

**RIVERSIDE COUNTY
ANIMAL SERVICES LOCATIONS:**

www.rcdas.org

BLYTHE

16450 West Hobson Way
Blythe, CA 92225
760-921-7857

COACHELLA VALLEY ANIMAL CAMPUS

72-050 Petland Place
Thousand Palms, CA 92276
760-343-3644

RIVERSIDE COUNTY ANIMAL SERVICES

6851 Van Buren Blvd.
Riverside, CA 92509
951-688-4340

OTHER ANIMAL SHELTERS:

ANIMAL CARE CENTER OF INDIRIO

45-355 Van Buren
Indio, CA 92201
760-391-4138

ANIMAL FRIENDS OF THE VALLEYS

29001 Bastron Avenue
Lake Elsinore, CA 92530
951-674-0618

(Serving incorporated Temecula, Wildomar,
Lake Elsinore, Murrieta and Canyon Lake)

MARY S. ROBERTS PET ADOPTION CENTER

6185 Industrial Avenue
Riverside, CA 92504
951-688-4340

RAMONA HUMANE SOCIETY

690 Humane Way
San Jacinto 92586
951-654-8002

(Serving Sun City, Menifee, Romoland and Homeland)

Looking to adopt a pet?

This website is linked to many animal shelters.

www.petfinder.com

To report illegal storm drain disposal, call

1-800-506-2555

Or visit our website at www.rcflood.org

E-mail fcnpsdes@rcflood.org

What's the Scoop?



TIPS FOR A HEALTHY PET AND A HEALTHIER ENVIRONMENT

CREATE A HEALTHY ENVIRONMENT in and around your home by following these simple pet practices. Your pet, family and neighbors will appreciate their clean comfortable surroundings.

HOUSEHOLD PETS

We all love our pets, but pet waste is a subject everyone likes to avoid. Pet waste left on trails, sidewalks, streets and grassy areas can be washed into the nearest waterway when it rains. Even if you can't see streams or lakes

near you, rainfall (stormwater) or sprinkler runoff can wash pet waste into the storm drains that carry runoff to the nearest streams or lakes untreated.

The risk of stormwater contamination increases if pet waste is allowed to accumulate in outdoor animal pen areas or left on sidewalks, streets or driveways.

Pet waste contains nutrients and bacteria. Nutrients can promote the growth of algae in streams and lakes. Algae can cause fish kills and other environmental damage if it is fed too many nutrients. Pet Waste also contains e. Coli and fecal bacteria, which



can cause disease in other animals and humans that come in contact with it when swimming or splashing in streams and lakes. Dogs also carry salmonella and giardia, which can make people sick.

Pet waste that is not picked up and properly disposed can also increase vector problems. Flies and other insects are not only attracted to and feed on pet waste, but can also be infected with diseases and spread those diseases to humans and other animals.

WHAT CAN YOU DO?

- **SCOOP** up pet waste and flush it down the toilet or place in trash can.
- **NEVER DUMP** pet waste into a storm drain or catch basin.
- **USE** the complimentary bags or mutt mitts offered in dispensers at local parks.
- **CARRY EXTRA BAGS** when walking your dog and make them available to other pet owners who are without.
- **TEACH CHILDREN** how to properly clean up after a pet.
- **TELL FRIENDS AND NEIGHBORS** about the ill effects of animal waste on the environment. Encourage them to clean up after pets.

Call 1-800-506-2555 TOLL FREE to report illegal dumping to the storm drain, find the dates and times of local Household Hazardous Waste Collection Events, obtain additional information on stormwater problems and solutions, request presentations about stormwater pollution in your child's classroom, or learn about free grasscycling and composting workshops.

SCOOP THE POOP

Many communities have "Scoop the Poop" laws that govern pet waste cleanup. Some of these laws specifically require

anyone who walks an animal off their property to carry a bag, shovel, or scooper. Any waste left by the animal must be cleaned up immediately. CALL YOUR LOCAL CODE ENFORCEMENT OFFICE to find out more about pet waste regulations.



OTHER WAYS TO PROTECT YOUR PETS AND THE ENVIRONMENT

Pets are only one of many sources that contribute to water pollution. However, these other sources of water pollution cannot only harm the environment but also harm your pet. Improperly used or stored lawn fertilizers, pesticides, soaps, grease and vehicle fluids cannot only be washed into local streams and lakes, these chemicals can also harm your pet if they ingest or touch these chemicals. Call 1-800-506-2555 for information regarding how to properly dispose of household hazardous wastes

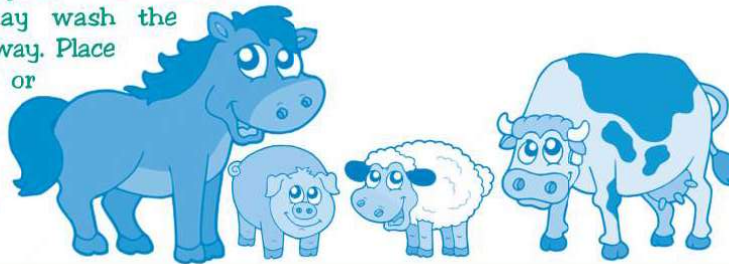
such as these. You can also keep your pets and our environment healthy by properly maintaining your vehicles, and limiting use of pesticides and fertilizers to only the amount that is absolutely needed.

Make sure to not only protect your pets, but to also protect your neighbors pets. NEVER HOSE VEHICLE FLUIDS into the street or gutter. USE ABSORBENT MATERIALS such as cat litter to clean-up spills. SWEEP UP used absorbent materials and place it in the trash.

HORSES AND LIVESTOCK

Fortunate enough to own a horse or livestock? You, too, can play a part in protecting and cleaning up our water resources. The following are a few simple Best Management Practices (BMPs) specifically designed for horses and livestock.

- STORE your manure properly. Do not store unprotected piles of manure in places where stormwater runoff may wash the manure away. Place a cover or tarp over the pile to keep rainwater out.



- BUILD a manure storage facility to protect your pets, property and the environment. These structures usually consist of a concrete pad to protect groundwater and a short wall on one or two sides to make manure handling easier.
- READ the Only Rain Down the Storm Drain brochure titled "Tips for Horse Care" for additional guidance and recommendations. This brochure should be available from your local city office or for download at www.rcflood.org/stormwater.
- KEEP animals out of streams - Horses and livestock can defecate in streams causing stormwater pollution. Livestock and horses in streams can also disturb sensitive habitat and vegetation, causing additional environmental damage. Keep livestock and horses away from streams and use designated stream crossings whenever possible.

- MATERIAL STORAGE SAFETY TIPS Many of the chemicals found in barns require careful handling and proper disposal. When using these chemicals, be certain to follow these common sense guidelines:

- ◆ Buy only what you need.
- ◆ Treat spills of hoof oils like a fuel spill. Use kitty litter to soak up the oil and dispose of it in a tightly sealed plastic bag.
- ◆ Store pesticides in a locked, dry, well-ventilated area.
- ◆ Protect stored fertilizer and pesticides from rain and surface water.

RESOURCE CONSERVATION DISTRICTS CAN HELP

Call 1-800-506-2555 for assistance with locating a local conservation district that can help you properly manage your manure, re-establish healthy pastures, control weeds, or identify appropriate grasses for your soils.

Thank you for doing your part to protect your watershed, the environment, your pets and your community!





Landscaping and garden maintenance activities can be major contributors to water pollution. Soils, yard wastes, over-watering and garden chemicals become part of the urban runoff mix that winds its way through streets, gutters and storm drains before entering lakes, rivers, streams, etc. Urban runoff pollution contaminates water and harms aquatic life!

In Riverside County, report illegal discharges into the storm drain, call
1-800-506-2555
"Only Rain Down the Storm Drain"

Important Links:

Riverside County Household Hazardous Waste Collection Information
1-800-304-2226 or www.rivcowm.org

Riverside County Backyard Composting Program
1-800-366-SAVE

Integrated Pest Management (IPM) Solutions
www.ipm.ucdavis.edu

California Master Gardener Programs
www.mastergardeners.org
www.camastergardeners.ucdavis.edu

California Native Plant Society
www.cnps.org

The Riverside County "Only Rain Down the Storm Drain" Pollution Prevention Program gratefully acknowledges Orange County's Storm Water Program for their contribution to this brochure.

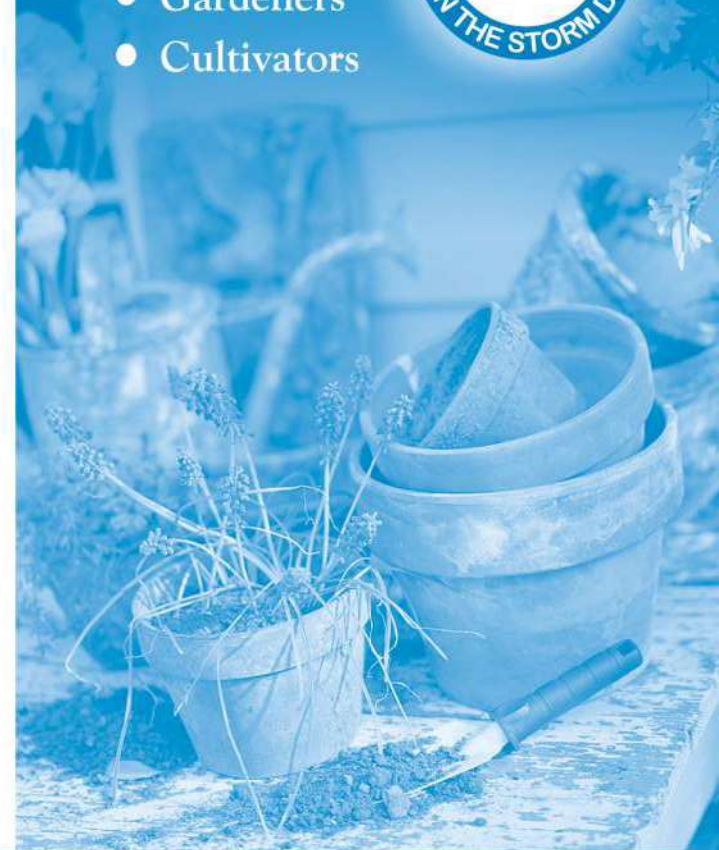


...Only Rain Down ...the Storm Drain

*What you should know for...
Landscape and Gardening*

Best Management tips for:

- Professionals
- Novices
- Landscapers
- Gardeners
- Cultivators



Tips for Landscape & Gardening

This brochure will help you to get the most of your lawn and gardening efforts and keep our waterways clean. Clean waterways provide recreation, establish thriving fish habitats, secure safe sanctuaries for wildlife, and add beauty to our communities. NEVER allow gardening products or waste water to enter the street, gutter or storm drain.

