RCA Joint Project Review (JPR) Findings

JPR #: 22-03-11-01
Date: 08/19/22

Project Information

Permittee:	**City of Lake Elsinore**
Case Information:	**LEAP 2022-02/Rome Hill Commercial**
Site Acreage:	**6.76 acres of which 4.28 acres are located within the Criteria Area[1]**
Portion of Site Proposed for MSHCP Conservation Area:	**0 acre**

Criteria Consistency Review

Consistency Conclusion: The project is consistent with both the Criteria and Other Plan requirements with implementation of the measures presented in these Findings (including any within the project information provided to the Regional Conservation Authority by the Permittee for this JPR).

Applicable Core/Linkage: Proposed Extension of Existing Core 3
Area Plan: Elsinore Area Plan

APN	Sub-Unit	Cell Group	Cell
371-150-001 371-150-002	SU3 – Elsinore	Independent	5038

Project Information

a. **Project Documentation**. JPR submittal materials provided by the Permittee included a JPR Application (March 3, 2022); an MSHCP Consistency Findings (*Findings*) prepared by the City of Lake Elsinore (August 4, 2022), a *Rome Hill General Biological Assessment* (*Assessment*) prepared by Hernandez Environmental Services (July 2022); and GIS shapefiles (June 2022).

b. **Project Location**. The proposed project is located in the City of Lake Elsinore. The site is bound to the southwest by Grand Avenue, to the north and west by Lake Elsinore, to the east by vacant lands, and to the southeast by commercial and residential development (Exhibit A). The proposed project site is located in the southwestern portion of the MSHCP Area (Exhibit B).

[1] Joint Project Review (JPR) only occurs within MSHCP Criteria Cells. Any portion of the project that extends beyond the Criteria is not included as part of this JPR review nor these Findings.

c. **Project Description**. The 6.76-acre proposed project consists of the construction of a commercial manufacturing development, which will include the construction of four warehouse and office buildings and a storage yard, as well as associated parking, landscaping, an access road, and utilities. Of the 6.76-acre project, only 4.28 acres are located within MSHCP Criteria Area (specifically, Cell 5038), and as such, only the 4.28-acre proposed development is the subject of these JPR Findings (hereafter referred to as the "project site"). The entire 4.28-acre project site will be permanently impacted by the construction of two commercial buildings, a storage yard, and associated parking and landscaping. Implementation of the proposed project will include lid infiltration basins that will run southwest to northeast along the eastern boundary of the project site. The proposed project does not include any temporary impacts or off-site improvements. All construction staging activities would occur within the project site boundary. No fuel modification or weed abatement zones would occur outside of the proposed project site boundary.

According to the *Assessment*, the proposed project site occurring within Cell 5038 consists of disturbed habitat and tamarisk dominant ruderal habitat. Baseline vegetation communities (1994) within the site consist of developed or disturbed land and grasslands (Exhibit C). The topography of the site is relatively flat with elevations on site ranging from 1,272 feet above mean sea level (AMSL) to 1,289 feet AMSL (i.e., the entire site is located above 1,265 feet AMSL). Soils within the project site consist of Hanford sandy loam, 2 to 9% slopes; Monserate sandy loam, 15 to 25% slopes, severely eroded; Ramona sandy loam, 5 to 8% slopes, eroded; and Traver loamy fine sand, eroded (Exhibit D). Traver soils comprise 0.1 acre in the northern corner of project site. The Traver series is important for the maintenance of several Narrow Endemic Plant Species (NEPSSA), and Proposed Extension of Existing Core 3 is specifically targeted toward the conservation of this soil series; however, according to the *Assessment*, the northern corner of the project site is located on a slope containing artificial fill and debris. The Hanford, Monserate, and Ramona soil series are not directly related to or support NEPSSA, Criteria Area Species (CASSA), or Delhi Sands Flower-loving Fly. NEPSSA, CASSA and Delhi Sands Flower-loving Fly are further discussed in Section 6.1.3 and 6.3.2 below.

In summary, the proposed project would result in 4.28 acres of permanent impacts inside criteria cell(s). No temporary impacts are proposed. No conservation or avoidance areas are proposed (Exhibit E).

Relation to Reserve Assembly

a. **Reserve Assembly Summary**. As stated in Section 3.2.3 of the MSHCP, "Proposed Extension of Existing Core 3 (Lake Elsinore Soils) consists of two blocks of land extending from the southern border of Existing Core E (Lake Elsinore). The northern portion of the proposed extension is also connected to Proposed Linkage 8. Proposed Extension of Existing Core 3 conserves soils of the Traver series, which is important to the maintenance of several species of Narrow Endemic Plants. The northern portion of the extension also provides for movement of species along the lower San Jacinto River to Proposed Linkage 8. Together with Existing Core E, Proposed Extension of Existing Core 3 provides Habitat for shorebird use. Since surrounding land uses include city (Lake Elsinore) and community Development, management of edge conditions in this area will be necessary to maintain high quality Habitat in this area. Guidelines Pertaining

to Urban/Wildlands Interface for the management of edge factors such as lighting, urban runoff, toxics, and domestic predators are presented in *Section 6.1* of this document [MSHCP]".

