# Appendix K Responses to Comments

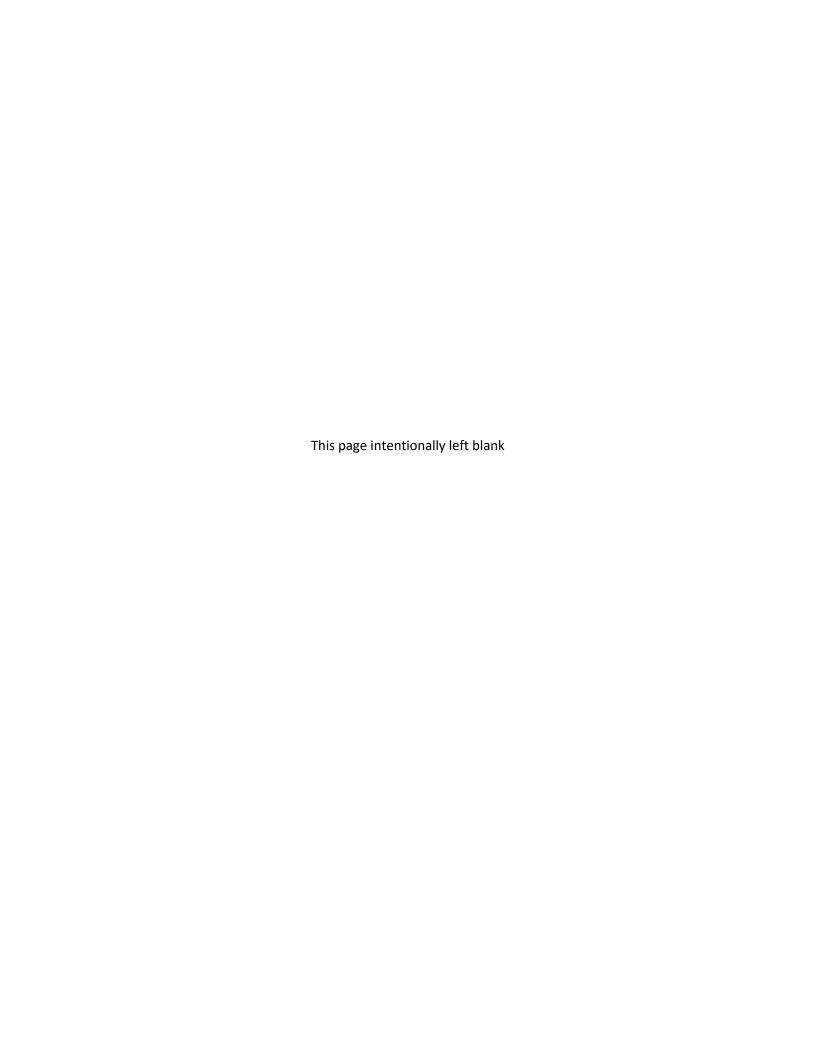
Final Initial Study/Mitigated Negative Declaration No. 2373 Ramona-Indian Warehouse Project (SCH # 2022070543)

> DPR and TPM 21-00011 PVCC SPA 21-21-05193

> > Lead Agency:

City of Perris Planning Division 135 North D Street Perris, CA 92570

November 2022



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#### **LIST OF ATTACHMENTS**

#### A Comment Letters

## ACRONYMS AND ABBREVIATIONS

CDFW California Department of Fish and Wildlife CEQA California Environmental Quality Act

City City of Perris

DBESP Determination of Biologically Equivalent or Superior Preservation

DC Design Conditions

District Riverside County Flood Control and Water Conservation District

EIR Environmental Impact Report
EMWD Eastern Municipal Water District

FEMA Federal Emergency Management Agency

GBRA General Biological Resource Assessment

IS/MND Initial Study/Mitigated Negative Declaration

MMRP Mitigation Monitoring and Reporting Program

MSHCP Western Riverside Multiple Species Habitat Conservation Plan

NPDES National Pollution Discharge Elimination System

PVCCSP Perris Valley Commerce Center Specific Plan

SCAQMD South Coast Air Quality Management District

USFWS U.S. Fish and Wildlife Service

# 1.0 INTRODUCTION

Pursuant to the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) Section 15073, the Initial Study/Mitigated Negative Declaration (IS/MND) for the Ramona-Indian Warehouse Project (Project) was circulated to the State Clearinghouse, Responsible Agencies, and interested parties for a 30-day period that commenced on July 29, 2022 and concluded on August 29, 2022 for public review and comment.