General Landscaping Tips

- Protect stockpiles and materials from wind and rain by storing them under tarps or secured plastic sheeting.
- Prevent erosion of slopes by planting fast-growing, dense ground covering plants. These will shield and bind the soil.
- Plant native vegetation to reduce the amount of water, fertilizers and pesticides applied to the landscape.
- Never apply pesticides or fertilizers when rain is predicted within the next 48 hours.



Garden & Lawn Maintenance

- Do not overwater. Use irrigation practices such as drip irrigation, soaker hoses or micro-spray systems. Periodically inspect and fix leaks and misdirected sprinklers.

- Do not rake or blow leaves, clippings or pruning waste into the street, gutter or storm drain. Instead, dispose of green waste by composting, hauling it to a permitted landfill, or recycling it through your city's program.



- Consider recycling your green waste and adding "nature's own fertilizer" to your lawn or garden.
- Read labels and use only as directed. Do not over-apply pesticides or fertilizers. Apply to spots as needed, rather than blanketing an entire area.
- Store pesticides, fertilizers and other chemicals in a dry covered area to prevent exposure that may result in the deterioration of containers and packaging.
- Rinse empty pesticide containers and re-use rinse water as you would use the product. Do not dump rinse water down storm drains or sewers. Dispose of empty containers in the trash.
- When available, use non-toxic alternatives to traditional pesticides, and use pesticides specifically designed to control the pest you are targeting.

- Try natural long-term common sense solutions first. Integrated Pest Management (IPM) can provide landscaping guidance and solutions, such as:

- ◆ **Physical Controls** - Try hand picking, barriers, traps or caulking holes to control weeds and pests.
- ◆ **Biological Controls** - Use predatory insects to control harmful pests.
- ◆ **Chemical Controls** - Check out www.ipm.ucdavis.edu before using chemicals. Remember, all chemicals should be used cautiously and in moderation.

- If fertilizer is spilled, sweep up the spill before irrigating. If the spill is liquid, apply an absorbent material such as cat litter, and then sweep it up and dispose of it in the trash.
- Take unwanted pesticides to a Household Waste Collection Center to be recycled.
- *Dumping toxics into the street, gutter or storm drain is illegal!*

www.bewaterwise.com Great water conservation tips and drought tolerant garden designs.

www.ourwaterourworld.com Learn how to safely manage home and garden pests.

Additional information can also be found on the back of this brochure.

Site Design & Landscape Planning SD-10



Design Objectives

- Maximize Infiltration
- Provide Retention
- Slow Runoff
- Minimize Impervious Land Coverage
- Prohibit Dumping of Improper Materials
- Contain Pollutants
- Collect and Convey

Description

Each project site possesses unique topographic, hydrologic, and vegetative features, some of which are more suitable for development than others. Integrating and incorporating appropriate landscape planning methodologies into the project design is the most effective action that can be done to minimize surface and groundwater contamination from stormwater.

Approach

Landscape planning should couple consideration of land suitability for urban uses with consideration of community goals and projected growth. Project plan designs should conserve natural areas to the extent possible, maximize natural water storage and infiltration opportunities, and protect slopes and channels.

Suitable Applications

Appropriate applications include residential, commercial and industrial areas planned for development or redevelopment.

Design Considerations

Design requirements for site design and landscapes planning should conform to applicable standards and specifications of agencies with jurisdiction and be consistent with applicable General Plan and Local Area Plan policies.



SD-10 Site Design & Landscape Planning

Designing New Installations

Begin the development of a plan for the landscape unit with attention to the following general principles:

- Formulate the plan on the basis of clearly articulated community goals. Carefully identify conflicts and choices between retaining and protecting desired resources and community growth.
- Map and assess land suitability for urban uses. Include the following landscape features in the assessment: wooded land, open unwooded land, steep slopes, erosion-prone soils, foundation suitability, soil suitability for waste disposal, aquifers, aquifer recharge areas, wetlands, floodplains, surface waters, agricultural lands, and various categories of urban land use. When appropriate, the assessment can highlight outstanding local or regional resources that the community determines should be protected (e.g., a scenic area, recreational area, threatened species habitat, farmland, fish run). Mapping and assessment should recognize not only these resources but also additional areas needed for their sustenance.

Project plan designs should conserve natural areas to the extent possible, maximize natural water storage and infiltration opportunities, and protect slopes and channels.

Conserve Natural Areas during Landscape Planning

If applicable, the following items are required and must be implemented in the site layout during the subdivision design and approval process, consistent with applicable General Plan and Local Area Plan policies:

- Cluster development on least-sensitive portions of a site while leaving the remaining land in a natural undisturbed condition.
- Limit clearing and grading of native vegetation at a site to the minimum amount needed to build lots, allow access, and provide fire protection.
- Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Promote natural vegetation by using parking lot islands and other landscaped areas.
- Preserve riparian areas and wetlands.

Maximize Natural Water Storage and Infiltration Opportunities Within the Landscape Unit

- Promote the conservation of forest cover. Building on land that is already deforested affects basin hydrology to a lesser extent than converting forested land. Loss of forest cover reduces interception storage, detention in the organic forest floor layer, and water losses by evapotranspiration, resulting in large peak runoff increases and either their negative effects or the expense of countering them with structural solutions.
- Maintain natural storage reservoirs and drainage corridors, including depressions, areas of permeable soils, swales, and intermittent streams. Develop and implement policies and

Site Design & Landscape Planning SD-10

regulations to discourage the clearing, filling, and channelization of these features. Utilize them in drainage networks in preference to pipes, culverts, and engineered ditches.

- Evaluating infiltration opportunities by referring to the stormwater management manual for the jurisdiction and pay particular attention to the selection criteria for avoiding groundwater contamination, poor soils, and hydrogeological conditions that cause these facilities to fail. If necessary, locate developments with large amounts of impervious surfaces or a potential to produce relatively contaminated runoff away from groundwater recharge areas.

Protection of Slopes and Channels during Landscape Design

- Convey runoff safely from the tops of slopes.
- Avoid disturbing steep or unstable slopes.
- Avoid disturbing natural channels.
- Stabilize disturbed slopes as quickly as possible.
- Vegetate slopes with native or drought tolerant vegetation.
- Control and treat flows in landscaping and/or other controls prior to reaching existing natural drainage systems.
- Stabilize temporary and permanent channel crossings as quickly as possible, and ensure that increases in run-off velocity and frequency caused by the project do not erode the channel.
- Install energy dissipaters, such as riprap, at the outlets of new storm drains, culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion. Energy dissipaters shall be installed in such a way as to minimize impacts to receiving waters.
- Line on-site conveyance channels where appropriate, to reduce erosion caused by increased flow velocity due to increases in tributary impervious area. The first choice for linings should be grass or some other vegetative surface, since these materials not only reduce runoff velocities, but also provide water quality benefits from filtration and infiltration. If velocities in the channel are high enough to erode grass or other vegetative linings, riprap, concrete, soil cement, or geo-grid stabilization are other alternatives.
- Consider other design principles that are comparable and equally effective.

Redeveloping Existing Installations

Various jurisdictional stormwater management and mitigation plans (SUSMP, WQMP, etc.) define “redevelopment” in terms of amounts of additional impervious area, increases in gross floor area and/or exterior construction, and land disturbing activities with structural or impervious surfaces. The definition of “redevelopment” must be consulted to determine whether or not the requirements for new development apply to areas intended for redevelopment. If the definition applies, the steps outlined under “designing new installations” above should be followed.

SD-10 Site Design & Landscape Planning

Redevelopment may present significant opportunity to add features which had not previously been implemented. Examples include incorporation of depressions, areas of permeable soils, and swales in newly redeveloped areas. While some site constraints may exist due to the status of already existing infrastructure, opportunities should not be missed to maximize infiltration, slow runoff, reduce impervious areas, disconnect directly connected impervious areas.

Other Resources

A Manual for the Standard Urban Stormwater Mitigation Plan (SUSMP), Los Angeles County Department of Public Works, May 2002.

Stormwater Management Manual for Western Washington, Washington State Department of Ecology, August 2001.

Model Standard Urban Storm Water Mitigation Plan (SUSMP) for San Diego County, Port of San Diego, and Cities in San Diego County, February 14, 2002.

Model Water Quality Management Plan (WQMP) for County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County, Draft February 2003.

Ventura Countywide Technical Guidance Manual for Stormwater Quality Control Measures, July 2002.



