

May 1, 2007

Mr. Gerard Ste. Marie  
35622 Crest Meadow Drive  
Wildomar, CA 92595

RE: Comments Regarding Negative Declaration Wildomar Incorporation Project  
SCH# 2007031036

Dear Mr. Ste. Marie:

Thank you for your recommendations concerning the aforementioned project. Our responses to your recommendations are as follows:

- 1) Fire Protection. Because the project consists of the incorporation of the Wildomar community as a new city, physical impacts which would typically be experienced during site preparation would not occur with the proposed project. Construction of new fire facilities will be analyzed when the precise location(s) have been decided upon and when project design features are in place. Additionally, the County Fire Department has indicated new facilities will be required regardless of whether Wildomar incorporates.
- 2) Table 3.2-1 on page 3-2 of the Negative Declaration identifies the types of government functions that would be transferred to the new city.
- 3) Locations for general government public facilities would be decided on as the newly formed City of Wildomar evolves.
- 4) It is expected that existing locations will be utilized to house the newly formed government prior to the possibility of construction of any new facilities.
- 5) Construction of new facilities will be constructed only if the newly formed City of Wildomar determines new buildings are necessary.
- 6) Potential land use and planning conflicts will be analyzed if and when new construction is proposed.
- 7) Personnel and public access requirements for new facilities will be analyzed if and when new construction is proposed.
- 8) The potential for adverse transportation-related (including parking) impacts would be analyzed if and when new construction is proposed.

We appreciate your comments and recommendations. Please feel free to contact me at (951) 369-0631 should you have any questions or require any additional information.

Sincerely,

George J. Spiliotis  
Executive Officer

May 1, 2007

Mr. Ken Seumalo, P.E.  
Director of Public Works, City Engineer  
City of Lake Elsinore  
130 S. Main Street  
Lake Elsinore, CA 92530

Re: Comments on the Negative Declaration for the Incorporation of Wildomar  
SCH# 2007031036

Dear Mr. Seumalo:

Thank you for your recommendations concerning the aforementioned project. Our responses to your recommendations are as follows:

1. Comment noted. The actions of the City does not change the proposed incorporation boundaries. Regardless, there is no significant difference in impacts of the incorporation with or without the CHE site.
2. Comment noted. LAFCO recognizes that the CHE landowner has requested its removal from within the proposed Wildomar Incorporation boundary and LAFCO has approved its request to be placed within the Sphere of Influence of the City of Lake Elsinore.
3. Comment noted. Inter-agency coordination will take place during construction of Lost Road, Cottonwood Canyon Road, and other regional roads that benefit multiple agencies.

We appreciate your comments and recommendations. Please feel free to contact me at (951) 369-0631 should you have any questions or require any additional information.

Sincerely,

George J. Spiliotis  
Executive Officer

May 1, 2007

Mr. Matt Brady  
Blackstone Circle  
Wildomar, CA 95295

Re: Negative Declaration for the Incorporation of Wildomar  
SCH# 2007031036

Dear Mr. Brady:

Thank you for your recommendations concerning the aforementioned project. Please be advised that LAFCO cannot respond to your comments and/or questions regarding the comprehensive fiscal analysis. We are the lead agency for the Negative Declaration (ND). Your comments and questions related to the comprehensive fiscal analysis (CFA) will be directed to GST Consulting. Our responses to your recommendations for the Negative Declaration are as follows:

1. The Negative Declaration was based upon the most current fiscal analysis prepared for the incorporation of Wildomar at the time.
2. The proposed levels of service released in the CFA on February 25, 2007 do not present significant differences from the levels of service described in the Negative Declaration.
3. Noted. All roadway improvements to Lost Road, Cottonwood Canyon, or other regional roadways would be coordinated with various regional municipalities such as the County of Riverside and/or the City of Lake Elsinore prior to the improvements taking place. These improvements are expected to require future environmental analysis, at which time the potential impacts would be identified and analyzed.
4. As stated on page 3-2 in Table 3.2-1 of the Negative Declaration, roadway maintenance within the boundary of the City of Wildomar would be performed by the City and/or contract staff. Questions regarding discrepancies between the two consultants will be directed to GST Consulting.
5. Noted, comment will be directed to GST Consulting.
6. Noted, comment will be directed to GST Consulting.
7. Noted, comment will be directed to GST Consulting.
8. Noted, comment will be directed to GST Consulting.
9. Noted, comment will be directed to GST Consulting.
10. As stated on page 4-24 of the ND, the community of Wildomar voted on August 29, 2006 to create a Landscape Maintenance District (LMD) to provide ongoing maintenance for Marna O'Brien Park, Windsong Park, and Heritage Park by the County of Riverside. Formation of the LMD will enable the County of Riverside or the City, as successor to the LMD, to maintain future public parks on both sides of the I-15 freeway in the Wildomar LMD. Be advised private, community parks would also be developed.
11. Comment noted.

12. Comment noted.
13. Noted, comment will be directed to GST Consulting.
14. Noted, comment will be directed to GST Consulting.
15. On Page 4-1 under the heading of “Environmental Factors Potentially Affected,” there were several environmental factors that, due to the nature of the proposed project, required a more in-depth analysis to determine if there was the potential for a significant impact. This is the standard approach in the preparation of an ND or an MND. Once this analysis was performed in relation to the proposed Wildomar Incorporation, it was determined that “no impact” would take place in the areas of public services, utilities/services systems, hydrology/water quality, recreation, transportation/traffic. This conclusion is supported by the information discussed within the body of the IS/ND. See page 4-30, Section XVII, “Mandatory Findings of Significance.”
16. A Negative Declaration was prepared for the proposed Wildomar Incorporation because it was determined that there was no potential for impact to occur as a result of the proposed project. Therefore, no mitigation was required, and a Mitigation Monitoring and Reporting Program (MMRP) was not necessary. An MMRP is made up of mitigation measures related to a particular project, and no mitigation measures exist in relation to the Wildomar Incorporation project.
17. The ND states that Government Code Section 57376 requires the new city to immediately adopt and continue county ordinances for 120 days or until superseding ordinances are adopted. This guarantees continuation of the current zoning since zoning is adopted by ordinance. The General Plan is typically adopted by resolution since it is not a regulatory document. It is not uncommon for new cities to keep zoning ordinances and the General Plan in effect for at least a year or more until they have the time and funds to prepare and certify a new city General Plan.
18. The ND states that the unincorporated community of Wildomar participates in the Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and assumes it would continue to do so following project implementation (incorporation). As noted in comments from the Department of Fish and Game, incorporation is anticipated in Section 11.6 of the MSHCP Implementation Agreement. The California Department of Fish and Game who, as a Trustee Agency for fish and wildlife resources (Fish and Game Code sections 711.7 and 1802 and the CEQA Guidelines section 15386) and as a Responsible Agency regarding any discretionary actions, would work closely with the newly incorporated City to effect a smooth transition and achieve compliance with the provisions of the MSHCP. Incorporation of a new city can be accommodated in the MSHCP as a minor amendment, as discussed in Section 20.4 of the Implementing Agreement. County fee ordinances associated with the MSHCP would be initially adopted by the City (see comment #17 above).
19. The incorporation of Wildomar is a legislative project, would not involve physical impacts. As such, there would be no impact to coast live oak trees.
20. Much of Riverside County is rated as a potential wildland fire area by the State of California Department of Forestry and Fire Protection and by the Riverside County General Plan Safety Element. Policies have been developed (and are in place) to minimize the threat of wildfire hazards. See General Plan Safety Element Policy S 5.1 and S 5.5, requiring municipalities to conduct and implement long-range fire safety planning, including stringent building, fire, subdivision, and municipal code standards; improved

infrastructure (i.e., roads) and improved mutual aid agreements with the provide and public sector.

21. The Elsinore Valley Municipal Water District stated in the *Elsinore Basin Groundwater Management Plan* prepared in January 2005 that it has sufficient water supplies through year 2015, at a minimum.
22. Comment noted. On page 4-25, the ND states that the community of Wildomar voted on August 29, 2006 to create a Landscape Maintenance District that would pay for the costs of maintaining Marna O'Brien Park, Windsong Park, and Heritage Park.