#### 1.1 COMMENT LETTERS

State CEQA Guidelines Section 15074 requires the decision-making body of the lead agency to consider the proposed IS/MND together with any comments received during the public review process. There is no requirement for a formal response to each of the comments received (unlike the requirement for a Final Environmental Impact Report [EIR]). However, in order to provide the City of Perris (City) Planning Commission with additional information upon which to base their decision whether to approve or deny the proposed Project, the following Responses to Comments have been prepared. Each comment letter is labeled alphabetically with each individual comment identified by a number. Responses to each individual comment are contained in Section 2 of this document. All comment letters are provided in Attachment A. All written comments have been made a part of the public record.

Letters F and G were withdrawn after the close of the public review period. Responses to individual comments in these letters have not been provided; however, these letters have been included in Attachment A along with their associated withdrawal letters as part of the public record.

LIST OF PERSONS, ORGANIZATIONS, AND AGENGIES THAT COMMENTED ON THE INITIAL STUDY

Letter	Commenting Party	Date
Α	Eastern Municipal Water District	August 3, 2022
В	Riverside County Flood Control And Water Conservation District	August 4, 2022
С	Kelly Klaus	August 9, 2022
D	Western Municipal Water District	August 16, 2022
Е	California Department of Fish and Wildlife	August 26, 2022
F	Lozeau Drury LLP on behalf of Supporters Alliance for Environmental Responsibility	August 29, 2022 (Withdrawn)
G	Blum Collins & Ho, LLP on behalf of Golden State	August 29, 2022
	Environmental Justice Alliance	(Withdrawn)
Н	Riverside Transit Agency	August 31, 2022

In response to the comments received during public review, clarifications to the text of the Final IS/MND were made. The clarifications in the Final IS/MND do not constitute "substantial revision" as defined in State CEQA Guidelines Section 15073.5(b); therefore, recirculation of the IS/MND is not required.

### 2.0 RESPONSES TO COMMENTS

#### 2.1 RESPONSES TO COMMENT LETTER A

Eastern Municipal Water District
Alfred Javier, Director of Environmental and Regulatory Compliance
August 3, 2022

- A-1 This comment is introductory in nature and provides the commenter's understanding of the Project components. The comment does not question the content or conclusions of the IS/MND. No further response is required.
- A-2 The Project proponent understands these Eastern Municipal Water District (EMWD) requirements and is in the process of revising a Design Conditions (DC) report for EMWD approval prior to final design and plan checks.
- A-3 The EMWD DC process outlined in this comment is in progress for the Project. The first DC submittal was made to the EMWD on May 16, 2022. The EMWD provided comments on the initial submittal on August 2, 2022. The Recycled Water Use Exhibit, which falls under the umbrella of the DC was submitted to the EMWD on August 4, 2022. The City will continue to coordinate with the EMWD for review and approval of final DC and Project plans.

#### 2.2 RESPONSES TO COMMENT LETTER B

Riverside County Flood Control and Water Conservation District Amy McNeill, Engineering Project Manager August 4, 2022

- B-1 This comment is introductory in nature and explains the Riverside County Flood Control and Water Conservation District's (District's) scope of review regarding detailed comments provided in the rest of the letter. The comment does not question the content or conclusions of the IS/MND. The City understands that these comments do not imply approval or endorsement of the Project.
- B-2 This comment acknowledges the proposed drainage facilities that are a part of the District's Master Drainage Plan and, therefore, must be constructed to District standards. The comment provides further detail about the District's role regarding the process for construction and maintenance of the drainage facilities. The Project applicant will enter into a cooperative agreement with the District and understands the requirements provided by the comment letter. This comment does not question the content or conclusions of the IS/MND, and no further response is required.