The project site (4.28 acres) is located within Independent Cell 5038. As stated in Section 3.3.3 of the MSHCP, "Conservation within this Cell will contribute to assembly of Proposed Extension of Existing Core 3. Conservation within this Cell will focus on grassland habitat. Areas conserved within this Cell will be connected to grassland habitat proposed for conservation in Cell 5036 to the east. Conservation within this Cell will range from 35% to 45% of the Cell focusing in the eastern central portion of the Cell."

Cell 5038 totals approximately 167 acres. Using the mid-range (40%), approximately 66.8 acres are described for conservation within this Cell. To date, 22.3 acres have been developed or are approved for development in this Cell, which includes the 4.28 to acre proposed project acreage and 0.2 acre of covered roads. There are 61.1 acres of Public-Quasi Public Lands that cannot be counted towards the Additional Reserve Lands (ARL). There are 0 acres in this Cell that have already been conserved or are proposed for conservation; therefore, 66.8 acres are still needed for conservation in order to achieve the mid-range goal for this Cell. There are approximately 83.6 undeveloped acres available within the Cell, of which 76.6 undeveloped acres are potentially available within, or immediately adjacent to, areas described for conservation that could functionally contribute to Proposed Extension of Existing Core 3.

In summary, with no acres conserved to date, and 76.6 undeveloped acres available for conservation that could also functionally contribute to Proposed Extension of Existing Core 3, Cell 5038 could achieve the mid-range goal of 66.8 acres.

b. **Rough Step.** The proposed project is within Rough Step Units 8 and 9. As stated in Section 4 of the MSHCP 2020 Annual Report, "Rough Step Unit 8 encompasses 50,408 acres within the west-central region of western Riverside County and includes the cities of Lake Elsinore and Canyon Lake, the Alberhill Area, the San Jacinto River, Horsethief Canyon, and Temescal Wash (see Figure 4-9, Rough Step Unit 8). This Rough Step Unit is bound by the Santa Ana Mountains to the west, Interstate 215 to the east, Bundy Canyon Road to the south, and Rough Step Unit 7 to the north. In Rough Step Unit 8, there are 22,690 acres within the Criteria Area. Only that portion within Criteria Cells is tracked by Rough Step and not all vegetation or land cover within a Rough Step Unit has acreage goals. In Rough Step Unit 8 there are nine vegetation/land cover types, but only four have Rough Step acreage goals; coastal sage scrub; grasslands; riparian scrub, woodland, forest; and Riversidean alluvial fan sage scrub. *Table 4-11, Rough Step Unit 8 Acreage Totals* provides the losses and gains and resulting allowable development acreage for each of the four vegetation communities with acreage goals.

Through 2020, a total of 3,394 acres of conservation has occurred for the four tracked vegetation communities within Rough Step Unit 8. Losses to this unit total 893 acres, with remaining development allowance as follows: 616 acres of coastal sage scrub; 13 acres of riparian scrub, woodland, forest; and 7 acres of Riversidean alluvial fan sage scrub.

At the end of 2020, the vegetation category of grasslands remains "out of Rough Step" for Rough Step 8. To bring the vegetation category back into Rough Step, a total of 130 acres are needed. There are 404 acres of

pending grassland conservation in Rough Step Unit 8 as follows: (1) completed JPR projects but which have not yet conveyed (168 ac.), (2) Summerly Back Basin mitigation areas (139 ac.), and (3) Cottonwood Canyon Conservation Area (97 ac.). While the timing of conveyance of development-related conservation is unknown, both the Summerly Back Basin and Cottonwood Canyon conservation can be expected within 1-2 years. The RCA and Permittees continue to focus acquisition efforts when possible, on grasslands, as well as working to acquire additional acres in the other vegetation categories, within this Rough Step Unit."

Although the 2021 Annual Report has not been finalized, the remaining development allowance as of the end of 2021 is preliminary for Rough Step 8 as follows: 610.79 acres of coastal sage scrub, -146.86 acres of grasslands, 12.56 acres of riparian scrub, woodland, forest; and 3.91 acres of Riversidean alluvial fan sage scrub. This unit remains out of Rough Step for grassland for 2021. Developed or disturbed land is not tracked for rough step.

Baseline vegetation (1994) for the area of the project site located within Criteria Cell 5038 consists of developed or disturbed land and grasslands (Exhibit C). The grassland vegetation category has been out of Rough Step in Unit 8 since inception of the MSHCP due to pre-MSHCP developments. The RCA is actively engaged in acquiring parcels that would bring grassland vegetation back into Rough Step for Unit 8 and the total acreage needed as of 2021 is 162.3 acres of grasslands. This project would permanently impact approximately 3.99 acres of grasslands in Rough Step Unit 8 and increase the negative balance of this out of Rough Step vegetation community. However, as noted above, the RCA is actively engaged in acquiring parcels that would bring grassland vegetation back into Rough Step for Unit 8 (i.e., 404 acres of pending grassland conservation). Based on the above discussion the proposed project would not conflict with Rough Step 8.

