1.0 INTRODUCTION

Attached are the agency and public comments, response to those comments, and the Initial Study Addenda for the Draft Initial Study/Mitigated Negative Declaration for the *Temescal Canyon Road Bridge and Road Realignment Project, dated March 8, 2018.*

The primary objective and purpose of the Initial Study/Mitigated Negative Declaration public review process is to obtain comments on the adequacy of the analysis of environmental impacts, the mitigation measures presented, and other analyses contained in the Initial Study prepared by the City of Lake Elsinore (City). The California Environmental Quality Act (CEQA) requires that the City decision makers consider the comments received during the public review of the Initial Study/Mitigated Negative Declaration prior to carrying out or approving the project (CEQA Guidelines Section 15074[b]). Comments that do not directly relate to the analysis in this document (i.e., are outside the scope of this document) are not given specific responses; however, all comments are included in this section so that the decision makers may know the opinions of the commenter.

The *Temescal Canyon Road Bridge and Road Realignment Project* Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse No. 2018031021) was circulated to the public and public agencies for a 30-day public review from March 9, 2018 through April 9, 2018. The California Department of Fish and Wildlife requested more time to comment on the Initial Study and was given until April 12, 2018 to provide the City comments. The comments received regarding the project and the responses to comments are included in this document. Six comment letters were received as follows:

Comment Letter A: Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office

Comment Letter B: Endangered Habitats League

Comment Letter C: South Coast Air Quality Management District

Comment Letter D: Rincon Band of Luiseño Indians

Comment Letter E: California Department of Fish and Wildlife

Comment Letter F: California Office of Planning and Research

The comment letters are identified as Letters A through F. Aside from the courtesy statements, introductions, and closings, individual comments within the body of each letter have been identified and numbered. A copy of each comment letter received is included. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each comment identified are included on the page(s) following each comment letter.

As a result of comments made by the South Coast Air Quality Management District and the California Department of Fish and Wildlife, the Initial Study and Mitigation Monitoring and Reporting Plan have been revised Please refer to the analysis in the May 7, 2018 Initial Study.

Letter A

From: Fossum, Larry (TRBL)
To: Richard J. MacHott, LEED Green Assoc.
Subject: Temescal Canyon Rd Bridge and Road Realignment Project
Date: Monday, March 12, 2018 9:30:45 AM

Dear Richard:

A records check of the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to other tribes in the area. This letter shall conclude our consultation efforts.

A-1

Cordially,

Larry Fossum
On behalf of
Patricia Garcia-Plotkin
Director of Historic Preservation

RESPONSE TO COMMENT LETTER A

Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office
Larry Fossum
On behalf of Patricia Garcia-Plotkin
Director of Historic Preservation
February 28, 2018

Response to Comment A-1. The City acknowledges and appreciates the Agua Caliente Band of Cahuilla Indians' comment. No response is required.

Letter B

From: Dan Silver
To: Richard J. MacHott, LEED Green Assoc.; Grant Taylor
Subject: Temescal Canyon Road Bridge
Date: Tuesday, March 20, 2018 3:36:03 PM

March 20, 2018

Richard MacHott
Community Development Dept
City of Lake Elsinore
130 S Main St
Lake Elsinore, CA 92530

RE: Temescal Canyon Road Bridge

Dear Mr MacHott:

Endangered Habitats League (EHL) has reviewed the environmental documentation for this project. The City has worked with the RCA to ensure compliance with the MSHCP and has proposed appropriate mitigation to enhance values in the wash. We appreciate the City's sound approach and have no other comments. B-1

With best regards,
Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

Response to Comment Letter B

Endangered Habitats League
Dan Silver
Executive Director
March 20, 2018

Response to Comment B-1. The City acknowledges and appreciates the Endangered Habitats League's comment. No response is required.

Letter C

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS: April 4, 2018

rmachott@lake-elsinore.org
Richard J. MacHott, Planning Manager
City of Lake Elsinore – Community Development Department
130 South Main Street
Lake Elsinore, CA 92530

Mitigated Negative Declaration (MND) for the
Temescal Canyon Road Bridge and Road Realignment Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new four-lane bridge that is 98-feet wide (with a curb-to-curb width of 80 feet), 375 feet long, and a structure depth of 5 feet (Proposed Project). The new bridge will connect to a 696-foot long realigned roadway that will extend from 200 feet south of the bridge to Lake Street approximately 180 feet south of the current intersection[1]. Based on a review of Figure 2, *Project Vicinity*, in the MND and aerial photographs, SCAQMD staff found that nearby land uses within 500 feet of the Proposed Project include vacant lands to the north, east, and west, and industrial uses to the west. According to the Road Construction Emissions Model output in Appendix B, *Air Quality Report*, to the MND, construction of the Proposed Project is expected to take approximately 16 months. "The approximate total construction area of the project is 4.04 acres with an impervious area of approximately 2.3 acres (proposed roadway pavement, bridge, and concrete slope protection near the bridge abutment)[2]." C-1

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction emissions. However, the Lead Agency did not conduct an operational emissions analysis. Detailed comments are included in the attachment. The attachment also includes SCAQMD staff's recommendations on additional mitigation measures to further reduce construction emissions from NOx, PM10, and PM2.5. C-2

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. C-3

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

[1] MND. Page 3.
[2] MND. Appendix B. Page 6.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS
RVC180308-02
Control Number

ATTACHMENT

SCAQMD's Air Quality CEQA Thresholds of Significance

1. While CEQA permits a Lead Agency to apply appropriate thresholds to determine the level of significance, the Lead Agency may not apply thresholds in a manner that precludes consideration of substantial evidence demonstrating that there may be a significant effect on the environment. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. SCAQMD's CEQA thresholds of significance for air quality provide a clear quantitative benchmark to determine the significance of a project's air quality impacts. Therefore, for most projects within the SCAQMD, SCAQMD's air quality CEQA thresholds of significance for construction and operation[3] are used to determine the level of significance of a project's air quality impacts. C-4

   The Lead Agency quantified the maximum construction emissions for the Proposed Project in pounds per day[4] in Appendix B but did not compare those emissions to SCAQMD's air quality CEQA regional significance thresholds to determine the Proposed Project's CEQA impacts in the main body of the MND[5]. However, under Section 3b in the main body of the MND, the Lead Agency found that the Proposed Project's construction-related air quality impacts would be less than significant after incorporating requirements under SCAQMD Rule 403[6]. To provide substantial evidence to support the less than significant finding in the main body of CEQA document, it is recommended that the Lead Agency use SCAQMD's reginal air quality CEQA significance thresholds to determine the level of significance in the Final MND. Using SCAQMD's CEQA significance thresholds clearly identifies whether the Proposed Project would result in significant air quality impacts under CEQA, discloses the magnitude of the impacts, facilitates the identification of feasible mitigation measures, and evaluates the level of impacts before and after mitigation measures. C-5

Construction Air Quality Impact Analysis

2. This comment is related to Comment No. 1. While the Lead Agency conducted the construction air quality impact analysis and disclosed the Proposed Project's maximum construction emissions in the technical appendix (Appendix B, *Air Quality Report*) to the MND, the Lead Agency did not include a detailed discussion on the Proposed Project's potential construction air quality impacts in the main body of the MND. To facilitate public review of the air quality impacts analysis, Lead Agency should include a discussion on the Proposed Project's construction impacts under Section 3b, *Air Quality*, in the main body of the Final MND. C-6

Operational Air Quality Impact Analysis

3. The Lead Agency quantified the Proposed Project's construction emissions but did not conduct operational emissions impact analysis. Since the Proposed Project will involve construction of a four-lane bridge without demolishing the existing bridge[7], it has the potential to generate or attract new or additional vehicular trips that will travel on the new bridge, which can lead to increases in criteria pollutants and air toxics emissions. Therefore, SCAQMD staff recommends that the Lead Agency use the good-faith effort to quantify and disclose any potential adverse air quality impacts from additional vehicle travel during implementation of the Proposed Project in the Final MND. C-7

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[3] South Coast Air Quality Management District. March 2015. *SCAQMD Air Quality Significance Thresholds*. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.

