

**THE FRIENDS OF THE NORTHERN SAN JACINTO VALLEY**  
**P.O. Box 9097**  
**Moreno Valley, CA 92552-9097**

7 August 2006

Via E-mail and Certified Mail

Adam Rush, Project Planner  
Riverside County Planning Department  
4080 Lemon Street, 9<sup>th</sup> Floor  
P.O. Box 1409  
Riverside, CA 92502-1409

Dear Mr. Rush:

**Re: Notice of Preparation for an Environmental Impact Report, “The Villages of Lakeview”, Specific Plan No. 342, General Plan Amendment GPA No. 720, Changes of Zone No. 7055 and a Development Agreement**

Thank you for the opportunity to provide these comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Villages of Lakeview Specific Plan (“Project”). The Friends of the Northern San Jacinto Valley (Friends) is a local conservation group dedicated to preserving and protecting the northern San Jacinto Valley, the San Jacinto Wildlife Area, Mystic Lake, and Potrero Creek Conservation Unit. The Friends is concerned that the proposed Project would significantly impact the regional environment of the northern San Jacinto Valley.

While we largely agree with the County that most of the Project’s impacts would be “potentially significant,” it is unfortunate that more information has not been provided concerning the County’s approach to analyzing each area of impact. These deficiencies in the NOP hamper our ability to provide comprehensive comments on the scope of the EIR.

While our comments on the NOP are summarized below we reserve the right to comment fully on other environmental issues once the County releases the Draft EIR for the Project.

**Public Scoping Meeting**

The scoping meeting must be held in the community of Nuevo/Lakeview in the evening so that all interested members of the community can attend. The NOP comment period should be extended for 30 days after this scoping meeting. Holding a “public hearing” at 8:00 a.m. on a work day in the middle of the week is unacceptable because it freezes out a significant portion of the working population. At a minimum, a second scoping meeting should be held in the Nuevo/Lakeview community after 6:00 p.m.

**Greenhouse Gas Reduction (not mentioned)**

This and all projects under consideration by the County must detail how they are going to contribute to the reduction of Greenhouse Gas production. In particular, how they are going to comply with both the spirit and the letter of AB 32 and other initiatives by the state of California to help ensure the survival of the human species and life as we know it now.

### **Project Description (Pg. 1)**

The NOP fails to provide sufficient information about the description of the Project. In particular, the document does not mention the gas pipeline which would run through at least phase one of the project and is critical to the siting of the school in phase one north of the Ramona Expressway.

Existing land uses in the communities of Lakeview and Nuevo also include residences which are not mentioned.

Appendix A is missing. This document should give the details of the general plan amendment and also identify the Ramona Expressway improvements which are the basis for the general plan amendment. Once this information is provided, the NOP should be republished with a 30 day public comment period.

### **Environmental Issues (Pg. 14)**

This section does not mention the Davis Road Unit of the San Jacinto Wildlife Area, a 10,000 acre Multi-Species Habitat Conservation Plan (MSHCP) reserve and state hunting area which contain wetlands and habitat for many endangered species, including the Stephens' kangaroo rat. Lake Perris State Recreation Area is also an MSHCP reserve.

This section does not describe the developer's HANS (Habitat Acquisition and Negotiation Strategy) process for MSHCP compliance or indicate that the HANS process cannot be approved by the County Board of Supervisors unless it is fully part of this California Environmental Quality Act (CEQA) document.

This section does not mention that the Ramona Expressway at Davis Road (which runs through the Project) is the ONLY public entrance to the SJWA.

### **Aesthetics (Pg. 14)**

The night time glare on Mt. Palomar or the SJWA cannot be mitigated merely by complying with a local ordinance.

This section does not mention the impacts of light pollution on the SJWA and endangered species from all sources, not only street light. Homes, businesses, ball parks, multi-story buildings, etc. Merely following the MSHCP guidelines is not sufficient; a detailed avoidance plan must be developed.

