

Appendix A

Notice of Preparation, Initial Study & Environmental Checklist,

prepared for

County of Riverside

by

Terra Nova Planning & Research Inc., Inc., May 23, 2023

NOP Comment Letters, Tribal Consultation Comment Letters.



RIVERSIDE COUNTY PLANNING DEPARTMENT

John Hildebrand, Director

Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: May 26, 2023

TO: Responsible/Trustee Agencies

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") for the Thermal Ranch Specific Plan and related applications. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Thermal Ranch Specific Plan No. SP00401, GPA2300001; CZ2300003; TTM No. 38578, TTM No. 38531; and Plot Plan No.s 230035 & 230038

PROJECT LOCATION: Section 5, Township 7 South, Range 8 East, SBB&M. It is located 3.7± miles west of State Highway 111 and State Highway 86 Expressway.

PROJECT DESCRIPTION: Specific Plan, inclusive of two accompanying subdivision maps, two plot plans and a General Plan Amendment and Change of Zone on 619.1±-acres currently in agriculture. Comprised of a 223.1±-acre equestrian center, a mix of residential neighborhoods, workforce housing, estate lots, single-family attached and detached homes, and condominiums, providing up to 1,362 dwelling units ranging in densities from 0.60 to 27.3 units per acre. Would include 275,000± gross leasable square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space; and up to 150,000 square feet of retail space, and a 150-room hotel. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

- 1 Adoption by resolution of a General Plan Amendment (GPA2300001)
- 2 Adoption by ordinance of a Change of Zone (CZ2300003)
- 3 Adoption of Specific Plan No. SP00401
- 4 Approval of Tentative Tract Map No. 38578 and Tentative Tract Map 38531
- 5 Approval of Plot Plan No.s 230035 & 230038

LEAD AGENCY:

Riverside County Planning Department, 4080 Lemon Street, 12th Floor P.O. Box 1409 Riverside, CA 92502-1409, Attn: Russell Brady, Project Planner

PROJECT SPONSOR:

Applicant: Thermal Ranch LLC. Address: 19312 Canyon Drive, Villa Park, CA 92861

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

Riverside Office, 4080 Lemon Street, 12th Floor P.O. Box 1409, Riverside, California 92502-1409, Phone: (951) 955-3200 □ Fax: (951) 955-1811

Desert Office-77-588 El Duna Court, Suite H Palm Desert, California 92211 (760) 863-8277·Fax (760) 863-7555

“Planning Our Future... Preserving Our Past”

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

- Aesthetics
- Agricultural Resources
- Air Quality & GHGs
- Biological Resources
- Cultural/Tribal Resources
- Geology & Soils
- Hazards/Hazardous Materials
- Hydrology / Water Quality
- Land Use/Planning
- Mineral Resources
- Paleontological Resources
- Population/Housing
- Population/Housing
- Public Services
- Recreation
- Transportation
- Utilities/Service System
- Wildfire
- Mandatory Findings of Significance

PUBLIC REVIEW DOCUMENT: This Notice of Preparation can be downloaded using the following link: <https://planning.rctlma.org/> under CEQA Environmental Noticing.

PUBLIC COMMENT PERIOD: This 30-day public review period will commence at 8:00 a.m. on May 26, 2023, and end on June 27, 2023 at 5:00 p.m.

PUBLIC SCOPING MEETING: A virtual scoping meeting will be held at the June 19, 2023 Director’s Hearing at 1:30 p.m. via Zoom at the following link: (<https://planning.rctlma.org/Public-Hearings/Directors-Hearing/2023-Directors-Hearing-Meetings>) to provide an opportunity to learn more about this proposed development and provide comments on the possible environmental effects the County should study in the Environmental Impact Report. Written comments on the NOP must be received at the County within the public review period at the following address: County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92501. In addition, you may email comments to the following address: rbrady@rivco.org. Copies of the Notice of Preparation are also available for review at the above address and at the Mecca Public Library at 91-260 Ave 66, Mecca, CA 92254.

DATE & TIME OF SCOPING SESSION: June 19, 2023, 1:30 p.m. or as soon as possible thereafter. Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Project Planner Russell Brady at (951) 955-3025 or email at rbrady@rivco.org, or go to the County Planning Department’s Planning Commission agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

Please send all written correspondence to:
RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Russell Brady, Project Planner
P.O. Box 1409
Riverside, CA 92502-1409



COUNTY OF RIVERSIDE
4080 Lemon Street 12th Floor
Riverside, CA 92501
Phone: (760) 863-8277

**NOTICE OF PREPARATION
OF AN
ENVIRONMENTAL IMPACT REPORT
THERMAL RANCH SPECIFIC PLAN**

Lead Agency: County of Riverside Planning Department
4080 Lemon Street, 12th Floor
Riverside, California 92501
Phone: (951) 955-3025

Contact Person: Russell Brady, Senior Planner

Project Title: Thermal Ranch Specific Plan et al

County Project No.: Thermal Ranch Specific Plan Case No. SP00401, General Plan Amendment No. GPA 2300001, Change of Zone No. CZ 2300003, Tentative Tract Map No. 38578, Tentative Tract Map No. 38531; Plot Plan Nos. 230035 & 230038; Environmental Impact Report Case No.: Not yet assigned.

Project Location: The subject Thermal Ranch Specific Plan property is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County. The subject property encompasses 619.1± acres. It is bounded on the north by Avenue 62, on the south by Avenue 64, on the west by Harrison Street and on the east by Tyler Street. It is located 3.7± miles west of State Highway 86 Expressway and 2 miles west of the CVWD Water Reclamation Plant No. 4 (WRP # 4). The site is also approximately 1.25 miles south of the closest runway of the Jackie Cochran Regional Airport and approximately 2.5 miles west of the Coachella Valley Stormwater Channel (also see attached CEQA Initial Study and Exhibit 3).

Findings/Determination: The County has prepared an Initial Study for the proposed Thermal Ranch Specific Plan (SP00401) and related applications (TTM No. 38578 and TTM No. 38531, two plot plan applications, General Plan Amendment and Change of Zone) and has determined that potentially significant impacts could result from the proposed Project. Therefore, an Environmental Impact Report (EIR) should be prepared to analyze the environmental effects. The County has prepared the attached Initial Study and this Notice of Preparation.

NOP Comment Period: This 30-day public review period will commence at 8:00 a.m. on May 26, 2023 and end on June 27, 2023 at 5:00 p.m. A virtual scoping meeting will be held on June 19, 2023 Director's Hearing at 1:30 p.m. via Zoom at the following link (<https://planning.rctlma.org/Public-Hearings/Directors-Hearing/2023-Directors-Hearing-Meetings>) to provide an opportunity to learn more about this proposed development and provide comments on the possible environmental effects the County should study in the Environmental Impact Report.

Written comments on the NOP must be received at the County within the public review period at the following address: County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92501. In addition, you may email comments to the following address: [rbrady@rivco.org]. Copies of the Notice of Preparation are also available for review at the above address and at the Mecca Public Library at 91-260 Ave 66, Mecca, CA 92254.

A. Introduction

The proposed Thermal Ranch Specific Plan Project is planned on rural agricultural lands that are in an area that is transitioning from agriculture and other rural uses to urban uses, including resort-oriented residential, equestrian estates and mixed-use development. The entire subject Project property is currently in agricultural use inclusive of several ag-related haybarns, packing sheds, shop, and other structures, irrigation water well and other irrigation-related infrastructure, and an agricultural drain along the property's south boundary within or adjacent to the Avenue 64 alignment. There are no undisturbed areas within the boundaries of the subject property.

B. Project Description

The Thermal Ranch Specific Plan Project includes accompanying Tentative Tract Map Nos. 38531 and 38578, two plot plan applications, and a General Plan Amendment (GPA) and Change of Zone (CZ) (Project). This equestrian-oriented development Project is proposed on 619.1-acres and will be comprised of a mix of uses including and centered around a 223.1-acre equestrian center and related show facilities, including barns, stabling and related equestrian services. Water, sewer and electric power will be extended to serve the proposed Project. The equestrian center will require approximately 300 staff and may have up to 8,100 visitors comprised of riders, trainers, stable hands and visitors on peak event days.