Rain Garden

Design Objectives

- Maximize Infiltration
- Provide Retention
- Slow Runoff
- Minimize Impervious Land Coverage
- Prohibit Dumping of Improper Materials
- Contain Pollutants
- Collect and Convey

Description

Various roof runoff controls are available to address stormwater that drains off rooftops. The objective is to reduce the total volume and rate of runoff from individual lots, and retain the pollutants on site that may be picked up from roofing materials and atmospheric deposition. Roof runoff controls consist of directing the roof runoff away from paved areas and mitigating flow to the storm drain system through one of several general approaches: cisterns or rain barrels; dry wells or infiltration trenches; pop-up emitters, and foundation planting. The first three approaches require the roof runoff to be contained in a gutter and downspout system. Foundation planting provides a vegetated strip under the drip line of the roof.

Approach

Design of individual lots for single-family homes as well as lots for higher density residential and commercial structures should consider site design provisions for containing and infiltrating roof runoff or directing roof runoff to vegetative swales or buffer areas. Retained water can be reused for watering gardens, lawns, and trees. Benefits to the environment include reduced demand for potable water used for irrigation, improved stormwater quality, increased groundwater recharge, decreased runoff volume and peak flows, and decreased flooding potential.

Suitable Applications

Appropriate applications include residential, commercial and industrial areas planned for development or redevelopment.

Design Considerations

Designing New Installations

Cisterns or Rain Barrels

One method of addressing roof runoff is to direct roof downspouts to cisterns or rain barrels. A cistern is an above ground storage vessel with either a manually operated valve or a permanently open outlet. Roof runoff is temporarily stored and then released for irrigation or infiltration between storms. The number of rain



barrels needed is a function of the rooftop area. Some low impact developers recommend that every house have at least 2 rain barrels, with a minimum storage capacity of 1000 liters. Roof barrels serve several purposes including mitigating the first flush from the roof which has a high volume, amount of contaminants, and thermal load. Several types of rain barrels are commercially available. Consideration must be given to selecting rain barrels that are vector proof and childproof. In addition, some barrels are designed with a bypass valve that filters out grit and other contaminants and routes overflow to a soak-away pit or rain garden.

If the cistern has an operable valve, the valve can be closed to store stormwater for irrigation or infiltration between storms. This system requires continual monitoring by the resident or grounds crews, but provides greater flexibility in water storage and metering. If a cistern is provided with an operable valve and water is stored inside for long periods, the cistern must be covered to prevent mosquitoes from breeding.

A cistern system with a permanently open outlet can also provide for metering stormwater runoff. If the cistern outlet is significantly smaller than the size of the downspout inlet (say $\frac{1}{4}$ to $\frac{1}{2}$ inch diameter), runoff will build up inside the cistern during storms, and will empty out slowly after peak intensities subside. This is a feasible way to mitigate the peak flow increases caused by rooftop impervious land coverage, especially for the frequent, small storms.

Dry wells and Infiltration Trenches

Roof downspouts can be directed to dry wells or infiltration trenches. A dry well is constructed by excavating a hole in the ground and filling it with an open graded aggregate, and allowing the water to fill the dry well and infiltrate after the storm event. An underground connection from the downspout conveys water into the dry well, allowing it to be stored in the voids. To minimize sedimentation from lateral soil movement, the sides and top of the stone storage matrix can be wrapped in a permeable filter fabric, though the bottom may remain open. A perforated observation pipe can be inserted vertically into the dry well to allow for inspection and maintenance.

In practice, dry wells receiving runoff from single roof downspouts have been successful over long periods because they contain very little sediment. They must be sized according to the amount of rooftop runoff received, but are typically 4 to 5 feet square, and 2 to 3 feet deep, with a minimum of 1-foot soil cover over the top (maximum depth of 10 feet).

To protect the foundation, dry wells must be set away from the building at least 10 feet. They must be installed in solids that accommodate infiltration. In poorly drained soils, dry wells have very limited feasibility.

Infiltration trenches function in a similar manner and would be particularly effective for larger roof areas. An infiltration trench is a long, narrow, rock-filled trench with no outlet that receives stormwater runoff. These are described under Treatment Controls.

Pop-up Drainage Emitter

Roof downspouts can be directed to an underground pipe that daylights some distance from the building foundation, releasing the roof runoff through a pop-up emitter. Similar to a pop-up irrigation head, the emitter only opens when there is flow from the roof. The emitter remains flush to the ground during dry periods, for ease of lawn or landscape maintenance.

Foundation Planting

Landscape planting can be provided around the base to allow increased opportunities for stormwater infiltration and protect the soil from erosion caused by concentrated sheet flow coming off the roof. Foundation plantings can reduce the physical impact of water on the soil and provide a subsurface matrix of roots that encourage infiltration. These plantings must be sturdy enough to tolerate the heavy runoff sheet flows, and periodic soil saturation.

Redeveloping Existing Installations

Various jurisdictional stormwater management and mitigation plans (SUSMP, WQMP, etc.) define “redevelopment” in terms of amounts of additional impervious area, increases in gross floor area and/or exterior construction, and land disturbing activities with structural or impervious surfaces. The definition of “redevelopment” must be consulted to determine whether or not the requirements for new development apply to areas intended for redevelopment. If the definition applies, the steps outlined under “designing new installations” above should be followed.

Supplemental Information

Examples

- City of Ottawa’s Water Links Surface –Water Quality Protection Program
- City of Toronto Downspout Disconnection Program
- City of Boston, MA, Rain Barrel Demonstration Program

Other Resources

Hager, Marty Catherine, Stormwater, “Low-Impact Development”, January/February 2003.
www.stormh2o.com

Low Impact Urban Design Tools, Low Impact Development Design Center, Beltsville, MD.
www.lid-stormwater.net

Start at the Source, Bay Area Stormwater Management Agencies Association, 1999 Edition



Design Objectives

- 0 Maximize Infiltration
- 0 Provide Retention
- 0 Slow Runoff
 - Minimize Impervious Land Coverage
 - Prohibit Dumping of Improper Materials
 - Contain Pollutants
 - Collect and Convey

Description

Irrigation water provided to landscaped areas may result in excess irrigation water being conveyed into stormwater drainage systems.

Approach

Project plan designs for development and redevelopment should include application methods of irrigation water that minimize runoff of excess irrigation water into the stormwater conveyance system.

Suitable Applications

Appropriate applications include residential, commercial and industrial areas planned for development or redevelopment. (Detached residential single-family homes are typically excluded from this requirement.)

Design Considerations

Designing New Installations

The following methods to reduce excessive irrigation runoff should be considered, and incorporated and implemented where determined applicable and feasible by the Permittee:

- Employ rain-triggered shutoff devices to prevent irrigation after precipitation.
- Design irrigation systems to each landscape area's specific water requirements.
- Include design featuring flow reducers or shutoff valves triggered by a pressure drop to control water loss in the event of broken sprinkler heads or lines.
- Implement landscape plans consistent with County or City water conservation resolutions, which may include provision of water sensors, programmable irrigation times (for short cycles), etc.



- Design timing and application methods of irrigation water to minimize the runoff of excess irrigation water into the storm water drainage system.
- Group plants with similar water requirements in order to reduce excess irrigation runoff and promote surface filtration. Choose plants with low irrigation requirements (for example, native or drought tolerant species). Consider design features such as:
 - Using mulches (such as wood chips or bar) in planter areas without ground cover to minimize sediment in runoff
 - Installing appropriate plant materials for the location, in accordance with amount of sunlight and climate, and use native plant materials where possible and/or as recommended by the landscape architect
 - Leaving a vegetative barrier along the property boundary and interior watercourses, to act as a pollutant filter, where appropriate and feasible
 - Choosing plants that minimize or eliminate the use of fertilizer or pesticides to sustain growth
- Employ other comparable, equally effective methods to reduce irrigation water runoff.

Redeveloping Existing Installations

Various jurisdictional stormwater management and mitigation plans (SUSMP, WQMP, etc.) define “redevelopment” in terms of amounts of additional impervious area, increases in gross floor area and/or exterior construction, and land disturbing activities with structural or impervious surfaces. The definition of “redevelopment” must be consulted to determine whether or not the requirements for new development apply to areas intended for redevelopment. If the definition applies, the steps outlined under “designing new installations” above should be followed.

Other Resources

A Manual for the Standard Urban Stormwater Mitigation Plan (SUSMP), Los Angeles County Department of Public Works, May 2002.

Model Standard Urban Storm Water Mitigation Plan (SUSMP) for San Diego County, Port of San Diego, and Cities in San Diego County, February 14, 2002.

Model Water Quality Management Plan (WQMP) for County of Orange, Orange County Flood Control District, and the Incorporated Cities of Orange County, Draft February 2003.

Ventura Countywide Technical Guidance Manual for Stormwater Quality Control Measures, July 2002.



Ruth Villalobos & Associates, Inc.

October 5, 2023

Candice Assadzadeh, Senior Planner
City of Riverside
Community Economic Development Department – Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

RE: 841 Alpine Meadows Lane Tentative Parcel Map No. 39174, PR-2021-001023 (PM, GE) – Responses to Comments Received on Draft Initial Study/Mitigated Negative Declaration

The following comments are those contained in emails from Richard Block for Friends of Riverside’s Hills dated September 14 and 22, 2023 and responses to those comments.

Comment: “Friends of Riverside’s Hills is very concerned about protecting the City’s designated arroyos, very much including the Prenda Arroyo. The Initial Study for the project says “The project site is largely within the mapped extent of the Prenda Arroyo, as identified in the Riverside Municipal Code (RMC), Title 17 Grading, Exhibits A-F, and is therefore subject to the requirements of the Hillside/Arroyo Grading Ordinance.” Actually examination of said Exhibit C appears to show that the project site is all or mostly all entirely well within the mapped portion of the Prenda Arroyo....

If one or more of the 3 newly added parcels or its proposed graded or built area is substantially within the arroyo or its setback, then the project at least MAY have a significant environmental impact related to environmentally purposed provisions of the Grading Code, the answer to question 11b of the IS should be “Potentially significant impact”, and an EIR for the project is required.”