[4] MND. Appendix B. Table 5.1. Page 34.

[5] *Ibid*.

[6] MND. Page 25.

[7] MND. Page 42.

Additional Recommended Air Quality Mitigation Measures

4. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures to revise the existing Mitigation Measures Air-02, Air-03, and AIR-5 in the Final MND to further reduce construction emissions from NOx, PM10, and PM2.5.

   a) Require the use of 2010 model year diesel haul trucks that conform to 2010 U.S. EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

   b) Requires the use of Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provisions of written documents by contractors to prove and ensure compliance.

   c) Minimize idling of all construction vehicles to five minutes or less. This is consistent with the CARB's idling policy[8]. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

C-8

[8] California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf.

Response to Comment Letter C

South Coast Air Quality Management District (SCAQMD)
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources
April 4, 2018

Response to Comment C-1. The South Coast Air Quality Management District's (SCAQMD) assumptions are correct.

Response to Comment C-2. The City acknowledges the project's construction emissions were quantified. It is the City's opinion the quantification of the project's operation emissions was not required. The reason being the roadway is not being widened over what currently exists (baseline). The current Temescal Canyon Road is two lanes and the roadway will continue to be two lanes with the proposed project. The bridge is being built to accommodate four lanes and will be striped for two lanes with the proposed project. The proposed roadway is being realigned (moved) and the current Temescal Canyon Road will be decommissioned. There will be no additional traffic (vehicle emissions) over what is currently traveling on the roadway. In addition, the widening of the future roadway to four lanes was analyzed as a part of a larger project (Alberhill Villages Specific Plan EIR) which determined there would be significant unavoidable impacts from ROG, NOx, CO, and PM_{10} operational emissions for Phases 1, 2, and 4 after mitigation; therefore, it is not necessary to analyze the long-term operational impacts of the roadway and bridge. In addition, the City adopted Findings and a Statement of Overriding Considerations stating the benefits of the Specific Plan outweigh the environmental impacts on air quality from the project.

Page 2 of the Initial Study reads "*The entire realigned roadway including the roadway from the bridge to Lake Street going southeast was the subject of a separate CEQA document approved by the City of Lake Elsinore as part of the Alberhill Villages Specific Plan (AVSP) EIR in February 2017 (SCH No. 2012061046) and it conforms to the City's standard for a "Major Highway" with a right-of-way width of 100 feet. The ultimate standard roadway section would consist of a painted 14-foot median, two 12-foot inside lanes, two 15-foot outside lanes, two 6-foot shoulders, and two 10-foot parkways that can accommodate a 6-foot wide sidewalk*."

In addition, it was stated in the Initial Study page 24, "*The project is in the 2016 Regional Transportation Plan (RTP), which was found to be conforming by the FHWA/Federal Transit Administration (FTA) on June 1, 2016. The project is also in the 2015 Federal Transportation Improvement Program (FTIP), which was found to be conforming by the FHWA/FTA on December 15, 2014 (Project ID: RIV111203; Description: Bridge Replacement/Realignment: Replace Temescal Canyon Road two-lane bridge with a four-lane bridge over Temescal Wash). The Build Alternative is consistent with the scope of design concept of the FTIP. Therefore, the proposed project is in conformance with the State Implementation Plan (SIP). The proposed project will not substantially contribute to or cause deterioration of existing air quality; therefore, mitigation measures are not required for the long term operation of the project. Hence, the proposed project is considered to be consistent with the General Plans for the City of Lake Elsinore and the County of Riverside, as well as with the SCAG forecast, and is, therefore, consistent with the AQMP*."

Page 26 of the Initial Study states "*The proposed project is not adding capacity to the roadway. Temescal Canyon Road is currently two lanes in the project area and will remain two lanes after the bridge is built. Long-term emissions will improve from the enhanced traffic flow due to the roadway improvements. The proposed project is not expected to generate any additional traffic and regional traffic trips will remain similar to what is projected. The proposed project will improve traffic movement*

in the project vicinity, thereby lowering the total pollutants emitted by vehicles crossing the bridge. Because the proposed project will reduce rather than increase long-term air quality emissions, impacts related operational emissions are less than significant. Therefore, no mitigation is required for long-term emissions and no further analysis is needed."

The City has taken the SCAQMD proposed mitigation measures into advisement and is including revised **Mitigation Measures AIR-03 and AIR-05** and new **Mitigation Measures AIR-06 and AIR-07** in the Final Initial Study and Mitigation Monitoring Plan as follows:

AIR-03. All trucks that are to haul excavated or graded material on site will comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2), and (e)(4), as amended, regarding the prevention of such material spilling onto public streets and roads. The contractor shall provide periodic reporting documents to the City to prove and ensure compliance.

AIR-05. All construction vehicles both on and off site shall be prohibited from idling in excess of ~~10~~ 5 minutes. This requirement shall be provided as a bid or contract specification with contractors.

AIR-06. Construction trucks shall use of 2010 model year diesel haul trucks that conform to 2010 U.S. EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction. This requirement shall be provided as a bid or contract specification with contractors. The contractor shall provide periodic reporting documents to the City to prove and ensure compliance.

AIR-07. The contractor shall use Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower. This requirement shall be provided as a bid or contract specification with contractor.

Response to Comment C-3. Comment noted. All public and commenting agencies comments along with the requested changes to the Initial Study have been responded to and provided to both the commenters and the City's approving body prior to action on the proposed project and adoption of the Mitigated Negative Declaration in accordance with CEQA Guidelines Section 15074.

Response to Comment C-4. Text has been added to the Initial Study comparing the impacts of the project against AQMD's thresholds of significance for construction only. Please refer to Response to C-2 and C-7 for the discussion on why the operation emissions of the proposed project were not analyzed.

ADDED TEXT IN the Initial Study

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant With Mitigation Incorporated. Currently, the Basin is designated as a non-attainment area for ozone, PM_{10}, and $PM_{2.5}$. Development Construction of the project will contribute to air emissions on a short-term basis. Short-term emissions will result from construction activities, such as fugitive dust from grading/site preparation and equipment exhaust.

Construction. Construction would involve vegetation clearing, construction activities, and paving roadway surfaces. Construction-related effects on air quality from the bridge replacement and realignment project would be greatest during the site preparation phases because most engine emissions are associated with the excavation, handling, and transport of soils to and from the site. If not properly controlled, these activities would temporarily generate PM_{10}, $PM_{2.5}$, CO, SO_2, NO_X, and

VOCs. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after drying. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, the silt content of soil, wind speed, and the amount of equipment operating at the time. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase while vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site.

SO_2 is generated by oxidation during combustion of organic sulfur compounds contained in diesel fuel. Off-road diesel fuel meeting federal standards can contain up to 5,000 parts per million (ppm) of sulfur, whereas on-road diesel is restricted to less than 15 ppm of sulfur. However, under California law and ARB regulations, off-road diesel fuel used in California must meet the same sulfur and additional standards as on-road diesel fuel. Accordingly, SO_2-related issues due to diesel exhaust would be minimal.

