W.O. 2018-1004



Corporate Headquarters 3788 McCray Street Riverside, CA 92506 951.686.1070

Palm Desert Office 41-990 Cook St., Bldg. I-801B Palm Desert, CA 92211 951.686.1070

Murrieta Office 41870 Kalmia Street #160 Murrieta, CA 92562 951.686.1070 February 28, 2018

Mr. Eric Norris
Planning Director
City of Eastvale
12363 Limonite Avenue Suite 910
Eastvale, CA 91752

Transmitted via electronic mail

RE: Comments on the Notice of Preparation for a Draft
Environmental Impact Report/Initial Study for the Lewis

Retail/Civic Center & Al's Corner Project

On behalf of the Jurupa Community Services District (JCSD), Albert A. Webb Associates (WEBB), as consultants to JCSD, has reviewed and commented on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR)/Initial Study for the proposed Lewis Retail/Civic Center & Al's Corner Project (proposed Project). As discussed in the Initial Study, JCSD is responsible for providing water, sewer, and park services to the city of Eastvale (City). The proposed Project will be subject to JCSD's rules, regulations, conditions, requirements, and payment of appropriate fees for commercial projects. Additionally, the proposed Project will be required to undergo an industrial waste review to determine the need for a commercial discharge permit and any additional associated sewer fees. We provide the following comments, which focus primarily on the discussions of water and wastewater:

- It is our understanding that the 23-acre Lewis Retail/Civic Center site (Site 1) involves a Tentative Parcel Map to subdivide Site 1 into eight commercial parcels and one right-of-way parcel, a General Plan Amendment to change the land use designation from Medium Density Residential to Commercial Retail, a Change of Zone to change the zone from Rural Residential (R-R) and Watercourse, Watershed, and Conservation Area (W-1) to General Commercial (C-1/C-P), and a Major Development Plan Review for a portion of Site 1; and the 1.38-acre Al's Corner site (Site 2) involves a General Plan Amendment to change the land use designation from Medium Density Residential to Commercial Retail to bring the General Plan land use designation and Zoning into conformance, and a Major Development Plan Review. Since a General Plan Amendment is proposed for both sites which is inconsistent with the prior land uses contemplated for water and sewer service connections. JCSD will need to review the potential land uses described in the NOP/Initial Study to assess the potential incremental increase in water and sewer usage. Additionally, JCSD staff will need to submit a water and sewer availability letter to the Board of Directors for its consideration as noted under comments #5 and #6.
- 2. It is our understanding that there is no specific development proposed on Sites 1 or 2; however, future uses on Site 1 includes



Mr. Eric Norris
Comments on the Notice of Preparation for a DEIR/Initial Study
for the Lewis Retail/Civic Center & Al's Corner Project
Page 2

approximately 7.44 acres set aside for City Hall and public library and approximately 14 acres set aside for various fast-food restaurants, medical offices, a gas station, a coffee shop, and a hotel.

- 3. Based on page 3 of the Initial Study for the proposed Project, no specific development is proposed on Site 2; however, the analysis in the forthcoming DEIR will analyze development of Site 2 with a 16-pump gas station with market and car wash. The development assumed for Site 2 does not match what is noted in the NOP and Figure 2 of the NOP which assumes an approximately 5,000-square-foot, drive-through car wash. Please clarify in the DEIR what is assumed for development on Site 2.
- The Project applicant must provide JCSD with fire flow requirements and conditions of approval from the Riverside County Fire Department in order to determine the adequacy of the existing water system.
- 5. We have reviewed JCSD's water and sewer atlas maps to identify the nearest main lines for potential service connections. Water facilities consist of an existing 24-inch diameter line in Hamner Avenue. Sewer facilities consist of an existing 21-inch diameter line in Hamner Avenue. JCSD staff has preliminarily determined that existing facilities have sufficient water capacity for the proposed Project. Thus, no off-site water pipeline is anticipated based on JCSD's staff's preliminary review of existing facilities and potential uses on Sites 1 and 2.
- 6. Page 67 of the Initial Study prepared for the proposed Project stated that "Through a joint powers authority, the JCSD partners with the Chino Desalter Authority (CDA), the owner and operator of two water treatment plants (desalters), to treat potable water for the JCSD service area. Each of the desalters has the current capacity to treat 12 million gallons per day (mgd) of water. In addition, the CDA is currently in the process of expanding the treatment capacity of the desalters via local groundwater wells. Water is treated at the Chino I Desalter, the Chino II Desalter, and the Roger Teagarden Ion Exchange Treatment Plant. Based on a water demand rate of 3.7 acre-feet per year (AFY) per acre for commercial-retail uses, the proposed developments would have a total water demand of approximately 85.1 AFY or 75,923 gallons per day. Thus, the proposed Project total demand would equal approximately 0.63 percent of current treatment capacity."

The calculation provided seems to only account for Site 1's water demand (23-acre Site 1 X 3.7 acre-feet per year = 85.1 AFY). There is a typographical error in the AFY conversion to gallons per day for Site 1; it should be noted that 85.1 AFY equates to 75,973 gallons per day (1 acre foot per year = 892.75 gallons per day). Additionally, the water demand for Site 2 was not calculated in the Initial Study. Site 2 encompasses 1.38 acres and thus, would yield approximately 5.106 AFY or 4,558 gallons per day (1.38-acre Site 2 x 3.7 acre-feet per year). The combined Sites 1 and 2 water demand with implementation of the proposed Project is projected

Mr. Eric Norris
Comments on the Notice of Preparation for a DEIR/Initial Study
for the Lewis Retail/Civic Center & Al's Corner Project
Page 3

to be approximately 90.206 AFY or 80,531 gallons per day. Thus, the proposed Project total demand would equal approximately 0.67 percent of current treatment capacity. A water availability letter will be required. JCSD staff will need to submit a water availability letter to the JCSD Board of Directors, for its consideration.

7. JCSD staff has preliminarily determined that existing facilities have sufficient sewer capacity for the proposed Project. Thus, no off-site sewer pipeline is anticipated based on JCSD's staff's review of existing facilities and potential uses on Sites 1 and 2. A sewer availability letter will be required. JCSD staff will need to submit a sewer availability letter to the JCSD Board of Directors, for its consideration.

The above mentioned comments are JCSD's understanding of the project and clarification on the proposed Project's water demands. Please incorporate the clarification regarding water demand in the DEIR. The Project applicant will be required to contact JCSD to start the development processes for the proposed Project. The Project applicant will be required to submit plans and fees for sewer and water service. The Project applicant can find further information on the JCSD's fee schedules and development processes on the JCSD's website at www.icsd.us.

Should the potential land use designations/uses change from what has been noted in the NOP/Initial Study, JCSD requests a copy of the change of uses and may provide subsequent comments after its review. JCSD looks forward to receiving a copy of the DEIR for the Project. If you have any questions regarding this letter please do not hesitate to contact the undersigned at cheryl.degano@webbassociates.com or (951) 686-1070.

Sincerely,

ALBERT A. WEBB ASSOCIATES

Cheryl DeGano

Principal Environmental Analyst

c: Seungwon Won, Ph.D., P.E., JCSD

Stephanie Tang

Senior Environmental Analyst