- B-3 This comment provides the District's process required for channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of District facilities. As stated in response to comment B-2, the City understands the stated requirements. Since this comment does not question the content or conclusions of the IS/MND, no further response is required.
- B-4 The Project applicant proposes additional impervious surface area and would pay the applicable fee related to the Project's location in the Perris Valley Area Drainage Plan. According to the Area Drainage Plan Summary (District 2014), the fee for the Perris Valley Drainage Area is currently \$8,875 per acre. According to the Project's Preliminary Drainage Report (Appendix H), the Project would introduce 524,480 square feet (12.04 acres) of impervious surfaces to the Project site, which would result in fees of \$106,855 based on the current fee rate. The Project applicant would be required to pay fees at the rate in effect at the time of permit issuance.
- B-5 This comment has been noted and an encroachment permit will be obtained prior to any construction activities occurring within District rights of way or facilities, as noted in Table 3 of the IS/MND. This comment does not question the content or conclusions of the IS/MND, and no further response is required.
- **B-6** The Project would require a National Pollution Discharge Elimination System (NPDES) Construction General Permit and submittal of a Water Quality Management Plan demonstrating compliance with the regional NPDES MS4 permit. As documented in Section 3.X.d of the IS/MND, the Project site is not located in a Federal Emergency Management Agency (FEMA) mapped floodplain and no review of the Project by FEMA is required. The IS/MND and Mitigation Monitoring and Reporting Program (MMRP; Appendix L) have been prepared in accordance with the State CEQA Guidelines. The Project applicant is responsible for complying with all applicable federal, state, and local environmental rules and regulations. As discussed in response to item 3.IV.c of the IS/MND, waters of the State are located at the Project site. Impacts to these resources would be mitigated in accordance with Project mitigation measure MM Bio 1 and the Project would require a Streambed Alteration Agreement from California Department of Fish and Wildlife (CDFW) and a Waste Discharge Requirement from the Regional Water Quality Control Board. This comment does not guestion the content or conclusions of the IS/MND, and no further analysis is required.

#### 2.3 RESPONSES TO COMMENT LETTER C

#### Kelly Kaus August 9, 2022

- C-1 This comment describes a legal dispute between the commenter and the property owner at the northwest corner of the Project site. This comment does not question the content or conclusions of the IS/MND, and no further analysis is required.
- **C-2** The City has noted the suggested Project modification.

C-3 This comment expresses support for rezoning of the parcel to Light Industrial based on the presence of the Accident Potential Zone. The City thanks you for your engagement in the CEQA review process.

#### 2.4 RESPONSE TO COMMENT LETTER D

Western Municipal Water District Thomas G. Scott, P.E., Principal Engineer August 16, 2022

**D-1** This comment indicates that Western Municipal Water District has no comments on the Project and defers to the EMWD as the water and sewer purveyor for the site. Comments on the Project were received from the EMWD and are addressed in response to Comment Letter A.

#### 2.5 RESPONSES TO COMMENT LETTER E

California Department of Fish and Wildlife
Kim Freeburn, Acting Environmental Program Manager
August 26, 2022

- E-1 This comment is introductory in nature and includes a description of the CDFW's role as a trustee and responsible agency. The comment also provides background on the applicable regulations related to biological resources, which include the Fish and Game Code, California Endangered Species Act, and Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), of which the City is a permittee. This comment does not question the content or conclusions of the IS/MND, and no further response is required.
- E-2 This comment provides a summary of the Project location and description, as provided in the IS/MND. This comment does not question the content or conclusions of the IS/MND. No further response is required.
- **E-3** This comment introduces the following comments from CDFW. Responses to the individual comments are provided below.
- The City understands the requirement for the Project applicant to pay Local Development Mitigation Fees and demonstrate compliance with the applicable MSHCP sections. In accordance with the State CEQA Guidelines and CDFW requirements, Section 3.IV.f of the IS/MND provides a discussion of the Project's consistency with the MSHCP. Further detail is provided in the Project's General Biological Resource Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, attached to the IS/MND as Appendix C. The Wildlife Agencies will be notified in accordance with MSHCP requirements and the Project will not be approved if the City finds it inconsistent with the MSHCP.