Table A: Construction Emissions

Construction Phase	Maximum Project Construction Emissions (lbs/day)				
	ROG	NOx	CO	Total PM_{10}	Total $PM_{2.5}$
Grubbing/Land Clearing	1.04	12.44	6.99	3.02	0.98
Grading/Excavation	6.96	78.77	44.18	6.17	3.83
Drainage/Utilities/Sub-Grade	5.18	50.34	38.03	5.31	3.13
Paving	1.55	21.56	14.08	1.01	0.82
Peak Daily	**6.96**	**78.77**	**44.18**	**6.17**	**3.83**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**55**
Significant Emissions?	**No**	**No**	**No**	**No**	**No**

Source: *Temescal Canyon Road Bridge Replacement and Road Realignment Air Quality Study*, LSA Associates, Inc., September 29, 2017.
CO = carbon monoxide
lbs/day = pounds per day
NOX = oxides of nitrogen
PM2.5 = particulate matter less than 2.5 microns in size
PM10 = particulate matter less than 10 microns in size
ROG = reactive organic gases

The maximum amount of construction-related emissions during a peak construction day is presented in the table above (model data are provided in Appendix B). The PM_{10} and $PM_{2.5}$ emissions assume a 50 percent control of fugitive dust as a result of watering and associated dust-control measures. The emissions presented in the table are based on information available at the time of calculations. The proposed project is anticipated to take approximately 16 months to construct beginning in 2019. Caltrans Standard Specifications for construction (Section 14-9.03 [Dust Control] and Section 14-9.02 [Air Pollution Control]) will be adhered to in order to reduce emissions generated by construction equipment. Additionally, the SCAQMD has established Rule 403 for reducing fugitive dust emissions. The best available control measures (BACM), as specified in SCAQMD Rule 403, shall be incorporated into the proposed project commitments. With the implementation of standard construction measures (providing 50 percent effectiveness) such as frequent watering (e.g., minimum twice per day) and **Mitigation Measures AIR-1 through AIR-7**, fugitive dust and exhaust emissions from construction activities will reduce short-term air quality impacts to a less than significant level.

The project is required to comply with regional rules that assist in reducing short-term air pollutant emissions. The purpose of SCAQMD Rule 403 is to reduce the amount of particulate matter in the atmosphere resulting from man-made fugitive dust sources. Among the requirements under this rule, fugitive dust must be controlled so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. This is achieved by requiring actions to prevent, reduce, or mitigate dust emissions. Adherence to Rule 403 is a standard requirement for any development project occurring within the SCAQMD. Adherence to Rule 403 with the following construction practices measures, air quality emission impacts associated with construction activities will be less than significant. Adherence to **Mitigation Measures AIR-01 through AIR-07** will reduce short-term air quality impacts to a less than significant level.

Mitigation Measures:

AIR-01 During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions will be controlled by regular watering or other dust preventive measures using the following procedures, as specified in the South Coast Air Quality Management District (SCAQMD) Rule 403. All material excavated or graded will be sufficiently watered to prevent excessive amounts of dust. Watering will occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day. All material transported on site or off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust. The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized so as to prevent excessive amounts of dust. These control techniques will be indicated in project specifications. Visible dust beyond the property line emanating from the project will be prevented to the maximum extent feasible.

AIR-02 Project grading plans will show the duration of construction. Ozone precursor emissions from construction equipment vehicles will be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications.

AIR-03 All trucks that are to haul excavated or graded material on site will comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2), and (e)(4), as amended, regarding the prevention of such material spilling onto public streets and roads. The contractor shall provide periodic reporting documents to the City to prove and ensure compliance.

AIR-04 The contractor will adhere to the California Department of Transportation (Caltrans) Standard Specifications for Construction (Sections 14.9 02 and 14 9.03).

AIR-05 All construction vehicles both on and off site shall be prohibited from idling in excess of 10 5 minutes. This requirement shall be provided as a bid or contract specification with contractors.

AIR-06 Construction trucks shall use of 2010 model year diesel haul trucks that conform to 2010 U.S. EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction. This requirement shall be provided as a bid or contract specification with contractors. The contractor shall provide periodic reporting documents to the City to prove and ensure compliance.

AIR-07 The contractor shall use Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower. This requirement shall be provided as a bid or contract specification with contractors.

Operation. The proposed project is not adding capacity to the roadway. Temescal Canyon Road is currently two lanes in the project area and will remain two lanes after the bridge is built. Long-term emissions will improve from the enhanced traffic flow due to the roadway improvements and the bridge being widened. Currently the bridge width does not accommodate two passing vehicles comfortably. The proposed project is not expected to generate any additional traffic and regional traffic trips will remain similar to what is projected. The proposed project will improve traffic movement in the project vicinity, thereby lowering the total pollutants emitted by vehicles crossing the bridge. In addition, the roadway and bridge were included in the EIR prepared and certified for the Alberhill Villages Specific Plan adopted by the City in February 2017. The EIR determined ROG, NOx, CO, and PM10 operational emissions for Phases 1, 2, and 4 are significant and unavoidable. In addition, the City adopted Findings and a Statement of Overriding Considerations stating the benefits of the Specific Plan outweigh the environmental impacts on air quality from the project.

The realignment of the roadway and bridge will take place during Phase I of the Because the proposed project will reduce rather than increase long-term air quality emissions, impacts related operational emissions are less than significant. Therefore, no mitigation is required for long-term emissions and no further analysis is needed.

Response to Comment C-5. Text has been added to the Initial Study (refer to Response to Comment C-4) to make it easier for the reader to understand the impacts on air quality as a result of construction of the proposed project.

Response to Comment C-6. Text has been added to the Initial Study (refer to Response to Comment C-4) to make it easier for the reader to understand the impacts on air quality as a result of construction of the proposed project.

Response to Comment C-7. Please refer to Response to Comment C-2, the project will not add additional air quality pollutants to the area as a result of the new roadway and bridge. The current Temescal Canyon Road will be decommissioned and the roadway and bridge are being realigned (refer to Figure 3 in the Initial Study). No additional vehicular trips will occur as a result of the project. The old bridge will not be demolished because it contains utilities that are cost prohibited to be moved from their current location. The old roadway will not be open to through traffic.

Response to Comment C-8. The recommended mitigation measures have been incorporated into the Final Initial Study and Mitigation Monitoring Plan as requested.

Letter D

From: Erica Martinez
To: Richard J. MacHott, LEED Green Assoc.
Cc: Destiny Colocho
Subject: Temescal Canyon Road Bridge and Road Realignment Project
Date: Wednesday, April 11, 2018 8:38:16 AM

Dear Mr. MacHott:

Thank you for providing the Rincon Band with the Initial Study/MND for the above referenced project. We have reviewed the document and are not in agreement with the recommended mitigation measure pertaining to cultural resources. The City of Lake Elsinore is associated with the Luiseño Creation Story. In addition, Temescal Canyon Road was a trading route for the Luiseño people. Furthermore, Rincon has knowledge of several ground stone implements were discovered approximately a half mile north of the proposed project area. For these reasons, we recommend that the project be conditioned with archaeological and Luiseño Tribal Monitoring, and that a Monitor Treatment Plan be produced and implemented for potential discoveries and ground disturbances in undisturbed soil. D-1

We look forward to hearing from you. If you have any additional questions or concerns please do not hesitate to contact our office at your convenience.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Erica A. Ortiz-Martinez
Administrative Assistant
For Destiny Colocho, Director
Cultural Resources Department
Rincon Band of Luiseño Indians
1 West Tribal Road | Valley Center, CA 92082
Office:760-297-2635
Fax: 760-692-1498
Email: emartinez@rincontribe.org