Other components of the Thermal Ranch Specific Plan include a mix of residential neighborhoods ranging from seasonal horse park workforce housing (comprised of modular housing and RV parking accommodations), to large single-family estate lots including some suitable for keeping horses. Other residential product planned includes single-family attached and detached homes and resort condominiums. At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.60 to 27.3 units per acre, and up to 320 RV spaces. During the off-season of April through September, planned workforce housing (modulars and RV spaces) may be made available to accommodate local farmworkers.

Additionally, TTM No. 38531, TTM No. 38578, and two Plot Plan applications have been filed and are addressed in this CEQA analysis. The TTM No. 38531 will subdivide the property into nine large parcels and TTM No. 38578 will further subdivide PA-2 (Estate Residential) into 132 individual residential estate lots and PA-3 into 390 single-family detached lots and single-family attached lots with mass grading of the entire site. The two plot plans will allow development to commence in PA-1 (Equestrian Center) and PA-4 (Horse Park Workforce Housing) following approval of the Specific Plan and these related applications.

Proposed commercial areas in PA-5 and PA-6 would provide up to 200,000± leasable square feet of retail, other commercial, entertainment and food & beverage space and related amenities. PA-1 will include 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space. PA-5 could accommodate a 54.4±-acre mixed-use resort with a 150± key resort hotel and ancillary retail and recreational amenities, as well as up to 340 resort condominium units that may also be available for the hotel pool. The Project provides for five well sites to be owned and operated by Coachella Valley Water District (CVWD) and to be located in the northern, eastern and southern portions of the Project site, as well as a potential electrical substation site in the southeastern corner of the property. Each of the major Specific Plan components is described in the attached CEQA Initial Study.

C. Environmental Setting and Surrounding Land Uses

The subject property is located within the boundaries of the East Coachella Valley Area Plan (ECVAP) and is currently designated “*Agriculture*”, but is located in an area of the eastern Coachella Valley that has been undergoing community-wide planning and urbanization. The property is also located immediately north of lands of the Torres-Martinez Desert Cahuilla Indians. Lands to the immediate north, east and northeast include Kohl Ranch and the Thermal Club developments. The subject property is located immediately east of the Vista Santa Rosa Community.

The ECVAP states that the “*The Land Use Plan focuses on preserving the unique features in the Eastern Coachella Valley area and, at the same time, guides the accommodation of future growth. To accomplish this, more detailed land use designations are applied than for the countywide General Plan.*” The subject property lies both adjacent to and in proximity of such transitional land uses. Also relevant are issues of environmental justice, including reducing unique or compounded health risks in disadvantaged communities, promoting civic engagement in the public decision-making process, and prioritizing improvements and programs that address the needs of disadvantaged communities. The proposed Specific Plan will address land use and overall General Plan consistency, which will be further addressed in the Draft EIR.

D. Areas of Potential Environmental Concern

Introduction

The attached Initial Study has been prepared for the proposed Specific Plan and associated applications in accordance with the California Environmental Quality Act (CEQA). Implementation of the proposed Specific Plan may have impacts to important environmental resources and may be affected by potential environmental hazards. These areas of potential environmental concern have been identified and are briefly described below and in greater detail in the attached Initial Study. A more in-depth analysis of each of these areas of concern will be provided in the EIR being prepared for the proposed Specific Plan.

Aesthetic and Scenic Resources

The Coachella Valley area is characterized by the low-lying desert valley floor surrounded by the steep, high elevation terrain of the Santa Rosa, San Jacinto, San Bernardino and Little San Bernardino Mountains. Views of the mountain ranges and the expanses of desert floor and local agriculture are visible from within the project planning area and are highly valued. The Specific Plan proposes urban land uses with buildings up to 60 feet in height, which could impact scenic views in some locations. Future development could have a potentially significant impact on these resources; light and glare levels will be considered in project design and analyzed in the EIR.

Agricultural Resources

The subject property is located in the agricultural region of the eastern Coachella Valley in central Riverside County. Agriculture is an industry of major economic importance to the valley, county and state. All but the southwest corner of the subject property is designated as Prime Farmland, the balance being designated as Farmland of State-wide Importance. Other lands surrounding the site also include Prime Farmland, Farmland of State-wide Importance, Unique Farmland and Farmland of Local Significance. The subject and surrounding agricultural lands are also served by imported Colorado River water provided by the Coachella Branch of the All-American Canal and associated facilities and irrigation distribution system operated by the US Bureau of Reclamation and CVWD. The Project’s impacts to agricultural resources will be further analyzed in the EIR.

Air Quality and Greenhouse Gas/Climate Change/Energy

In general, air quality in the Coachella Valley area is good, particularly in comparison to other localities in Southern California. However, on-going agricultural activities and continued regional urbanization in the past few decades has contributed to the degradation of the air quality due to population growth, increased traffic, construction activities and various other site disturbances. Pollutant levels are monitored daily in Indio, Mecca and at the Palm Springs International Airport.

Ozone and PM₁₀ are the two pollutants of greatest concern in the Coachella Valley. Under the federal Clean Air Act, the planning area and vicinity are located within Federal "Non-attainment" areas for suspended particulates and ozone. Suspended particulates, including PM₁₀ (particulate matter measuring smaller than 10 microns in diameter) and PM_{2.5} (measuring smaller than 2.5 microns in diameter), and ozone present the major threat to local air quality and are the primary pollutants of concern in the Coachella Valley. The Coachella Valley is currently designated attainment/unclassifiable for PM_{2.5}. Carbon monoxide, nitrogen dioxides, and sulfur dioxide are designated as attainment within the Coachella Valley. The planning area is located within a region identified as susceptible to wind erosion in the Riverside County General Plan, conditions which can contribute to elevated PM₁₀ and PM_{2.5} levels.

Air quality emissions also generate pollutants known as greenhouse gases (GHG) that contribute to climate change and global warming. While increasing energy demand, the Thermal Ranch Specific Plan could result in more energy efficient buildings and HVAC systems, and promote renewable, non-polluting energy systems in the form of solar photovoltaic and thermal. Air quality constraints and potential adverse (and beneficial) impacts of Plan implementation on air quality, including those associated with GHGs, will be further assessed in the EIR.

Biological Resources

The County is a permittee under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), and the proposed Specific Plan area is located within 2.25 miles of lands designated as Conservation Areas established by the CVMSHCP. The planning area includes extensive agriculture, equestrian and other rural uses, and undeveloped desert lands that may harbor bird species protected under the Migratory Bird Treaty Act (MBTA). To some extent, potential impacts of future development facilitated by the Specific Plan to covered species and plant communities would be mitigated through payment of development impact fees.

The project vicinity includes Tribal and allottee lands under the jurisdiction of the Torres Martinez Desert Cahuilla Indians, including lands to the immediate south and to the southwest. The forthcoming EIR will determine whether and to what extent buildout of the Specific Plan will conflict with the CVMSHCP, and further evaluate the potential for development facilitated by the Specific Plan to adversely affect sensitive biological resources.

Cultural, Tribal and Historic Resources

The subject property is vacant and has been in active cultivation for several decades. Surrounding lands include extensive agriculture, both active and fallow, as well as heretofore undisturbed lands adjacent to and in proximity of the Project site that include stands of mesquite and associated habitat that may have served as an important food source for native Cahuilla peoples. Lands within the Reservation boundary of the Torres-Martinez Desert Cahuilla Indians are located immediately south, a short distance west and southeast of the subject property. In the Project vicinity, numerous Native American cultural resources have been found and documented, including fish traps, pottery scatters, grinding rocks, trail segments, and rock cairn features. While the Project planning area does not provide perennial or even seasonal waters sources, native habitat may have provided valuable food and fiber resources.

The Project site encompasses 619.1± acres located on the valley floor between the Santa Rosa foothills and the Coachella Valley Stormwater Channel; the entire subject site is in active cultivation and has been for several decades. The site is occupied by five agricultural out-buildings, including hay sheds and an equipment/shop building dating from at least 1985. There is no evidence of building foundations or other structures that might imply earlier development or occupation during historic times. Surrounding lands have mostly been disturbed for agriculture and other uses for many years. The subject property does not appear to harbor nor is it located near important historic structures that could be affected directly or indirectly by the proposed Project. Nonetheless, a cultural (historic and archaeological) resources survey and report are being prepared on the proposed Project and its findings will be incorporated into the forthcoming EIR.