“I have now found the desired maps in the project biology report, (Revised Biological Resources Assessment) so don’t need to have them sent separately. But there is a concern about the description in that report of the part of the project site that is within the Prenda Arroyo as mapped by the City in the grading code. In that bio report, as shown in its Figure 4, except for a small area at the northeast corner and southeast corner, the entire project site is within the Prenda Arroyo as mapped in the Grading Code. And yet, as marked in the bio report’s Figures 8a, 8b, and 9a, showing alleged “Actual boundaries of arroyo within parcel” and “50-foot setback from arroyo”, only the extreme southern and southeastern parts of the project site are shown as being within the arroyo, a contradiction. In particular, the proposed buildings and graded area are entirely within the arroyo, which is a degradation of the arroyo inconsistent with the grading code. The bio report (and IS) appears to be confounding the arroyo tributary coming from the northeast (which is not a blue-line stream) with the main arroyo stream (a blue-line stream) southerly of the project site.”

As outlined in the Initial Study, Section 4. Biological Resources, (pages 16 – 23), the analysis and conclusions in the Initial Study are based on the analysis and conclusions contained in the project specific biological resources reports prepared by L&L Environmental, Inc. and contained in Appendix A

to the Initial Study, including the *Revised Biological Resources Assessment and Breeding Season Burrowing Owl Survey* and the *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis*. Figure 4 – Mapped Area of Prenda Arroyo of the *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis* report identifies the project area within the overall extent of Prenda Arroyo, as identified in and referenced in the *Riverside Municipal Code (RMC), Title 17 Grading, Exhibits A-F, more specifically Exhibit C*, as shown in the excerpt below. The yellow outline is the mapped Prenda Arroyo as shown in RMC Title 17 Grading, Exhibit C. Accordingly, Figure 4 of the biological report does identify that the project site is largely located within the mapped Prenda Arroyo of the RMC Title 17 Exhibit C.



L&L Environmental, Inc.
 BIOLOGICAL AND CULTURAL
 INVESTIGATIONS AND MONITORING
 QUIN-05-752

Figure 4
Mapped Area of
Prenda Arroyo
 (Riverside, California Code of Ordinances / Title 17
https://library.municode.com/ca/riverside/codes/code_of_ordinances)
 Alpine Meadows Lane, City of Riverside
 County of Riverside, California

As outlined in the attached L&L Memo (dated September 25, 2023), Section 4.5 of the Biological Resources Assessment differentiates the arroyo tributary and the main arroyo stream (Prenda Creek). As seen in the excerpt below, the actual Prenda Arroyo as observed out in the field/at the site includes Prenda Creek, identified as a blue line stream, that is located outside of the project boundary. The ephemeral drainage feature that crosses the southeast portion of the project site is not a blueline stream and is tributary to Prenda Creek.

“The Prenda Arroyo includes Prenda Creek, an ephemeral drainage that is a blueline stream on U.S. Geological Survey (USGS) maps. Prenda Creek is located about 150 feet south of the parcel (at its closest point). An ephemeral drainage that is tributary to Prenda Creek crosses the southeast portion of the parcel from east to west. This unnamed drainage is not a blueline stream.”

Section 4.6 of the Biological Resources Assessment also states, as the commentor does, that most of the parcel is within the mapped extent of the Prenda Arroyo as seen in the excerpt below.

“As shown in Figure 4, most of the parcel is within the mapped extent of the Prenda Arroyo except for a portion of the northeast quadrant and a small area of the southeast corner.”

Although the project site is within the mapped Prenda Arroyo per RMC Title 17 Exhibit C, it is not within the actual Prenda Arroyo, which is based on in-person assessment of the site and documentation of the current conditions of the site by an experienced biologist. (emphasis added)

Comment: “That means that any consideration of conformity with the Code’s Hillside/Arroyo provisions, by the developer’s consultants or the City Planning Division, may well have ignored the fact that the disturbed area is within the Prenda Arroyo, and thus have been inadequate.”

As outlined in the attached L&L Memo (dated September 25, 2023), Section 4.6.3 of the Biological Resources Assessment, Section 17.08.011 of RMC Title 17 defines arroyos as:

"Arroyo" shall mean those areas shown within the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F of this title. The limits of these arroyos and arroyo tributaries shall include all the land within the water course area, the adjacent slopes having an average natural slope of 30 percent or greater, and all other areas within the boundaries shown on Exhibits A-F of this title. (emphasis added)
Section 4.6.3 of the Biological Resources Assessment also notes that:

The provisions for hillside/arroyo grading as defined in Section 17.28.020 of the Riverside Municipal Code apply to all excavation and grading of any land within or adjacent to the boundaries of Prenda Arroyo. This Section states in part, “No development or grading of any kind shall be permitted within 50 feet of the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F. The Community & Economic Development Director shall have the authority to administratively allow grading within designated arroyo tributaries depending on the sensitivity of the area. Sensitivity shall be determined by such factors as the presence of riparian vegetation, habitat for rare or endangered species, significant rock outcroppings or other unique topographic features on the property proposed to be graded or in nearby segments of the same tributary.” (emphasis added)

Section 4.6.3 of the Biological Resources Assessment analyzes the current condition of the arroyo with respect to the watercourse as it currently exists, adjacent slopes, riparian vegetation, habitat for rare or endangered species, significant rock outcrops, and unique topographic features.

This analysis found:

The Project disturbance area is not within the watercourse as it currently exists (as defined by a jurisdictional delineation), including adjacent slopes of 30 percent or greater.

The Project would not impact any riparian vegetation or other sensitive vegetation community.

Most listed and special status plant and wildlife species known from the region are either absent, not expected to occur, or have a low potential for occurrence on the site. There are a few exceptions, but most are covered under the MSHCP and considered adequately conserved. Recommended mitigation would avoid and minimize any potential impacts.

The Project will not impact any significant rock outcrops or unique topographic features.

The Biological Resources Assessment acknowledged that the Project site is within the mapped extent of the Prenda Arroyo and conducted an analysis of the current condition of the arroyo within the Project parcel. This analysis was requested by the City of Riverside to support an exception to the hillside/arroyo grading provisions, as allowed by Section 17.28.020 of the Riverside Municipal Code.

The drainage feature within the project parcel/boundary that crosses the southeast portion of the project site is not a blueline stream and is tributary to Prenda Creek. And as it does not support riparian or other sensitive vegetation, does not have habitat for rare or endangered species, or have significant rock outcroppings or other unique topographic features, is not considered a sensitive area. Therefore, the conformity analysis of the project with the provisions of the RMC Title 17 Grading is not flawed or inadequate.

Comment: “One other thing noted: the biological survey was done in the summer of 2021 after an exceptionally dry winter and spring (Table 2a) which may have caused impacts not taken into account.”

As outlined in the attached L&L Memo (dated September 25, 2023), Section 4.1.1 of the Biological Resources Assessment provides precipitation data for the two years prior to the survey. This is one of the factors that informs the analysis of potential for occurrence of plants and wildlife on the Project site (as detailed in Section 5.0 and Appendix B of the Biological Resources Assessment).

As noted in Section 3.1 of the Biological Resources Assessment, potentials for occurrence of plant and wildlife species were evaluated based on the presence and quality of habitat, geographic and elevation range of species, proximity to a known occurrence of a species obtained from CNDDDB or other reliable data, and field observations. Classifications for individual species may be modified based on biologists’ experience and expert opinion. (emphasis added)

The analysis of potentials for occurrence considers any environmental conditions that may affect plant and wildlife species, including below average rainfall. For this Project, the analysis was conducted by a biologist with over 30 years of experience in southern California ecosystems and was conservative, particularly in regard to annual plant species that may be strongly affected by rainfall patterns. The Biological Resources Assessment accounted for environmental conditions on the site, including precipitation, when analyzing potential impacts and also provided recommended mitigation measures (Section 6.0 of the Biological Resources Assessment) to avoid and minimize any potential impacts to sensitive biological resources. For these reasons, even though the analysis was conducted in the

summer of 2021, the impact analysis was thorough and complete and did not underestimate potential impacts.

Comment: “The City’s Grading Code, section 17.28.020 Hillside/Arroyo Grading, includes the following provisions:

14. Arroyo grading.

a. No development or grading of any kind shall be permitted within 50 feet of the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F. The Community & Economic Development Director shall have the authority to administratively allow grading within designated arroyo tributaries depending on the sensitivity of the area. Sensitivity shall be determined by such factors as the presence of riparian vegetation, habitat for rare or endangered species, significant rock outcroppings or other unique topographic features on the property proposed to be graded or in nearby segments of the same tributary.