Rincon Band of Luiseño Indians
www.rincontribe.org

Response to Comment Letter D

Rincon Band of Luiseño Indians
Destiny Colocho, Director
Cultural Resources Department
April 11, 2018

Response to Comment D-1. The City appreciates the comments from the Rincon Band of Luiseño Indians. The Initial Study **Mitigation Measures TCR-02 through TCR-07** provides for a monitoring program with Consulting Tribes and a Treatment Plan (pages 58-60). The City does not agree with the conclusions made by commenter since adequate mitigation is provided. The mitigation measure states the following:

TCR-02 *At least 30 days prior to excavation within any previously undisturbed native soils, the City shall contact the Consulting Tribes to notify each Tribe of excavation activities and coordinate with the Tribes to develop Monitoring Agreements. The Agreements shall address the designation, responsibilities, and participation of Native American Tribal monitors during excavation and other ground disturbing activities within undisturbed native soils and construction scheduling. Native American monitoring shall be limited to only those periods during project construction where excavation within previously undisturbed areas is occurring. Ground disturbing activities within previously disturbed areas shall not require notification, monitoring or an Agreement.*

TCR-03 *The Project Archaeologist, in consultation with the Monitoring Tribe(s), the Developer and the City, shall develop a Cultural Resources Monitoring Plan (CRMP) to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the Plan shall include:*

a. Project grading and development scheduling;

b. The coordination of a monitoring schedule as agreed upon by the Monitoring Tribe(s), the Project archaeologist, and the City of Lake Elsinore; and

c. The protocols and stipulations that the City, Monitoring Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resources.

TCR-04 *Prior to any grading, excavation and/or other ground-disturbing activities on the Project site, the Project archaeologist and the Monitoring Tribe(s) shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The City's construction manager shall ensure that construction personnel are made available for and attend the training and shall retain documentation demonstrating attendance.*

TCR-05 *In accordance with the agreement required in TCR-2, the Project archaeologist and designated tribal monitor(s) assigned to the project by the Luiseño Tribe(s) shall have the authority to stop and redirect excavation in order to evaluate the significance of any archaeological resources discovered on the property.*

TCR-06 All artifacts discovered at the development site shall be inventoried and analyzed by the Project archaeologist and Native American monitor(s). If any cultural materials of *Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop. The Project archaeologist and Native American monitor(s) shall analyze the Native American cultural materials for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribes. All items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.*

The City and/or landowner shall relinquish ownership of all cultural resources. Native American cultural materials that cannot be avoided or relocated at the Project site shall be prepared in a manner for curation. Within a reasonable amount of time, the Project archaeological, following consultation with the Monitoring Tribe(s), shall deliver the materials to a qualified repository in Riverside County that meets or exceeds federal standards per 36 CFR Part 79 and which shall be made available to all qualified researchers and tribal representatives.

TCR-07 ***Treatment and Disposition of Cultural Resources:*** *In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:*

1. *Temporary On-Site Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite. The removal of any cultural materials from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and*

2. *Treatment and Final Disposition: The agency shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all cultural materials and non- human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the cultural materials through one or more of the following methods and provide the City of Lake Elsinore Planning Department, Caltrans and Consulting Tribe(s)*

    a. *Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;*

    b. *A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation:*

c. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City of Lake Elsinore Planning Department, Caltrans and Consulting Tribe(s) documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Lake Elsinore Planning Department,

State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(909) 484-0167
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EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director

April 13, 2018
Sent via email

Letter E

Mr. Richard MacHott
LEED Green Associate, Planning Manager
City of Lake Elsinore
130 S. Main Street
Lake Elsinore, CA 82530
rmachott@Lake-Elsinore.org

Subject: Initial Study with Proposed Mitigated Negative Declaration
Temescal Canyon Road Bridge and Road Alignment Project
State Clearinghouse No. 2018031021

Dear Mr. MacHott:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Initial Study and proposed Mitigated Negative Declaration (IS/MND) for the Temescal Canyon Road Bridge and Road Alignment Project (project) [State Clearinghouse No. 2018031021]. We appreciate your willingness to grant the Department a seven-day extension to April 13, 2018 to submit our comments. The Department is responding to the IS/MND as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The project proposes to construct a new bridge over Temescal Wash in the City of Lake Elsinore, California. The bridge will be constructed as a four-lane structure (98-feet wide, 375 feet long, structure depth of 5 feet). The roadway will be constructed in three areas: from 200 feet north of the proposed bridge to the existing two-lane Temescal Canyon Road, from the bridge to the existing two-lane Temescal Canyon Road (a 649-foot roadway transition), and northwest and southeast of the proposed bridge (approximately 200 feet of roadway). The new bridge will connect to a 696-foot long realigned roadway that will extend from 200 feet south of the bridge to Lake Street approximately 180 feet south of the

current intersection. The bridge will consist of a 14-foot painted median, two 12-foot inside lanes, two 15-foot outside lanes, two 6-foot shoulders that can accommodate a Class II bike lane, and two 6-foot sidewalks separated from vehicular traffic with a concrete barrier. The bridge sidewalk and deck will include utility openings to accommodate future utilities.

Within Temescal Wash, construction activities will include grading of the stream bank and channel upstream, downstream, and within the bridge footprint, and placement of concrete slope protection, a cutoff wall, and a riprap launch pad. A 478-foot long segment of Temescal Wash will be excavated to create a low-flow channel to divert flow under the proposed bridge. The created low-flow channel would extend approximately 324 feet downstream and 154 feet upstream of the proposed bridge. The total construction footprint of the project is 5.01 acres, approximately 3.0 acres of which will result in permanent, impervious impacts (proposed roadway pavement, bridge, and concrete slope protection near the bridge abutment). E-1

COMMENTS AND RECOMMENDATIONS

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department offers the comments and recommendations presented below to assist the City of Lake Elsinore (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources and the project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). E-2

The Department's comments and recommendations on the IS/MND include:

<u>Project Description</u>

The Department appreciates the inclusion of specific length, width, and acreage delineation of the overall project footprint and the permanent and temporary impacts to streambed and riparian resources. In order to gain a more complete understanding of project impacts, the Department requests a detailed description of the "minor regrading of the creek near the bridge," as well as dimensions, and depth of the low-flow channel. The impacts acreage of the Project Description does not match the impact acreage described in the Natural Environmental Study (NES) accompanying the IS/MND (Figure 6, Appendix A), and the Department requests that this inconsistency be corrected. Furthermore, a detailed description E-3

of the bridge construction techniques should be included, as construction activities can have differing levels of impact to wildlife behavior (such as nesting, foraging, and movement). Further information is necessary for the Department to be able to evaluate the impacts on fish and wildlife resources. E-3

Hydrology

Based on the information provided in the preliminary Geotechnical Report, the Department is concerned that the current bridge design may affect existing stream conditions, including, but not limited to scour/erosion of the stream's banks and channel, perching groundwater, and dewatering adjacent conservation lands. The preliminary Geotechnical Report included with the IS/MND states that "permanent stabilized groundwater may be present at or within a few feet of the Temescal Wash channel bed and potential for perched groundwater at higher elevations near the creek, and during and following floods, is considered high," while "it is proposed to grade the channel with a soft bottom and a central low-flow trapezoidal channel, and to extend the abutment slope paving and pier foundation cut-off level below expected scour depth to about El. 1192 feet, or roughly 10 feet below existing grade." E-4

Where a project has the potential to affect the hydrologic regime of a watershed, the CEQA document should identify and discuss the necessary elements and/or processes required to successfully maintain downstream biological diversity in order to minimize downstream impacts. Where impacts are anticipated, the CEQA document should also propose adequate, specific, and defensible compensatory mitigation (where necessary). E-5

Potential impacts to onsite and adjacent habitat resulting from floodplain de-watering and draining of perched groundwater should be analyzed and addressed prior to adoption of the IS/MND. The Department recommends inclusion of at minimum the following items: E-6

1. A thorough evaluation of the Temescal Wash groundwater table, both within and adjacent to the project footprint (inclusive of upstream and downstream reaches and associated habitats);
2. An evaluation of pre- and post-project streambank stability;
3. A detailed evaluation of current streambed conditions and justification of need for the proposed low-flow channel; and
4. A sediment transport study, comparing pre- and post-construction conditions.