Geology/Soils

The planning area is located in the vicinity of the active faults of the San Andreas Fault Zone that extend through lands approximately six miles northeast of the site. The San Andreas Fault is capable of generating a moment magnitude 7.4 earthquake. The planning area would be exposed to strong ground shaking during a major quake on

nearby faults, with associated potential for ground failure and liquefaction during such events. The local soils are also highly susceptible to wind and water erosion. The forthcoming EIR will evaluate the geotechnical conditions in the planning area and potential significant impacts from buildout of the proposed Specific Plan.

Hazards and Hazardous Materials

The entire Project site is in active agriculture, which began on these lands in the 1950s, and includes several out-buildings and a shop. Surrounding existing land uses are largely agricultural with increasing urbanization to the north and east. Lands to the east also include the Thermal Landfill, a site identified on the Cortese List as a source of “metals, organochlorine pesticides and polynuclear aromatic hydrocarbons”. The landfill, which is approximately 2.5 miles northeast of the subject property, was closed in 1972. On July 27, 2016, DTSC approved the Removal Action Workplan and an agency-approved maintenance plan is in effect. There are no other hazardous material sites in proximity of the subject property. There are no large or small commercial enterprises, auto dealerships with related maintenance facilities, gasoline service stations, restaurants and other potential generators of hazardous materials in the Project vicinity. A Phase I site assessment will be conducted to further assess the potential for hazardous materials either on-site or in the Project vicinity and will be further analysed in the forthcoming EIR.

Hydrology and Flooding

The subject property is subject to local flooding primarily from the Santa Rosa Mountains to the west. The site is also located west of the Coachella Valley Stormwater Channel (CVSC) and one mile west of the 100-Year flood plain associated with this major drainage feature. The south half of the subject property is designated Zone X on the FEMA Flood Insurance Rate Maps with reference to a 2018 FEMA *Letter of Map Revision*. The Zone X designation indicates inundation threat of less than 1-foot in depth and partially associated with a reduced flood risk due to levee protection. The referenced levee is presumably the Dike No 4 protective levee to the west built by the US Bureau of Reclamation. The forthcoming EIR will evaluate the Project’s hydrology and water quality impacts.

The subject property is within the boundaries of the CVWD 2015 *Eastern Coachella Valley Stormwater Master Plan*. This plan shows an east-west “open channel” along Ave 64 (south Project boundary) designated as “N01” and extending from just east of Jackson Street east to its discharge into the CVSC. The N01 channel is also called out as the “*Avenue 64 Evacuation Channel*” with its future location to be along the north side of Ave 64. The master plan also identified open channel “N01-02 within or along Harrison Street (west Project boundary).

Land Use Compatibility

The Project site is currently designated “Agriculture” in the Foundation Element and the Eastern Coachella Valley Area Plan (ECVAP) of the General Plan. Surrounding lands are also designated Agriculture to the north and west, as well as Low Density Residential and planned development to the north and east. The site is located in an area of the eastern Coachella Valley that has been undergoing community-wide planning and urbanization. The property is also located immediately north of lands of the Torres-Martinez Desert Cahuilla. Lands to the immediate north, east and northeast include Kohl Ranch and the Thermal Cub developments. The Desert Mirage High School and Las Palmas Elementary School are located approximately one-half mile south of the subject property on Tyler Street. The subject property is located immediately east of the Vista Santa Rosa Community.

The applicant proposes a land use change in the Foundation Element designation to “Community Development” and also to apply a variety of ECVAP land use designations consistent with proposed underlying land uses. Consistency zoning is also proposed and a part of this Project, with proposed zoning designation that correspond to the proposed ECVAP and use designations. The ECVAP state that the “*The Land Use Plan focuses on preserving the unique features in the Eastern Coachella Valley area and, at the same time, guides the accommodation of future growth. To accomplish this, more detailed land use designations are applied than for the countywide General Plan.*” The subject property lies both adjacent to and in proximity of such transitional land uses. The proposed Specific Plan will address land use and overall General Plan consistency, which will be further addressed in the Draft EIR.

Airports

The site is located 1.25± miles southwest of the nearest runway of the County-owned and operated Jacqueline Cochran Regional Airport (JCRA; aka Thermal Airport), which consists of a long north-south runway and a shorter NW/SE runway, as well as a variety of hangers, offices and other buildings and facilities. Nearly the entire Project site is located within Land Use Compatibility Zone D for the airport (a small portion in the S/W corner is in Zone E). All of the proposed Project uses, densities/intensities are consistent with the Basic Compatibility Criteria in Table 2A of the Airport Land Use Compatibility Plan (ALUCP), except for single-family estate homes proposed in the north. The entire project site lies outside of the 60 dB CNEL contour for the ultimate buildout of the airport (See Exhibit JC-6 on p. E6-6 of the ALUCP). In fact, the entire project site lies outside of the 55 dB CNEL contour. As shown in Table 2B on page 2-23 of the ALUCP, residential uses are considered “clearly appropriate” outside of the 55 dB CNEL contour. Pursuant to consultation with ALUC staff, the Project proponent is preparing an ALUC application as well as a bird/airport impact analysis and management plan. The potential impacts of the Project in the JCRA will be further analyzed in the forthcoming EIR.

Noise

The proposed Project site is located 1.25± miles southwest of the nearest runway of the County-owned and operated Jacqueline Cochran Regional Airport. The entire project site lies outside of both the 60 dB CNEL and the 55 dB CNEL contour. As shown in Table 2B on page 2-23 of the ALUCP, residential uses are considered “clearly appropriate” outside of the 55 dB CNEL contour. As discussed above, the Project proponent is preparing an ALUC application as well as a bird/airport impact analysis and management plan. The potential impacts of the Project to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project will be further analyzed in the forthcoming EIR.

Paleontological Resources

The County General Plan maps large portions of the Coachella Valley, including the subject property, as having a high sensitivity for the occurrence of paleontological resources. In the project vicinity, these are largely associated with fossil bivalves from earlier stands of Ancient Lake Cahuilla, which reached an elevation of approximately 42 feet above mean sea level. Evidence of this high stand can be clearly seen along the edge of the Santa Rosa Mountains where a “bathtub” ring of calcium deposits can be seen. In addition to lacustrine sediments from the Coachella soil series and fluvial sediments from the Gilman soil series, several shell and shell fragments of freshwater mollusks have been observed in the project vicinity. Previous paleontological surveys conducted in the area have identified three species of freshwater mollusks, *Physa* sp., *Tryonia* sp., and *Gyraulus* sp., which are among the most common species of freshwater mollusks to be found in the lakebed sediments. While the lakebed sediments are often called the Quaternary Lake Cahuilla beds (Rogers 1965; Dibblee 1954:Plate 3; Scott 2010), no Pleistocene-age fossils localities have been reported from these lakebed sediments or their equivalent strata in the Coachella Valley. A paleontological study is being prepared and potential impacts to sensitive resources will be further analysed in the forthcoming EIR.

Population and Housing

Based upon a census tract review of changes in population in the Coachella Valley, the Project site and planning areas have shown zero or negative population growth between the period of 2000 and 2020. The Project vicinity includes the unincorporated communities of Thermal and Mecca located three and five miles northeast and east, respectively. These two communities had a combined population of approximately 7,100 and are more than 90% Hispanic/Latino (American Community Survey, 2015-2019). Between 2010 and 2020, the community saw a 4% drop in population. While there was strong development interest in the eastern Coachella Valley prior to 2008 (Great Recession), renewed interest and development has recently begun to expand in this area. A query of the US 2020 Census Data indicates that within a three-mile radius of the Project site there was a total permanent population of 7,492, of which 93% identified themselves as Hispanic or Latino.

Public Services

This NOP and associated Initial Study indicate that the proposed Project will have a less than significant impact on local service providers described below. Nonetheless, the forthcoming EIR will further analyse Project impacts on these services.

Fire Protection Services

Fire protection services are provided to the Project area and the surrounding communities by the Riverside County Fire Department under a contract with CalFire. Stations in the Project vicinity include Station 39 at 86911 58th Ave, Thermal and located three miles to the east with a response time of approximately five minutes.