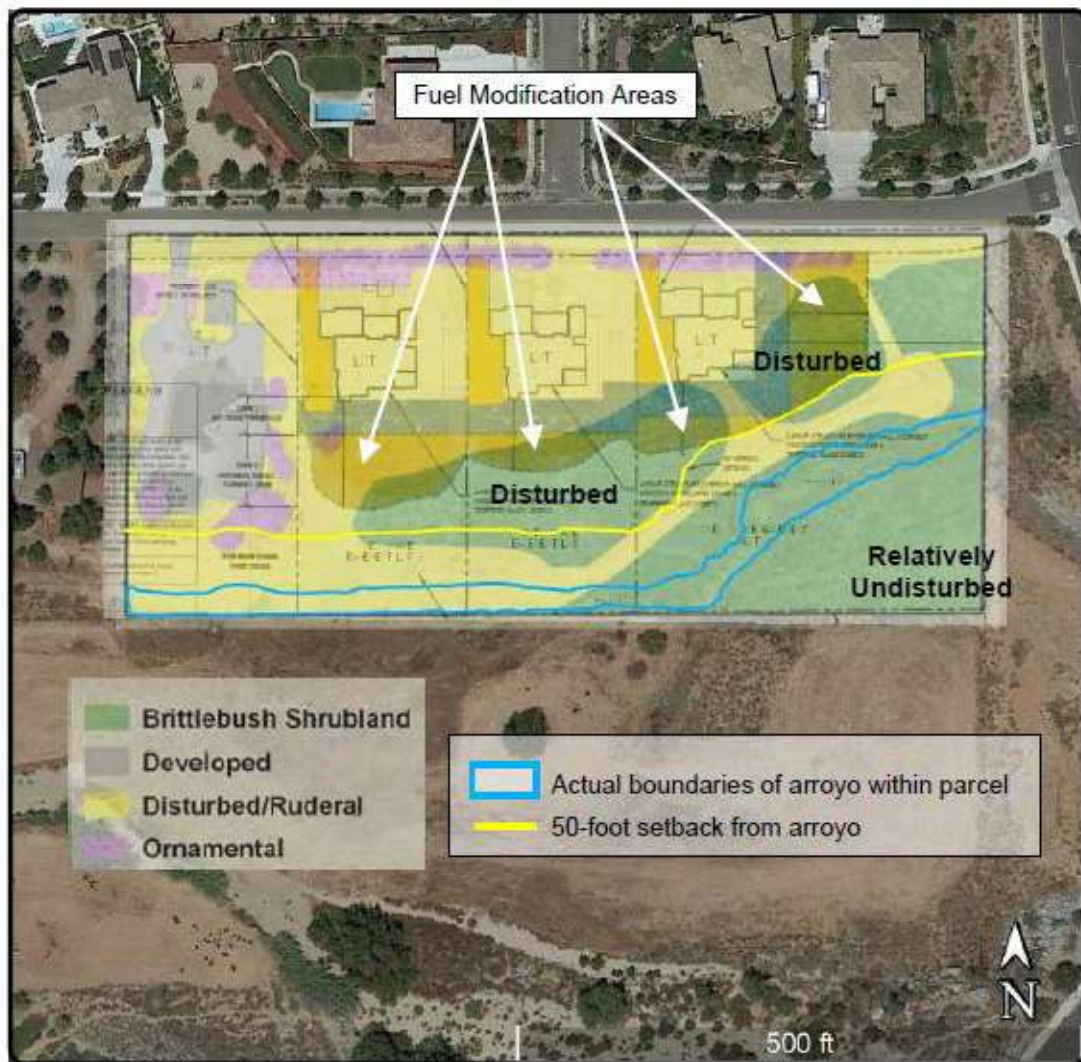
b. The limits of these arroyos shall include all that land within the watercourse area, the adjacent slopes having an average natural slope of 30 percent or greater, and all other areas within the boundaries shown on Exhibits A-F.

d. No native vegetation shall be removed and no non-native vegetation shall be introduced within the boundaries of these arroyos in areas that cannot be graded.

e. All land within the boundaries of these arroyos shall be included as an open space easement on final tract and parcel maps.”

The project map in the Biological Resources Assessment and the City map of the Prenda Arroyo (Exhibit C) in the Grading Code taken together show that the entire proposed developed area (graded area and buildings) is within the main Prenda Arroyo itself and not within the arroyo tributary coming from the northeast (which crosses into the project site but not the proposed developed area of that site) nor any other arroyo tributary. While the quoted code provision subsection a. allows the Director to administratively allow grading within an arroyo tributary, it gives no such authority regarding grading within the actual arroyo (as opposed to grading within a tributary). Thus this project is in several ways in violation of the above quoted grading code provisions 14 a, d, and e. Since these provisions are obviously environmentally purposed, the Initial Study gave the wrong answer to question 11b about conflict with such provisions, and as we previously noted, under CEQA the project requires an EIR rather than an MND.”

As outlined in the responses above, the project does not conflict with the provisions of RMC Title 17 Grading, 14. a-d. As further outlined in the *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis*, Figure 7b (page 25), the actual boundaries of the arroyo within the project parcel are shown in blue, and a 50-foot setback, which are both located outside of the development footprint, the grading limits, and the fuel modification areas of the project, showing complete avoidance of the actual arroyo.



L&L Environmental, Inc.
 BIOLOGICAL AND CULTURAL
 INVESTIGATIONS AND MONITORING
 QUIN-05-752

Figure 7b
Habitat with Fuel Mod
 (Aerial obtained from Google Earth, August 2019)
 Alpine Meadows Lane, City of Riverside
 Riverside County, California

Threshold 11b of the Initial Study indicates: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? The Initial Study includes discussion of the project’s consistency with RMC Title 17 in Biological Resources 4c and within the supporting biological studies included in the Appendix to the Initial Study. Because consistency with RMC Title 17 was not specifically discussed in threshold 11b does not mean it was omitted from the Initial Study altogether

and because of that an EIR should be prepared. Rather a minor revision is recommended to the Initial Study to further clarify that the project's consistency with RMC Title 17 was conducted. This minor revision is to provide additional clarification and does not change the analysis or conclusions in the Initial Study.

The recommended revision to 11b of the Initial Study is as follows, with additions shown in underline and deletions shown in ~~strikethrough~~:

No Less than Significant Impact. The project site has the land use designation of Very Low Density Residential (VLDR) and is zoned R-1-1/2 Acre – Single – Family Residential Zone. The R-1-1/2 Acre zone is established for large lot single-family residences where the keeping of livestock and other farm animals and agricultural uses are not permitted. The proposed project is consistent with the land use designation of VLDR and will meet the zoning standards for the R-1-1/2 Acre zone. The project is an infill project consistent with the General Plan 2025 and the existing surrounding residential development.

The provisions for hillside/arroyo grading as defined in Section 17.28.020 of the Municipal Code apply to all excavation and grading of any land within or adjacent to the boundaries of Prenda Arroyo. Section 17.28.020 states in part, "No development or grading of any kind shall be permitted within 50 feet of the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F. The Community & Economic Development Director shall have the authority to administratively allow grading within designated arroyo tributaries depending on the sensitivity of the area. Sensitivity shall be determined by such factors as the presence of riparian vegetation, habitat for rare or endangered species, significant rock outcroppings or other unique topographic features on the property proposed to be graded or in nearby segments of the same tributary."

The development footprint, the grading limits, and the fuel modification areas of the proposed project, are located outside the actual arroyo and a 50-foot setback from the arroyo. As such the project will not impact the actual Prenda Arroyo limits. A Grading Exception is needed to allow grading within the extent of the mapped Prenda Arroyo (as identified in the Riverside Municipal Code (RMC), Title 17 Grading, Exhibits A-F). An Open Space Easement will be recorded for the portions of Lots 2-4 located outside of the grading limits. Therefore, the project will not conflict with the provisions of RMC Title 17 Grading.

For these reasons, this project will have ~~no~~ less than significant impact ~~on~~ related to an applicable land use plan, policy, or regulation for the purpose of avoiding or mitigating an environmental effect, directly, indirectly, or cumulatively.

The following comment is contained in an email from Arlee Montalvo dated October 4, 2023 and responses to those comments.

Dear Candice,

I am adding a few background documents to these submittals. In 2006, the County/City Arroyo Watershed Committee (CCAC), a standing committee with appointees from the City of Riverside City Council (CC) and the County of Riverside Board of Supervisors (BOS) provided a policy recommendation document to the City of Riverside City Council. The document provided important recommendations for the protection of arroyos in our region and most of the policy recommendations were adopted by the County Board of Supervisors and the City of Riverside City Council. A number of important protections were incorporated as tools in the 2025 General Plan Open Space and Conservation Elements-- Tools for Implementation. The proposed project within the boundaries of one of our main arroyos departs from the approved recommendations and General Plan Implementation tools.

Sincerely,
Arlee Montalvo
former member and secretary of the CCAC

This does not include any specific comments on the draft Mitigated Negative Declaration or Environmental Initial Study or supporting technical studies. Regarding the project location in relation to the arroyo, as outlined above and in the *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis* (Appendix B to the draft Mitigated Negative Declaration and Environmental Initial Study), Figure 7b (page 25), the actual boundaries of the arroyo within the project parcel are shown in blue, and a 50-foot setback, which are both located outside of the development footprint, the grading limits, and the fuel modification areas of the project, showing complete avoidance of the actual arroyo.

The comments do not affect the analysis completed or conclusions provided in the Draft Initial Study/Mitigated Negative Declaration (IS/MND), does not provide new information or evidence related to the analysis completed in the IS/MND, and does not reflect on the adequacy or content of the IS/MND. The comments are noted for the record and only minor revisions were warranted to provide additional clarification but does not change the analysis or conclusions in the IS/MND.

Sincerely,



Sonya Hooker
Vice President/ Director of Environmental Services
Ruth Villalobos & Associates (RVA), Inc.
3602 Inland Empire Blvd., Suite C310
Ontario, CA 91764

MEMO

DATE: SEPTEMBER 25, 2023
TO: SONYA HOOKER, RUTH VILLALOBOS & ASSOCIATES, INC.
FROM: CARLA WAKEMAN, L&L ENVIRONMENTAL, INC.
Subject: ALPINE MEADOWS RESPONSE TO COMMENTS

L&L Environmental, Inc. (L&L) has reviewed the comments by Richard Block for Friends of Riverside's Hills (via email dated September 14, 2023) regarding the Alpine Meadows Project (Project) at 841 Alpine Meadows Lane, Planning Case PR-2022-001293. L&L appreciates the author's concern for Riverside's sensitive biological resources and offers the following responses to the comments.

Comment: The bio report (and IS) appears to be confounding the arroyo tributary coming from the northeast (which is not a blue-line stream) with the main arroyo stream (a blue-line stream) southerly of the project site.

