Band of Luiseno Indians (Soboba). All parties shall review and be provided with an opportunity to comment upon, the plan in a reasonable time period as determined by the City prior to permitting for the Project. If consensus among the Project archeologist, the City and Tribe(s) about monitoring and treatment methods cannot be reached, the City shall make the determination in its best judgement regarding the appropriate measures for inclusion in the CR/TCR-MMP considering input and recommendations from archaeologist and the consulting Tribe(s). Any and all findings of discovered resources will be subject to the protocol detailed within the CR/TCR-MMP. As a condition of project approval, a MMRP is recommended to identify any cultural resources that may be uncovered during grading, and subsequently, to mitigate potential impacts to any discovered archaeological resources evaluated as significant. This CR/TCR-MMP program shall include, but not be limited to, the following provisions actions:

- 1) Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the Citylead agency stating that a certified archaeologist has been retained to implement the CR/TCR-MMP monitoring program.
- 2) The project applicant shall provide Native American monitoring from the consulting Tribe(s) on a rotating basis during all grading and ground disturbing activities. when the archaeological monitor identifies undisturbed soil or Native American artifacts. The Native American monitor(s) shall work in concert with the archaeological monitor to observe ground disturbances to fulfill the provisions of the CR/TCR-MMP and search for cultural materials when the potential exists to encounter prehistoric artifacts.

- 3) The certified archaeologist and the consulting tribal monitor(s) shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the CR/TCR-MMP monitoring program.
- ~~4) During the cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.~~
- ~~5) Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.~~
- 6) 4) In the event that previously unidentified cultural resources or tribal cultural resources are discovered, the archaeologist in consultation with the tribal monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources or tribal cultural resources. The archaeologist shall contact the City lead agency at the time of discovery. The archaeologist, in consultation with the tribal monitor(s) and City lead agency, shall determine the significance of the discovered resources. The City lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources and tribal cultural resources, the CR/TCR-MMP shall address culturally appropriate methods and treatment, including additional steps to mitigate impacts as determined by the City, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.
- ~~7) 5) Before construction activities are allowed to resume in the affected area, any cultural resources or tribal cultural resources that cannot be avoided and preserved in place shall be addressed though the methods and processes identified in the CR/TCR-MMP. the artifacts shall be recovered and features recorded using professional archaeological methods. The project archaeologist in consultation with the consulting tribal monitor(s) shall identify the methods for data recovery in the CR/TCR-MMP, determine the amount of material to be recovered for an adequate artifact sample for analysis.~~

- 8) 6) All cultural material collected during the grading monitoring program shall be subject to the culturally appropriate treatment and mitigation standards outlined in the TCR-CRMP, which may include reburial on-site in an area that will be protected in perpetuity or relinquishment to the culturally affiliated consulting tribal government for culturally appropriate treatment. processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.
- 9) 7) A Phase 4 report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed, in consultation with the consulting tribal monitor(s), and submitted to the satisfaction of the City lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.
- 8) Any historic archaeological material that is not Native American in origin (non-TCR and) shall be curated at an institution meeting the State and federal standards for curation.

**MM CUL-2: Human Remains** - If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant, ~~most likely descendant.~~ The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

**MM TCR-1:** Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The Project applicant/~~Lead agency~~ shall retain, via a monitoring agreement, a Native American Monitor(s) authorized to represent Kizh Nation, Pechanga, and Soboba on a rotating basis for all "ground-disturbing activities" in native soil and previously unexamined fill soils that occur within the proposed project area~~from or approved by the Gabrieleño Band of Mission Indians — Kizh Nation.~~ The monitor(s) shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project ~~at all project locations~~ (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, all

grading activities, archaeological investigations, demolition, pavement removal, subsurface testing of any kind, weed abatement, potholing, auguring, clearing, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the City lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor(s) will complete daily monitoring activity logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related and Tribal Cultural Resource materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Tribal monitoring activity logs will be provided to the City and Applicant with any confidential information, as provided by law, not being subject to a Public Records Act Request. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring for site preparation activities and for construction within each Planning Area shall conclude upon the sooner of (1) when the consulting Tribe(s)' monitor(s) confirms through a written confirmation that all grading and ground-disturbing activities are no longer within archaeological and cultural resources soils or (2) a determination by the City and written notification to the Tribal monitor(s) that soil-disturbing construction activities have concluded at the site. upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground disturbing activities and phases that may involve ground disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

**MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects**

A. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant (“MLD”). The MLD shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

BA. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute, unless there are multiple Ancestral remains comprising a burial site, which may also be a Tribal Cultural Resource. In the event that funerary objects are located, additional treatment measures will be imposed and implemented pursuant to the provisions of a Cultural Resources/Tribal Cultural Resources Mitigation and Monitoring Plan and after seeking recommendations from the MLD and the culturally affiliated consulting tribe(s).

~~B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.~~

~~C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).~~

CD. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the City, after consulting with the project archeologist and after seeking recommendations from the named MLD and consulting Tribe(s), Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable, and provides the project manager

~~express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)~~

~~DE. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. If multiple Native American human remains are uncovered, additional treatment and measures will be required for the site as agreed upon by the project archeologist and the City, after seeking recommendations from the MLD and consulting Tribe(s). Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.~~

~~EF. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.~~

**~~MM TCR-3: Procedures for Burials and Funerary Remains~~**

~~A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.~~

~~B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.~~

~~C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.~~

~~D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.~~

~~E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.~~

~~F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.~~

~~G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.~~

**Comment P-2.** Commenter requests continuation of government-to-government consultation under AB 52 and SB 18 regarding mitigation measures related to potential impacts to tribal cultural resource.

**Response to P-2.** Please see response to comment P-1. Because Commenter discontinued consultation following the City's requests in 2022, the City understood that consultation under those laws had concluded. Accordingly, the City prepared the Draft SEIR and circulated it for public review. However, the City has carefully reviewed the Tribe's comment letter, and is incorporating a number of revisions to the previously proposed mitigation measures in response to the Tribe's input.

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-----Original Message-----

From: Joseph Ontiveros <jontiveros@soboba-nsn.gov>

Sent: Sunday, November 24, 2024 8:33 PM

To: Sandra Vanian <sandra.vanian@coronaca.gov>; jvaldez <jvaldez@soboba-nsn.gov>

Subject: Request for Extension of Submittal Comment Deadline for Subsequent Environmental Impact Report (EIR) - Green Ranch River SPA & Business Park Industrial Development

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

Hello Sandra,

I hope all is well. It has been brought to our attention that the stipulations of the environmental impact report are not consistent with the standard mitigation measures developed with corona planning department. Instead, what we have noticed are one side mitigation measures that in many cases challenge the actual statutes set forth under California Public resource codes, and health and safety codes.

This is specifically relating to the discovery of human remains and predetermining how treatment and disposition will take place, before the actual, most likely descent process has been executed.

For this specific section, we recommend either utilizing the standard mitigation, measure language, or incorporating the actual statutes verbatim. we highly advise against modifying or predetermining the process, as it can be problematic in the event that the most likely to send it is none of those tribes that have engaged in consultation, or, that it is all three of the tribes that are engaged in consultation.

Additionally, there are many sections , including the section for TCRs, which is in contrast with the requirements of CEQA to mitigate impacts to cultural resources, and tribal cultural resources by definition. Many of these extensive requirements go beyond what is required, and in some cases have nothing to do with mitigation for tribal cultural resources at all.

For this reason, the Soboba Band is kindly requesting an 48 hr extension of time to provide a redline markup, of the proposed mitigation measures that are currently in the draft EIR. Along with those proposed revisions, will be supporting comments, as well as reference to the applicable statutes for your review.

If the city is not willing to grant the requested extension of time, then we recommend that all of the newly incorporated revisions and newly proposed mitigation measures for TCRs, are omitted and not approved. Instead, the standard mitigation measures that the city has been using since AB52 went into place, should be incorporated as final language. The standard mitigation measures that the city maintains are inclusive of all

↑  
Q-1  
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↑  
Q-2  
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tribes that have engaged in consultation, and are sufficient for mitigating impacts, as time has shown.

Thank you again and my apologies for the late email, but this is a dire situation, and of the utmost importance.

Sincerely

JOSEPH ONTIVEROS  
TRIBAL HISTORIC PRESERVATION OFFICER  
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## **Response to Comment Letter Q: Soboba Band of Indians**

**November 24, 2024**

**Comment Q-1.** Commenter asserts the Draft SEIR uses non-standard mitigation measures, they are one sided, and inconsistent with applicable California Public Resource Codes and Health and Safety Codes. Commenter specifically objects to the predetermination of how treatment and disposition of human remains would take place before the most likely descendent process has been executed. Commenter recommends use of either standard mitigation, measure language, or incorporation of actual statutes. Commenter asserts the Draft SEIR creates conflicts between the unique mitigation requirements of cultural resources and tribal cultural resources.

**Response to Q-1.** The City proposes to modify the language in cultural resources and tribal cultural resources mitigation measures MM CUL-1, CUL-2, TCR-1, and TCR-2 as shown above in response to comment P-1. MM TCR-3 was removed because it is a repeat of MM CUL-2 as revised. The intent of these changes addresses the comments raised by Commenter. The resulting changes to MMs CUL-1, CUL-2, TCR-1, and TCR-2 are also shown in the Errata, Section 3.0, of this Final SEIR.