Police Protection Services

The nearest Riverside County Sheriff's Station is located at 86625 Airport Boulevard in Thermal. The nearby City of La Quinta also contracts with the County Sheriff's Department and provides mutual aid across the County Sheriff's various clients in the Coachella Valley. The La Quinta station is located at 78-495 Calle Tampico, approximately 10 miles northwest of the subject property.

School Services

The subject property is located within the boundaries of the Coachella Valley Unified School District (CVUSD), which has its headquarters in Thermal. It serves a population that is approximately 80% Hispanic. The CVUSD has 14 elementary schools, 3 middle schools and 3 high schools, plus one continuation high school and one special school for teenage mothers. In the Project vicinity, the Desert Mirage High School and the Las Palmas Elementary School are located one-half mile south of the site at the northeast corner of Tyler Street and Avenue 66.

Library Services

The Mecca Library is located at 91620 Ave 66, Mecca, approximately 5.5 miles east of the Project site offers a full range of information services and assistance, Children's programs, Literacy tutoring, English as a Second Language classes, Internet access, Word processors, Large Print books, Audio books, DVDs and videos, Music CDs and cassettes, Newspapers and magazines, Live Online Homework Help, Tax forms, Copiers, and downloadable audio books. The Coachella Library, a branch of the Riverside County Library System, is located at 1500 Sixth Street, Coachella, approximately 5 miles north of the subject property and the La Quinta Library is located at 78-275 Calle Tampico, approximately 9 miles northwest of the subject property.

Health Services

Local and regional health service providers and facilities include the John F. Kennedy (JFK) Memorial Hospital in Indio, Eisenhower Medical Center (EMC) in Rancho Mirage, and Desert Regional Medical Center in Palm Springs. JFK is located nearest to the subject property, at 47-111 Monroe Street, approximately 8 miles north of the proposed Project site. This facility contains 158 beds, offers a variety of inpatient and outpatient services, and includes a 24-hour emergency room. JFK provides a full range of medical services, including surgical, cardiology, gastrointestinal, diagnostic imaging, and outpatient rehabilitation. The hospital also provides obstetrics and houses an orthopedic/bone/joint institute. The Indio Family Care Center is located on 47-923 Oasis Street. Services include primary care, family planning, prenatal care, childcare and nutrition. Although all emergency services are not offered at this clinic, walk-in patients are welcome and will be referred to an emergency facility as needed.

Mecca Health Clinic is located at 91275 Ave 66, Mecca, approximately 5.25 miles east of the subject property. Mecca Health Clinic is operated by Inncare, a private, non-profit organization providing an array of comprehensive primary care services to residents throughout Imperial and Riverside Counties. Inncare is a Federally Qualified Health Center and a Federal Public Health Service (PHS) employer. In 1970, Inncare became the first federally funded migrant health center in the United States. In addition to a health clinic, Inncare also provides dental clinics and Women/Infant/Children Nutrition (WIC) Education Centers.

Recreation

The subject property is located in a rural but urbanizing portion of eastern Coachella Valley. Local and regional park and open space and recreational resources include Lake Cahuilla Veterans County Park and the Santa Rosa and San Jacinto National Monument. Lake Cahuilla Veterans Regional Park encompasses 710-acres with expansive lawns and picturesque mountain views, situated at the base of the Santa Rosa Mountains 5 miles west of the subject property. The park is owned and operated by the Riverside County Regional Park and Open-Space District.

The subject property is located within the 1,800 square mile service area of the Desert Recreation District, which for more than 70 years has been providing residents and visitors recreational services in the Greater Coachella Valley. The District provides barrier-free, safe services to unincorporated areas of the Coachella Valley and municipalities. It is the largest park and recreation district in California, and manages, maintains and assists in maintaining over 30 parks and recreation facilities. Whether and to what extent the Project may adversely impact local or regional recreational resources will be further analysed in the forthcoming EIR.

Transportation

The subject property is located in a predominantly rural agricultural area but one that has been progressively transitioning to urban uses. The County General Plan Circulation Element update recognizes the ongoing changes in land use in this area and has planned a network of major and arterial roadways to address anticipated future demand. The subject property is bounded by planned major roadways of all four sides, including: Ave 62 on the north (Expressway: 128' to 220' RW); Ave 64 (Major (118' RW); Tyler Street on the east (Secondary: 100' RW); and Harrison Street on the west (Expressway: 128' to 220' RW). Of these four bounding streets, three are partially constructed and Ave 64 has not been graded or otherwise improved.

Surrounding elements of the roadway network include the Highway 86 Expressway and interchange at its intersection with Ave 62, and the bridging of the Coachella Valley Stormwater Channel at Ave 62 and at Airport Boulevard (Ave 56) four miles to the north. Harrison Street provides major north-south circulation north to the City of Coachella and south to its intersection with the Highway 86 Expressway south of the County Line in Imperial County.

Traffic data collected for the 2015 County General Plan Update and from the Caltrans annual census indicates that traffic volumes on major roadways in the Project vicinity are low. Only two major roadways (Harrison Street and the Highway 86 Expressway) have cited existing Caltrans traffic volumes. In the vicinity of the Project, Harrison Street two-way 2009 volumes averaged 12,000 vehicles per day (VPD). According to the 2017 traffic census conducted by the Coachella Valley Association of Governments (CVAG), the 2017 volumes on Harrison Street south of Airport Boulevard (Ave 56) were 7,568 VPD.

Ave 62 currently provides important east-west connectivity but volumes on this roadway east of Highway 111 are also low. The CVAG traffic census for Ave 62 east of Harrison Street indicates that 2006 volumes were 1,577 VPD, modestly increasing to 1,596 VPD in 2010 and reaching 2,626 VPD in 2017. Meanwhile, County traffic data indicates that volumes on Ave 62 east of Harrison Street were 1,124 VPD. The Highway 86 Expressway provides divided highway connectivity between the Coachella Valley and Imperial Valley to the south. At its intersection with State Highway 111 between Ave 62 and 64 the average traffic volumes were 15,300 VPD. A project-specific traffic impact analysis will be prepared and incorporated into the EIR to evaluate potentially significant transportation impacts, including vehicle miles traveled (VMT) and consistency with the County's General Plan standards for intersection and roadway levels of service.