The proposed project is also within Rough Step Unit 9. As stated in Section 4 of the MSHCP 2020 Annual Report, "Rough Step Unit 9 is composed of three separate areas within Riverside County. The first area encompasses 80,163 acres within the southwest area of the MSHCP. This portion of the Rough Step Unit consists of mostly Public/Quasi-Public Lands within the Cleveland National Forest forming the coastal mountain range between Southwest Riverside County and Orange County. The second area encompasses 20,975 acres within the northeast area of the MSHCP. This portion of the Rough Step Unit consists of mostly Public/Quasi-Public Lands within the San Bernardino National Forest and the city of Banning north of the Morongo Indian Tribal Lands. The third area encompasses 138,720 acres within the southeast middle portion of the MSHCP. This portion of the Rough Step Unit consists of mostly Public/Quasi-Public Lands within the San Bernardino National Forest but does include the unincorporated areas of Idyllwild and Pine Cove, as well as Garner Valley north of Anza. (See Figure 4-10, Rough Step Unit 9). Rough Step Unit 9 has no key vegetation communities that are tracked through Rough Step, therefore no further evaluation is necessary or provided.

The Rough Step Unit 8 development allowances may have changed by the time this project submits for a grading permit. As such, the RCA provides the following required Measure to ensure the City does not exceed Rough Step allowances:

ROUGH STEP MEASURE. In accordance with MSHCP Volume I, Section 6.7, it is the Permittees responsibility that [*if the rough step rule is not met during any analysis period* (performed annually by

the Regional Conservation Authority [RCA]), ***the Permittees must conserve appropriate lands supporting a specified vegetation community within the analysis unit to bring the Plan back into the parameters of the rule prior to authorizing additional loss of the vegetation community for which the rule was not achieved.*** **The Permittee is encouraged to consult with the RCA on current rough step allowances prior to working with project applicants developing grading plans. The Permittee must not cause additional loss of any rough step vegetation that is out of balance. Prior to issuance of a grading permit, the Permittee will confirm with the RCA that the Project will not impact out-of-balance Rough Step vegetation in the applicable Rough Step unit.**

Other Plan Requirements (MSHCP Volume I)

Section 6.1.2 – Was Riparian/Riverine/Vernal Pool Mapping or Information Provided?

Yes. There are no Riparian/Riverine areas on the project site. There are no vernal pools on the project site, and the soils and topography present on the site do not support habitat considered suitable for fairy shrimp. There is no suitable riparian bird habitat on the project site.

Section 6.1.3 – Was Narrow Endemic Plant Species Survey Information Provided?

Yes. The project site is located within a Narrow Endemic Plant Species Survey Area (NEPSSA), specifically Munz's onion, San Diego ambrosia, many-stemmed dudleya, spreading navarretia, California Orcutt grass, Hammitt's clay-cress, and Wright's trichocoronis.

Section 6.3.2 – Was Additional Survey Information Provided?

Yes. The project site is not located in Additional Survey Needs and Procedures Areas for amphibians or small mammals. The project site does not support Delhi sands (Exhibit D) or in areas that would trigger additional review for Delhi sands flower-loving fly. However, the project site is located in a Criteria Area Species Survey Area (CASSA) for San Jacinto Valley crownscale, Parish's brittlescale, Davidson's saltscale, thread-leaved brodiaea, smooth tarplant, round-leaved filaree, Coulter's goldfields, and little mousetail. The project site is located in an Additional Survey Needs and Procedures Area for burrowing owl.

Section 6.1.4 – Was Information Pertaining to Urban/Wildland Interface Guidelines Provided?

Yes. The property is located south of MSHCP Existing Core E (Lake Elsinore), as such, the project applicant will be required to follow the Urban/Wildland Interface Guidelines.

Comments on Other Plan Requirements:

a. **Section 6.1.2.** Hernandez Environmental Services assessed the project site for MSHCP resources on November 22, 2021 (refer to the *Assessment* for additional details). The following discusses each requirement under this policy.

Riparian/Riverine. According to the *Assessment*, no MSHCP Section 6.1.2 riparian/riverine resources are present within the project site. The project site is flat with elevations ranging from 1,272 feet AMSL to 1,289 feet AMSL. The site lacked any indicators (i.e., defined bed, bank, channel, or obvious shifts in vegetation) that would suggest a drainage feature occurs within the site. The northern corner of the project site contains 0.05 acre of tamarisk, a facultative species that is equally likely to occur in wetlands and non-wetlands. This northern corner of the project site is also mapped as containing 0.01 acre of Traver soil series, which is known to retain moisture; however, according to the *Assessment*, this area is located on a slope containing artificial fill and debris (*Assessment*, Appendix C). Furthermore, this 0.05-acre patch of tamarisk occurs above 1,265 feet AMSL. No additional vegetation associated with riparian or wetland habitats was observed within the project site. As such, it was determined that the project site does not contain riparian/riverine areas as defined in Section 6.1.2 of the Western Riverside County MSHCP.

Vernal Pools/Fairy Shrimp. The project site is primarily composed of Hanford sandy loam which is described as being well drained. The northeastern portion corner of the site contains Monserate sandy loam, Ramona sandy loam, and Traver loamy fine sand. Monserate sandy loam is described as moderately well to well drained, and Ramona sandy loam is described as being well-drained. Traver loamy fine sand is described as being moderately well to somewhat poorly drained. As previously discussed, the area where Traver soils occur within the project site occur on a slope which would not allow for water pooling within this portion of the site. As such, the project site lacks the ability to pool water for any significant length of time after rain events. No vernal pools, swales, or other features such as ditches, borrow pits, cattle troughs, or cement culverts with signs of pooling water were found on the site. In addition, a review of historical aerial photographs of the project site shows no indication of a history of pooled water/ponding. Due to the absence of suitable fairy shrimp habitat, focused surveys were not warranted.