**Comment Q-2.** Commenter requested a 48-hour extension to provide comment on the Draft SEIR in order to provide a redline markup of the proposed mitigation measures, supporting comments, and reference to the applicable statutes. If an extension can not be allowed, Commenter recommends all of the Draft SEIR current mitigation measures for TCRs be replaced with standard mitigation measures.

**Response to Q-2.** The City consulted with Commenter in accordance with AB 52 and SB 18 in October 2020. During consultation, the City sent the cultural resources study along with the confidential appendices, geotechnical study, paleontological study, and conceptual grading plan prepared for the Project to Commenter per their request. The City followed up in June 2022 and did not receive a response. Commenter discontinued communications with the City during AB 52 and SB 18 consultation, and therefore, the City considered consultation to be closed. The City sent the Notice of Availability regarding the release of the Draft SEIR on October 11, 2024 and the 45-day review period ended November 25, 2024. Commenter submitted Letter Q on November 24, 2024, requesting they be given an extension on the comment period. Commenter then submitted Letter Q at the close of the comment period. No changes to the Draft SEIR are required.

See response to comment P-1 regarding the revisions made to mitigation measures MMs CUL-1, CUL-2, TCR-1, and TCR-2. Note that Draft SEIR MM TCR-3 has been eliminated, because it is a repeat of revised MM CUL-2. The intent of these changes addresses the comments raised by Commenter.

## 3.0 ERRATA AND ADDITIONS TO THE DRAFT SEIR

### 3.1 INTRODUCTION

This section of the Final Subsequent Environmental Impact Report (Final SEIR) provides changes to the Draft SEIR that have been made to clarify, correct, or add to the environmental impact analysis for the Modified Project. These changes are a result of public and agency comments received in response to the Draft SEIR and/or information that has become available since publication of the Draft SEIR that clarify or update the SEIR narrative. The changes described in this section are minor changes that do not constitute significant new information that alter the outcome of the environmental analysis or require recirculation of the Draft SEIR document [California Environmental Quality Act (CEQA) Section 15088.5]. CEQA Guidelines, Section 15088.5, states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
  - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
  - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
  - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
  - (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft SEIR disclosed in these Final SEIR modifications do not constitute “significant” new information because:

- There is no new significant information disclosed in this Final EIR that would result in the creation of a new significant environmental impact from either the Modified Project or from a new or revised mitigation measure.
- There is no new significant information disclosed in this Final EIR that would result in the substantial increase in the severity of an environmental impact from the Modified Project unless mitigation measures are adopted that reduce the identified significant impact to a level of insignificance.
- There is no new significant information disclosed in this Final EIR that would produce the ability of a project alternative or mitigation measure considerably different from others previously analyzed to clearly lessen the significant environmental impacts of the Modified Project, but the project Applicant declines to adopt it. The Final EIR does not require the introduction of a new feasible project alternative or mitigation measure considerably different from others previously analyzed to reduce any significant environmental impact attributable to the Modified Project.
- The Draft SEIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment was precluded. This conclusion is supported by the fact that none of the comments received during the public review period require substantive changes to the text of the Draft SEIR.

Therefore, recirculation of the Draft SEIR is not required because the new information added to SEIR No. 2 through the modifications presented in the next subsection of this Final SEIR clarifies or makes insignificant modifications to the text of the Draft SEIR.

### **3.2 ERRATA AND ADDITIONS**

The following errata changes and text additions to the Draft SEIR are presented in this subsection. The Draft SEIR section heading or appropriate indicator identifying where changes have been made are shown in *ITALICS*. Deletions to text are shown with strikethrough (~~strikethrough~~) and additions are shown with double underline (underline).

*The text of Mitigation Measures 4.7.4A (Draft SEIR pp 1-17 and 1-18), CUL-1 (Draft SEIR pp 1-19 to 1-21), CUL-2 (Draft SEIR p 1-21), TCR-1 (Draft SEIR pg 1-17 and 1-18), TCR-2 (Draft SEIR pg 1-17 and 1-18), TCR-3 (Draft SEIR pg 1-17 and 1-18), and 4.11.3.C (Draft SEIR pg 1-27) as they appear or were missing from Table 1-1 - Summary of Impacts, Mitigation Measures, and Level of Significance after Mitigation, of the Draft SEIR has been revised as follows:*

Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation	Significance Compared to Approved Project
Threshold BIO-5: Adopted Policies and/or Ordinances	Potentially Significant	4.7.4A: Prior to issuance of grading permits for PA 1, 2, 3, and 5, and 6, the project shall comply with <u>Chapter 17.59 of the Corona Municipal Code</u> <del>the City's Hillside Development Overlay Ordinance</del> . This mitigation was previously introduced as mitigation measure 4.6-1. This Ordinance promotes the use of residential clustering techniques and their measures to minimize impacts on hillside sites, typically areas containing oak trees. Home sites shall be clustered into the fewest number of acres possible to minimize the spread of impacts over a large portion of the property to reduce fragmentation of the remaining natural areas.	Less than Significant	Equal
Threshold CUL-2: Adverse change in significance of an archaeological resource	Potentially Significant	CUL-1: <del>Unanticipated Discoveries of Cultural Resources Mitigation Monitoring and Reporting Program (MMRP)</del> - <u>Prior to issuance of grading permits, a Cultural Resources/ Tribal Cultural Resources Mitigation and Monitoring Plan CR/TCR-MMP shall be prepared by the Project archaeologist and submitted to the City for dissemination to the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh), Pechanga Band of Indians (Pechanga), and Soboba Band of Luiseno Indians (Soboba). All parties shall review and be provided with an opportunity to comment upon, the plan in a reasonable time period as determined by the City prior to permitting for the Project. If consensus among the Project archeologist, the City and Tribe(s) about monitoring and treatment methods cannot be reached, the Lead Agency shall make the determination in its best judgement regarding</u>	Less than Significant	Equal

	<p><u>the appropriate measures for inclusion in the CR/TCR-MMP considering input and recommendations from archaeologist and the consulting Tribe(s). Any and all findings of discovered resources will be subject to the protocol detailed within the CR/TCR-MMP. As a condition of project approval, a MMRP is recommended to identify any cultural resources that may be uncovered during grading, and subsequently, to mitigate potential impacts to any discovered archaeological resources evaluated as significant.</u></p> <p>This <u>CR/TCR-MMP program</u> shall include, but not be limited to, the following <u>provisions actions</u>:</p> <ol style="list-style-type: none"> <li>1) Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the <u>Citylead agency</u> stating that a certified archaeologist has been retained to implement the <u>CR/TCR-MMP monitoring program</u>.</li> <li>2) The project applicant shall provide Native American monitoring <u>from the consulting Tribes on a rotating basis during all grading and ground disturbing activities, when the archaeological monitor identifies undisturbed soil or Native American artifacts.</u> The Native American monitor(s) shall work in concert with the archaeological monitor to observe ground disturbances <u>to fulfill the provisions of the CR/TCR-MMP and search for cultural materials when the potential exists to encounter prehistoric artifacts.</u></li> <li>3) The certified archaeologist <u>and the consulting tribal monitor(s)</u> shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the <u>CR/TCR-MMP monitoring program</u>.</li> </ol>		
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		<p><del>4) During the cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.</del></p> <p><del>5) Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.</del></p> <p>6) <u>4) In the event that previously unidentified cultural resources or tribal cultural resources are discovered, the archaeologist in consultation with the tribal monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources or tribal cultural resources. The archaeologist shall contact the Citylead agency at the time of discovery. The archaeologist, in consultation with the tribal monitor(s) and Citylead agency, shall determine the significance of the discovered resources. The Citylead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources and tribal cultural resources, the CR/TCR-MMP shall address culturally appropriate methods and treatment, including additional steps to mitigate impacts as determined by the City, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the</u></p>		
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		<p>county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.</p> <p>7) <u>5) Before construction activities are allowed to resume in the affected area, any cultural resources or tribal cultural resources that cannot be avoided and preserved in place shall be addressed through the methods and processes identified in the CR/TCR-MMP. the artifacts shall be recovered and features recorded using professional archaeological methods. The project archaeologist in consultation with the consulting tribal monitor(s) shall identify the methods for data recovery in the CR/TCR-MMP. determine the amount of material to be recovered for an adequate artifact sample for analysis.</u></p> <p>8) <u>6) All cultural material collected during the grading monitoring program shall be subject to the culturally appropriate treatment and mitigation standards outlined in the TCR-CRMP, which may include reburial on-site in an area that will be protected in perpetuity or relinquishment to the culturally affiliated consulting tribal government for culturally appropriate treatment. processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent euration.</u></p> <p>9) <u>7) A Phase 4 report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed, in consultation with the consulting</u></p>		
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		<p><u>tribal monitor(s)</u>, and submitted to the satisfaction of the <u>Citylead agency</u> prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.</p> <p><u>8) Any historic archaeological material that is not Native American in origin (non-TCR and) shall be curated at an institution meeting the State and federal standards for curation.</u></p>		
<p>Threshold                  CUL-3:                  Disturb human remains</p>	<p>Potentially Significant</p>	<p>CUL-2: Human Remains - If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the <u>Most Likely Descendant</u>, "<del>most likely descendant</del>." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.</p>	<p>Less than Significant</p>	<p>Equal</p>
<p>Threshold                  TCR-1:                  Impacts to Listed or Eligible Tribal Cultural Resources</p>	<p>Potentially Significant</p>	<p>Implement MM CUL-1</p> <p>TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities</p> <p>A. The Project applicant/<del>lead agency</del> shall retain, <u>via a monitoring agreement</u>, a Native American Monitor(s) <u>authorized to represent Kizh Nation, Pechanga, and Soboba on a rotating basis for all "ground-disturbing activities" in native soil and previously</u></p>	<p>Less than Significant</p>	<p>Equal</p>