EXHIBITS 1 THRU 10 FOLLOW



CALIFORNIA

**PACIFIC
OCEAN**

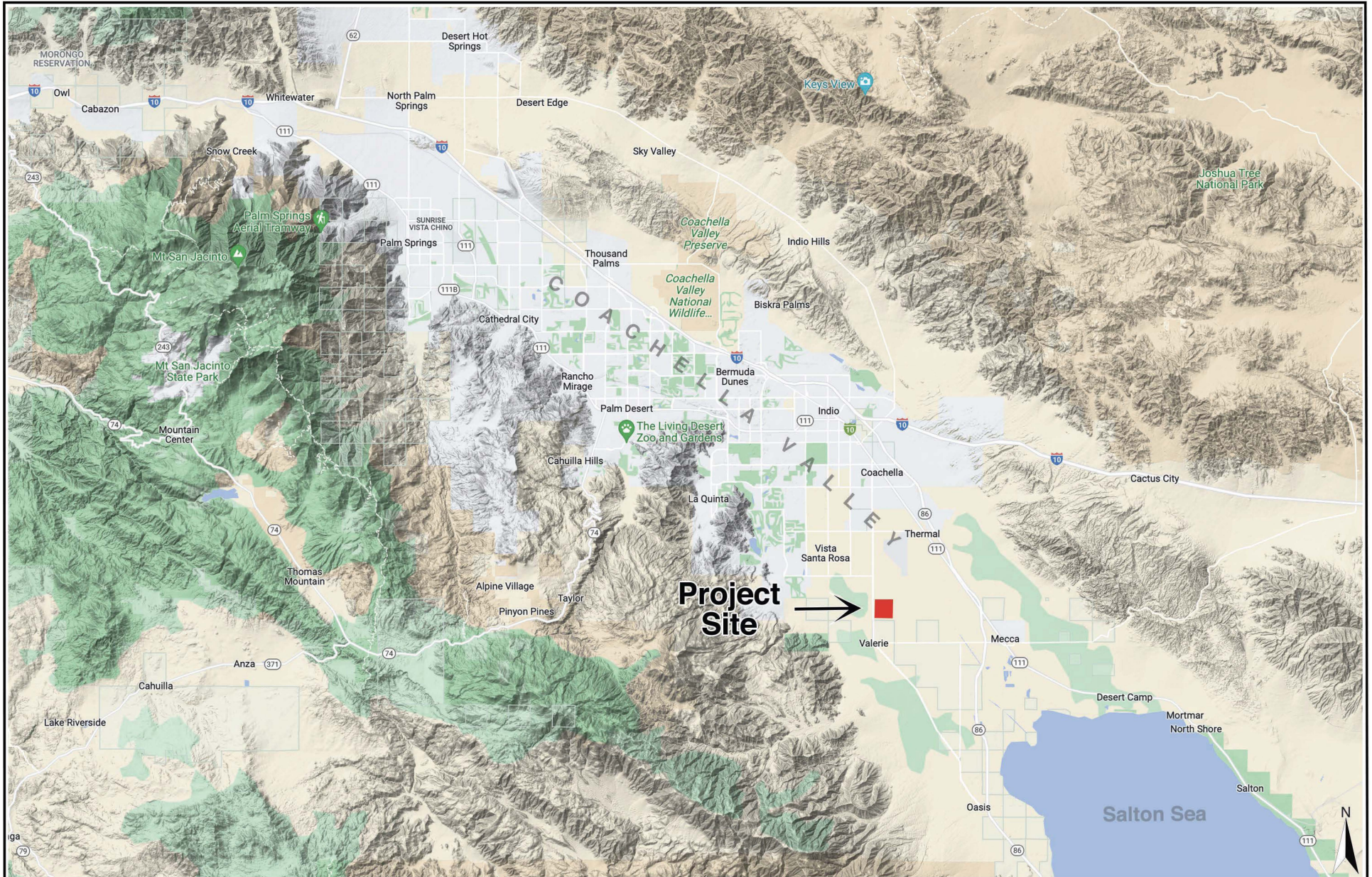
MEXICO



RIVERSIDE COUNTY



02.07.23



Source: Google Maps, 02.07.23

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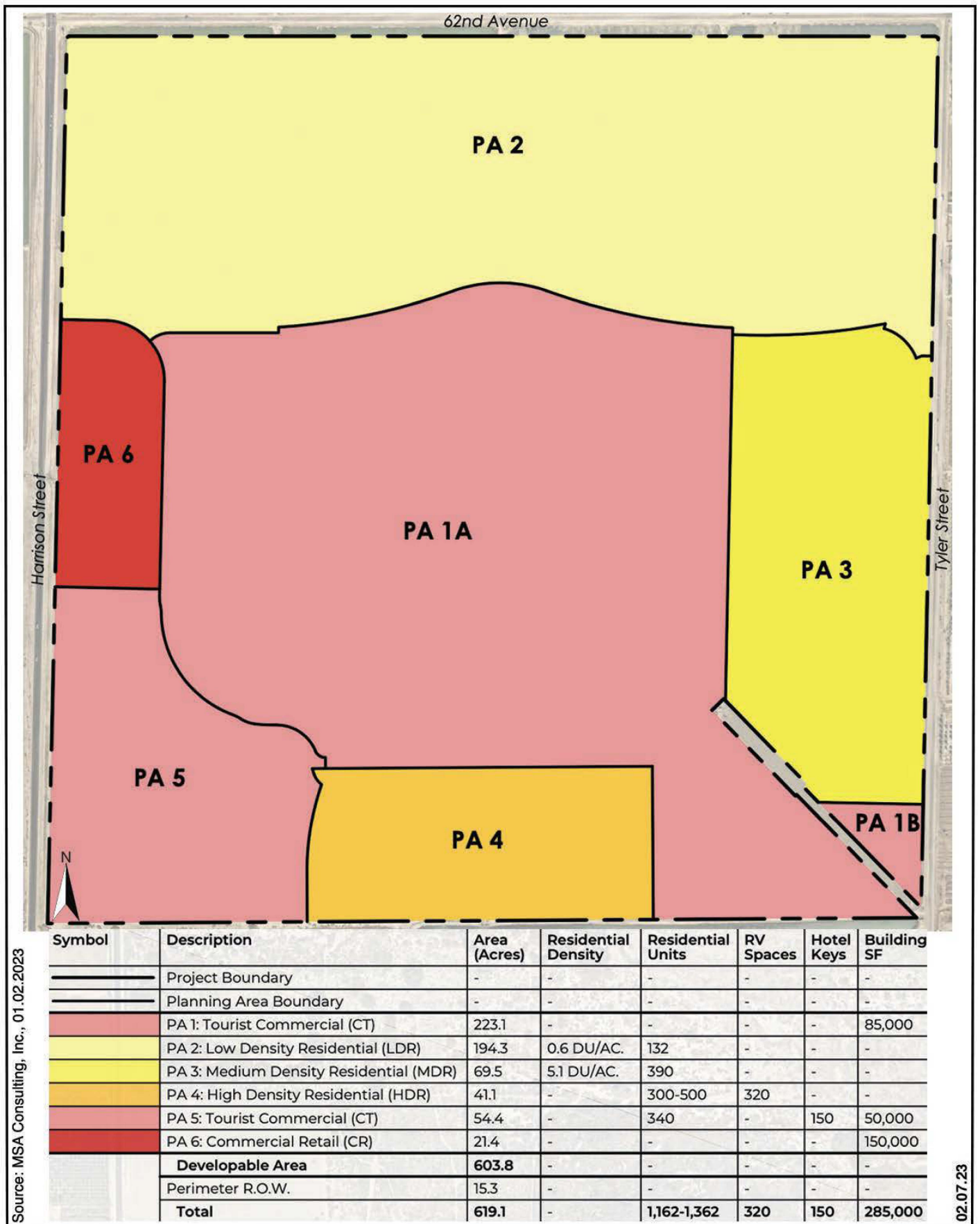
Source: Google Earth, 02.07.23

02.07.23



Source: Google Earth, 09.30.2022

02.07.23





Legend					
----- Project Boundary					
①	Horse Park	(A)	Grand Entry	(H)	Private Barns
②	Estate Lots	(B)	Gathering/Dining Commons	(I)	Pasture
③	Neighborhoods	(C)	Competition Rings	(J)	Grass Field
④	Horse Park Workforce Housing	(D)	Warmup/Jumper Rings	(K)	Back of House
⑤	Hotel/Resort	(E)	Common Barns	(L)	Office
⑥	Commercial	(F)	Parking	(M)	CVWD Well Site
		(G)	Staging Area	(N)	Potential Substation

Note: This exhibit illustrates one possible development scenario. Other site development concepts are allowed subject to the standards and guidelines of this Specific Plan.