L&L Response: Section 4.5 of the Biological Resources Assessment (L&L, May 2023) differentiates the arroyo tributary and the main arroyo stream (Prenda Creek). Section 4.5 states:

"The Prenda Arroyo includes Prenda Creek, an ephemeral drainage that is a blueline stream on U.S. Geological Survey (USGS) maps. Prenda Creek is located about 150 feet south of the parcel (at its closest point). An ephemeral drainage that is tributary to Prenda Creek crosses the southeast portion of the parcel from east to west. This unnamed drainage is not a blueline stream."

Comment: That means that any consideration of conformity with the Code's Hillside/Arroyo provisions, by the developer's consultants or the City Planning Division, may well have ignored the fact that the disturbed area is within the Prenda Arroyo, and thus have been inadequate.

L&L Response: Section 4.6 of the Biological Resources Assessment states that the majority of the Project site is within the mapped extent of the Prenda Arroyo and this is also shown on Figure 4 of the Biological Resources Assessment. As referenced in Figure 4, the mapped extent of the arroyo is from the City of Riverside Municipal Code. Section 4.6 of the Biological Resources Assessment states:

"As shown in Figure 4, most of the parcel is within the mapped extent of the Prenda Arroyo except for a portion of the northeast quadrant and a small area of the southeast corner."

As noted in Section 4.6.3 of the Biological Resources Assessment, Section 17.08.011 of the City of Riverside Municipal Code defines arroyos as:

"Arroyo" shall mean those areas shown within the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F of this title. The limits of these arroyos and arroyo tributaries shall include all the land within the water course area, the adjacent slopes having an average natural slope of 30 percent or greater, and all other areas within the boundaries shown on Exhibits A-F of this title. (emphasis added)

Section 4.6.3 of the Biological Resources Assessment also notes that:

The provisions for hillside/arroyo grading as defined in Section 17.28.020 of the Riverside Municipal Code apply to all excavation and grading of any land within or adjacent to the boundaries of Prenda Arroyo. This Section states in part, "No development or grading of any kind shall be permitted within 50 feet of the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F. The Community & Economic Development Director shall have the authority to administratively allow grading within designated arroyo tributaries depending on the sensitivity of the area. Sensitivity shall be determined by such factors as the presence of riparian vegetation, habitat for rare or endangered species, significant rock outcroppings or other unique

topographic features on the property proposed to be graded or in nearby segments of the same tributary.” (emphasis added)

Section 4.6.3 of the Biological Resources Assessment analyzes the current condition of the arroyo with respect to the watercourse as it currently exists, adjacent slopes, riparian vegetation, habitat for rare or endangered species, significant rock outcrops, and unique topographic features.

This analysis found:

- The Project disturbance area is not within the watercourse as it currently exists (as defined by a jurisdictional delineation), including adjacent slopes of 30 percent or greater.
- The Project would not impact any riparian vegetation or other sensitive vegetation community.
- Most listed and special status plant and wildlife species known from the region are either absent, not expected to occur, or have a low potential for occurrence on the site. There are a few exceptions, but most are covered under the MSHCP and considered adequately conserved. Recommended mitigation would avoid and minimize any potential impacts.
- The Project will not impact any significant rock outcrops or unique topographic features.

The Biological Resources Assessment acknowledged that the Project site is within the mapped extent of the Prenda Arroyo and conducted an analysis of the current condition of the arroyo within the Project parcel. This analysis was requested by the City of Riverside to support an exception to the hillside/arroyo grading provisions, as allowed by Section 17.28.020 of the Riverside Municipal Code.

Comment: The biological survey was done in the summer of 2021 after an exceptionally dry winter and spring (Table 2a) which may have caused impacts not taken into account.

L&L Response: Section 4.1.1 of the Biological Resources Assessment provides precipitation data for the two years prior to the survey. This is one of the factors that informs the analysis of potential for occurrence of plants and wildlife on the Project site (as detailed in Section 5.0 and Appendix B of the Biological Resources Assessment).

As noted in Section 3.1 of the Biological Resources Assessment, potentials for occurrence of plant and wildlife species were evaluated based on the presence and quality of habitat, geographic and elevation range of species, proximity to a known occurrence of a species obtained from CNDDDB or other reliable data, and field observations. Classifications for individual species may be modified based on biologists' experience and expert opinion. (emphasis added)

The analysis of potentials for occurrence considers any environmental conditions that may affect plant and wildlife species, including below average rainfall. For this Project, the analysis was conducted by a biologist with over 30 years of experience in southern California ecosystems and was conservative, particularly in regard to annual plant species that may be strongly affected by rainfall patterns.

The Biological Resources Assessment accounted for environmental conditions on the site, including precipitation, when analyzing potential impacts and also provided recommended mitigation measures (Section 6.0 of the Biological Resources Assessment) to avoid and minimize any potential impacts to sensitive biological resources.

L&L appreciates the opportunity to respond to these comments. Please feel free to contact me if there are any questions.

Thank you,



Carla Wakeman, Senior Biologist

L&L Environmental, Inc. | LLenviroinc.com | Service is Our Only Business

Office: 909-335-9897 | Fax: 909-335-9893 | Cell 909-520-2056 | cwakeman@llenviroinc.com

Mailing Address: 700 East Redlands Blvd., #U351, Redlands CA 92373

Physical Address: 721 Nevada, Suite 307, Redlands, CA 92373

From: [Richard Block](#)
To: [Assadzadeh, Candice](#)
Cc: [Leonard Nunney](#); [Arlee Montalvo](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#)
Subject: [EXTERNAL] FW: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - Tentative ParcelMap No. 39174 - PR-2021-001023 (PM, GE)
Date: Thursday, September 14, 2023 7:22:10 PM
Attachments: [PR-2022-001293 NOI.pdf](#)

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Hello, Candice, and thanks for sending this. I note that the correct address appears to be 841 Alpine Meadows Lane, not 841 Meadows Lane.

Friends of Riverside's Hills is very concerned about protecting the City's designated arroyos, very much including the Prenda Arroyo. The Initial Study for the project says "The project site is largely within the mapped extent of the Prenda Arroyo, as identified in the Riverside Municipal Code (RMC), Title 17 Grading, Exhibits A-F, and is therefore subject to the requirements of the Hillside/Arroyo Grading Ordinance." Actually examination of said Exhibit C appears to show that the project site is all or mostly all entirely well within the mapped portion of the Prenda Arroyo. Please send us maps showing the boundaries of each of the proposed new lots and the precise boundary of the Prenda Arroyo and its designated setback in the vicinity of the project as it relates to the project boundary. The extent to which the project is within the arroyo or its setback of course relates to the Hillside/Arroyo provisions of the Grading Code, specifically Chapter 17.28. The IS says "The proposed project involves grading of pads, construction of 3 new single-family residential units." Thus any consideration of a grading exception or of the extent of compliance or non-compliance with the environmentally purposed provisions of Chapter 17.28 requires consideration of the proposed grading of pads and location of the proposed 3 new residential units. The IS is deficient in not providing such maps – please send us such maps/diagrams.

if one or more of the 3 newly added parcels or its proposed graded or built area is substantially within the arroyo or its setback, then the project at least MAY have a significant environmental impact related to environmentally purposed provisions of the Grading Code, the answer to question 11b of the IS should be "Potentially significant impact", and an EIR for the project is required.

Thanks,
Richard
Richard Block for Friends of Riverside's Hills

Sent from [Mail](#) for Windows

From: [Assadzadeh, Candice](#)
Sent: Thursday, September 14, 2023 4:42 PM
Subject: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - Tentative ParcelMap No. 39174 - PR-2021-001023 (PM, GE)

**NOTICE OF INTENT TO ADOPT
MITIGATED NEGATIVE DECLARATION
FOR THE CITY OF RIVERSIDE, CALIFORNIA**

PLANNING CASE PR-2022-001293 (PM, GE): Proposal by Jerardo Reyes and Ryan Williams to consider the following entitlements: 1) Tentative Parcel Map (No. 39174) to subdivide a 5.74-acre parcel into four parcels for residential purposes; and 2) Grading Exception to allow grading within the Prenda Arroyo and the 50-foot arroyo setback. The Planning Division of the Community & Economic Development Department recommends the Community & Economic Development Director determine the project will not have a significant effect on the environment and adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (MMRP).

NOTES: *It should be noted that Tribal Consultations have been conducted pursuant to A.B. 52.*

PROJECT LOCATION: The 5.74-acre project site is developed with an existing single-family residence, located at 841 Alpine Meadows Lane, situated on the south side of Alpine Meadows Lane between Harbart Drive and Kingdom Drive, in the R-1-1/2-Acre – Single Family Residential Zone, in Ward 4.

HAZARDOUS WASTE SITES: Pursuant to Section 15087.c.6 of the Guidelines for California Environmental Quality Act the City acknowledges the non-existence of hazardous waste sites within the project area reviewed by this Mitigated Negative Declaration.

PROJECT CONTACT: Candice Assadzadeh, Senior Planner
826-5667

PHONE: (951)

E-MAIL:

cassadzadeh@riversideca.gov

PUBLIC REVIEW AND WRITTEN COMMENTS: The review period for submitting written comments on the Mitigated Negative Declaration pursuant to State CEQA Guidelines Section 15105 commences on **Friday, September 15, 2023** and will close on **Wednesday, October 4, 2023** at 5:00 p.m. If you have any questions regarding the project or Mitigated Negative Declaration, please contact by e-mail or phone as indicated above.

Comments should be addressed to: Candice Assadzadeh, Senior Planner
City of Riverside, Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

DOCUMENT AVAILABILITY: The Mitigated Negative Declaration is available at the City Planning Division, located at the address above, and may also be viewed on the City's website at <https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents> as well as the Office of Planning & Research's website at <https://ceqanet.opr.ca.gov>.

DETERMINATION: The Community & Economic Development Department Director's determination becomes final on **Friday, October 6, 2023**, unless appealed to the City Council no later than **Monday, October 16, 2023**. Appeal procedures are available from

the Planning Division.