		<p><del>unexamined fill soils that occur within the proposed project area from or approved by the Gabrieleño Band of Mission Indians — Kizh Nation.</del> The monitor(s) shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project <del>at all project locations</del> (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, <u>all grading activities, archaeological investigations, demolition, pavement removal, subsurface testing of any kind, weed abatement, potholing, auguring, clearing, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</u></p> <p>B. A copy of the executed monitoring agreement shall be submitted to the <del>City lead agency</del> prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor(s) will complete daily monitoring <u>activity</u> logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, <del>cultural-related</del> <u>and Tribal Cultural Resource</u> materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). <u>Tribal monitoring activity logs will be provided to the City and Applicant any with confidential information, as provided by law, not being subject to a Public Records Act Request. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of</u></p>		
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		<p><del>monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.</del></p> <p><del>D. On-site tribal monitoring <u>for site preparation activities and for construction within each Planning Area</u> shall conclude <u>upon the sooner of (1) when the consulting Tribe(s)' monitor(s) confirms through a written confirmation that all grading and ground-disturbing activities are no longer within archaeological and cultural resources soils or (2) a determination by the City and written notification to the Tribal monitor(s) that soil-disturbing construction activities have concluded at the site.</u> upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground disturbing activities and phases that may involve ground disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.</del></p> <p><del>E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.</del></p> <p><del>TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects</del></p>		
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		<p><u>A. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant (“MLD”). The MLD shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.</u></p> <p><u>BA. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute, unless there are multiple Ancestral remains comprising a burial site, which may also be a Tribal Cultural Resource. In the event that funerary objects are located, additional treatment measures will be imposed and implemented pursuant to the provisions of a Cultural Resources/Tribal Cultural Resources Mitigation and Monitoring Plan and after seeking recommendations from the MLD and the culturally affiliated consulting tribe(s).</u></p> <p><del>B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately</del></p>		
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	<p><del>reported to the County Coroner and all ground disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.</del></p> <p><del>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</del></p> <p><del><u>C</u>D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the <u>City, after consulting with the project archeologist and after seeking recommendations from the named MLD and consulting Tribe(s)</u> <del>Kizh</del> determines in its sole discretion that resuming construction activities at that distance is acceptable, and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)</del></p> <p><del><u>D</u>E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. <u>If multiple Native American human remains are uncovered, additional treatment and measures will be required for the site as agreed upon by the project archeologist and the City, after seeking recommendations from the MLD and consulting Tribe(s).</u> Any historic archaeological material that is not Native American in origin (non TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles</del></p>		
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	<p>County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.</p> <p><u>EF</u>. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p> <p><b>MM TCR 3: — Procedures for Burials and Funerary Remains</b></p> <p>A. As the Most Likely Descendant (“MLD”), the Koo nas gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.</p> <p>B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.</p> <p>C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.</p> <p>D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains.</p>		
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		<p><del>If this type of steel plate is not available, a 24 hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.</del></p> <p><del>E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.</del></p> <p><del>F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.</del></p> <p><del>G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC.</del></p>		
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		<p><del>The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.</del></p>		
<p>Threshold                  HYD-1:                  Violate any                  water quality                  standards or                  waste                  discharge                  requirements</p>	<p>Potentially                  Significant</p>	<ul style="list-style-type: none"> <li>• The construction entrance shall be stabilized to reduce tracking onto adjacent streets.</li> <li>• Dikes, drains, swales or other features shall be used to divert and/or redirect runoff.</li> </ul> <p><u>4.11.3.C: Manufactured slopes shall be stabilized. Where appropriate, retaining wall designs shall include waterproofing and weep holes, subdrains or backdrains for relieving possible hydrostatic pressures.</u></p> <p>4.11.3.D: Manufactured slopes shall be revegetated to help ensure stability. Revegetation plans shall be submitted to the City for review and approval prior to the issuance of grading permits. Plant selection shall comply with the Plant Palette contained in Section 4.3.6 of the Green River Ranch Specific Plan.</p> <p>4.11.4.A: Development within the Specific Plan area shall comply with applicable provisions of the NPDES permit and the applicable standards and regulations of responsible agencies.</p> <p><u>4.11.4.B: Precast “stormceptors” shall be installed in parking areas and/or in areas where fuels, oils, solvents or other pollutants may enter the stormwater stream (i.e., gas stations, loading areas). Such devices shall be adequately maintained (including the cleaning/replacing of absorbent fiberglass “pillows” and periodic removal of accumulated sand and silt).</u></p>		

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*The text on page p. 4.3-17 of the Draft SEIR has been revised as follows:*

.....significance thresholds during operational activities. The Modified Project is required to comply with SCAQMD Rule 2305, the Warehouse Indirect Source Rule, which requires owners and operators associated with warehouses 100,000 square feet or larger are required to directly reduce NO<sub>x</sub> and PM emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. As such, the Modified Project would be required to incorporate **Mitigation Measures, MM AQ-2 through MM AQ-45** to reduce operational-related emissions, specifically designed to improve truck efficiency. However, the estimated long-term operational emissions generated under full buildout of the Modified Project would exceed the SCAQMD's regional operational significance thresholds. In addition, Project operational-source VOC emissions during summer cannot be definitively reduced below applicable SCQMD thresholds and therefore would therefore exceed regional operational significance thresholds.

*The text on page p. 4.3-18 of the Draft SEIR has been revised as follows:*

**Mitigation Measure**

The Modified Project introduces the following Mitigation Measures and are further described in detail Section 4.3.10.

- **MM AQ-1 through AQ-45**

*The text on page p. 4.3-21 of the Draft SEIR has been revised as follows:*

As previously stated in Impact AQ-1, the Modified Project would be required to incorporate **Mitigation Measures, MM AQ-2 through MM AQ-45** to reduce operational-related emissions. The estimated maximum daily operational emissions with mitigation are summarized on Table 4.3-4 below.

*The text on page p. 4.3-22 of the Draft SEIR has been revised as follows:*

As discussed previously, the 2001 EIR determined the Approved Project would produce construction-related impacts from NO<sub>x</sub> and PM<sub>10</sub> emissions and operational-related emissions from CO, ROC, and NO<sub>x</sub> that would be significant and unavoidable even with implementation of all feasible mitigation measures. Therefore, no new impacts would occur with implementation of the Modified Project when compared to those identified in the 2001 EIR. However, additional mitigation measures **MM AQ-1 through MM AQ-45** have been identified for the Modified Project to reduce impacts from construction and operations of the Modified Project to the fullest extent feasible.

**Mitigation Measure**

The Modified Project introduces the following Mitigation Measures and are further described in detail Section 4.3.10.

• **MM AQ-1 through AQ-45**

*The text on page p. 4.3-30 of the Draft SEIR has been revised as follows:*

**NEW MITIGATION MEASURES APPLICABLE TO MODIFIED PROJECT**

The Modified Project introduces the following Mitigation Measures and are further described in detail below. No feasible mitigation measures beyond MM AQ-2 through MM AQ-45 exist that would reduce project-related operational emissions to levels that are less than significant.

*The text on page pp. 4.7-19 and 4.7-20 of the Draft SEIR has been revised as follows:*

The Geotechnical Study identified the existence of very old alluvial fan sediments and sedimentary formations beneath the Modified Project that are considered to possess high paleontological resource sensitivity. Consequently, ground breaking activities during Project construction are considered to have a potential for impact to paleontological resources and therefore mitigation is required. Full-time paleontological monitoring shall be required in undisturbed fossil-bearing formations starting at the surface during surficial grading, excavation, or utility trenching activities associated with site preparation. This same conclusion was reached by the earlier investigations contained in the 2001 EIR for the Approved Project. For this reason, the Geotechnical Study recommended a draft PRIMP that would ~~complement~~replace the PRIMP contained in MM 4.9.1A of the prior 2001 EIR for the Approved Project. The revised and updated PRIMP would be comparable to the Approved Project's mitigation, consistent with the provisions of CEQA, the City's GP policies regarding paleontological resources, and the guidelines of the Society of Vertebrate Paleontology. Upon implementation, the revised and updated PRIMP ~~in combination with the recommendations contained in the 2001 EIR Mitigation Measure 4.9.1A~~ would mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological fossil resources, if present, to less than significant. The updated and revise PRIMP acknowledges that paleontological monitoring may be reduced or halted if the excavations are unlikely to yield paleontological resources based upon the observations and recommendations of the professional-level project paleontologist.

Therefore, no new or substantially greater impacts would occur with implementation of the Modified Project when compared to those identified in the 2001 EIR for the Approved Project with implementation of ~~2001 EIR MM 4.9.1.A~~ plus revised and updated Mitigation Measure MM PAL-1.

**Mitigation Measure**

~~In addition to 2001 EIR MM 4.9.1.A, and~~ The Modified Project introduces Mitigation Measure MM PAL-1 that would reduce project-related impacts to levels that are less than significant.