Source: MSA Consulting, Inc., 02.09.2023



02.09.23



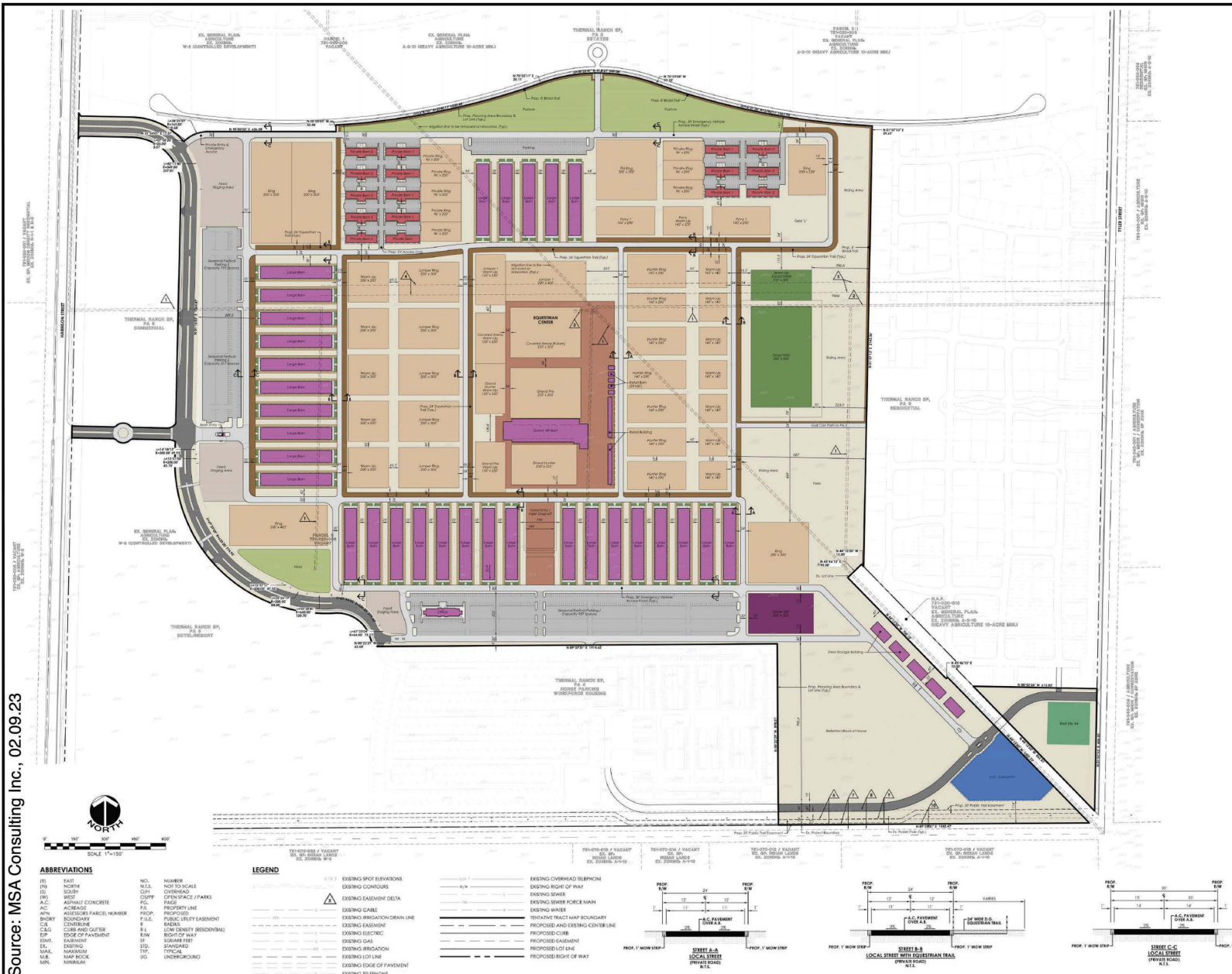
TERRA NOVA[®]
PLANNING & RESEARCH, INC.

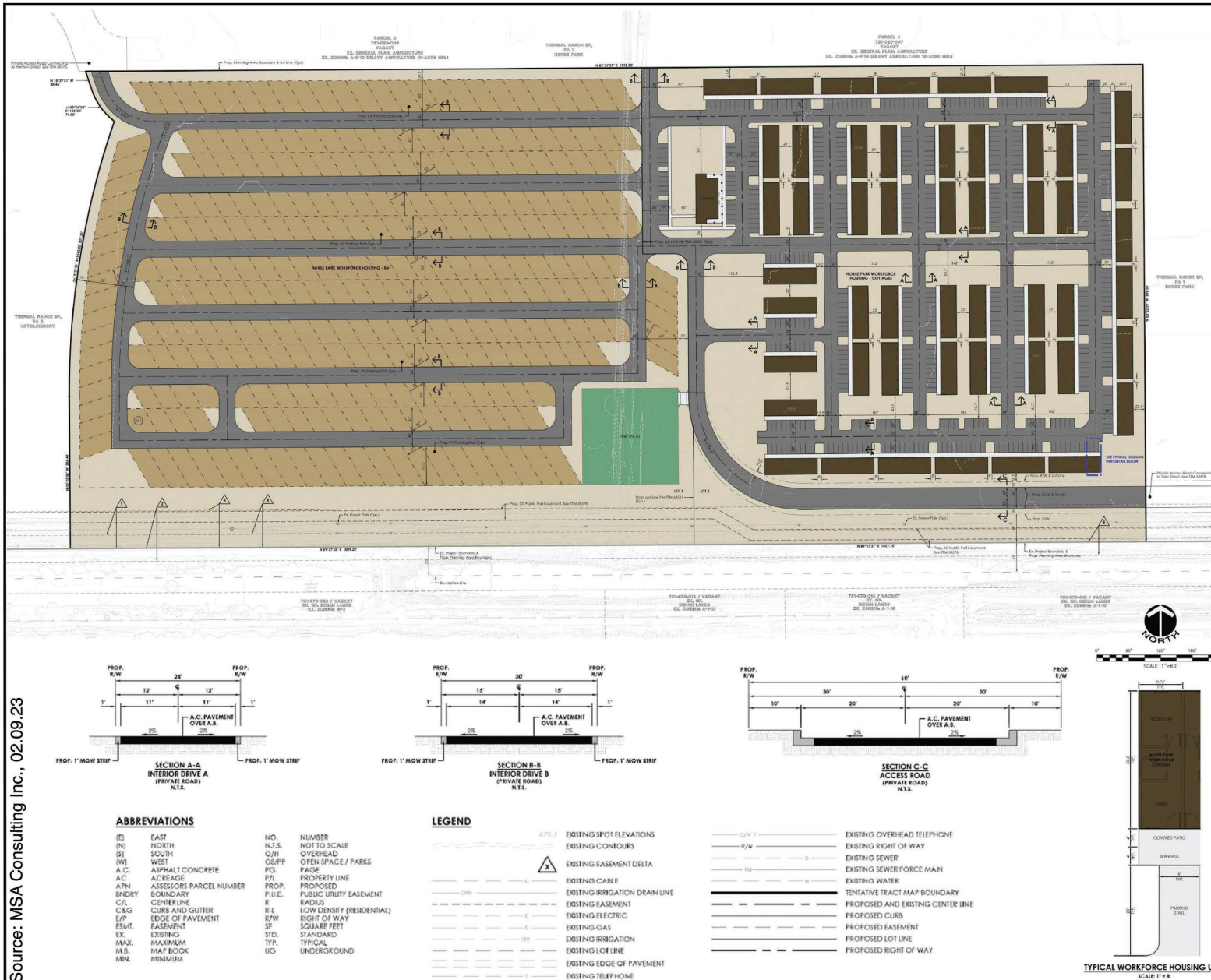
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7

**Thermal Ranch Specific Plan
EIR Notice of Preparation
Tentative Tract Map 38578
Thermal, California**







THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

PLOT PLAN PFXXXXXX

THERMAL RANCH SPECIFIC PLAN PA-4 (HORSE PARK WORKFORCE HOUSING)

EXHIBIT DATE: FEBRUARY 8, 2023

NO.	DATE	DESCRIPTION	AMENDMENTS

DATA TABLE

APPLICANT / OWNER:	THERMAL RANCH, LLC		
ADDRESS:	19312 CANYON DRIVE VELA PARK, CALIFORNIA 92581		
CONTACT:	JEREMY SMITH		
EXHIBIT PREPARED BY:	MSA CONSULTING, INC.		
ADDRESS:	3400 HIGH HOPE DRIVE RANCHO MIRAGE, CALIFORNIA 92270		
CONTACT:	PAUL DEPALATE, AICP	TELEPHONE:	(760) 320-9811
SOURCE OF TOPOGRAPHY:	AEROTECH MAPPING, INC.		
ADDRESS:	200 SPECTRUM CENTER DRIVE, SUITE 300 RYNE, CALIFORNIA 92518		
DATE OF TOPOGRAPHY:	DECEMBER 7, 2022	TELEPHONE:	(619) 609-9220
ASSESSOR'S PARCEL NUMBERS:	751-000-006 & -007		

LEGAL DESCRIPTION:
A PORTION OF SECTION 6, TOWNSHIP 7 SOUTH, RANGE 8 EAST, SAN BERNARDINO BASE AND MERIDIAN.