Riparian Birds. While the site contains 0.05 acre of tamarisk, this area is not associated with any riparian/riverine features for reasons discussed above and lacks suitable dense cover and stratified canopy. Due to the absence of riparian/riverine features and suitable riparian habitat that would support riparian birds, focused surveys for riparian/riverine bird species listed in Section 6.1.2 of the MSHCP are not warranted.

Based on the information provided in the *Assessment*, the project demonstrates consistency with Section 6.1.2 of the MSHCP.

b. **Section 6.1.3 NEPSSA Plants**.

The project site is located within a Narrow Endemic Plant Species Survey Area for Munz's onion, San Diego ambrosia, many-stemmed dudleya, spreading navarretia, California Orcutt grass, Hammitt's clay-cress, and Wright's trichocoronis. A habitat suitability assessment was conducted on the project site on November 22, 2021. The project site is continually disturbed by the use of motor vehicles and the storage of large materials and consists primarily of disturbed habitat. A small patch (0.05-acre) of tamarisk is located in the northeastern corner; however, according to the *Assessment* this patch occurs on a slope that is composed of artificial fill and debris.

The project site lacks suitable habitat for Munz's onion (e.g., site lacks clay soils), many-stemmed dudleya (e.g., site lacks clay soils), spreading Navarretia (e.g., site lacks wetlands and vernal pools), California Orcutt grass (e.g., site lacks wetlands and vernal pools), Hammitt's claycress (e.g., site lacks clay soils), San Diego ambrosia (e.g., site lacks clay soils, wetlands, and vernal pools), and Wright's trichocoronis (e.g., site lacks wetlands and vernal pools). Due to the lack of suitable habitat within the project site, focused surveys were not warranted.

Based on the information provided in the *Assessment*, the project demonstrates consistency with Section 6.1.3 of the MSHCP.

c. **Section 6.3.2**. **Additional Survey Needs and Procedures.** The following describes Additional Survey Needs and Procedures applicable to the proposed project**:**

CASSA Plants. The project site is located within a Criteria Area Species Survey Area survey area for the following eight species: San Jacinto Valley crownscale, Parish's brittlescale, Davidson's saltscale, thread-leaved brodiaea, smooth tarplant, round-leaved filaree, Coulter's goldfields, and little mousetail. A habitat suitability assessment was conducted on the project site on November 22, 2021. According to the *Assessment*, the project site is continually disturbed by the use of motor vehicles and the storage of large materials and consists primarily of disturbed habitat. A small patch (0.05-acre) of tamarisk is located in the northeastern corner; however, according to the *Assessment* this patch occurs on a slope that is composed of artificial fill and debris. Based on the information provided in the *Assessment*, the project site lacks suitable habitat for Coulter's goldfields (e.g., site lacks wetlands), Davidson's saltscale (e.g., site lacks wetlands), little mousetail (e.g., site lacks wetlands and vernal pools), Parish's brittlescale (e.g., site lacks wetlands and vernal pools), San Jacinto Valley crownscale (e.g., site lacks wetlands and vernal pools), round-leaved filaree (e.g., site lacks grasslands), and thread-leaved brodiaea (e.g., site lacks clay soils, wetlands and vernal pools). Smooth tarplant is presumed absent from the site due to a lack of alkaline soils, as well as a lack of suitable wetlands and vernal pools. As previously stated under the Section 6.1.3 NEPSSA Plants, and per the *Assessment*, Traver soils are alkaline and present in the northern corner of the site, yet the artificial fill over this area does not provide suitable habitat for smooth tarplant. Due to the lack of suitable habitat within the project site, focused surveys were not warranted.

Burrowing Owl. The project site is located in an Additional Survey Needs and Procedures Area for burrowing owl. A Step I habitat assessment and a Step II-A focused burrow survey were conducted concurrently on November 22, 2021. According to the *Assessment*, the project site does not provide suitable habitat for burrowing owl due to the heavily compacted soils that have resulted from the continual disturbance on the site by motor vehicles. The project site also lacks ground squirrel burrows or constructed structures that could function as burrow surrogates. Therefore, Step II-B (focused burrowing owl surveys) were not warranted. Although a burrowing pre-construction survey is not required due to a lack of suitable habitat, the *Assessment* did include a commitment to conduct this survey. Therefore, this measure is included below.