#### **4.7.8 CUMULATIVE IMPACTS ASSOCIATED WITH THE MODIFIED PROJECT**

Future development within the Modified Project vicinity would result in the potential for loss of paleontological resources. However, each development project is required to implement appropriate mitigation during earth moving activities in the same manner as identified for the Modified Project (~~prior EIR MM 4.9.1.4 and new~~ MM PAL-1). For this reason, cumulative impacts to paleontological resources would be reduced to below a level of significance in the same manner as concluded in the 2001 EIR. Pursuant to local paleontological protection measures contained in the County of Riverside's and City's GPs, and the provisions of CEQA, impacts to paleontological resources from projects within the cumulative impact area that require discretionary action by a public agency would be assessed. Similar to the conclusion reached in the prior EIR, it is reasonable to assume appropriate mitigation would be required for all cumulative projects and impacts would be reduced to less than significant on a project and cumulative level. Therefore, no new or substantially greater cumulative impacts would occur with implementation of the Modified Project when compared to those identified in the 2001 EIR for the Approved Project.

*The text of Mitigation Measure 4.7.4A as it appears on p. 4.4.-44 of the Draft SEIR has been revised as follows:*

4.7.4A: Prior to issuance of grading permits for PA 1, 2, 3, and 5, the project shall comply with Chapter 17.59 of the Corona Municipal Code~~the City's Hillside Development Overlay Ordinance~~. This mitigation was previously introduced as mitigation measure 4.6-1. This Ordinance promotes the use of residential clustering techniques and their measures to minimize impacts on hillside sites, typically areas containing oak trees. Home sites shall be clustered into the fewest number of acres possible to minimize the spread of impacts over a large portion of the property to reduce fragmentation of the remaining natural areas.

*The text on p. 4.10-23 of the Draft SEIR has been revised as follows:*

#### **Mitigation Measures**

The following Mitigation Measures from the previously certified 2001 EIR are applicable to the Modified Project are shown below and further described in detail Section 4.10.9:

- **4.11.1A, 4.11.1.B, 4.11.2.A, 4.11.2B, 4.11.3A, 4.11.3.B, ~~4.11.3.C, 4.11.3.D,~~ and 4.11.4A, and 4.11.4B**

*The text of Mitigation Measure CUL-1 as it appears on pp. 4.5.-9 to 4.5-11 of the Draft SEIR has been revised as follows:*

MM CUL-1: **Unanticipated Discoveries of Cultural Resources Mitigation Monitoring and Reporting Program (MMRP)** - Prior to issuance of grading permits, a Cultural Resources/ Tribal Cultural Resources Mitigation and Monitoring Plan (CR/TCR-MMP) shall be prepared by the Project archaeologist and submitted to the City for dissemination to the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh), Pechanga Band of Indians (Pechanga), and Soboba Band of Luiseno Indians (Soboba). All parties shall review and be provided with an opportunity to comment upon, the plan in a reasonable time period as determined by the City prior to permitting for the Project. If consensus among the Project archaeologist, the City and Tribe(s) about monitoring and treatment methods cannot be reached, the City shall make the determination in its best judgement regarding the appropriate measures for inclusion in the CR/TCR-MMP considering input and recommendations from archaeologist and the consulting Tribe(s). Any and all findings of discovered resources will be subject to the protocol detailed within the CR/TCR-MMP. As a condition of project approval, a MMRP is recommended to identify any cultural resources that may be uncovered during grading, and subsequently, to mitigate potential impacts to any discovered archaeological resources evaluated as significant.

This CR/TCR-MMP ~~program~~ shall include, but not be limited to, the following provisions ~~actions~~:

- 1) Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the City ~~lead agency~~ stating that a certified archaeologist has been retained to implement the CR/TCR-MMP ~~monitoring program~~.
- 2) The project applicant shall provide Native American monitoring from the consulting Tribes on a rotating basis during all grading and ground disturbing activities. ~~when the archaeological monitor identifies undisturbed soil or Native American artifacts. The~~ Native American monitor(s) shall work in concert with the archaeological monitor to observe ground disturbances to fulfill the provisions of the CR/TCR-MMP ~~and search for cultural materials when the potential exists to encounter prehistoric artifacts.~~
- 3) The certified archaeologist and the consulting tribal monitor(s) shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the CR/TCR-MMP ~~monitoring program~~.

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- 4) ~~During the cutting of previously undisturbed deposits, the archaeological monitor(s) shall be on site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.~~
- 5) ~~Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.~~
- 6) 4) In the event that previously unidentified cultural resources or tribal cultural resources are discovered, the archaeologist in consultation with the tribal monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources or tribal cultural resources. The archaeologist shall contact the Citylead agency at the time of discovery. The archaeologist, in consultation with the tribal monitor(s) and City-lead agency, shall determine the significance of the discovered resources. The Citylead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources and tribal cultural resources, the CR/TCR-MMP shall address culturally appropriate methods and treatment, including additional steps to mitigate impacts as determined by the City, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.
- 7) 5) Before construction activities are allowed to resume in the affected area, any cultural resources or tribal cultural resources that cannot be avoided and preserved in place shall be addressed though the methods and processes identified in the CR/TCR-MMP. the artifacts shall be recovered and features recorded using professional archaeological methods. The project archaeologist in consultation with the consulting tribal monitor(s) shall identify the methods for data recovery in the CR/TCR-MMP, determine the amount of material to be recovered for an adequate artifact sample for analysis.
- 8) 6) All cultural material collected during the grading monitoring program shall be subject to the culturally appropriate treatment and mitigation standards outlined in the TCR-CRMP, which may include reburial on-site in an area that will be protected in perpetuity or relinquishment to the culturally affiliated consulting tribal government

~~for culturally appropriate treatment, processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.~~

- 9) 7) A Phase 4 report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed, in consultation with the consulting tribal monitor(s), and submitted to the satisfaction of the City lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.

8) Any historic archaeological material that is not Native American in origin (non-TCR and) shall be curated at an institution meeting the State and federal standards for curation.

*The text of Mitigation Measure CUL-2 as it appears on p. 4.5-11 of the Draft SEIR has been revised as follows:*

MM CUL-2: **Human Remains** - If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant, "~~most likely descendant~~." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

*The text of Mitigation Measure TCR-1 as it appears on pp. 4.18-16 and 4.18-17 of the Draft SEIR has been revised as follows:*

MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The Project applicant ~~lead agency~~ shall retain, via a monitoring agreement, a Native American Monitor(s) authorized to represent Kizh Nation, Pechanga, and Soboba on a rotating basis for all "ground-disturbing activities" in native soil and previously unexamined fill soils that occur within the proposed project area ~~from or approved by the Gabrieleño Band of Mission Indians — Kizh Nation~~. The monitor(s) shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project ~~at all~~

~~project locations~~(i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, all grading activities, archaeological investigations, demolition, pavement removal, subsurface testing of any kind, weed abatement, potholing, auguring, clearing, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the ~~City lead agency~~ prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor(s) will complete daily monitoring activity logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, ~~cultural-related and Tribal Cultural Resource~~ materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Tribal monitoring activity logs will be provided to the City and Applicant with any confidential information, as provided by law, not being subject to a Public Records Act Request. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring for site preparation activities and for construction within each Planning Area shall conclude upon the sooner of (1) when the consulting Tribe(s)’ monitor(s) confirms through a written confirmation that all grading and ground-disturbing activities are no longer within archaeological and cultural resources soils or (2) a determination by the City and written notification to the Tribal monitor(s) that soil-disturbing construction activities have concluded at the site, upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. ~~Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe~~

~~deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.~~

*The text of Mitigation Measure TCR-2 as it appears on pp. 4.18-17 and 4.18-18 of the Draft SEIR has been revised as follows:*

MM TCR-2: ~~Unanticipated Discovery of Human Remains and Associated Funerary Objects~~

A. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant ("MLD"). The MLD shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

~~BA.~~ Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute, unless there are multiple Ancestral remains comprising a burial site, which may also be a Tribal Cultural Resource. In the event that funerary objects are located, additional treatment measures will be imposed and implemented pursuant to the provisions of a Cultural Resources/Tribal Cultural Resources Mitigation and Monitoring Plan and after seeking recommendations from the MLD and the cultural affiliated consulting tribe(s).

~~B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.~~

~~C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).~~

~~CD.~~ Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the named MLD and

~~consulting Tribe(s) Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable, and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)~~

~~DE. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. If multiple Native American human remains are uncovered, additional treatment and measures will be required for the site as agreed upon by project archeologist and the City, after seeking recommendations from the MLD and consulting Tribe(s). Any historic archaeological material that is not Native American in origin (non TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.~~

~~EF. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.~~

*The text of Mitigation Measure TCR-3 as it appears on pp. 4.18-18 and 4.18-19 of the Draft SEIR has been revised as follows:*

**MM TCR 3: — Procedures for Burials and Funerary Remains**

~~A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.~~

~~B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.~~

~~C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.~~

~~D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24 hour guard should be posted outside of~~

~~working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.~~

~~E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.~~

~~F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.~~

~~G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.~~

## 4.0 UPDATED MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) was originally formulated based on the findings of the certified Environmental Impact Report (Certified EIR) for the Green River Ranch Specific Plan, State Clearinghouse No. 1999091143, approved in 2001. The MMRP has been updated with changes to mitigation measures included in the original Certified EIR as well as new mitigation measures presented in the 2024 Draft SEIR. This MMRP complies with Section 15097 of the California Environmental Quality Act (CEQA) Guidelines, which requires that the Lead Agency “adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects.”