LAND USE DESCRIPTION:	UNIT	SF	ACREAGE	PERCENTAGE
PLANNING AREA 4 GROSS AREA	-	1,800,018 SF	41.3 AC.	-
PROPOSED WILLIE AS	-	32,160 SF	0.8 AC.	-
PROPOSED NET AREA	-	1,767,858 SF	40.5 AC.	100%
PROPOSED BUILDING AREA (LAUNCH BUILDING)	1 BUILDING	3,330 SF	0.1 AC.	1%
PROPOSED BUILDING AREA (WORKFORCE HOUSING - COTTAGES)	300 UNITS	155,000 SF	3.6 AC.	9%
STANDARD UNIT (450 UNITS)	-	135,000 SF	-	-
ACCESSIBLE UNIT (50 UNITS)	-	25,000 SF	-	-
PROPOSED RV STALL	-	548,988 SF	12.6 AC.	31%
ACCESS ROADS, HARDSCAPE & PARKING	-	531,724 SF	12.2 AC.	30%
LANDSCAPE & OPEN SPACE AREAS	-	338,016 SF	7.8 AC.	20%

ON-SITE PARKING DATA:

PROPOSED PARKING STALLS	COUNT
PROPOSED LAUNCH BUILDING PARKING STALLS	30 STALLS
PROPOSED WORKFORCE HOUSING PARKING STALLS	527 STALLS
TOTAL PARKING PROVIDED	557 STALLS

EXISTING EASEMENT NOTES:

- 25' FIRELINE EASEMENT, RECORDED 5/9/1987, IN BOOK 2085, PAGE 184-186, O.R. (PLOTTED HEREON)
- GRANT DEED TO C.V.W.D. AND 25' DRAINAGE CHANNEL, R.W., RECORDED 5/9/1987, IN BOOK 2085, PAGE 187-188, O.R. (PLOTTED HEREON)
- 15' POWER LINE EASEMENT, RECORDED 1/4/1989, AS INSTRUMENT NO. 1502, O.R. (PLOTTED HEREON)
- 25' FIRELINE EASEMENT, RECORDED 5/9/1987, IN BOOK 2085, PAGE 190-192, O.R. (PLOTTED HEREON)
- GRANT DEED TO C.V.W.D. AND 25' DRAINAGE CHANNEL, R.W., RECORDED 5/9/1987, IN BOOK 2085, PAGE 193-195, O.R. (PLOTTED HEREON)

EXISTING ZONING: CONTROLLED DEVELOPMENT (PD-2) / HEAVY AGRICULTURE (DANCE MIN. LOT (A-2-10))

PROPOSED ZONING: THERMAL RANCH SPECIFIC PLAN: PFA & RECREATION, VEHICLE PARKING / WORKFORCE HOUSING

EXISTING GENERAL PLAN LAND USE: AGRICULTURE

PROPOSED GENERAL PLAN LAND USE: COMMUNITY DEVELOPMENT FOUNDATION - HIGH DENSITY

PUBLIC UTILITY SURVEYORS:

ELECTRIC:	1. BAYVIEW IRRIGATION DISTRICT	(800) 303-7756
GAS:	SOUTHERN CALIFORNIA GAS COMPANY	(800) 427-2200
TELEPHONE:	FRONTIER COMMUNICATIONS	(800) 921-8101
WATER:	COACHELLA VALLEY WATER DISTRICT	(760) 395-2651
CABLE:	FRONTIER COMMUNICATIONS	(800) 921-8101
SEWER:	COACHELLA VALLEY WATER DISTRICT	(760) 395-2651
USA:	UNDERGROUND SERVICE ALERT	(800) 227-2400

FEMA FLOOD ZONE DESIGNATION:
ZONE "A": WITHOUT BASE ELEVATION
ZONE "X": 0.2% ANNUAL CHANCE FLOOD & AREAS OF MINIMAL FLOOD HAZARD
AS SHOWN ON RIVERSIDE COUNTY, CALIFORNIA, FLOOD INSURANCE RATE MAP, COMMUNITY PLAN MAP NUMBER 10-03-03-01, EFFECTIVE DATE: MARCH 4, 2018.

IDENTIFICATION: HIGH LIQUIFICATION ZONE

SCHOOL DISTRICT: COACHELLA VALLEY UNIFIED

COUNTY SERVICE AREA: 125 - THERMAL, SF LIGHTING

EXISTING SPECIFIC PLAN: NONE

PROPOSED SPECIFIC PLAN: THERMAL RANCH SP

NOTE: 1. PROVIDED PARKING CALCULATION AS PER THERMAL RANCH SP

02.09.23

Exhibit

10



Thermal Ranch Specific Plan EIR Notice of Preparation PA - 4 Plot Plan Thermal, California

/COUNTY OF RIVERSIDE

ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

Environmental Assessment (CEQ / EA) Number: NA

Project Case Type (s) and Number(s): GPA 2300001; CZ 2300003; Specific Plan No. SP00401, TTM No. 38578, TTM No. 38531; and Plot Plan No.s 230035 & 230038

Lead Agency Name: County of Riverside Planning Department

Address: 4080 Lemon Street 12th Floor, Riverside, CA 92501

Contact Person: Russel Brady, Senior Planner

Telephone Number: 951-955-3025

Applicant's Name: Thermal Ranch LLC

Applicant's Address: 19312 Canyon Drive, Villa Park, CA 92861

I. PROJECT INFORMATION

Project Description:

The Thermal Ranch Specific Plan, inclusive of two accompanying subdivision maps (Tentative Tract Map (TTM) No. 38578 and Tentative Tract Map (TTM) 38531, two plot plan applications, and a General Plan Amendment (GPA) and Change of Zone (CZ), is proposed on 619.1±-acres and will be comprised of a mix of uses including and centered around a 223.1±-acre equestrian center and related show facilities, including barns, stabling and related equestrian services (Planning Area 1/PA-1). The equestrian center will require 300 staff, and will have an additional 8,100 visitors on peak event days comprised of riders, trainers, stable hands and visitors.

Other components of the Thermal Ranch Specific Plan would include a mix of residential neighborhoods ranging horse park workforce housing (including modular housing and RV parking accommodations) (Planning Area 4/PA-4), to large single-family estate lots, some suitable for keeping horses (Planning Area 2/PA-2). Other residential product planned includes single-family attached and detached homes (Planning Area 3/PA-3) and condominiums (possibly extended stay) in Planning Area 5 (PA-5) and may also be available to the planned hotel room pool. At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.60 to 27.3 units per acre.

Proposed commercial areas would provide 275,000± gross leasable square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space; and up to 150,000 square feet of retail space in Planning Area 6 (PA-6). A 54.4±-acre mixed use resort with a 150± key resort hotel, beach club and ancillary retail is also proposed (Planning Area 5/PA-5). The Project provides four Coachella Valley Water District (CVWD) well sites to be located in the northern and eastern portions of the Project site.

Additionally, two subdivision maps (TTM No. 385378 and TTM No. 38531), and two Plot Plan applications have been filed and are addressed in this CEQA analysis. TTM No. 38531 will subdivide the property into nine large parcels and TTM No. 38578 will further subdivide PA-2 (Estate Residential) into 132 individual lots and PA-3 into 390 single-family lots. The two plot plans will allow development to commence in PA-1 and PA-4 following approval of the Specific Plan and these related applications. Each of the major Specific Plan components is described below.

The Project will result in full half-street improvements, phased to Project improvements, of Avenue 62, Harrison Street and Tyler Street. Water and sewer will be extended from immediately off-site to serve the proposed Project. Two sewerage lift stations are proposed in the southerly portion of the Project. An on-site electric power substation is also planned. These on-site and off-site utility infrastructure improvements will be fully analyzed in the EIR.

The Thermal Ranch Specific Plan site is currently designated "Agriculture" in the Foundation Element and the Eastern Coachella Valley Area Plan (ECVAP) of the General Plan. The applicant proposes a land use change to the Foundation Element designation to "Community Development" and to apply a variety of ECVAP land use designations consistent with proposed underlying land uses. Consistency zoning is also proposed and a part of this Project, with proposed zoning designation that correspond to the proposed ECVAP land use designations. See Table 2 below.