E-5 The referenced General Biological Resource Assessment (GBRA; Appendix C) states that there are 0.58 acre of CDFW jurisdictional resources within the property. The initial evaluation of riparian/riverine and vernal pools resources provided in the GBRA concludes that the resources on the property do not meet the MSHCP definition of riparian/riverine. This conclusion was based on the statement in MSHCP Section 6.1.2 that "areas demonstrating characteristics which are artificially created are not included in these definitions." The GBRA concludes "the pools do not meet the MSHCP definition of vernal pools since they lack two of the three criteria (soils and vegetation) and were created from artificial manipulation of the land."

A U.S. Fish and Wildlife Service (USFWS) protocol fairy shrimp survey, consisting of both wet and dry season surveys, was conducted between October 2020 and April 2021, and concluded sensitive fairy shrimp species are currently absent from the property.

Based on a meeting between City staff, CDFW staff, and the Project applicant on September 22, 2022, the artificial drainage was determined to be an MSHCP riparian/riverine resource based on its connection to downstream resources. The CDFW agreed that pools 1 through 11 were not MSHCP pools, but that pool 12 is considered an MSHCP pool, as pools are to be evaluated on a case-by-case basis and not required to meet all three vernal pool success criteria. Based on this, a Determination of Biologically Equivalent or Superior Preservation (DBESP) has been prepared and provided to the CDFW for comment.

The mitigation measure MM Bio 4 that is discussed in comment E-5 is a measure from the Perris Valley Commerce Center Specific Plan (PVCCSP) and was included as a reference requirement to projects developed within the PVCCSP planning area; it was not identified as one of the two PVCCSP EIR measures that are applicable to the proposed Project. Therefore, the recommended edits are not provided. Based on the CDFW's comments and the proposed changes to mitigation, the following Project-specific mitigation measure MM Biol 3 will be added to the IS/MND and MMRP.

MM Biol 3 The Project proponent shall provide mitigation to address the Project impacts to 0.58 acre of MSHCP Riparian/Riverine and Vernal Pool Resources consisting of 0.19 acre of Riverine habitat and 0.39 acre of pool habitat. Mitigation shall be provided in accordance with the Final DBESP, which can be accomplished through the purchase of rehabilitation credits at the Riverpark Mitigation Bank. Final mitigation requirements will be determined through the permitting process with the CDFW and RWQCB.

- E-6 The City and Project applicant agree with this comment and are planning to submit an application for a Lake and Streambed Alteration Agreement to CDFW. The Project-specific mitigation measure MM Bio 1 has been updated as MM Biol 4 in the Final IS/MND and MMRP to reflect the changes, as provided below (CDFW edits are shown in **bold** and strikethrough, City edits are shown with underline and double strikethrough).
  - MM Bio 4 Prior to the City's issuance of a grading permit for the Project site and prior to the start of Project activities, the Project proponent shall notify the California Department of Fish and Wildlife (CDFW) of planned impacts to Fish and Game Code Section 1602 resources. The Project proponent shall either receive a Streambed Alteration Agreement or written documentation from the CDFW that a Streamed Alteration Agreement is **not needed.** The Project proponent shall also obtain a report of Waste Discharge Requirement from the RWQCB. Mitigation for impacts to CDFW and RWQCB waters will be determined during the permitting process with the agencies. and demonstrate proof of purchase of mitigation credits at a 2:1 ratio for impacts to This 2:1 mitigation ratio and mitigation type are proposed, given the flows on-site are mainly artificial and the adjacent lands resulted in an increase in elevation that contributed to the formation of Pool 12. Drainage 2 (sheet flow and channel) and the earthen bottom portions of Drainage 1 that are the result of storm drains flows are proposed to be mitigated with 1:1 rehabilitation credit. Purchase of mitigation credits is not proposed for the impacts to the concrete brow ditch of Drainage 1, as this will be replaced on-site with the construction of Line E.
- E-7 The Project will comply with applicable laws as noted by the commenter. This comment includes speculation by CDFW staff that they have observed changing climate conditions that may result in the nesting bird season occurring earlier and later in the year than historical nesting season dates. This statement says "conditions may" result in breeding season changes which indicates that actual data that can show a change in breeding season is not available. As requested by the CDFW, the City and Project applicant agree to expand the requirement for nesting bird surveys to be based on potentially occurring native and migratory bird species rather than a specified time period.