With the inclusion and analysis of additional groundwater information, the Department recommends revising the impacts assessment of the Environmental Checklist as necessary for Section 4 (Biological Resources) and Section 9 (Hydrology and Water Quality) to reflect the additional impacts E-7

associated with possible groundwater alteration associated with the proposed project. E-7

At this point in time the Department is concerned that evaluation of impacts to groundwater resources is incomplete, and therefore insufficient to inform minimization and avoidance of sensitive biological resources. Consequently, the Department does not have adequate information to assess whether impacts will be offset to a "less than significant" level. E-8

Bats

The NES indicates that suitable roosting habitat for special-status bat species within the project area is absent, yet the project site contains mature trees and snags, and the existing Temescal Canyon Bridge is located within 700 feet of the existing bridge. The NES does not contain documentation of bat habitat assessment surveys to support the justification that bat species or roosting habitat is absent. E-9

In order to provide a more complete description of the baseline conditions, the Department recommends that the City complete a bat habitat assessment of all suitable roosting structures/locations within and adjacent to the project area, during the appropriate time of year and that results be included in the CEQA document prior to adoption of the MND. The Department further recommends that the assessment be completed by a bat biologist experienced in the ecology of bats using both natural and man-made structures. If bats are detected within the project area the MND should include appropriate avoidance, minimization, and/or mitigation measures to address potential impacts, including considerations of vegetation removal, noise minimization, and appropriate construction monitoring. E-10

Nesting Birds

Mitigation Measure BIO-01 through BIO-03 provide mitigation measures for impacts to nesting birds. Please note that it is the project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that is it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 E-11

states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA. The Department recommends that BIO-02 be conditioned to require the completion of surveys regardless of time of year, and that surveys include areas containing both vegetated and non-vegetated areas, as some species may nest directly on the ground. E-11

MSHCP Consistency Review Process

The Department and United States Fish and Wildlife Service (Service) provided comments on the Determination of Biologically Equivalent or Superior Preservation (DBESP) via email on April 9, 2018 (attached). The joint email letter requested the provision of additional information for the Department and Service to complete their review. The Department encourages the City to complete the MSHCP consistency review process prior to adopting the MND. E-12

Department Conclusions and Further Coordination

The Department appreciates the opportunity to comment on the IS/MND for the Temescal Canyon Road Bridge and Road Alignment Project (SCH No. 2018031021), and we request that the City address the Department's comments and concerns prior to adoption of the MND. The Department is aware that this project is contingent upon Federal Highway Administration funds, and will continue working with the City to preserve funding. If you should have any questions pertaining to the comments provided in this letter, please contact Claire Ingel at (909) 484-3979 or at claire.ingel@wildlife.ca.gov. E-13

Sincerely,

For Scott Wilson
Environmental Program Manager

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

Enclosed: DBESP for the Temescal Canyon Road Bridge Replacement and Road Realignment Project, Temescal Wash, City of Lake Elsinore

Response to Comment Letter E

California Department of Fish and Wildlife
Scott Wilson
Environmental Program Manager
April 12, 2018

Response to Comment E-1. The California Department of Fish and Wildlife's (Department) depiction of the proposed project is accurate. No response is required.

Response to Comment E-2. Comment is noted. The City understands and appreciates the Department's role in assessing the project.

Response to Comment E-3.

Channel Grading: As shown on the attached channel grading plan, the grading area of Temescal Wash will consist of approximately 2.66 acres. The average length and width of channel excavation limits are 420 feet and 300 feet, respectively. The excavation depths (or "cut") are depicted at the following locations as shown on the attached grading plan:

1. Upstream segment of the graded channel near Section D-D – excavation depths vary from 1.5' to 4.5' with depths in most areas of the main channel ranging from 1.5' to 3.5'.
2. Immediately upstream of the bridge – excavation depths vary from 2' to 5' with depths in most areas of the main channel ranging from 2' to 4'.
3. Immediately downstream of the bridge – excavation depths vary from 2' to 6' with depths in most areas of the main channel ranging from 2' to 4'.
4. Downstream segment of the graded channel between Sections A-A and B-B – excavation depths vary from 1.5' to 7.5'. If the local and isolated ridgeline that was constructed by PacClay is not considered (red shaded area), the excavation depths will be shallower, ranging from 1.5' to 4.5'.

The excavation depth in the lowest elevation of the main channel is approximately 2' deep (blue shaded area).

Low-flow Channel: As result of the proposed grading and location of the proposed bridge columns, a 478-foot segment of the existing low flow channel (404 Jurisdictional Delineation) will be impacted. The impacted segment will be relocated to convey low flows through the proposed bridge. The relocated low-flow channel will extend approximately 100 feet downstream of the proposed bridge. It will also extend approximately 250 feet upstream of the proposed bridge. The bottom of the low-flow channel is approximately 18 feet wide while the top of bank is approximately 55 feet wide. The depth of the channel varies from 1 foot to 1.2 feet. The relocated low-flow channel will be restored to replicate the bio-resource of the existing low-flow channel.

Bridge Construction Techniques: The proposed bridge is a Cast-In-Place (CIP) Pre-Stressed Concrete Box Girder structure, which is the most cost-effective structure type for a nominal span length in the range of 100 to 200 feet in California. CIP Concrete Box Girder structures require very little maintenance. The only major long-term maintenance work involves sealing the concrete bridge deck and replacing the expansion joint rubber material every 10 to 20 years. The maintenance work is done on the bridge deck without entering the channel bottom.

The proposed bridge will be supported by two piers in the channel and two abutments, one at the beginning and one at the end of the structure. The pier columns and abutments will be supported by driven steel piles. The abutment footings will be placed in the approach embankments. The slopes under the bride will be protected from scour and erosion by a concrete lining on the surface of the embankment.

Construction of the pier footings require shoring around the footing area for excavation to reach the level that pile driving will commence. Prior to excavation inside the shoring, temporary dewatering will be performed to lower the local ground water level (just within the shoring enclosure) until the excavation is completed, steel piles are installed, and a layer of concrete seal course is placed below the footing. The purpose of the seal course is to make the excavated area water tight in order to construct the reinforced concrete pile cap and the piers. The temporary dewatering at each pier will last approximately 6 weeks. Temporary dewatering at the abutments is not required as the footings are placed above the graded channel bottom.

The cast-in-place construction method to build the superstructure girder will require installation of temporary falsework in the channel. The falsework support generally consists of temporary timber columns or temporary steel pipe bents. The contractor has the responsibility to design and erect the falsework to maintain a proper storm flow conveyance capacity as mandated by the contract specifications. Falsework in the channel can be removed approximately 6 months after its installation.

Equipment needed to construct the bridge will consist of crane, pile driver, bulldozer, excavator, compactor, and loader.

Response to Comment E-4.