### **Agriculture (Pg. 16)**

This section does not mention the significant detrimental impacts to the local affordable food supply of turning productive farmland into residential and commercial development. As the earth's temperature rises, much farmland will be lost. As the price of fossil fuel rises, the cost of growing and transporting food will rise. It is likely that soon, only locally grown (organic) food will be affordable.

### **Air Quality (Pg. 17)**

The EIR should thoroughly examine the Project's air quality impacts. Findings of Overriding Considerations cannot be made regarding the degradation of air quality and its impacts on humans and wildlife unless they are "reasonable". It is unreasonable to cause illness and death to the current and future residents of the Nuevo/Lakeview community. (See recent cases won by the Center for Community Action and Environmental Justice in Riverside County.)

### **Biological Resources (Pg. 18)**

The EIR should thoroughly examine the Project's impacts to biological resources. There can be no impacts to the biological resources of the San Jacinto Wildlife Area and MSHCP reserve. Merely following the guidelines for mitigation in the MSHCP alone are NOT sufficient to make findings of "no

significant impact”. A detailed CEQA analysis must be done to show that there will be no impacts to the San Jacinto Wildlife Area.

The County must consider an alternative which would prohibit development north of the Ramona Expressway, with the present agricultural lands becoming part of an Agricultural Preserve.

This section does not mention impacts to the San Jacinto Wildlife Area and its many endangered species, including but not limited to: light pollution; noise; cats and dogs; trespass; off-highway vehicles (OHV); increased traffic from increased population (34,000 plus) within a mile of the SJWA; conflicts with hunting prohibitions within 450 feet of development; conflicts with wetlands proximity and West Nile virus; issues related to avian flu and the relocation of the chicken ranch close to the SJWA; air pollution impacts on wildlife; impacts on the affordability of reclaimed water; impacts to threatened plants and other related biological issues.

**Geology, Liquefaction, Ground Shaking, Landslides, Subsidence, slopes, soils, erosion, wind erosion (Pg. 21)**

Issues of fissures, subsidence, liquefaction, and hydroconsolidation are all significant and must be discussed thoroughly in the EIR.

This section does not mention the gas pipeline. The contents, age, material size, pressure and shut of valve location and how and how quickly activated, must be included.

In addition, the impacts of the proposed Lake Perris Dam expansion (increase in capacity) must be addressed. Maps and a discussion showing the current inundation path of a failure of the dam at Lake Perris must be shown, as well as maps and a discussion regarding the proposed increase in the capacity of Lake Perris.

It is unacceptable that the EIR will not be discussing the risk of rupture and ground shaking from faults in the EIR, especially when the project includes a gas pipeline.

**Hazards and Hazardous Materials (Pg. 26)**

This section does not mention the gas pipeline. The contents, age, material size, pressure and shut of valve location and how and how quickly activated, must be included.

**Airports (Pg. 21)**

This section does not mention the Perris Airport nor does it discuss the impacts of air traffic on the SJWA.

**Hazardous Fire Area (Pg. 28)**

This section does not mention Lake Perris State Recreation Area from which fires have spread to the SJWA. This does not mention the impacts of increased population and OHV illegal use and fire hazards.

**Flood Plains (Pg. 30)**

This section should address impacts to the SJWA and its MSHCP values; the impacts of dam capacity increases at Lake Perris; the impacts to Mystic Lake as a flood control pooling area; the proposed “dam” on the Ramona Expressway; a detailed discussion of the NPDP permit before it is issued; and a discussion of current and proposed projects up and downstream filling in the San Jacinto River Flood plain---especially the impacts to the SJWA. This section does not discuss how endangered plants south of the Ramona Expressway and on the SJWA will be affected by this project; nor does it discuss the cumulative impact on threatened plants of all the projects in the County and surrounding cities.

### **Land Use Planning (Pg. 25)**

Appendix A explaining the justification for the General Plan Amendment and improvements to the Ramona Expressway must be included. The comment period should be extended for thirty days after this document is received by all persons reviewing the NOP. This plan is not consistent with current uses. Additional comments will be made after Appendix A (general plan amendment) is made part of the NOP and after recent actions taken by the Board of Supervisors regarding land use planning in the Nuevo/Lakview area are also made part of the NOP.