CEQA requires adoption of a reporting or monitoring program for those measures placed on a project to mitigate or avoid adverse effects on the environment (Public Resource Code Section 21081.6). The law states that the reporting or monitoring program shall be designed to ensure compliance during project implementation.

The MMRP contains the following elements:

1. The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
2. A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
3. The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

The City of Corona (City) as Lead Agency is responsible for ensuring full compliance with the mitigation measures adopted for the proposed Modified Project, as well as the balance of the Green River Ranch Specific Plan. The City will monitor and report on all mitigation activities. Mitigation measures will be implemented at different stages of development throughout the Green River Ranch

Specific Plan project area as revised by the Modified Project. In this regard, the responsibilities for implementation have been assigned to the project Applicant, contractor, or a combination thereof. If during the course of project development and implementation any of the mitigation measures identified herein cannot be successfully implemented, the City shall be immediately informed and the City will notify affected responsible agencies. The City, in conjunction with affected responsible agencies, will determine if modification to the project is required and/or whether alternative mitigation is appropriate.

## UPDATED MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST

Project File Name: GRRSP Amendment & BPI Development

Date: January 2025

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<b>AESTHETICS</b>						
<b>4.6.1M:</b> Sources of lighting within the Specific Plan area should be limited to the minimum standard to ensure safe circulation and visibility.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits
<b>4.6.1N:</b> Street lighting should be limited to intersections and other locations needed to maintain safe access (e.g., sharp curves).	City of Corona, Planning and Development Department, Development Services Division	Prior to Construction (once)	Prior to Issuance of Encroachment Permits	Review of street improvement plans and on-site inspection		Withhold Encroachment Permits
<b>4.6.1O:</b> Exterior lighting for buildings should be of a low profile and intensity.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building and on-site inspection		Withhold Building Permits

**Project File Name: GRRSP Amendment & BPI Development**

**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<b>AIR QUALITY</b>						
<b>4.3.1A:</b> The Construction Contractor shall select the construction equipment used on site based on low emission factors and high energy efficiency. The Construction Contractor shall ensure that construction grading plans include a statement that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.	City of Corona, Planning and Development Department, Building and Development Services Divisions	Prior to Construction (once)	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits
<b>4.3.1B:</b> The Construction Contractor shall utilize electric or diesel-powered equipment in lieu of gasoline-powered engines where feasible.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits
<b>4.3.1C:</b> The Construction Contractor shall ensure that construction grading plans include a statement that work crews will shut off equipment when not in use. During smog season (May through October), the overall length of the construction period should be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time.	City of Corona, Planning and Development Department, Building and Development Services Divisions	Prior to Construction (once)	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits

**Project File Name: GRRSP Amendment & BPI Development**

**Date: January 2025**

<b>Mitigation Measure No. / Implementing Action</b>	<b>Responsible for Monitoring</b>	<b>Monitoring Frequency</b>	<b>Timing of Verification</b>	<b>Method of Verification</b>	<b>Verified Date/ Initials</b>	<b>Sanctions for Non-Compliance</b>
<b>4.3.1D:</b> The Construction Contractor shall time the construction activities so as to not interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flag person shall be retained to maintain safety adjacent to existing roadways.	City of Corona, Public Works Department and Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Grading and Building Permits	Review of traffic control plans and on-site inspection		Withhold Grading Permit, Building Permit, and/or Issuance of a Stop Work Order
<b>4.3.1E:</b> The Construction Contractor shall support and encourage ridesharing and transit incentives for the construction crew.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits
<b>4.3.1F:</b> Dust generated by the development activities shall be retained on site and kept to a minimum by following the dust control measures listed below:  a. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.  b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from	City of Corona, Planning and Development Department, Building Division	Prior to Grading and during grading and construction operations.	Prior to Issuance of Grading Permit	Review of construction documents and on-site inspection.		Withhold Grading Permit and/or Issuance of a Stop Work Order

**Project File Name: GRRSP Amendment & BPI Development**

**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>leaving the site. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day, and whenever wind exceeds 15 miles per hour.</p> <p>c. After clearing, grading, earth moving, or excavation is completed, the entire area of disturbed soil shall be treated immediately by pickup of the soil until the area is paved or otherwise developed so that dust generation will not occur.</p> <p>d. Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.</p> <p>e. Trucks transporting soil, sand, cut or fill materials and/or construction debris to or from the site shall be tarped from the point of origin.</p>						
<p><b>4.3.1G:</b> The Construction Contractor shall utilize as much as possible pre-coated/natural colored building materials, water-based or low-VOC coating, and coating transfer or spray equipment with high transfer efficiency, such as high volume low pressure (HVLP) spray method, or manual coatings application such as paint brush, hand roller, trowel, spatula, dauber, rag, or sponge.</p>	<p>City of Corona, Planning and Development Department, Building Division</p>	<p>Prior to Construction (once)</p>	<p>Prior to Issuance of Building Permits</p>	<p>The City shall provide the applicant and the construction contractor(s) the relevant information.</p>		<p>Withhold Building Permit</p>

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**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p><b>4.3.2A:</b> The project shall comply with Title 24 of the California Code of Regulations established by the Energy Commission regarding energy conservation standards. The project applicant shall incorporate the following in building plans:</p> <ul style="list-style-type: none"> <li>• Planting trees to provide shade and shadow to building.</li> <li>• Solar or low-emission water heaters shall be used with combined space/water heater unit.</li> <li>• Refrigerator with vacuum power insulation.</li> <li>• Double-pained glass or window treatment for energy conservation shall be used in all exterior windows.</li> <li>• Energy-efficient low-sodium parking lot lights shall be used.</li> </ul>	<p>City of Corona, Planning and Development Department, Building Division</p>	<p>Prior to Construction (once)</p>	<p>Prior to Issuance of Building Permits</p>	<p>Review of building plans and on-site inspection</p>		<p>Withhold Building Permits</p>
<p><b>4.3.2B:</b> Encourage use of transportation demand measures (TDM) such as preferential parking for vanpooling/carpooling, subsidy for transit pass or vanpooling/carpooling, flextime work schedule, bike racks, lockers, showers, and on-site cafeteria in the design and operations of the commercial land uses.</p>	<p>City of Corona, Planning and Development Department, Building and Planning Divisions</p>	<p>Prior to Construction (once)</p>	<p>Prior to issuance of Building Permit</p>	<p>Review of construction documents and on-site inspection</p>		<p>Withhold Building Permit and/or Issuance of a Stop Work Order</p>

**Project File Name: GRRSP Amendment & BPI Development**

**Date: January 2025**

<b>Mitigation Measure No. / Implementing Action</b>	<b>Responsible for Monitoring</b>	<b>Monitoring Frequency</b>	<b>Timing of Verification</b>	<b>Method of Verification</b>	<b>Verified Date/ Initials</b>	<b>Sanctions for Non-Compliance</b>
<b>4.3.2C:</b> The project proponent shall determine with the City and the electrical purveyor if it is feasible to pre-wire houses for electrical charges for EV cars and/or optic fibers for home offices. If feasible, install EV charges and/or optic-fibers per the electrical purveyor's direction prior to Certificate of Occupancy.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits
<b>AQ-1:</b> During grading of Planning Areas 1, 2, and 3, all Construction Contractors shall ensure that offroad diesel construction equipment complies with Environmental Protection Agency (EPA)/CARB Tier 4 Interim emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.	City of Corona, Planning and Development Department, Building Division	Prior to Grading and during grading and construction operations.	Prior to Issuance of Grading Permit	Review of construction documents and on-site inspection.		Withhold Grading Permit and/or Issuance of a Stop Work Order
<b>AQ-2:</b> Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of a	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits

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Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
certificate of occupancy, the Lead Agency (City of Corona) shall conduct a site inspection to ensure that the signs are in place.						
<b>AQ-3:</b> Prior to tenant occupancy for Planning Areas 1, 2 and 3, the Project Applicants or successors in interest shall provide documentation to the Lead Agency (City of Corona) demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Occupancy Permits	Review of building plans and on-site inspection		Withhold Occupancy Permits
<b>AQ-4:</b> The minimum number of automobile electric vehicle (EV) charging stations required by the California Code of Regulations (CCR) Title 24 shall be provided. Final designs of Project buildings shall include electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations.	City of Corona, Planning and Development Department, Building Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits
<b>BIOLOGICAL RESOURCES</b>						
<b>4.7.1A:</b> Prior to issuance of grading permits for each increment of development, applicable pre-construction California gnatcatcher surveys shall be conducted and a survey report approved by the City. The report shall	City of Corona, Planning and Development	Prior to Grading and during grading and	Prior to Issuance of Grading Permit	Submit to the City California gnatcatcher pre-construction surveys		Withhold Grading Permit and/or

