



INLAND EMPIRE WATERKEEPER®

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July 21, 2015

City of Jurupa Valley Planning Department
ATTN: Thomas Merrell, Planning Director
8930 Limonite Avenue, Jurupa Valley, CA 92509
Sent via email: tmerrell@jurupavalley.org

Re: Paradise Knolls Specific Plan, Draft Environmental Impact Report, State Clearinghouse No. 2014051049

Dear Mr. Thomas Merrell,

Inland Empire Waterkeeper (Waterkeeper) is a non-profit environmental organization dedicated to advocacy, education, restoration and enforcement in the Santa Ana River Watershed. Waterkeepers' members use and enjoy the unique waterways of the Inland Empire and rely on our region's surface and groundwater on an everyday basis. We write on behalf of our collective membership to express our concerns with the Draft Environmental Impact Report (DEIR) for Paradise Knolls.

1.) There Should Be No Increases in Storm Water Discharges or Pollution

The golf course that currently occupies the project site is almost fully covered in pervious soil. The DEIR proposes to change the project site to 65% impervious surfaces. Since storm water will no longer be able to freely soak into as much pervious soil, this will result in more storm water leaving the project site than currently does. In addition, the residential units and streets will add more pollution to this storm water than currently exists. For these reasons, Paradise Knolls' infiltration basins need to be able to make sure that this new, more polluted storm water does not leave the facility. The DEIR mentions infiltration basins, but does not provide much more in the way of details. Paradise Knolls' infiltration basins should be able to stop this new storm water from leaving the facility, and should not add any additional storm water or pollution to the Santa Ana River and Hidden Valley Wildlife Area.

2.) There Should be an Impact Assessment and Plan to Protect the Hidden Valley Wildlife Area

Paradise Knolls' DEIR should include a specific Impact Assessment for impacts to the Hidden Valley Wildlife Area. The DEIR should also include a plan for how to prevent or mitigate any impacts and damage to the adjacent Hidden Valley Wildlife Area caused by increased storm water and pollution flows from Paradise Knolls. No matter how effective the BMPs used by Paradise Knolls, some increase in pollution and storm water discharge to the Hidden Valley Wildlife Area is inevitable. A complete plan of Paradise Knolls' Best Management Practices (BMPs) should also be specifically designed to protect the Hidden Valley Wildlife Area. This BMP plan should be included in the DEIR.

3.) The Equestrian Community Should Not Contribute to TMDLs

Santa Ana River Reach 3 has a Total Maximum Daily Load (TMDL) for pathogens. This would be affected by the proposed equestrian community at Paradise Knolls. Horse manure would cause or contribute to the pathogen TMDL for Santa Ana River Reach 3. The EIR should have a plan to make sure that pathogens from horse manure do not leave the project site and contribute to the TMDL.

4.) The Location of the Site Needs to Take Climate Change Into Account

The DEIR proposes to build 650 residential units right up to the edge of a FEMA floodplain. In some areas of the project site, particularly the northwestern area, the floodplain actually extends into the area where residential units are proposed. Climate change will cause more extreme storm events. This may result in an expansion of the floodplain, which would put the proposed residential areas at risk of flooding. Flooding of the residential areas would cause debris flows and urban runoff to enter the Hidden Valley Wildlife Area and the Santa Ana River. Therefore, in the interest of preserving water quality and protecting residents and their property, the DEIR must take floods caused by climate change into account.

Regards,

Megan Brousseau

Program Director
Inland Empire Waterkeeper