BURROWING OWL MEASURE. Due to the presence of potentially suitable habitat, a 30-day pre-construction survey for burrowing owls is required prior to initial ground-disturbing activities

(including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies, and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

Based on the information provided by in the *Assessment*, the project demonstrates consistency with Section 6.3.2 of the MSHCP.

d. **Section 6.1.4. Urban/Wildlands Interface Guidelines.** To preserve the integrity of areas adjacent to the project site which are proposed Conservation Areas, the guidelines contained in Section 6.1.4 related to controlling adverse effects for development adjacent to the MSHCP Conservation Area should be considered by the Permittee in their actions relative to the project. Therefore, the Permittee should include the following measures as project conditions of approval, as applicable:

SECTION 6.1.4 MEASURE.

i. **Incorporate measures to control the quantity and quality of runoff from the site entering the MSHCP Conservation Area. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into MSHCP Conservation Areas. Best Management Practices (BMPs) will be implemented to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm downstream biological resources or ecosystems.**

ii. **Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts, such as manure, that are potentially toxic or may adversely affect wildlife species, Habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. The greatest risk is from landscaping fertilization overspray and runoff.**

iii. **Night lighting shall be directed away from the MSHCP Conservation Area and the avoided area on site to protect species from direct night lighting.**

iv. **Proposed noise-generating land uses affecting the MSHCP Conservation Area, including designated avoidance areas, shall incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards.**

v. **Avoid use of invasive, non-native plant species listed in Table 6-2 of the MSHCP in approving landscape plans for the portions of the project that are adjacent to the MSHCP Conservation Area, including avoidance areas. Considerations in reviewing the applicability of this list shall include proximity of planting areas to the MSHCP Conservation Areas and designated avoidance areas, species considered in the planting plans, resources being protected within the MSHCP Conservation Area and their relative sensitivity to invasion, and barriers to plant and seed dispersal, such as walls, topography, and other features.**

vi. **Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate, in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping into existing and future MSHCP Conservation Areas. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms.**

vii. **Manufactured slopes associated with proposed site development shall not extend into the MSHCP Conservation Area.**

viii. **Weed abatement and fuel modification activities are not permitted in the Conservation Area, including designated avoidance areas.**

e. **Appendix C**. The following best management practices (BMPs), as applicable, shall be implemented for the duration of construction:

APPENDIX C MEASURE.

i. **A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.**

ii. **Water pollution and erosion control plans shall be developed and implemented in accordance with RWQCB requirements.**

iii. **The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.**

iv. **The upstream and downstream limits of projects disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.**

v. Projects should be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern.

vi. Projects that cannot be conducted without placing equipment or personnel in sensitive habitats should be timed to avoid the breeding season of riparian species identified in MSHCP Global Species Objective No. 7.

vii. When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing of other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments off site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.

viii. Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city, FWS, and CDFG [CDFW], RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.

ix. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.

x. The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.

xi. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.

xii. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.

xiii. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).

xiv. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and

routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.

xv. The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions, including these BMPs.

SG/TC

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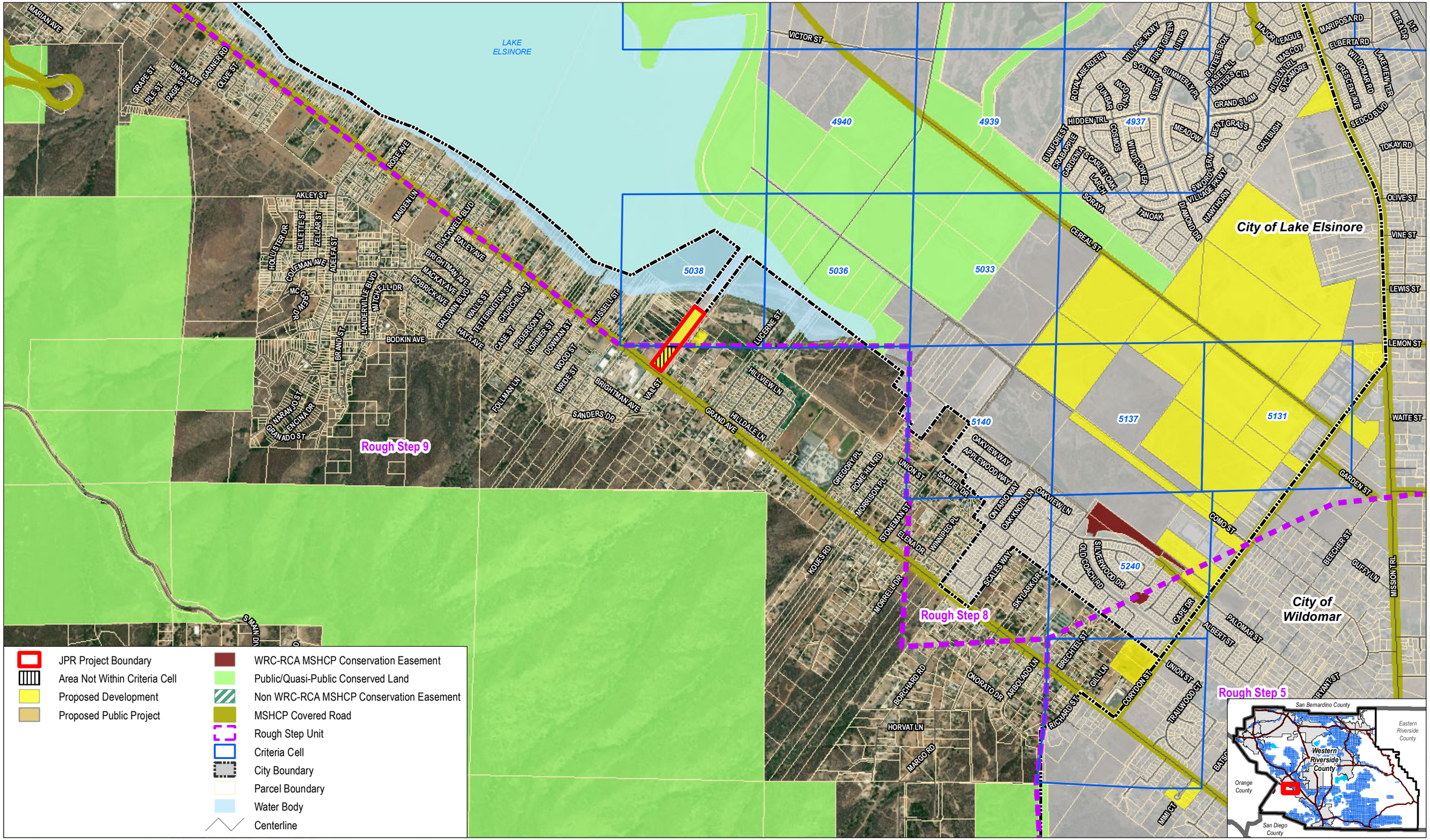

