



## Lake Street Storage Project

### Appendix C3

Western Riverside County MSHCP Joint Project Review, U.S. Fish and  
Wildlife Service & California Department of Fish and Wildlife, April 23,  
2019



U.S. Fish and Wildlife Service  
Palm Springs Fish and Wildlife Office  
777 East Tahquitz Canyon Way, Suite 208  
Palm Springs, California 92262  
760-322-2070  
FAX 760-322-4648



California Department of Fish and Wildlife  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, California 91764  
909-484-0167  
FAX 909-481-2945

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In Reply Refer To:  
FWS/CDFW-WRIV-19B0138-19CPA0161

April 23, 2019  
*Sent by email*

Richard J. MacHott, Planning Manager  
Community Development Department-Planning Division  
City of Lake Elsinore  
130 South Main Street  
Lake Elsinore, California 92530

Subject: Western Riverside County MSHCP Joint Project Review 18-08-29-01, Lake Street Storage Project (LEAP 2018-2), City of Lake Elsinore

Dear Mr. MacHott:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (CDFW), hereafter referred to jointly as the Wildlife Agencies, have reviewed Joint Project Review (JPR) 18-08-29-01 for the City of Lake Elsinore's (City) Lake Street Storage Project/LEAP 2018-2 (Project), which we received on April 9, 2019. The JPR was prepared to evaluate the Project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Wildlife Agencies are providing the following comments as they relate to the Project's consistency with MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface).

*Project Description*

The 14.44-acre Project site is located east of Lake Street and south of Interstate 15 in the City of Lake Elsinore and proposes the construction of a gas station with a mini-market, indoor RV/boat storage, self-storage areas, and associated infrastructure. The conceptual site plan submitted with the JPR identifies that the gas station and mini-market will occupy the northwest portion of the property, the indoor storage facility the center, and the self-storage facility the eastern portion of the property. The conceptual site plan identifies also "future development" in the southwest portion of the project site. Temescal Creek lies immediately south of the project site and flows along the entirety of the approximate 1,800-foot southern project site boundary. There are mitigation and conservation areas east and south of the project site along Temescal Creek.

The Project is located in a Criteria Area Species Survey Area (CASSA) for Parish's brittle scale, Davidson's salt scale, thread-leaved brodiaea, round-leaved filaree, smooth tarplant, Coulter's goldfields, and little mouse tail. A habitat assessment was completed on November 3, 2017. Because of intense disturbance of the project site (active mining, involving removal of topsoil) and presence of coarse-grained soils, the project site was deemed unsuitable to support CASSA plant species.

*Conditions of Approval*

The Wildlife Agencies have reviewed the JPR and agree with the RCA's finding that the project is subject to Section 6.1.4 of the MSHCP, i.e., Guidelines Pertaining to the Urban/Wildlands Interface. The project site is adjacent to mitigation/conservation lands, and riparian habitat suitable for riparian bird species, including least Bell's vireo, yellow warbler, and yellow-breasted chat: the southern boundary of the project site is immediately adjacent to Temescal Creek, and the entire eastern boundary is adjacent to riparian habitat dominated mitigation lands. In addition, Temescal Creek is a movement corridor for wildlife. Given the adjacency of these sensitive conservation areas, the Wildlife Agencies are concerned about potential edge effects related to proposed project, particularly as the ultimate site plan is currently unknown (the site plan provided with the JPR is conceptual, and unidentified "future development" is depicted in the southwest corner of the project site).

The revised fence and wall plan (Figure D-1, Habitat Assessment and MSHCP Consistency Analysis, completed by SOAR Environmental Consulting, dated March 25, 2019) identifies that walls and fencing will be installed along the southern and eastern boundary of the project site, and that the fencing will be comprised of three different sections: chain link, tubular steel security, and masonry wall. Upon review of the JPR the RCA recommended that the City condition the project to construct a physical barrier (e.g., a solid masonry wall) along the southern and eastern project boundary to attenuate potential noise and light impacts to adjacent conservation/mitigation/riparian habitat lands. The RCA did not recommend a specific wall height, nor did they provide recommendations on wall composition. The RCA did however recommend that the City "condition the project to conduct a noise study, confirming the type and dimensions of the barrier needed to ensure project-generated noise levels reaching adjacent conservation lands do not exceed residential noise standards" (page 5, RCA Joint Project Review). For lighting, the RCA stated "The City will condition the project to perform the necessary lighting study to confirm the proposed project does not increase existing ambient lighting reaching the conservation lands."

The Wildlife Agencies agree with the RCA that the dimensions and design of the physical barrier should be driven by data. To assist the City with conditioning the project to meet these objectives, the Wildlife Agencies are available to assist in the design and review of proposed noise and light studies, and in the selection of the measures reduce edge effects. Project measures to address noise and light impacts could include pulling the project back from the creek, building a solid barrier (such as a brick wall), and creating a natural barrier with vegetation along the edge of the project adjacent to the creek. We recommend modifying the project by pulling it back from the edge of the riparian area, creating an earthen berm, and planting with native vegetation to create a barrier that will assist with noise and light attenuation.

Throughout southern California riparian areas have been particularly hard hit by transient encampments. Gas stations, mini-markets, and other business with high traffic, food, and facilities can concentrate unmanaged human use in adjacent natural areas with shade and cover. The project should be designed to ensure that secure, controlled access can be maintained between the adjacent conservation areas and the project site. This may require placing barriers

along the roads leading into and out of the project site.

The use of poison baits to control rodents has injured and killed hundreds or thousands of wild animals and pets. Predatory and scavenging birds and mammals like owls, hawks, raccoons, bobcats, mountain lions, foxes, skunks and coyotes that eat dead or dying rodents that have consumed these baits will also be poisoned. Pets will also eat dead or dying rodents and unprotected bait. In addition, unsecured waste containers (e.g. trash cans) increase urban predators (raccoons, opossums, coyotes) due to greater availability of scavenged food sources. The use of secure waste containers and other efforts will help minimize food availability to urban predators and rodents. The Wildlife Agencies recommend that the project be conditioned to use mechanical means (traps) to control rodents if needed, and incorporate measures such as exclusion and sanitation to control rodents and avoid attracting urban predators.

*Summary*

The Wildlife Agencies are concerned that the placement of the proposed project immediately adjacent to Temescal Creek will pose significant issues to the wildlife movement, habitat use and habitat quality from increased noise, lighting, human use and use of rodenticides without appropriate urban/wildlife interface measures to address these concerns. Prior to project approval, we would like to review a copy of the project conditions required by the City to address these issues. The Wildlife Agencies request a meeting to discuss project measures to address the Urban/Wildlife interface. We are available for a meeting with the City and Project applicant.

We appreciate the opportunity to provide comments on this JPR, and look forward to continuing work with you and the Applicant on this Project. If you have any questions or comments regarding this letter, please contact James Thiede of the Service at [james\\_thiede@fws.gov](mailto:james_thiede@fws.gov) or Carly Beck of the Department at [carly.beck@wildlife.ca.gov](mailto:carly.beck@wildlife.ca.gov) or by telephone at 909-945-3294.

Sincerely,

**KARIN  
CLEARY-ROSE**  
for  
Kennon A. Corey  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

Digitally signed by  
KARIN CLEARY-ROSE  
Date: 2019.04.23  
17:46:41 -07'00'



Leslie MacNair  
Regional Manager  
California Department of Fish and Wildlife

cc:  
Charles Landry, Regional Conservation Authority