Stream Stability: Without relying on the results of the sediment transport analysis to determine the impacts of the bridge to the existing stream condition and scour/erosion of the banks and channel, an initial hydraulics and channel stability assessment was prepared during the preliminary engineering phase to determine (or predict) the stability of Temescal Wash using the following engineering procedures:

- Evaluate the results of the hydraulic calculations, specifically flow velocities, between the existing (pre-project) and proposed (with-project) conditions – Per the HEC-RAS model, the flow velocities at the upstream end of the bridge under the existing and proposed conditions are 4.16 FPS and 3.50 FPS, respectively, which indicate that the flow velocity is reduced by 0.66 FPS upon construction of the proposed bridge. Since the flow velocity under the proposed condition is lower than the existing condition, the project will not have an impact to the current or existing scour condition of the wash in the vicinity of the bridge.

  Regarding the potential sediment aggradation or siltation issue associated with the reduction in the flow velocity upon construction of the proposed bridge, we offer the following assessment:

  - According to the preliminary soils report, the soil type in the project area can be classified as Silty Sand and Clayey Sand with approximate D50 values of 0.18 mm and 0.15 mm, respectively. As mentioned previously, the 100-year flow velocity at the upstream face of the proposed bridge is 3.5 FPS. Per the Hjulstrom's diagram (see Figure 1) and based on a flow velocity of 3.5 FPS (or 106.7 cm/sec) and D50 value of 0.18 mm, the soil in the project area is expected to be in the “erosion” section of the diagram, which means that movement of sediment is expected to occur, for soils with a D50 value of 25 mm or less (clay, silt and very fine sand to less than coarse sand). In order for the soils to drop off or settle in the bridge area, the flow velocity needs to be about 0.06 FPS (or 2 cm/sec) or lower, which is not

expected to occur even during the more frequent storm event (i.e. less than the 100-year event such as the 2, 5 or 10-year events). Please note that the computed flow velocity of 3.5 FPS was derived based on high roughness coefficients (Manning's N-values) of 0.07 for the main channel and 0.055 for the floodplain area to reflect the proposed vegetation plan within the conservation easement.

- Perform a field investigation to identify the existence (or absence) of any significant channel degradation (head-cutting) or aggradation – Through multiple field site visits over 4 years (and after various storm events), no major or significant channel degradation (head-cutting) or aggradation in the wash area from Bernard Street up to Lake Street has been observed.

- Evaluate the long-term changes in the topographic characteristics of the stream by comparing available topographic maps prepared at various dates – Channel instability is generally caused by physiological changes in the wash or river such as sediment supply imbalance associated with gravel mining operation and poorly designed flood control improvements. Drastic changes in the hydrological condition of the river system could also be a contributing factor. Our study evaluated the stability of Temescal Wash by comparing the changes in the overall river bed and floodplain elevations using the following aerial topographic maps:

    - Riverside County Flood Control District's 1969 Line Topo Map with 4-foot contour intervals (NGVD 1929):
        - Section 15, T5S and R5W
        - Section 16, T5S and R5W

    - Riverside County Flood Control District's 2009 Orthophoto Map with 4-foot contour intervals (NAVD 1988):
        - Section 15, T5S and R5W
        - Section 16, T5S and R5W

    - Project design aerial topographic map dated 2015 with 1-foot contour intervals (NAVD 1988)

Our study evaluated the reach of Temescal Wash from Bernard Street culvert (formerly Larson Road) to Lake Street bridge. The results of the analysis are outlined below:

- Section 16 (Bernard Street culvert, formerly Larson Road): No appreciable change in elevations in the overbank area of Temescal Wash is apparent. However, the flowline elevation of the wash shown on the 1969 line topo map at the upstream side of the culvert is 1199.5 (NGVD 1929) or 1201.86 (NAVD 1988) while the 2009 orthophoto map shows it to be approximately elevation 1204.0. Due to heavy and dense vegetation existing in the 2009 orthophoto map, it is feasible that elevation 1204.0 does not reflect the true flow line elevation of the wash. The project design topo map (2015) shows elevation 1200.6 at roughly the same location. This could mean that a channel degradation of approximately 1.26 feet has occurred from 1969 to 2015, a period of 46 years, which translates to a long-term degradation rate of 0.03 feet per year.

- Section 15 (existing Temescal Canyon Road Bridge): The flowline elevation of the wash shown on the 1969 line topo map is 1208.8 (NGVD 1929) or 1211.16 (NAVD 1988) while the 2009 orthophoto map shows it to be approximately elevation 1212.0. Again, due to heavy and dense vegetation existing in the 2009 orthophoto map, it is feasible that elevation 1212.0 does not reflect the true flow line elevation of the wash.

> The project design topo map (2015) shows elevation 1210.0 at roughly the same location in the wash. This could mean that a channel degradation of approximately 1.16 feet has occurred from 1969 to 2015, a period of 46 years, which translates to a long-term degradation rate of 0.03 feet per year.

The results indicate that an average degradation rate of approximately 0.03 feet per year (or 0.36 inches per year) can be expected, which is considered a minor change and it provides qualitative evidence about the long-term stability of Temescal Wash.

The results of the initial hydraulics and channel stability assessment indicate no substantial hydraulic changes will occur to the flow depth and flow velocity under the existing condition due to the construction of the bridge and proposed channel grading. Additionally, the results indicate that the risk of erosion or siltation will not significantly increase from existing to proposed conditions. Nevertheless, a sediment transport study will be performed during the PS&E phase to either verify or refute the findings of the initial hydraulics and channel stability assessment. If the results of the sediment transport study indicate that the risk of erosion or siltation has significantly increased due to the proposed channel grading, then the project design will be modified to minimize grading of the main channel and the profile of the bridge and roadway over Temescal Wash will be raised to provide adequate conveyance of the 100-year storm flow. Section 9(c) of the IS/MND has been modified from a "Less than Significant" to "Less than Significant with Mitigation Incorporated" (see **Mitigation Measure HYD-01**). The following mitigation measure has been added to the Initial Study and Mitigation Monitoring and Reporting Plan in the Addenda.

HYD-01 During final design (PS&E phase), groundwater table testing and monitoring shall be performed to determine actual and seasonal groundwater table data. Groundwater table testing shall be performed, and monitoring wells shall be installed at the beginning of final design at three locations; (1) upstream of the bridge, (2) downstream of the bridge, and (3) within the bridge footprint. The current groundwater table shall be measured using a hollow-stem auger drilling approximately 10 feet below groundwater table. The standpipe piezometer wells shall be installed and monitored monthly during the dry season, and one day after and five days after each significant rainfall event, but no less than monthly during the rainy season. Monitoring of the groundwater table shall be performed for a period of at least a year prior to start of project construction and until construction of the bridge foundations and cutoff walls are completed in order to obtain seasonal groundwater table information. If the results of the tests indicate a shallow or perched groundwater condition that will result in groundwater draining to the surface, then the project design shall be modified to minimize grading of the main channel and the profile of the bridge and roadway over the wash shall be raised.