SOURCE: Western Riverside County Regional Conservation Authority 2022; County of Riverside 2022; Esri Basemap 2022. Map created on 7/14/2022.

Regional Conservation Authority
Western Riverside County

r14491
Permittee: City of Lake Elsinore (LEAP 2022-02) - Rome Hill Commercial

0 1,000 2,000 Feet

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EXHIBIT A

JPR Log No. 22-03-11-01 - Regional

JPR Log No. 22-03-11-01

Proposed Linkages:
- Constrained Linkage
- Linkage
- Existing Channel

Existing Cores & Linkages:
- Constrained Linkage
- Core
- Linkage
- Noncontiguous Habitat Block

Proposed Cores & Habitat Blocks:
- Core
- Proposed Extension of Existing Cores
- Noncontiguous Habitat Block

SOURCE: Western Riverside County Regional Conservation Authority (WRC-RCA). Map created on 3/16/2022

Regional Conservation Authority
Western Riverside County

r14491
Permittee: City of Lake Elsinore (LEAP 2022-02) - Rome Hill Commercial

0 2 4 Miles

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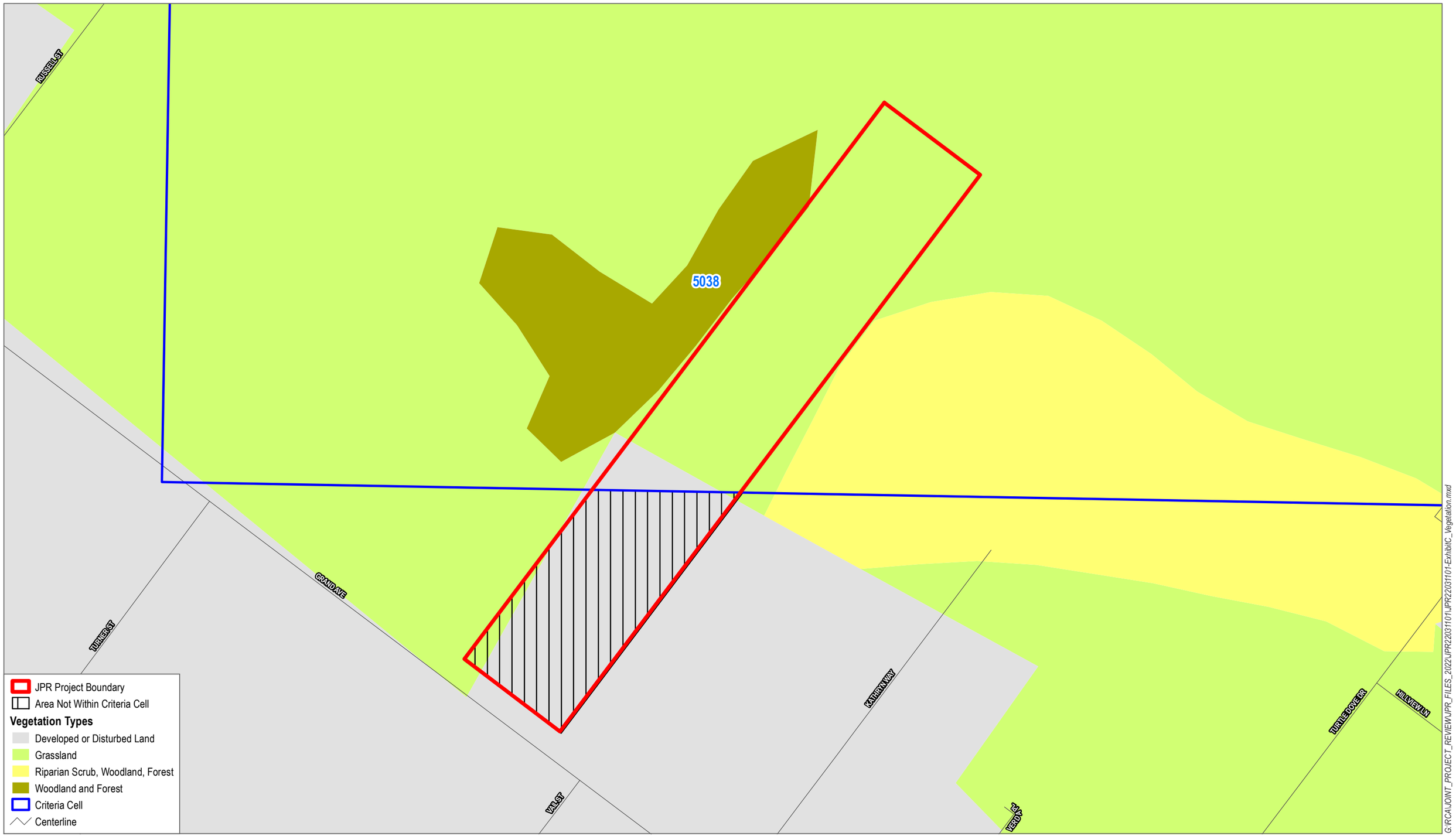
EXHIBIT B