### **Noise (Pg. 34)**

The impacts of noise from all sources from increased traffic on the Ramona Expressway, increased air traffic, housing and commercial development (especially the prospect of many multi-story buildings) on the SJWA and endangered species must be analyzed. Merely following the MSHCP guidelines is not sufficient, but a detailed avoidance plan must be developed. The highway noise must be evaluated in conjunction with all other noise, including noise from 35,000 new residents and an unknown number of new businesses. These combined impacts on the SJWA must be evaluated. The noise evaluation must include the impacts to residents and the SJWA when the Ramona Expressway is built out to include eight lanes and light rail.

### **Schools (Pg. 39)**

This section does not mention that a separate CEQA document will be prepared by the school districts for each school and information about how to obtain a copy of these documents.

### **Recreation (Pg. 39)**

The adjacent SJWA with its hunting, wetland, birding, biking, hiking, equestrian, nature viewing and educational uses is not mentioned.

There is no mention of how conflicts between these uses (especially hunting and wetlands) and this and other proposed development will impact the SJWA.

### **Transportation (Pg. 40)**

This section does not discuss the proposal (linked to the general plan amendment) to widen only a short portion of the Ramona Expressway. It does not discuss the need for public transportation such as light rail and the impacts of its absence. Appendix A is required to be part of the NOP.

### **Circulation and Trails (Pg. 42)**

This section does not discuss the impacts to the SJWA of increased ease of access through the increased population, increased number of roads leading to Davis Road; increase number of bike, equestrian and other trails.

### **Utility and Service Systems (Pg. 43)**

The EMWDF letter of assurance must assure a sustainable supply of affordable potable water, as water which is not affordable is not actually available.

### **Water (Pg. 43)**

The water supply assurances must be based on current actual supplies, not speculative proposal to increase supplies. It also must take into account the impacts of global warming on rising sea levels and the Sierra snow pack; the impacts of peak oil on increased energy costs; and the impacts of increasing polluted water on the supply of potable water.

**Sewer (Pg. 43)**

The details of the NPDS permit must be available as part of the EIR for public review and comment as part of this EIR before the permit is issued.

**Impacts to Humans (Pg. 49)**

Air Quality and other impacts to humans must be analyzed and discussed in the EIR. Air pollution, etc. will have a substantial direct impact on humans and must be mitigated to a level of non-significance. Findings of overriding consideration cannot be made on a human life.

**Documents relied upon (Pg. 48)**

This document must indicate precisely the page number and section of each RCIP document relied upon so that they may be easily reviewed by the public.

Are there other missing Appendixes, besides A?

**Cumulative and Growth Inducing Impacts (not mentioned)**

There must be a detailed analysis of the cumulative and growth-inducing impacts of all the projects in the San Jacinto Valley and surrounding areas, especially on impacts to the nearly 20,000 acre San Jacinto Wildlife Area, MSHCP Reserve and the 7,000 acre Lake Perris State Recreation Area, MSHCP Reserve. The cumulative impacts of a new urban area (not incorporated) of 35, 000 people on the County generally must be discussed.

**Alternative Analysis (not mentioned)**

The County should consider several alternative land use plans for the Project. In addition to the required No Project alternative, there must be an alternative with “no development north of the Ramona Expressway” and an alternative with the “establishment of an Agricultural Preserve north of the Ramona Expressway”.

**Notice**

Please provide the Friends of the Northern San Jacinto Valley with notice of any workshops or hearings before the Planning Commission or the Board of Supervisors on the Project. In addition, please send Friends copies of all agendas for these workshops and hearings as well as any staff reports that may be prepared for the Project. Finally, please provide the Friends with notice of the availability of the draft environmental impact report.

Sincerely,

Ann L. Turner-McKibben, President  
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