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**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>identify mitigation for impacts to the California gnatcatcher consisting of acquiring and preserving California gnatcatcher habitat of equal or greater quality at a minimum replacement ratio of 1:1 (acquire at least 1 acre for each acre impacted). The Modified Project would impact 8 acres of habitat used by the California gnatcatcher; therefore, mitigation shall consist of the acquisition and preservation of at least 8 acres of occupied habitat. The acquired habitat shall be in a location that facilitates management for the species (i.e., currently supports the species and is contiguous with a larger area that will be managed for conservation of the species). Potential suitable locations include areas adjacent to existing reserves (such as Stephens' kangaroo rat reserves) or within established mitigation banks for the California gnatcatcher.</p> <p>Project impacts to the California gnatcatcher and its designated critical habitat may require consultation or other permitting for compliance with the federal ESA that may result in requirements for additional mitigation measures beyond those described above.</p>	<p>Department, Planning Division</p>	<p>construction operations.</p>		<p>and other proof of documentation as necessary, demonstrating that mitigation measure has been met.</p>		<p>Issuance of a Stop Work Order</p>
<p><b>4.7.2A:</b> Prior to issuance of grading permits for each increment of development, applicable pre-construction riparian area surveys shall be conducted and a survey report approved by the City. The report shall identify all</p>	<p>City of Corona, Planning and Development</p>	<p>Prior to Grading and during grading and</p>	<p>Prior to Issuance of Grading Permit</p>	<p>Submit to the City riparian area pre-construction surveys, mitigation bank</p>		<p>Withhold Grading Permit and/or</p>

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**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>riparian habitat impacted (i.e., removed) by the proposed project and such impacted areas shall be replaced through creation of new riparian habitat of equal or greater quality. Impacts to 3.66 acres of CDFW jurisdiction (including 2.10 acres of potential RWQCB jurisdiction) shall be mitigated at a 3:1 ratio (10.98 acres) through the combination of onsite restoration and preservation, and offsite mitigation (Riverpark Mitigation Bank). The onsite mitigation will consist of the restoration of 2.57 acres of riparian oak woodland and the preservation of 6.36 acres of oak woodlands and streams. The balance of mitigation would consist of 4.62 acres would be purchased at a Mitigation bank.</p> <p>It is anticipated that project construction may require permits or approvals from the CDFW (per Section 1601/1603 of the Fish and Game Code) and RWQCB (per Section 401 of the federal Clean Water Act).</p>	<p>Department, Planning Division</p>	<p>construction operations.</p>		<p>receipts, and proof of documentation showing compliance with CDFW, RWQCB permits and regulations, as applicable.</p>		<p>Issuance of a Stop Work Order</p>
<p><b>4.7.3A:</b> Prior to the commencement of tree removal or grading on the proposed project site during the nesting season (March-July), all suitable habitat shall be thoroughly surveyed for the presence of nesting birds by a qualified biologist. If any active nests are detected, the area shall be flagged and avoided until the nesting cycle is complete. In addition, a biologist shall be present on site to monitor the tree removal and grading to ensure</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to Grading and during grading and construction operations.</p>	<p>Prior to Issuance of Grading Permit</p>	<p>Submit to the City nesting bird pre-construction surveys.</p>		<p>Withhold Grading Permit and/or Issuance of a Stop Work Order</p>

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Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
that any nests detected during the initial survey are not disturbed.						
<b>4.7.3B:</b> (Alternative) Tree removal and grading shall be delayed until after the nesting season (March-July).	City of Corona, Planning and Development Department, Planning Division	Prior to Grading and during grading and construction operations.	Prior to Issuance of Grading Permit	Review of grading plans and on-site inspection.		Withhold Grading Permit and/or Issuance of a Stop Work Order
<b>4.7.4A:</b> Prior to issuance of grading permits for PA 1, 2, 3, and 5, the project shall comply with Chapter 17.59 of the Corona Municipal Code. This mitigation was previously introduced as mitigation measure 4.6-1. This Ordinance promotes the use of residential clustering techniques and their measures to minimize impacts on hillside sites, typically areas containing oak trees. Home sites shall be clustered into the fewest number of acres possible to minimize the spread of impacts over a large portion of the property to reduce fragmentation of the remaining natural areas.	City of Corona, Planning and Development Department, Planning Division	Prior to Grading and during grading and construction operations.	Prior to Issuance of Grading Permit	Review of construction and grading plans and on-site inspection.		Withhold Grading Permit and/or Issuance of a Stop Work Order
<b>4.7.4B:</b> Prior to issuance of grading permits for PAs 1, 2, 3, and 5, the applicant shall design an oak woodland management plan which includes the following:	City of Corona, Planning and Development	Prior to Grading and during grading and	Prior to Issuance of Grading Permit	Submit to the City an oak woodland management plan.		Withhold Grading Permit and/or

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Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<ul style="list-style-type: none"> <li>Provisions for ongoing maintenance, management, and construction impact practices for all oaks on site.</li> <li>Provisions for enhancing oak woodlands not within the development zone.</li> <li>Provisions for limiting human and vehicular access to existing oak woodland areas in order to preserve habitat quality.</li> <li>Limitations on the use of herbicides or pesticides within the oak woodland areas.</li> </ul>	Department, Planning Division	construction operations.				Issuance of a Stop Work Order
<p><b>4.7.4C:</b> Prior to grading within PAs 1, 2, 3, and 5, the applicant shall conduct a revised Tree Survey, based on the staking of the specific limits of grading, to assess opportunities for transplanting the oak trees.</p>	City of Corona, Planning and Development Department, Planning Division	Prior to Grading and during grading and construction operations.	Prior to Issuance of Grading Permit	Submit to the City a tree survey.		Withhold Grading Permit and/or Issuance of a Stop Work Order
<p><b>4.7.4D:</b> Prior to issuance of grading permits within PAs 1, 2, 3, and 5, the applicant shall obtain a qualified native plant horticulturist to determine the sensibility and likelihood of survival of transplanting 10 percent of the oak trees.</p>	City of Corona, Planning and Development Department, Planning Division	Prior to Construction (once)	Prior to Issuance of Grading Permits	Submit to the City a report prepared by a qualified native plant horticulturist.		Withhold Grading Permits

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**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p><b>4.7.4E:</b> Prior to certification of occupancy, the applicant shall replant 15-gallon size oaks at a ratio of 10 to 1 for all oaks lost but not transplanted. The location and methods for these plantings would be specified by a qualified native plant biologist/horticulturist.</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to Construction (once)</p>	<p>Prior to Issuance of Occupancy Permits</p>	<p>Review of landscape plans and on-site inspection</p>		<p>Withhold Occupancy Permits</p>
<p><b>BIO-1:</b> If construction will occur within 300 feet of potential vireo habitat between March 15 and September 30, a biologist shall determine whether vireo individuals are present within the adjacent habitat. If work will start prior to March 15 and continue into the vireo season, or will start between March 15 and April 30, the biologist shall survey the adjacent habitat weekly for eight weeks[1] starting on or around March 15 until vireo are detected, or until eight visits are completed and the vireo is confirmed absent. If construction work will start after April 30, then surveys will start on or around April 10 (the formal start of the vireo survey period), and surveys will follow the survey intervals as stated above.</p> <p>If vireo individuals are detected, the biologist will determine necessity and applicability of measures to address edge effects for construction activities occurring within 300 feet of occupied vireo habitat to protect the vireo. At minimum the following are recommended.</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to Grading and during grading and construction operations.</p>	<p>Prior to Issuance of Grading Permit</p>	<p>Submit to the City a vireo habitat survey.</p>		<p>Withhold Grading Permit and/or Issuance of a Stop Work Order</p>

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**Date: January 2025**

Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>1) Noise: Given the proximity of the vireo habitat to the existing Green River Road and the adjacent SR-91, there is already an existing noise baseline from heavy traffic use, and it is possible that construction noise would not exceed that baseline. The Project proponent will retain a qualified biologist to perform noise monitoring to determine the ambient noise level at the habitat edge without construction activities occurring within 300 feet of the habitat edge, and then determine noise levels while construction activities are occurring. If it is determined that with construction, the noise levels exceed the ambient levels, then noise attenuation measures may be implemented, including the construction of a temporary noise attenuation barrier (sound wall) along the disturbance limits north of Green River Road. If it is determined that noise levels cannot be attenuated, then the specific construction activities resulting in the noise will need to be temporarily ceased until August 31, or prior if it is determined through surveys that the vireo are no longer present.</p> <p>2) Lighting: Any night lighting needed during construction within 300 feet of occupied vireo habitat will be down shielded or directed away from the vireo habitat to prevent the illumination of the adjacent habitat.</p>						

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Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<p>3) Dust Emissions: The Project, as a part of standard best management practices (BMPs) pursuant to South Coast Air Quality Management District Rule 403, will introduce dust control measures for the duration of construction activities to minimize any dust-related effect on adjacent vireos.</p> <p>4) Trespassing: Prior to the start of construction activities along the northern side of Green River Road, the edge of the disturbance limits adjacent to the vireo habitat will be demarcated with orange construction fencing to prevent trespassing into the adjacent habitat. In addition, the Project proponent will implement an Environmental Awareness Training program prior to the start of construction to advise workers of sensitive biological areas adjacent to the development footprint, including the habitat areas north of Green River Ranch Road.</p>						
<p><b>BIO-2:</b> If the Crotch bumble bee is still a Candidate species or has been confirmed as a State listed species at the time of Modified Project site disturbance, then prior to the issuance of a grading permit that would remove Crotch bumble bee habitat the following measures shall be implemented:</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to Grading and during grading and construction operations.</p>	<p>Prior to Issuance of Grading Permit</p>	<p>Submit to the City a Crotch bumble bee survey and proof of documentation showing compliance with the RCA and CDFW permits and</p>		<p>Withhold Grading Permit and/or Issuance of a Stop Work Order</p>