JPR Log No. 22-03-11-01 - Vicinity Map with MSHCP Schematic Cores and Linkages



SOURCE: WRC-RCA MSHCP Baseline Vegetation (1994). Map created on 6/27/2022.

Regional Conservation Authority
Western Riverside County

r14491
Permittee: City of Lake Elsinore (LEAP 2022-02) - Rome Hill Commercial
0 100 200 Feet

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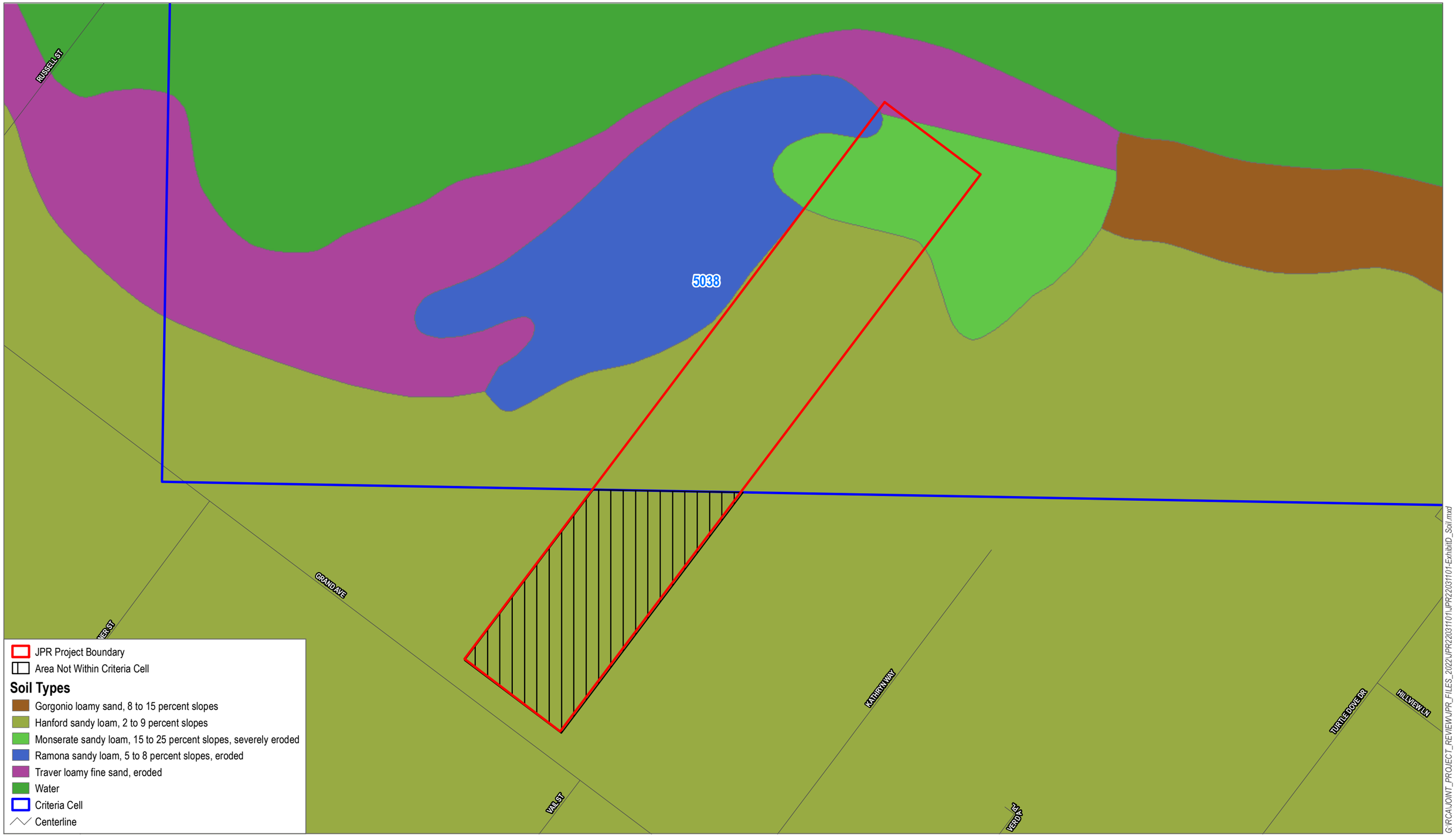
EXHIBIT C