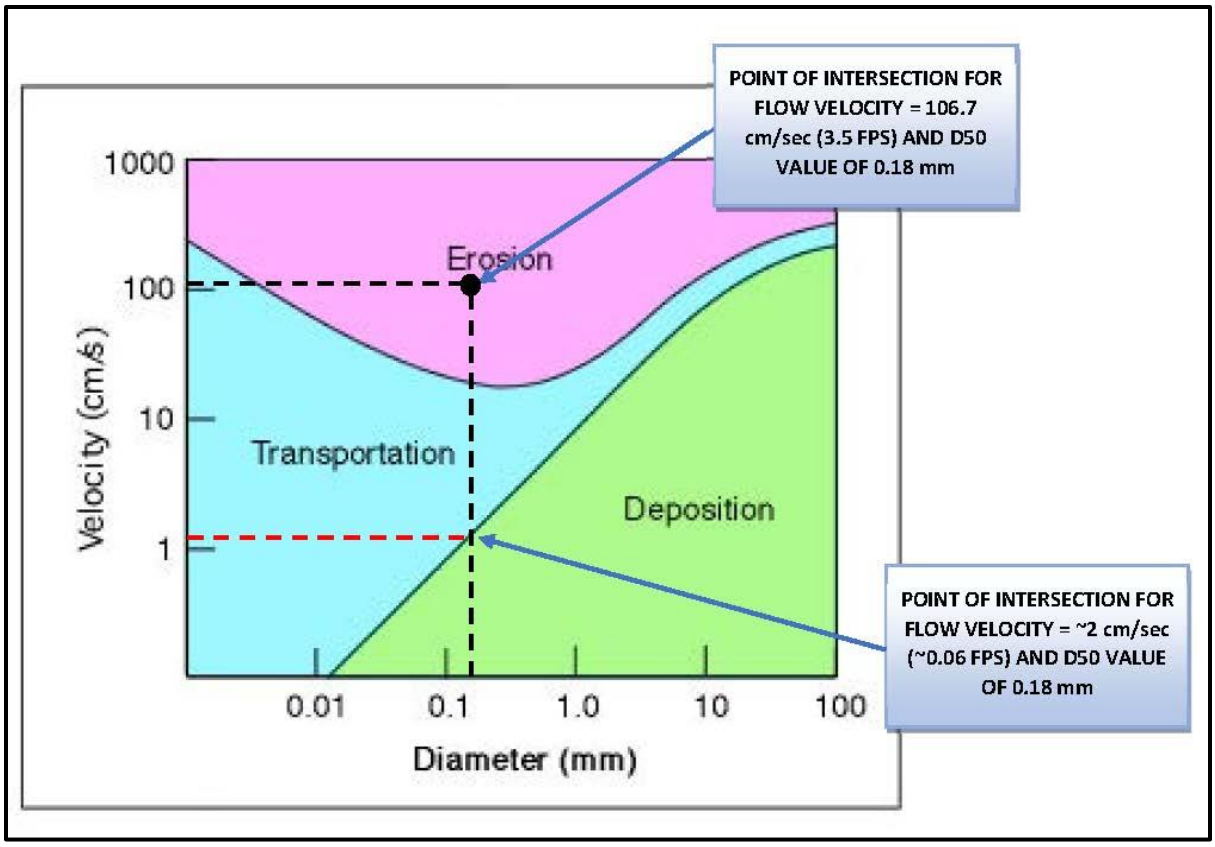

Figure 1: Hjulstrom's Diagram

Groundwater Table: Implementation of the proposed project will not require any withdrawal of groundwater beneath the project site except during the construction of the bridge foundations and cutoff walls (for scour protection). However, this operation will be temporary and short-term and should not have a permanent impact to the groundwater table of the surrounding area. Nevertheless, monitoring wells will be installed in Temescal Wash upstream and downstream of the proposed bridge and within the limits of the bridge during the final design phase to determine the current and seasonal groundwater level. If the results of the tests indicate a shallow or perched groundwater condition that will result in groundwater draining to the surface, then the project design will be modified to minimize grading of the main channel and the profile of the bridge and roadway over Temescal Wash will be raised to provide adequate conveyance of the 100-year storm flow (see **Mitigation Measure HYD-01**).

Response to Comment E-5. The proposed project area is miniscule relative to the total watershed area tributary to Temescal Wash. It is anticipated that because the project site will add a minimal amount of impervious surfaces, the effect to the hydrologic regime (storm flow) of Temescal Wash downstream of the project will be negligible. Implementation of the proposed project will not substantially increase the rate or amount of surface runoff in a manner which would impact the existing hydrologic regime of the watershed.

Response to Comment E-6.

Groundwater Table Testing and Monitoring: During final design (PS&E phase), groundwater table testing and monitoring will be performed to determine actual and seasonal groundwater table data.

Groundwater table testing will be performed, and monitoring wells will be installed at the beginning of final design at three locations; (1) upstream of the bridge, (2) downstream of the bridge, and (3) within the bridge footprint. The current groundwater table will be measured using a hollow-stem auger drilling approximately 10 feet below groundwater table. The standpipe piezometer wells will be installed and monitored monthly during the dry season, and one day after and five days after each significant rainfall event, but no less than monthly during the rainy season. Monitoring of the groundwater table will be performed for a period of at least a year prior to start of project construction and until construction of the bridge foundations and cutoff walls are completed in order to obtain seasonal groundwater table information. If the results of the tests indicate a shallow or perched groundwater condition that will result in groundwater draining to the surface, then the project design will be modified to minimize grading of the main channel and the profile of the bridge and roadway over Temescal Wash will be raised to provide adequate conveyance of the 100-year storm flow (see **Mitigation Measure HYD-01**).

Sediment Transport Study: During final design (PS&E phase), a sediment transport study will be prepared for Temescal Wash from Bernard Street up to Lake Street. The task will include evaluation of historical channel trends, contrast of local channel slopes to regional slope variation, evaluation of anticipated changes to sediment loading to the project reach due to upstream activities, hydraulic capacity calculations of using normal depth procedures, and sediment transport potential evaluation using qualitative hydraulic indicators. Steady-state methodologies will be used to contrast the sediment transport capacity of the channel reach local to the proposed bridge with anticipated supply rates, over a range of discharge conditions. Local sediment size information will be utilized with the hydraulic information and sediment transport relations to estimate bed material sediment transport volumes passing through the upstream, local and downstream channel reach. Sediment continuity will be applied to estimate potential erosion/sedimentation depths to be expected along the proposed channel under design event and average annual conditions. Local scour components, due to drop structures or other features incorporated into the proposed plan will be computed, if applicable. The potential hydraulic and/or channel deformation effects of bed form development will be assessed as well. Should the results of the sediment transport study indicate that the risk of erosion or siltation has significantly increased due to the proposed channel grading, then the project design will be modified to minimize grading of the main channel and the profile of the bridge and roadway over Temescal Wash will be raised to provide adequate conveyance of the 100-year storm flow (see **Mitigation Measure HYD-02**).

Response to Comment E-7. Section 9(b) of the IS/MND has been modified from a "Less than Significant" to "Less than Significant with Mitigation Incorporated" (see **Mitigation Measure HYD-01**).

Response to Comment E-8. Section 9(b) of the IS/MND has been modified from a "Less than Significant" to "Less than Significant with Mitigation Incorporated" (see **Mitigation Measure HYD-01**).

Response to Comment E-9 and E-10. It was determined, during general biological surveys within the project Biological Study Area and documented within the Natural Environmental Study (NES, Appendix C of the Initial Study) there is no suitable habitat for special status bats identified in the NES. However, to address potential effects to non-special status bats, the City has provided the following appropriate avoidance, minimization, and/or mitigation measures identified below to address bats, which will require that prior to construction, a Caltrans-approved bat biologist will conduct a bat assessment to identify the potential for bat species to occur within the project limits. Should the presence of bats be determined during the assessment, appropriate avoidance, minimization, and/or mitigation measures to reduce impacts, as described below, shall be implemented. **Mitigation Measure BIO-25** has been added to the Initial Study and the Mitigation Monitoring and Reporting Program in the Addenda.

BIO-25• Prior to construction, a Caltrans-approved bat biologist shall conduct a bat assessment survey to determine the presence or absence of bat species that may occur within the project limits. Should the presence of bat species be determined during this assessment, the following measures shall be implemented to address potential impacts to bats.

- Project-related construction activities shall occur outside of the bat maternity roosting season (April 1–August 31), if feasible. Should such activities occur during the maternity roosting season (April 1–August 31), the following measures shall be implemented to minimize potential impacts to day-roosting bats (including maternity colonies) from project construction.