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Mitigation Measure No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date/ Initials	Sanctions for Non-Compliance
<ul style="list-style-type: none"> <li>The Project proponent shall have conveyed or have an agreement to convey approximately 50.96 acres of various scrub habitats and 26 acres of nonnative grassland in the southern portion of the Project site to the RCA, which constitutes avoidance of suitable habitat.</li> <li>If the land to be conserved in the southern portion of the Project site has not been conveyed to the RCA and no agreement is yet in place to convey the property, the Project proponent shall coordinate with CDFW to address the extent of impacts and determine whether an Incidental Take Permit (ITP) for Crotch bumble bee would be required. If an ITP were required, then mitigation may be required by CDFW as part of the ITP process, and the conservation of the comparable open space habitat would be presented to support the ITP.</li> </ul>				regulations, as applicable.		
<b>CULTURAL RESOURCES</b>						
<b>CUL-1:</b> Unanticipated Discoveries of Cultural Resources - Prior to issuance of grading permits, a Cultural Resources/ Tribal Cultural Resources Mitigation and Monitoring Plan CR/TCR-MMP shall be prepared by the Project archaeologist and submitted to the City for dissemination to the Gabrieleño Band of Mission Indians	City of Corona, Planning and Development Department, Planning Division	Prior to Grading and during grading and	Prior to Issuance of Grading Permit	Provide evidence to the City that a qualified archeologist(s) monitor has been retained, and that the		Withhold Grading Permit and/or Issuance of a Stop Work Order

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<p>– Kizh Nation (Kizh), Pechanga Band of Indians (Pechanga), and Soboba Band of Luiseno Indians (Soboba). All parties shall review and be provided with an opportunity to comment upon, the plan in a reasonable time period as determined by the City prior to permitting for the Project. If consensus among the Project archeologist, the City and Tribe(s) about monitoring and treatment methods cannot be reached, the City shall make the determination in its best judgement regarding the appropriate measures for inclusion in the CR/TCR-MMP considering input and recommendations from archaeologist and the consulting Tribes. Any non-responsive party shall be assumed to have agreed to the plans without comment. Any and all findings of discovered resources will be subject to the protocol detailed within the CR/TCR-MMP.</p> <p>This CR/TCR-MMP shall include, but not be limited to, the following provisions:</p> <p>1) Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the City stating that a certified archaeologist has been retained to implement the CR/TCR-MMP.</p> <p>2) The project applicant shall provide Native American monitoring from the consulting Tribes on a</p>		<p>construction operations.</p>		<p>monitor will be present during all grading and other significant ground-disturbing.</p> <p>Provide the City a copy of the executed tribal agreement between the applicant and Native American tribe(s) who consulted on the project.</p> <p>A report of findings shall be submitted to the City 30 days of the end of monitoring activities.</p>		

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<p>rotating basis during all grading and ground disturbing activities. The Native American monitor(s) shall work in concert with the archaeological monitor to observe ground disturbances to fulfill the provisions of the CR/TCR-MMP.</p> <p>3) The certified archaeologist and the consulting tribal monitor(s) shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the CR/TCR-MM.</p> <p>4) In the event that previously unidentified cultural resources or tribal cultural resources are discovered, the archaeologist in consultation with the tribal monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources tribal cultural resources. The archaeologist shall contact the City at the time of discovery. The archaeologist, in consultation with the tribal monitor(s) and City, shall determine the significance of the discovered resources. The City must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources and tribal cultural resources, the CR/TCR-MMP shall address culturally appropriate methods and treatment, including additional steps to mitigate impacts as determined by the City.</p>						

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<p>5) Before construction activities are allowed to resume in the affected area, any cultural resources or tribal cultural resources that cannot be avoided and preserved in place shall be addressed through the methods and processes identified in the CR/TCR-MMP. The project archaeologist in consultation with the consulting tribal monitor(s) shall identify the methods for data recovery in the CR/TCR-MMP.</p> <p>6) All cultural material collected shall be subject to the culturally appropriate treatment and mitigation standards outlined in the TCR-CRMP, which may include reburial on-site in an area that will be protected in perpetuity or relinquishment to the culturally affiliated consulting tribal government for culturally appropriate treatment.</p> <p>7) A Phase 4 report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed, in consultation with the consulting tribal monitor(s), and submitted to the satisfaction of the City prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.</p> <p>8) Any historic archaeological material that is not Native American in origin (non-TCR and) shall be</p>						

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curated at an institution meeting the State and federal standards for curation.						
<p><b>CUL-2:</b> Human Remains - If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to Grading and during grading and construction operations.</p>	<p>Prior to Issuance of Grading Permit</p>	<p>On-site inspection.</p>		<p>Withhold Grading Permit and/or Issuance of a Stop Work Order</p>
<b>GEOLOGY AND SOILS</b>						

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<p><b>PAL-1:</b> 1) Monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources by a qualified paleontologist or paleontological monitor. Full time monitoring of grading or excavation activities should be performed starting from the surface in undisturbed areas of very old Quaternary (middle to early Pleistocene) alluvial fan deposits, and the Tertiary-aged Sespe, Vaqueros, Santiago, and Silverado formations within the project. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.</p> <p>2) Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils are collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to Grading and during grading and construction operations.</p>	<p>Prior to Issuance of Grading Permit</p>	<p>Provide the City proof of documentation that a qualified paleontological monitor(s) has been retained, and that the monitor will be present during all grading.</p> <p>If paleontological resources are found during grading and construction, a final monitoring and mitigation report shall be submitted to the City.</p>		<p>Withhold Grading Permit and/or Issuance of a Stop Work Order</p>

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<p>collected. Notes are taken on the map location and stratigraphy of the site, and the site is photographed before it is vacated and the fossils are removed to a safe place. On mass grading projects, any discovered fossil site is protected by red flagging to prevent it from being overrun by earthmovers (scrapers) before salvage begins. Fossils are collected in a similar manner, with notes and photographs being taken before removing the fossils. Precise location of the site is determined with the use of handheld Global Positioning System units. If the site involves a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, Brian F. Smith and Associates, Inc. (BFSA) will send a fossil recovery crew in to excavate around the find, encase the find within a plaster jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment is solicited to help remove the jacket to a safe location before it is returned to the BFSA laboratory facility for preparation.</p> <p>3) Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically suitable sample can be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry screen the sediment in the field, a concentrated sample may consist</p>						

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<p>of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, as many as 20 to 40 five-gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment. In the laboratory, individual fossils are cleaned of extraneous matrix, any breaks are repaired, and the specimen, if needed, is stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).</p> <p>4) Preparation of recovered specimens to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.</p> <p>5) Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., the Western Science Center, 2345 Searl Parkway, Hemet, California 92543). The paleontological program should include a written repository agreement prior to the initiation of mitigation activities.</p>						

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<p>6) Preparation of a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to the appropriate lead agency (City of Corona), will signify satisfactory completion of the project program to mitigate impacts to any paleontological resources.</p> <p>7) Decisions regarding the intensity of the CRMMRP will be made by the project paleontologist based upon the significance of the potential paleontological resources and their biostratigraphic, biochronologic, paleoecologic, taphonomic, and taxonomic attributes, not upon the ability of a project proponent to fund the CRMMRP.</p>						
<b>GREENHOUSE GASES AND GLOBAL CLIMATE CHANGE</b>						
<p><b>GHG-1:</b> Prior to issuance of a building permit for each increment of development in the GRRSP, the Project applicant shall provide documentation to the City of Corona Building Division demonstrating that the improvements and/or buildings subject to a building permit application include the measures from the CAP GHG Emissions Screening Tables (Appendix C to the</p>	<p>City of Corona, Planning and Development Department, Building Division</p>	<p>Prior to Construction (once)</p>	<p>Prior to Issuance of Building Permits</p>	<p>Review of building plans and on-site inspection</p>		<p>Withhold Building Permits</p>

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CAP), as needed to achieve a minimum of 100 points for both the residential and non-residential portions of the Project. Alternatively, specific measures may be substituted for other measures that achieve an equivalent amount of GHG reduction, subject to City of Corona Building Division review.						
<b>HAZARDOUS MATERIALS</b>						
<b>HAZ-1:</b> Prior to issuance of a demolition permit for each phase of development requiring demolition and removal of onsite structures, the Project applicant shall provide documentation to the City of Corona Building Division demonstrating that the improvements and/or buildings subject to a demolition permit application include survey testing for asbestos-containing materials (ACM) and lead-based paints (LBP) in accordance with existing federal and state regulations.	City of Corona, Planning and Development Department, Building Division	Prior to Demolition	Prior to issuance of demolition permits	Review of demolition plans and on-site inspection		Withhold Demolition Permits
<b>HYDROLOGY AND WATER QUALITY</b>						
<b>4.11.1A:</b> The project applicant shall obtain all required permits and clearances from the Corps, the RWQCB, and the CDFG prior to the disturbance of any existing drainage.	City of Corona, Planning and Development Department,	Prior to grading for any development.	Prior to the Issuance of Grading Permits	Submittal of copy of Notice of Intent (NOI) to City filed with the RWQCB, and evidence of		Withhold Grading Permits

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	Development Services Division			compliance with applicable Corps and CDFW permits.		
<b>4.11.1B:</b> Drainage facilities within engineered slopes/fills shall be designed and installed in accordance with the City of Corona standards.	City of Corona, Planning and Development Department, Development Services Division	Prior to grading for any development.	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits
<b>4.11.2A:</b> All proposed storm drain facilities and equipment shall be designed, installed and maintained in a manner to convey peak flows estimated for the project. Drainage plans shall be submitted to the City for review and approval prior to the issuance of grading permits.	City of Corona, Planning and Development Department, Development Services Division	Prior to grading for any development.	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits
<b>4.11.2B:</b> On-site detention basins shall be constructed to accommodate storm flows from the project site. Such facilities shall be designed, installed and maintained in a manner to reduce on-site runoff to a level that can be accommodated by the existing culverts beneath Green River Road. All required drainage structures shall be designed, installed, and maintained in accordance with applicable City of Corona standards.	City of Corona, Planning and Development Department, Development Services Division	Prior to grading for any development.	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits

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<p><b>4.11.3A:</b> The construction and/or grading contractor shall establish and implement a construction Storm Water Pollution Prevention Plan (SWPPP) and postconstruction Water Quality Management Plan (WQMP) in accordance with NPDES permit issued by the Santa Ana RWQCB.</p>	<p>City of Corona, Planning and Development Department, Development Services Division</p>	<p>Prior to grading for any development.</p>	<p>Prior to the Issuance of Grading Permits</p>	<p>Review of grading plans and on-site inspection</p>		<p>Withhold Precise Grading Permit</p>
<p><b>4.11.3B:</b> In accordance with issuance of a NPDES permit, the construction and/or grading contractor shall establish and implement specific Best Management Practices (BMP) at time of project implementation. Construction erosion and sediment control plans shall be submitted to the City for review and approval prior to the issuance of grading permits. BMPs to minimize erosion and/or sedimentation impacts shall include (but not be limited to) the following:</p> <ul style="list-style-type: none"> <li>• Collection of runoff entering developing areas into surface and subsurface drains for removal to nearby drainages.</li> <li>• Capture of runoff above steep slopes or poorly vegetated areas and conveyance to nearby drainages.</li> <li>• Conveyance of runoff generated on paved or covered areas via drains and swales to natural drainage courses.</li> </ul>	<p>City of Corona, Planning and Development Department, Development Services Division</p>	<p>Prior to grading for any development.</p>	<p>Prior to the Issuance of Grading Permits</p>	<p>Review of grading plans and on-site inspection</p>		<p>Withhold Precise Grading Permit</p>

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<ul style="list-style-type: none"> <li>• Revegetation of disturbed areas and vegetation of non-disturbed but highly erosive areas.</li> <li>• Use of drought tolerant plants and irrigation systems which minimize runoff.</li> <li>• Use of other erosion control devices such as rip-rap, gabions, concrete lining, small check dams, etc. to reduce erosion in gullies and active stream channels.</li> <li>• During the time that on-site soils are exposed, the soil surface shall be approximately 2 feet below the surrounding grade. Any storm water falling on exposed soils will infiltrate on site.</li> <li>• To the maximum extent possible, on-site vegetation shall be maintained.</li> <li>• Limit grading disturbance to essential project area.</li> <li>• Limit grading activities during the rainy season.</li> <li>• Balance and limit, to the extent possible, the amount of cut and fill.</li> <li>• Water entering and exiting the site shall be diverted through the placement of interceptor trenches or other erosion control devices.</li> <li>• Water shall be sprayed on disturbed areas to limit dust generation.</li> <li>• The construction entrance shall be stabilized to reduce tracking onto adjacent streets.</li> </ul>						

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<ul style="list-style-type: none"> <li>Dikes, drains, swales or other features shall be used to divert and/or redirect runoff.</li> </ul>						
<b>4.11.3C:</b> Manufactured slopes shall be stabilized. Where appropriate, retaining wall designs shall include waterproofing and weep holes, subdrains or backdrains for relieving possible hydrostatic pressures.	City of Corona, Planning and Development Department, Building and Development Services Divisions	Prior to grading and construction (once)	Prior to Issuance of Grading and Building Permits	Review of grading and building plans and on-site inspection		Withhold Building and Grading Permits
<b>4.11.3D:</b> Manufactured slopes shall be revegetated to help ensure stability. Revegetation plans shall be submitted to the City for review and approval prior to the issuance of grading permits. Plant selection shall comply with the Plant Palette contained in Section 4.3.6 of the Green River Ranch Specific Plan.	City of Corona, Planning and Development Department, Development Services Divisions	Prior to construction.	Prior to the Issuance of Grading and Landscape Permits	Review of grading and landscape plans and on-site inspection		Withhold Precise Grading and Landscape Permit
<b>4.11.4A:</b> Development within the Specific Plan area shall comply with applicable provisions of the NPDES permit and the applicable standards and regulations of responsible agencies.	City of Corona, Planning and Development Department, Development Services Division	Prior to Construction (once)	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits

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<b>4.11.4B:</b> Precast “stormceptors” shall be installed in parking areas and/or in areas where fuels, oils, solvents or other pollutants may enter the stormwater stream (i.e., gas stations, loading areas). Such devices shall be adequately maintained (including the cleaning/replacing of absorbent fiberglass “pillows” and periodic removal of accumulated sand and silt).	City of Corona, Planning and Development Department, Development Services Division	Prior to Construction (once)	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits
<b>HYD-1:</b> Erosion of existing natural downstream canyons and hillsides will be mitigated by properly designed grading, detention basins, energy dissipators and erosion protection rip-rap pads at the outlet of storm drain system.	City of Corona, Planning and Development Department, Development Services Division	Prior to Construction (once)	Prior to Issuance of Grading Permits	Review of grading plans and on-site inspection		Withhold Grading Permits
<b>TRANSPORTATION</b>						
<b>4.17.1:</b> Prior to the issuance of building permits for the BPI Development in PA 1, 2 and 3 and the Estate Residential uses in PA 5, separate Transportation Demand Management (TDM) Plans shall be prepared to reduce project VMT. Applicable trip reduction strategies may include but are not limited to the following:  <ul style="list-style-type: none"> <li>Implement voluntary local hiring programs.</li> </ul>	City of Corona, Planning and Development Department, Planning Division	Prior to Construction (once)	Prior to Issuance of Building Permits	Review of building plans and on-site inspection		Withhold Building Permits

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<ul style="list-style-type: none"> <li>Mark preferred parking spaces for vanpools and carpools.</li> <li>Provide on-site secured bike parking facilities.</li> <li>Provide information on carpooling and vanpooling opportunities to employees.</li> <li>Provide an on-site message board in each building or other comparable system to encourage and provide information about public transit, carpooling, and vanpooling, and carpool and vanpool ride-matching services.</li> </ul> <p>The TDM Plan shall include an estimate of the vehicle trip reduction anticipated for each strategy proposed based on published research such as California Air Pollution Control Officers Association (CAPCOA), <i>Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity</i> (December 2021) (CAPCOA Handbook).</p>						
<b>TRIBAL CULTURAL RESOURCES</b>						
<p><b>TCR-1:</b> Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities</p> <p>A. The Project applicant shall retain, via a monitoring agreement, a Native American Monitor(s) authorized to represent Kizh Nation, Pechanga, and Soboba on a</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to grading for any development.</p>	<p>Prior to the Issuance of Grading Permits</p>	<p>Submit to the City a copy of an executed tribal monitoring agreement between the project applicant</p>		<p>Withhold Precise Grading Permit</p>

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<p>rotating basis for all “ground-disturbing activities” in native soil and previously unexamined fill soils that occur within the proposed project area. The monitor(s) shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, all grading activities, archaeological investigations, demolition, pavement removal, subsurface testing of any kind, weed abatement, potholing, auguring, clearing, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor(s) will complete daily monitoring activity logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural and Tribal Cultural Resource materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s).</p>				and Native American Monitor(s).		

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<p>Tribal monitoring activity logs will be provided to the City and Applicant with any confidential information, as provided by law, not being subject to a Public Records Act Request.</p> <p>D. On-site tribal monitoring for site preparation activities and for construction within each Planning Area shall conclude upon the sooner of (1) when the consulting Tribe(s)' monitor(s) confirms through a written confirmation that all grading and ground-disturbing activities are no longer within archaeological and cultural resources soils or (2) a determination by the City and written notification to the Tribal monitor(s) that soil-disturbing construction activities have concluded at the site.</p>						
<p><b>TCR-2:</b> Unanticipated Discovery of Human Remains</p> <p>A. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource 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 (NAHC)</p>	<p>City of Corona, Planning and Development Department, Planning Division</p>	<p>Prior to grading for any development.</p>	<p>Prior to the Issuance of Grading Permits</p>	<p>On-site inspection and submittal of a report prepared by the project archaeologist documenting the unanticipated discovery of human remains, mitigation measures (if any) and final treatment and</p>		<p>Withhold Occupancy Permits</p>

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<p>shall be contacted within the period specified by law (24 hours). Subsequently, the NAHC shall identify the Most Likely Descendant (“MLD”). The MLD shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.</p> <p>B. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute, unless there are multiple Ancestral remains comprising a burial site, which may also be a Tribal Cultural Resource. In the event that funerary objects are located , additional treatment measures will be imposed and implemented pursuant to the provisions of a Cultural Resources/Tribal Cultural Resources Mitigation and Monitoring Plan and after seeking recommendations from the MLD and the culturally affiliated consulting tribe(s).</p> <p>C. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the City, after consulting with the project archaeologist and after seeking recommendations from the named MLD and consulting Tribe(s), determines that resuming</p>				disposition of the remains.		

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<p>construction activities at that distance is acceptable.</p> <p>D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. If multiple Native American human remains are uncovered, additional treatment and measures will be required for the site as agreed upon by the project archeologist and the City, after seeking recommendations from the MLD and consulting Tribe(s).</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>						