The CDFW commented that the mitigation measure includes that the nesting bird survey be conducted by a biologist that is qualified and goes on to list several qualifications including identifying breeding territories and nest success. For many bird species breeding territories have not been established and can vary greatly from one individual or pair to another. Establishing a nesting territory is highly subjective and is suggested not to be included in the mitigation measure. Nest success can be difficult to determine without full time nest monitoring that in itself can result in enough of a disturbance to the adult birds to cause a take of the nest via nest abandonment. Nest success for many species, particularly ground nesting species, is difficult to determine as often the nest consist of a divot on the ground with little true nest preparation. The young of ground nesting species tend to disperse rapidly after hatching and it can be difficult to determine succuss versus predation for such species. The Project site in question is comprised of a regularly disced former agricultural field with herbaceous vegetation and onsite nests would be limited to bird species that nest on the ground. The trees adjacent to the Project site have potential

to support tree nesting species, but direct impacts to the off-site trees are not proposed. The off-site trees are to be included in the nesting bird survey as much as access to them is allowed and via the use of binoculars. Monitoring of nests will be conducted but determination of nest success will be limited to best judgement based on the evidence presented.

Based on the CDFW's comments and the proposed changes to mitigation, the following Project-specific mitigation measure MM Biol 1 will replace PVCCSP EIR mitigation measure MM Bio 1 for the proposed Project. The Project-specific mitigation measure MM Biol 1 has been added to the Final IS/MND and MMRP to reflect the changes, as provided below.

MM Bio 1 Nesting Bird Survey. In order to avoid violation of the MBTA and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species.

If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the Project to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone.

If active nests are not located within the Project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

E-8 The CDFW requests that the City evaluate the direct, indirect, and cumulative impact to burrowing owl through the Determination of Biologically Equivalent or Superior Preservation (DBESP) process. However, under the MSHCP, the DBESP process is only initiated following the results of a positive survey. MSHCP Section 6.3.2 states:

For locations with positive survey results, 90% of those portions of the property that provide for long-term conservation value for the identified species shall be avoided until it is demonstrated that conservation goals for the particular species are met. Avoidance shall not be considered to be Conservation contributing to Reserve Assembly unless the avoided populations are acquired and managed as Additional Reserve Lands. Individual species conservation goals are presented in Section 9.0 of this document. Findings of equivalency shall be made as outlined below demonstrating that the 90% standard has been met.

A focused burrowing owl survey was conducted according to the Burrowing Owl Survey Instructions for the MSHCP with the results being negative. As stated in the IS/MND: "No burrowing owls or signs of burrowing owls were found on the Project site during the focused survey efforts." The full details of the burrowing owl survey are included in the GBRA report included as Appendix C to the IS/MND. The finding of equivalency is used to demonstrate that the 90 percent conservation threshold has been met for locations with positive survey results. The DBESP "shall be made if making the equivalency findings is determined to be infeasible." Based on the requirements of the MSHCP a project with a negative survey for a species such as burrowing owl is not subject to the DBESP process for the species.

The potential for burrowing owl to use the property for nesting is low. The property is regularly disturbed by discing. Three burrows were located on the slope adjacent to Indian Avenue and no sign of burrowing owl use was observed on the property. The Project will conduct preconstruction/take avoidance burrowing owl surveys within 30 days prior to onsite Project activities.

The CDFW recommended burrowing owl preconstruction surveys to occur within 30 days of the start of ground disturbing activities on the Project site. This is the standard preconstruction timeframe discussed in the MSHCP and the Burrowing Owl Survey Instructions for the MSHCP, which the City agrees with. The CDFW also recommended that an additional burrowing owl preconstruction survey be "conducted and reported to the CDFW within **three days** of ground disturbance or vegetation clearance following the recommended guidelines of the MSHCP." Per the meeting with CDFW staff on September 22, 2022, this three-day requirement is believed to have been a typographical error.

The Project proponent will conduct a preconstruction nesting bird survey for all birds including owls and other birds of prey within three days prior to ground disturbing activities and submit a report to the City per the nesting bird mitigation measure. PVCCSP EIR mitigation measure MM Bio 2 will be replaced for the Project as shown below. If burrowing owls are observed in the three-day MBTA survey discussed under the nesting bird mitigation measure, CDFW staff will be notified.