- Nighttime exit counts and acoustic surveys shall be performed by a qualified bat biologist at structures that may be subject to project-related impacts. These surveys shall be performed during the recognized bat maternity season (April 1–August 31, but preferably in June or July), and as far in advance of construction as possible in order to provide adequate time for mitigation planning.

- Construction activities within 200 feet of structures housing maternity colonies shall be coordinated with a Caltrans-approved bat biologist and the California Department of Fish and Wildlife.

- If direct impacts to bat-roosting habitat are anticipated, humane evictions and exclusions of roosting bats should be performed under the supervision of a Caltrans-approved bat biologist after August 31 in the fall (September or October) prior to any work activities that would result in direct impacts or direct mortality to roosting bats. This action will be performed in coordination with the California Department of Fish and Wildlife. To avoid potential mortality of flightless juvenile bats, evictions and exclusions of bats cannot be performed during the maternity season (April 1–August 31). Winter months are also inappropriate for bat eviction because not all individuals in a roost will emerge on any given night. In addition, long-distance movements to other roost sites are more difficult during the winter when prey availability is scarce, resulting in high mortality rates of evicted bats.

- If permanent, direct impacts to bat-roosting habitat are anticipated and/or if a humane eviction/exclusion is performed, alternate permanent roosting habitat shall be provided prior to the eviction/exclusion of bats from that structure to ensure no net loss of bat-roosting habitat. This action shall be coordinated with the California Department of Fish and Wildlife, and the design, numbers, and locations of these roost structures should be determined in consultation with a Caltrans-approved bat biologist to ensure that the installed habitat will provide adequate mitigation for impacts.

- The loss of a night roost can negatively affect the use of a foraging area, and consequently may result in reduced fecundity in species that are already slow to reproduce. If night roosting is confirmed at any of the structures within the proposed project area, work shall be limited to the daylight hours to the greatest extent feasible to avoid potential disruption of foraging. If night work cannot be avoided, night lighting shall be focused only on the area of direct work, airspace access to and from the roost features of the structure shall not be obstructed,

and light spillover into the adjacent foraging areas shall be minimized to the greatest extent feasible.

- All mature trees to be removed as part of the project evaluated by a qualified bat biologist for their potential to support roosting bats. Trees that are identified as suitable bat roost sites shall be removed using a two-step process that occurs over a 2-day period. On Day 1, branches and limbs that do not contain crevices or cavities shall be removed using hand tools or chainsaws. The goal is to create a disturbance sufficient to cause any bats roosting in the tree to leave that night and not return, but not at a level of intensity that will cause bats to fly out of the tree during the disturbance itself (i.e., during the daytime, when leaving the roost will likely result in predation). On Day 2, the remainder of the tree may be removed. Trimming or removal of any mature trees and snags during the maternity season (April 1–August 31) shall be avoided to prevent "take" of flightless young; this period approximately coincides with bird nesting season (March 15–September 15).

- If removal of mature trees during the bat maternity season (April 1–August 31) is necessary for project construction, all mature trees to be removed that have also been identified as containing suitable bat roosting habitat will be surveyed at night prior to removal. Any trees confirmed during those surveys as housing bat maternity colonies or special-status bat species will be avoided until the end of the maternity season.

Response to Comment E-11. Per CDFW recommendations, the nesting bird avoidance and **Minimization Measure BIO-03** has been amended and **Mitigation Measures BIO-4 and BIO-5** have been added has been added to the Initial Study and the Mitigation Monitoring and Reporting Program in the Addenda to include the following:

BIO-03 ~~Nesting bird habitat within the construction footprint of the project shall be resurveyed during the general bird breeding season if there is a lapse in construction activities longer than seven days.~~ Prior to project construction activities, a pre-construction nesting bird survey will be conducted over the entire project site by a qualified biologist within three days prior to construction activities.

BIO-04 If nesting birds be found, an exclusionary buffer shall be established by a qualified biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer shall be clearly marked in the field by construction personnel under guidance of the qualified biologist, and construction or clearing shall not be conducted within this zone until the qualified biologist determines that the young have fledged or the nest is no longer active.

BIO-05 Nesting bird habitat within the construction footprint of the project shall be resurveyed during the general bird breeding season if there is a lapse in construction activities longer than seven days.

Response to Comment E-12. The comments on the DBESP were received by the City and City's responses to the Department's concerns have been addressed.

Response to Comment E-13. Again the City appreciates the Department's comments on the Initial Study and have addressed the comments in the response to comments, the addenda to the Initial Study, and in a meeting with the Department and the US Fish and Wildlife Service on April 25, 2018.

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

April 9, 2018

Letter F

Richard McHott
City of Lake Elsinore
130 S. Main Street
Lake Elsinore, CA 92530

Subject: Temescal Canyon Bridge and Road Realignment Project
SCH#: 2018031021

Dear Richard McHott:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on April 6, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. F-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

Received by
4/16/18

Document Details Report
State Clearinghouse Data Base

SCH# 2018031021
Project Title Temescal Canyon Bridge and Road Realignment Project
Lead Agency Lake Elsinore, City of

Type MND Mitigated Negative Declaration

Description The existing bridge has been rated as functionally obsolete according to FHWA criteria, with a low sufficiency rating of 68.5. The bridge is considerably undersized and causes flood waters to backup and overtop the bridge deck and its roadway approaches, causing frequent road closures. Constructing a new bridge has been proposed to eliminate these issues and to provide adequate channel cross-section and freeboard to convey 100 year flood waters. The roadway is being realigned to provide adequate distance from the Lake St/I-15 interchange to where Temescal Canyon Rd intersects with Lake St. The project includes the realignment of Temescal Canyon Rd and a new bridge to be built over Temescal Creek. The roadway is being realigned to the project includes a new 98-ft wide, 375 ft long, 4 lane bridge stripped for 2 lanes and a new 649-ft long roadway transition from the bridge to the existing 2-lane Temescal Canyon Rd. The portion of the roadway 696-ft long the will extend from 22 ft south of the bridge to Lake St approx 180 ft south of the current intersection with Lake St will be built by the developer of the Alberhill Villages SP. This portion of the roadway was approved by the city of Lake Elsinore as part of the Alberhill Villages SP EIR SCH No. 2012061046 in February 2017.

Lead Agency Contact

Name Richard McHott
Agency City of Lake Elsinore
Phone (951) 674-3124 x 246 **Fax**
email
Address 130 S. Main Street
City Lake Elsinore **State** CA **Zip** 92530

Project Location

County Riverside
City Lake Elsinore
Region
Lat / Long 33° 43' 46.45" N / 117° 24' 0.0" W
Cross Streets Temescal Canyon Rd, and Lake St
Parcel No. varies
Township 5 **Range** 5 **Section** 15,16 **Base** Alberhil

Proximity to:

Highways I-15
Airports
Railways
Waterways Temescal Creek
Schools
Land Use LU: Open pit clay mining
Z: SP

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Cumulative Effects; Tribal Cultural Resources

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Native American Heritage Commission; Caltrans, District 8; Office of Emergency Services, California; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report
State Clearinghouse Data Base

Board, Region 7; Department of Toxic Substances Control

Date Received 03/08/2018 ***Start of Review*** 03/08/2018 ***End of Review*** 04/06/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Letter F

California Governor's Office of Planning and Research
Scott Morgan
Director, State Clearinghouse
April 9, 2018

Response to Comment F-1. The City recognizes the receipt of comments from State agencies and the State Clearinghouse's acknowledgement that it has complied with review requirements for environmental documents.