JPR Log No. 22-03-11-01 - Vegetation



SOURCE: Western Riverside County Regional Conservation Authority 2022; County of Riverside 2022; USDA/NRCS Soils 2017

Regional Conservation Authority
Western Riverside County

r14491
Permittee: City of Lake Elsinore (LEAP 2022-02) - Rome Hill Commercial

0 100 200 Feet

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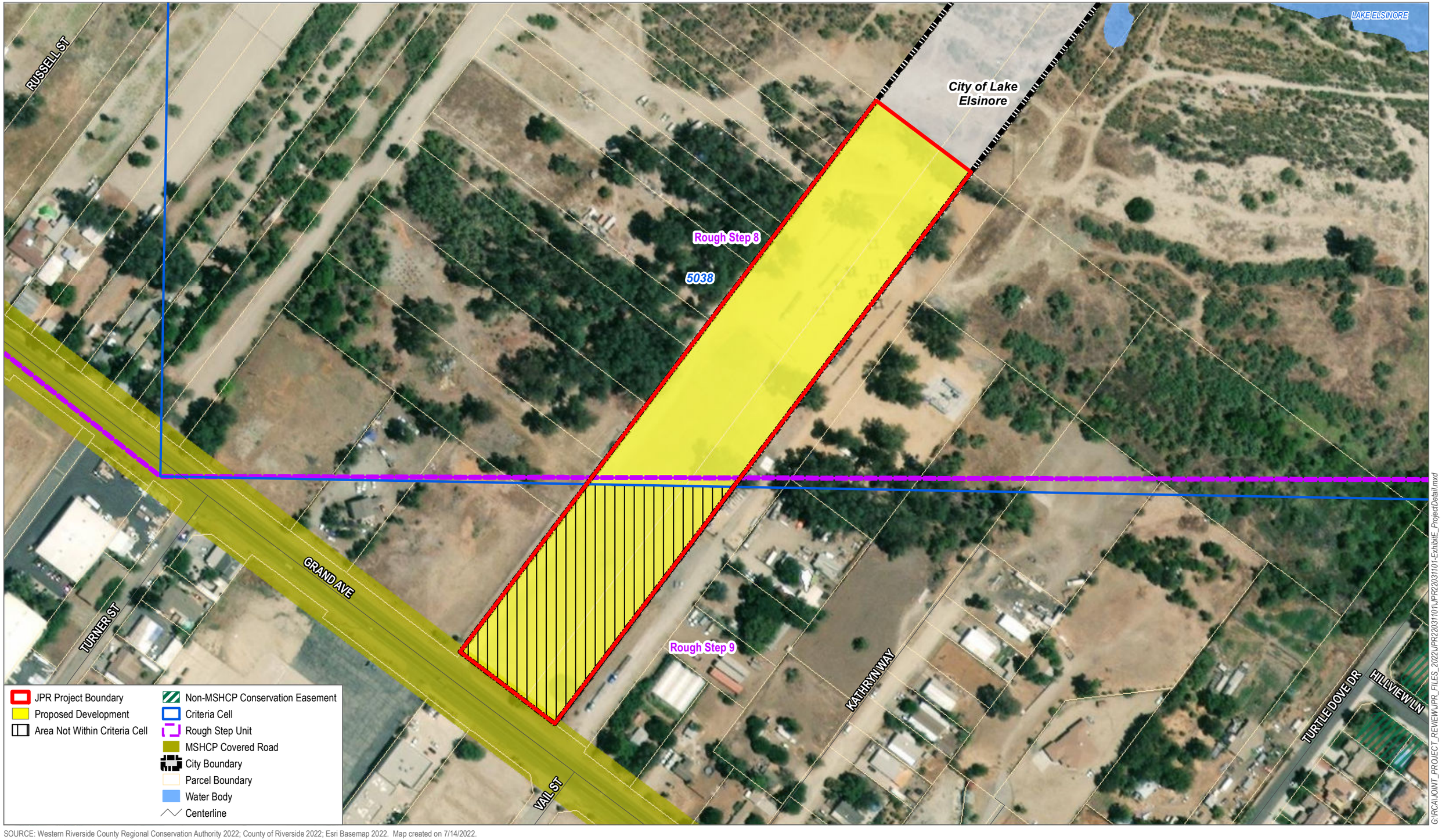
EXHIBIT D

JPR Log No. 22-03-11-01 - Soil



SOURCE: Western Riverside County Regional Conservation Authority 2022; County of Riverside 2022; Esri Basemap 2022. Map created on 7/14/2022.

Regional Conservation Authority
Western Riverside County

r14491
Permittee: City of Lake Elsinore (LEAP 2022-02) - Rome Hill Commercial
0 100 200 Feet

G:\RCA\JOINT_PROJECT_REVIEW\JPR_FILES_2022\JPR22031101\JPR22031101-ExhibitE_ProjectDetail.mxd

EXHIBIT E

JPR Log No. 22-03-11-02 - Project Detail