The mitigation measure has been replaced per CDFW recommendations with the exception of the three days survey and reporting requirement. The following Project-specific mitigation measure (MM Bio 2) will replace PVCCSP EIR mitigation measure MM Bio 2. Project-specific mitigation measure MM Biol 2 has been added to the Final IS/MND and MMRP, as provided below.

#### MM Biol 2

Burrowing Owl Preconstruction Survey. The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls within 30 days prior to commencement of grading and construction activities on the Project site. The survey will include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey will be submitted to the City prior to obtaining a grading permit. In addition, if burrowing owls are observed during the MBTA nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP.

If burrowing owl are detected, the CDFW shall be sent written notification by the City, within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey, the nests shall be avoided and the qualified biologist and Project Applicant shall coordinate with the City of Perris Planning Department, the USFWS, and the CDFW to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW and the USFWS prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. The Permittee shall implement the Burrowing Owl Plan following CDFW and USFWS review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW prior to the start of Project activities. When a qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin.

If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City and the City shall notify the CDFW and the USFWS within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.

- **E-9** One special status species, California horned lark, was observed during the Project site surveys documented in the GBRA (Appendix C). This observation has been added to the California Natural Diversity Database via the field survey form provided in comment E-9.
- E-10 This comment describes the requirement to pay filing fees to the CDFW. This fee would be paid upon filing of the Notice of Determination with the County of Riverside. The current fees for an IS/MND are \$2,548 plus a \$50 County document processing fee; however, the Project applicant would be required to pay the fees in effect at the time of filing (CDFW 2022).
- E-11 This comment provides a summary of the previous comments and offers CDFW personnel's availability for consultation. Responses to individual comments have been provided above in consultation with CDFW staff. The City thanks CDFW for their comments and participation in the CEQA review process.

#### 2.6 RESPONSES TO COMMENT LETTER F

Lozeau Drury LLP on behalf of Supporters Alliance for Environmental Responsibility

Amalia Bowley Fuentes, Lozeau Drury LLP

August 29, 2022, Withdrawn September 27, 2022

**Letter** Comment noted. As stated in this comment, Letter F-2 has been withdrawn and no further response is required.

**Letter** Per Letter F-1, this comment letter has been withdrawn by the commenter, and no formal response to the issues raised in the letter is required.

#### 2.7 RESPONSES TO COMMENT LETTER G

Blum Collins & Ho, LLP on behalf of Golden State Environmental Justice Alliance
Gary Ho, Blum Collins & Ho, LLP
August 29, 2022, Withdrawn September 21, 2022

**Letter** Comment noted. As stated in this comment, Letter G-2 has been withdrawn and no further response is required.

Per Letter G-1, this comment letter has been withdrawn by the commenter, and no formal response to the issues raised in the letter is required.

### 2.8 RESPONSE TO COMMENT LETTER H

Riverside Transit Agency
Mauricio Alvarez, MBA, Planning Analyst
August 31, 2022

H-1 This comment states that the Riverside Transit Agency has no comment on the IS/MND. As stated on page 38 of the IS/MND, the Project applicant previously contacted the RTA to comply with PVCCSP mitigation measures MM Air 18 and MM Trans 4. The RTA indicated that the Project would not conflict with any plans for future transit stops. The City thanks the RTA for their continued engagement with the CEQA review process.

# 3.0 REFERENCES

California Department of Fish and Wildlife (CDFW). 2022. CEQA Environmental Document Filing Fees. Available at: <a href="https://wildlife.ca.gov/Conservation/Environmental-Review/CEQA/Fees">https://wildlife.ca.gov/Conservation/Environmental-Review/CEQA/Fees</a>. Accessed September 2022.

Riverside County Flood Control and Water Conservation District (District). 2014. Area Drainage Plan Summary. Available from: <a href="https://rcflood.org/l-Want-To/Learn-About/Area-Drainage-Plan-Fees">https://rcflood.org/l-Want-To/Learn-About/Area-Drainage-Plan-Fees</a>. September.