We appreciate your comments and recommendations. Please feel free to contact me at (951) 369-0631 should you have any questions or require any additional information.

Sincerely,

George J. Spiliotis  
Executive Officer

May 1, 2007

Mr. Jeremy Krout  
RGP Planning & Development Services  
8921 Research Drive  
Irvine, CA 92618

Re: Comments on the Negative Declaration for the Incorporation of Wildomar in Relationship to Canyon Hills Estates (CHE)

Dear Mr. Krout:

Thank you for your recommendations concerning the aforementioned project. Our responses to your recommendations are as follows:

1. Comment noted. The action of the Commission placing the CHE property within the City of Lake Elsinore's SOI did not change the proposed incorporation boundaries. Regardless, there is no significant difference in impacts of the incorporation with or without the CHE site.
2. Comment noted. The actions of the City did not change the proposed incorporation boundaries. Regardless, there is no significant difference in impacts of the incorporation with or without the CHE site.
3. Comment noted, see response#1 and #2. LAFCO recognizes the landowner has made application to annex the property to the City of Lake Elsinore. Annexation has not yet been acted on by LAFCO.
4. BonTerra Consulting performed the IS/ND analysis for the proposed Incorporation of Wildomar. This analysis was based on the information provided to them at the time. BonTerra Consulting has performed some environmental analysis for the CHE project as a subconsultant. Future work on that project would be subject to mutual agreement between the parties. LAFCO has seen absolutely no indication that there has been anything other than a fair and professional analysis conducted, as you state you have hoped.

Sincerely,

George J. Spiliotis  
Executive Officer

May 1, 2007

Mr. Scott Dawson, Sr. Environmental Scientist  
California Department of Fish and Game  
Inland Deserts Region, Habitat Conservation Planning  
3602 Inland Empire Boulevard, C -220  
Ontario, California 91764

RE: Draft Negative Declaration – Wildomar Incorporation Project,  
SCH #2007031036

Dear Mr. Dawson:

Thank you very much for your letter concerning the above-referenced project.

If the incorporation is approved, we are confident the Department would work with the newly formed City to effect a smooth transition and achieve compliance with the provisions of the MSHCP.

Sincerely,

George J. Spiliotis  
Executive Officer

May 1, 2007

Ms. Teresa Tung, Sr. Civil Engineer  
Riverside County Flood Control and Water Conservation District  
1995 Market Street  
Riverside, CA 92501

RE: Notice of Intent to Adopt a Negative Declaration for the Incorporation  
of Wildomar

Dear Ms. Tung:

Thank you for your recommendations concerning the aforementioned project. Our responses to your recommendations are as follows:

1. The newly incorporated City, should the project be approved, would be encouraged to adopt all applicable District Master Drainage Plans which encompass or would be encompassed by the proposed incorporation.
2. Comment noted. Should the project be approved, the City would be encouraged to perpetuate the fee area over the applicable portions of this proposal and cooperate with the District in the implementation of Area Drainage Plan facilities.
3. Future studies conducted by the City, should the project be approved, would address potential impacts to existing Drainage facilities.
4. Comment noted. Should the project be approved, the City would observe all Federal Emergency Management Agency (FEMA) regulations should future development lie with a federally mapped flood plain.
5. Comment noted. The level of services (i.e., studies, maintenance, review) provided by the District would not be greatly impacted by the proposed incorporation.
6. The newly incorporated City, should the project be approved, would be in compliance with the National Pollutant Discharge Elimination System (NPDES) regulations set forth in the Santa Ana Regional Water Quality Control Board's Municipal Separate Storm Sewer System Permit Number CAS618033 and Board Order Number RB-2002-0011.

We appreciate your comments and recommendations. Please feel free to contact me at (951) 369-0631 should you have any questions or require any additional information.

Sincerely,

George J. Spiliotis  
Executive Officer