If you challenge the above proposed action in court, you may be limited to raising only those issues you or someone else raised in written comments delivered to the Planning Division of the City of Riverside during the comment period specified above.

DATE: September 15, 2023

Maribeth Tinio, City Planner

Candice Assadzadeh | Senior Planner

City of Riverside

Community and Economic Development Department – Planning Division

3900 Main Street, 3rd Floor

Riverside, CA 92522

Email: CAssadzadeh@riversideca.gov

Office: [\(951\) 826-5667](tel:9518265667)

Stay in-the-know with all things Riverside! Connect with us at

RiversideCA.gov/Connect.

From: [Richard Block](#)
To: [Assadzadeh, Candice](#)
Cc: [Leonard Nunney](#); [Arlee Montalvo](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#)
Subject: [EXTERNAL] RE: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - TentativeParcelMap No. 39174 - PR-2021-001023 (PM, GE)
Date: Thursday, September 14, 2023 9:53:28 PM

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Candice,

About the project maps (graded areas, building sites, etc.) I have now found the desired maps in the project biology report, (Revised Biological Resources Assessment) so don't need to have them sent separately. But there is a concern about the description in that report of the part of the project site that is within the Prenda Arroyo as mapped by the City in the grading code. In that bio report, as shown in its Figure 4, except for a small area at the northeast corner and southeast corner, the entire project site is within the Prenda Arroyo as mapped in the Grading Code. And yet, as marked in the bio report's Figures 8a, 8b, and 9a, showing alleged "Actual boundaries of arroyo within parcel" and "50-foot setback from arroyo", only the extreme southern and southeastern parts of the project site are shown as being within the arroyo, a contradiction. In particular, the proposed buildings and graded area are entirely within the arroyo, which is a degradation of the arroyo inconsistent with the grading code. The bio report (and IS) appears to be confounding the arroyo tributary coming from the northeast (which is not a blue-line stream) with the main arroyo stream (a blue-line stream) southerly of the project site.

That means that any consideration of conformity with the Code's Hillside/Arroyo provisions, by the developer's consultants or the City Planning Division, may well have ignored the fact that the disturbed area is within the Prenda Arroyo, and thus have been inadequate.

One other thing noted: the biological survey was done in the summer of 2021 after an exceptionally dry winter and spring (Table 2a) which may have caused impacts not taken into account.

Thanks,

Richard Block for Friends of Riverside's Hills.

Sent from [Mail](#) for Windows

From: [Richard Block](#)
Sent: Thursday, September 14, 2023 7:22 PM
To: [Assadzadeh, Candice](#)
Cc: [Leonard Nunney](#); [Arlee Montalvo](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#)
Subject: FW: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - TentativeParcelMap No. 39174 - PR-2021-001023 (PM, GE)

Hello, Candice, and thanks for sending this. I note that the correct address appears to be 841 Alpine Meadows Lane, not 841 Meadows Lane.

Friends of Riverside's Hills is very concerned about protecting the City's designated arroyos, very much including the Prenda Arroyo. The Initial Study for the project says "The project site is largely within the mapped extent of the Prenda Arroyo, as identified in the Riverside Municipal Code (RMC), Title 17 Grading, Exhibits A-F, and is therefore subject to the requirements of the Hillside/Arroyo Grading Ordinance." Actually examination of said Exhibit C appears to show that the project site is all or mostly all entirely well within the mapped portion of the Prenda Arroyo. Please send us maps showing the boundaries of each of the proposed new lots and the precise boundary of the Prenda Arroyo and its designated setback in the vicinity of the project as it relates to the project boundary. The extent to which the project is within the arroyo or its setback of course relates to the Hillside/Arroyo provisions of the Grading Code, specifically Chapter 17.28. The IS says "The proposed project involves grading of pads, construction of 3 new single-family residential units." Thus any consideration of a grading exception or of the extent of compliance or non-compliance with the environmentally purposed provisions of Chapter 17.28 requires consideration of the proposed grading of pads and location of the proposed 3 new residential units. The IS is deficient in not providing such maps – please send us such maps/diagrams.

if one or more of the 3 newly added parcels or its proposed graded or built area is substantially within the arroyo or its setback, then the project at least MAY have a significant environmental impact related to environmentally purposed provisions of the Grading Code, the answer to question 11b of the IS should be "Potentially significant impact", and an EIR for the project is required.

Thanks,
Richard
Richard Block for Friends of Riverside's Hills

Sent from [Mail](#) for Windows

From: [Assadzadeh, Candice](#)

Sent: Thursday, September 14, 2023 4:42 PM

Subject: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - Tentative ParcelMap No. 39174 - PR-2021-001023 (PM, GE)

**NOTICE OF INTENT TO ADOPT
MITIGATED NEGATIVE DECLARATION
FOR THE CITY OF RIVERSIDE, CALIFORNIA**

PLANNING CASE PR-2022-001293 (PM, GE): Proposal by Jerardo Reyes and Ryan Williams to consider the following entitlements: 1) Tentative Parcel Map (No. 39174) to subdivide a 5.74-acre parcel into four parcels for residential purposes; and 2) Grading Exception to allow grading within the Prenda Arroyo and the 50-foot arroyo setback. The Planning Division of the Community & Economic Development Department recommends the Community & Economic Development Director determine the project will not have a significant effect on the environment and adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (MMRP).

NOTES: *It should be noted that Tribal Consultations have been conducted pursuant*

to A.B. 52.

PROJECT LOCATION: The 5.74-acre project site is developed with an existing single-family residence, located at 841 Alpine Meadows Lane, situated on the south side of Alpine Meadows Lane between Harbart Drive and Kingdom Drive, in the R-1-1/2-Acre – Single Family Residential Zone, in Ward 4.

HAZARDOUS WASTE SITES: Pursuant to Section 15087.c.6 of the Guidelines for California Environmental Quality Act the City acknowledges the non-existence of hazardous waste sites within the project area reviewed by this Mitigated Negative Declaration.

PROJECT CONTACT: Candice Assadzadeh, Senior Planner
826-5667

PHONE: (951)

E-MAIL:

cassadzadeh@riversideca.gov

PUBLIC REVIEW AND WRITTEN COMMENTS: The review period for submitting written comments on the Mitigated Negative Declaration pursuant to State CEQA Guidelines Section 15105 commences on **Friday, September 15, 2023** and will close on **Wednesday, October 4, 2023** at 5:00 p.m. If you have any questions regarding the project or Mitigated Negative Declaration, please contact by e-mail or phone as indicated above.

Comments should be addressed to: Candice Assadzadeh, Senior Planner
City of Riverside, Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

DOCUMENT AVAILABILITY: The Mitigated Negative Declaration is available at the City Planning Division, located at the address above, and may also be viewed on the City's website at <https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents> as well as the Office of Planning & Research's website at <https://ceqanet.opr.ca.gov>.

DETERMINATION: The Community & Economic Development Department Director's determination becomes final on **Friday, October 6, 2023**, unless appealed to the City Council no later than **Monday, October 16, 2023**. Appeal procedures are available from the Planning Division.

If you challenge the above proposed action in court, you may be limited to raising only those issues you or someone else raised in written comments delivered to the Planning Division of the City of Riverside during the comment period specified above.

DATE: September 15, 2023

Maribeth Tinio, City Planner

Candice Assadzadeh | Senior Planner

City of Riverside

Community and Economic Development Department – Planning Division

3900 Main Street, 3rd Floor
Riverside, CA 92522
Email: CAssadzadeh@riversideca.gov
Office: [\(951\) 826-5667](tel:(951)826-5667)

Stay in-the-know with all things Riverside! Connect with us at
RiversideCA.gov/Connect.

From: [Richard Block](#)
To: [Assadzadeh, Candice](#)
Cc: [Leonard Nunney](#); [Arlee Montalvo](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#); [Norton, Brian](#); [Bob Buster](#)
Subject: [EXTERNAL] RE: NOTICE OF INTENT TO ADOPT MND: 841 Alpine Meadows Lane -TentativeParcelMap No. 39174 - PR-2021-001023 (PM, GE)
Date: Friday, September 22, 2023 6:18:28 PM

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Hello again, Candice.

Please add the following to the previous comments (copied below) of Friends of Riverside's Hills about this project.

The City's Grading Code, section 17.28.020 Hillside/Arroyo Grading, includes the following provisions:

"14. Arroyo grading.

a. No development or grading of any kind shall be permitted within 50 feet of the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F. The Community & Economic Development Director shall have the authority to administratively allow grading within designated arroyo tributaries depending on the sensitivity of the area. Sensitivity shall be determined by such factors as the presence of riparian vegetation, habitat for rare or endangered species, significant rock outcroppings or other unique topographic features on the property proposed to be graded or in nearby segments of the same tributary.

b. The limits of these arroyos shall include all that land within the watercourse area, the adjacent slopes having an average natural slope of 30 percent or greater, and all other areas within the boundaries shown on Exhibits A-F.

d. No native vegetation shall be removed and no non-native vegetation shall be introduced within the boundaries of these arroyos in areas that cannot be graded.

e. All land within the boundaries of these arroyos shall be included as an open space easement on final tract and parcel maps."

The project map in the Biological Resources Assessment and the City map of the Prenda Arroyo (Exhibit C) in the Grading Code taken together show that the entire proposed developed area (graded area and buildings) is within the main Prenda Arroyo itself and not within the arroyo tributary coming from the northeast (which crosses into the project site but not the proposed developed area of that site) nor any other arroyo tributary. While the quoted code provision subsection a. allows the Director to administratively allow grading within an arroyo tributary, it gives no such authority regarding grading within the actual arroyo (as opposed to grading within a tributary). Thus this project is in several ways in violation of the above quoted grading code provisions 14 a. d, and e. Since these provisions are obviously environmentally purposed, the Initial

Study gave the wrong answer to question 11b about conflict with such provisions, and as we previously noted, under CEQA the project requires an EIR rather than an MND.

Thanks for consideration of our comments. Please keep us informed of all considerations regarding this project and of any proposals pertaining to this site.

Richard
Richard Block for Friends of Riverside's Hills

Sent from [Mail](#) for Windows

From: [Richard Block](#)
Sent: Thursday, September 14, 2023 9:53 PM
To: [Assadzadeh, Candice](#)
Cc: [Leonard Nunney](#); [Arlee Montalvo](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#)
Subject: RE: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane -TentativeParcelMap No. 39174 - PR-2021-001023 (PM, GE)

Candice,
About the project maps (graded areas, building sites, etc.) I have now found the desired maps in the project biology report, (Revised Biological Resources Assessment) so don't need to have them sent separately. But there is a concern about the description in that report of the part of the project site that is within the Prenda Arroyo as mapped by the City in the grading code. In that bio report, as shown in its Figure 4, except for a small area at the northeast corner and southeast corner, the entire project site is within the Prenda Arroyo as mapped in the Grading Code. And yet, as marked in the bio report's Figures 8a, 8b, and 9a, showing alleged "Actual boundaries of arroyo within parcel" and "50-foot setback from arroyo", only the extreme southern and southeastern parts of the project site are shown as being within the arroyo, a contradiction. In particular, the proposed buildings and graded area are entirely within the arroyo, which is a degradation of the arroyo inconsistent with the grading code. The bio report (and IS) appears to be confounding the arroyo tributary coming from the northeast (which is not a blue-line stream) with the main arroyo stream (a blue-line stream) southerly of the project site.

That means that any consideration of conformity with the Code's Hillside/Arroyo provisions, by the developer's consultants or the City Planning Division, may well have ignored the fact that the disturbed area is within the Prenda Arroyo, and thus have been inadequate.

One other thing noted: the biological survey was done in the summer of 2021 after an exceptionally dry winter and spring (Table 2a) which may have caused impacts not taken into account.

Thanks,
Richard Block for Friends of Riverside's Hills.

Sent from [Mail](#) for Windows

From: [Richard Block](#)

Sent: Thursday, September 14, 2023 7:22 PM

To: [Assadzadeh, Candice](#)

Cc: [Leonard Nunney](#); [Arlee Montalvo](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#)

Subject: FW: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - Tentative ParcelMap No. 39174 - PR-2021-001023 (PM, GE)

Hello, Candice, and thanks for sending this. I note that the correct address appears to be 841 Alpine Meadows Lane, not 841 Meadows Lane.

Friends of Riverside's Hills is very concerned about protecting the City's designated arroyos, very much including the Prenda Arroyo. The Initial Study for the project says "The project site is largely within the mapped extent of the Prenda Arroyo, as identified in the Riverside Municipal Code (RMC), Title 17 Grading, Exhibits A-F, and is therefore subject to the requirements of the Hillside/Arroyo Grading Ordinance." Actually examination of said Exhibit C appears to show that the project site is all or mostly all entirely well within the mapped portion of the Prenda Arroyo. Please send us maps showing the boundaries of each of the proposed new lots and the precise boundary of the Prenda Arroyo and its designated setback in the vicinity of the project as it relates to the project boundary. The extent to which the project is within the arroyo or its setback of course relates to the Hillside/Arroyo provisions of the Grading Code, specifically Chapter 17.28. The IS says "The proposed project involves grading of pads, construction of 3 new single-family residential units." Thus any consideration of a grading exception or of the extent of compliance or non-compliance with the environmentally purposed provisions of Chapter 17.28 requires consideration of the proposed grading of pads and location of the proposed 3 new residential units. The IS is deficient in not providing such maps – please send us such maps/diagrams.

if one or more of the 3 newly added parcels or its proposed graded or built area is substantially within the arroyo or its setback, then the project at least MAY have a significant environmental impact related to environmentally purposed provisions of the Grading Code, the answer to question 11b of the IS should be "Potentially significant impact", and an EIR for the project is required.

Thanks,

Richard

Richard Block for Friends of Riverside's Hills

Sent from [Mail](#) for Windows

From: [Assadzadeh, Candice](#)

Sent: Thursday, September 14, 2023 4:42 PM

Subject: NOTICE OF INTENT TO ADOPT MND: 841 Meadows Lane - Tentative ParcelMap No. 39174 - PR-2021-001023 (PM, GE)

**NOTICE OF INTENT TO ADOPT
MITIGATED NEGATIVE DECLARATION
FOR THE CITY OF RIVERSIDE, CALIFORNIA**

PLANNING CASE PR-2022-001293 (PM, GE): Proposal by Jerardo Reyes and Ryan Williams to consider the following entitlements: 1) Tentative Parcel Map (No. 39174) to subdivide a 5.74-acre parcel into four parcels for residential purposes; and 2) Grading Exception to allow grading within the Prenda Arroyo and the 50-foot arroyo setback. The Planning Division of the Community & Economic Development Department recommends the Community & Economic Development Director determine the project will not have a significant effect on the environment and adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (MMRP).

NOTES: *It should be noted that Tribal Consultations have been conducted pursuant to A.B. 52.*

PROJECT LOCATION: The 5.74-acre project site is developed with an existing single-family residence, located at 841 Alpine Meadows Lane, situated on the south side of Alpine Meadows Lane between Harbart Drive and Kingdom Drive, in the R-1-1/2-Acre – Single Family Residential Zone, in Ward 4.

HAZARDOUS WASTE SITES: Pursuant to Section 15087.c.6 of the Guidelines for California Environmental Quality Act the City acknowledges the non-existence of hazardous waste sites within the project area reviewed by this Mitigated Negative Declaration.

PROJECT CONTACT: Candice Assadzadeh, Senior Planner **PHONE:** (951) 826-5667

E-MAIL:

cassadzadeh@riversideca.gov

PUBLIC REVIEW AND WRITTEN COMMENTS: The review period for submitting written comments on the Mitigated Negative Declaration pursuant to State CEQA Guidelines Section 15105 commences on **Friday, September 15, 2023** and will close on **Wednesday, October 4, 2023** at 5:00 p.m. If you have any questions regarding the project or Mitigated Negative Declaration, please contact by e-mail or phone as indicated above.

Comments should be addressed to: Candice Assadzadeh, Senior Planner
City of Riverside, Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

DOCUMENT AVAILABILITY: The Mitigated Negative Declaration is available at the City Planning Division, located at the address above, and may also be viewed on the City's website at <https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents> as well as the Office of Planning & Research's website at <https://ceqanet.opr.ca.gov>.

DETERMINATION: The Community & Economic Development Department Director's determination becomes final on **Friday, October 6, 2023**, unless appealed to the City Council no later than **Monday, October 16, 2023**. Appeal procedures are available from the Planning Division.

If you challenge the above proposed action in court, you may be limited to raising only

those issues you or someone else raised in written comments delivered to the Planning Division of the City of Riverside during the comment period specified above.

DATE: September 15, 2023

Maribeth Tinio, City Planner

Candice Assadzadeh | Senior Planner

City of Riverside

Community and Economic Development Department – Planning Division

3900 Main Street, 3rd Floor

Riverside, CA 92522

Email: CAssadzadeh@riversideca.gov

Office: [\(951\) 826-5667](tel:(951)826-5667)

Stay in-the-know with all things Riverside! Connect with us at

RiversideCA.gov/Connect.

From: [Arlee Montalvo](#)
To: [Assadzadeh, Candice](#)
Cc: [Leonard Nunney](#); [Gurumantra](#); [Nicolas Barth](#); [Tinio, Maribeth](#); [Norton, Brian](#); [Bob Buster](#); [Richard Block](#)
Subject: [EXTERNAL] Re: NOTICE OF INTENT TO ADOPT MND: 841 Alpine Meadows Lane -TentativeParcelMap No. 39174 - PR-2021-001023 (PM, GE)
Date: Wednesday, October 4, 2023 4:59:59 PM
Attachments: [CCAC Policy Study RECOMMENDATIONS&APPENDIX \[11-15-06 FINAL\]_opt.pdf](#)
[CCAC Policy Study coverletter signed \[11-15-06\].pdf](#)
[2007_05_10_City Memorandum to LUC.pdf](#)

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Dear Candice,

I am adding a few background documents to these submittals. In 2006, the County/City Arroyo Watershed Committee (CCAC), a standing committee with appointees from the City of Riverside City Council (CC) and the County of Riverside Board of Supervisors (BOS) provided a policy recommendation document to the City of Riverside City Council. The document provided important recommendations for the protection of arroyos in our region and most of the policy recommendations were adopted by the County Board of Supervisors and the City of Riverside City Council. A number of important protections were incorporated as tools in the 2025 General Plan Open Space and Conservation Elements-- Tools for Implementation. The proposed project within the boundaries of one of our main arroyos departs from the approved recommendations and General Plan Implementation tools.

Sincerely,
Arlee Montalvo
former member and secretary of the CCAC

On Fri, Sep 22, 2023 at 6:18 PM Richard Block <rblock31@charter.net> wrote:

Hello again, Candice.

Please add the following to the previous comments (copied below) of Friends of Riverside's Hills about this project.

The City's Grading Code, section 17.28.020 Hillside/Arroyo Grading, includes the following provisions:

“14. Arroyo grading.

a. No development or grading of any kind shall be permitted within 50 feet of the limits of the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos and associated tributaries as shown on Exhibits A-F. The Community & Economic Development Director shall have the authority to administratively allow grading within designated arroyo tributaries depending on the sensitivity of the area. Sensitivity shall be determined by such factors as the presence of riparian vegetation, habitat for rare or endangered species, significant