PROJECT LOCATION

The subject Thermal Ranch Specific Plan property is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County. The subject property encompasses approximately one square mile with a net acreage of 619.1± acres. It is bounded on the north by Avenue 62, on the south by Avenue 64, on the west by Harrison Street and on the east by Tyler Street. It is comprised of Assessor's Parcel Numbers: 751-020-002,003, 006, 007 and 010, and is also described as being Section 5, Township 7 South, Range 8 East, SBB&M. It is located 3.7± miles west of State Highway 86 Expressway and 2 miles west of the CVWD Water Reclamation Plant No. 4 (WRP # 4). The site is also approximately 1.25 miles south of the closest runway of the Jackie Cochran Regional Airport and approximately 2.5 miles west of the Coachella Valley Stormwater Channel. The separate APN: 751-020-010 is an exempt parcel under "USA" (US Bureau of Reclamation/USBR) ownership and planned for avoidance or as an owner-allowed "off-site" use area with USBR permission.

EXISTING CONDITIONS

The entire Project property is currently in agricultural use inclusive of several ag-related haybarns, packing sheds and other structures, irrigation water well and other irrigation-related infrastructure, and an agricultural drain along the property's south boundary within or adjacent to the Avenue 64 alignment. There are no undisturbed areas within the boundaries of the subject property (see Exhibit 4).

The Project's west boundary is Harrison Street, which is partially improved, providing approximately 38± feet of pavement with two travel lanes and graded and partially paved shoulders. The Project's north boundary of Avenue 62 is partially improved, providing approximately 24± feet of pavement and two travel lanes with graded but not otherwise improved shoulders. The subject property is bounded on the east by Tyler Street, which currently provides two travel lanes within a 24± feet paved section and with graded but unpaved shoulders.

The south of the subject property is bounded by the future Avenue 64, and is comprised of the following, described north-to-south: a 95-foot wide electric utility easement with power poles; a 25-foot wide pipeline easement; and a 25-foot wide parcel owned in fee by the Coachella Valley Water District (CVWD) for a future stormwater channel. The future Avenue 64 center line is located 55 feet south of the property line. These easements and drainage facilities separate the development portion of the site from the existing and future Avenue 64 right-of-way (see Exhibits 7 & 8).

THERMAL RANCH DEVELOPMENT PLAN

Planning Area 1 - Equestrian Center

The Equestrian Center is planned as PA-1 and is comprised of 231.1± acres located primarily in the central portion of the Project site, with an outlying "back of house" function that extends southeast to the corner of Tyler Street and Avenue 64. Primary access for PA-1 will be from two access drives to be located on Harrison Street, one approximately 700± feet north and one 700± feet south of Avenue 63 extended. Secondary/emergency access will be from the secondary access drive on Tyler Street north of Avenue 64 (see Exhibit 6).

The Equestrian Center will include 47 barns with capacity for up to 2,700 horses and over 2.5 million square feet of riding space including 18 sand competition rings and one (1) grass competition field, miles of riding paths, and turf areas, and an Olympic-level grand prix stadium, and covered riding arenas with highest occupancy occurring during the Coachella Valley's October through March equestrian show season.

Of the overall Project's 275,000± square feet of commercial space, the equestrian center portion of the project will include 75,000± square feet of event-related commercial and administrative space including retail and dining. The Equestrian Center will also provide 10,000 square feet of office space.

PA-1 will also include back of house functions, including areas for hay and feed storage, short-term manure storage for daily transport off-site, limited composting, and related back of house functions on 18.5± acres. Storage buildings, shade structures, sheds, storage bins, seasonal festival parking, greenhouse and a small staff building are also planned in this portion of PA-1. An electric power substation is also planned in the southeast corner of PA-1. Maximum building/structure height will not exceed 65 feet and most structures will be 40 feet or less in height. Security, commercial, event and work area lighting will also be provided, with maximum (arena) light standard height of 65 feet above arena grades.

Planning Area 2 - Estate Residential

PA-2 is comprised of 194.3± acres located in the northern-most portion of the project site, fronting on and taking primary access from Avenue 62. PA-2 development would provide up to 132 estate lots ranging in size from one-half acre to two acres and at a density of 0.6 dwelling units per acre. One and two-story construction of up to 35 feet will be permitted as will the keeping of horses on the southern-most row of lots only.

Planning Area 3 – Medium Density Residential-Detached and Attached Single-Family Residential

PA-3 is comprised of 69.5± acres on the east side of the Project with one primary and one secondary access drives from Tyler Street. PA-3 development would provide up to 390 dwelling units, including detached and attached single-family units planned in this area. PA-3 also provides a 3.1± acre open space and recreation area (amenities area) with tennis and pickleball courts, gym, pool, meeting areas and landscaped open space in the west-central portion of the planning area. Overall density will be 5.6 dwelling units per acre, and residences of up to 40 feet in height will be permitted.

Planning Area 4 –Workforce High Density Residential and RV Park

PA-4 is comprised of two sub-areas totaling 41.1± acres located at the south end of the Project and bounded by Avenue 64. Access will be provided from Tyler Street and internal roads connected to Harrison Street. PA-4a development would provide 300 to 500 units of workforce housing on 18.3± acres envisioned for workforce housing from October through March and farmworker housing during the rest of the year. PA-4b will provide up to 320 RV spaces on 22.8 acres. PA-4 also provides a 0.7± acre pool and recreation area (amenities area), and on-site laundry and convenience store in the central portion of the planning area that will be accessible to residents of both the RV park and the modular home village. The RV park area (PA-4b) will be developed at a density of 14± spaces per acre. The modular workforce housing (PA-4a) densities will be 16.3 to 27.3 dwelling units per acre and building heights of up to 20 feet in height will be permitted.

Planning Area 5 – Resort Residential Complex

PA-5 is comprised of 54.4± acres located at the southwest corner of the Project site and bounded on the south by Avenue 64, on the west by Harrison Street, and on the east by a major interior drive that separates PA-5 from PA-4 to the east and PA-1 to the northeast. Primary access will be from one drive on Harrison Street 2,100± feet north of Avenue 64 centerline. Building heights would range from one to four-stories and a maximum height of 65 feet. Development planned for PA-5 includes the following:

- 42.1± acres providing up to 340 condominiums (may be extended stay and may be included in planned hotel rental pool) around a central recreational amenity area at a density of 8.1 dwelling units per acre.
- 8.1± acre hotel site planned for up to 150 hotel keys and including pool and pool club and other recreational and open space amenities.
- 4.2± acres for up to 50,000 square feet of retail space.

Planning Area 6 – Commercial Village (Neighborhood-Scale Shopping Center)

PA-6 is comprised of 21.4± acres and located along the west boundary of the Project site. Primary access will be from two drives on Harrison Street at the eastward extension of Avenue 63, one 700± feet north and one 700± south of Avenue 63. Buildings of up to 50 feet in height are permitted in PA-6. PA-6 provides 150,000± square feet of retail, restaurants, and commercial recreation space in a commercial center.

Off-Site Improvements

In addition to the improvements described above, the Project will also require the extension of existing sanitary sewer lines from Avenue 62 and existing domestic water lines in Harrison Street into the Project site. Natural gas lines will need to be extended and applicant is consulting with SoCalGas on this line extension, which will be described and analysed in the forthcoming EIR. No other off-site improvements are anticipated.

**Table 1: Land Use Summary
Desert International Horse Park (DIHP) Specific Plan**

Planning Area	GPLU	Base Zone	Description	Acres	Residential Units & Density	Hotel Keys	Population	Commercial FAR	Commercial SF	Office SF	Employees	Bldg Height (feet)
1	C-T	A-1	Horse Park	223.1					75,000	10,000	300	65
2	LDR	R-R	Estate Residential	194.3	132 / 0.6		356					35
3	MDR	R-1	Single Family Attached/Detached	69.5	390 / 5.6		1,053					40
4a	HDR	R-T	Workforce Cottages	18.3	300-500 / 16.3-27.3		810-1,350					20
4b	HDR	R-T	Workforce RV Park	22.8	320 / 14		864					20
5a	CT	C-T	Resort Condos	42.1	340 / 8.1		918					40
5b	CT	C-T	Hotel	8.1		150					180-300	65
5c	CT	C-T	Resort Retail	4.2				0.20 - 0.35	50,000		200	40
6	CR	C-1	Commercial Retail	21.4				0.20 - 0.35	150,000		600	50
Perimeter ROW				15.3								
TOTALS				619.1	1,060-1,362 Residences 320 RVs	150	4,001 – 4,541		275,000	10,000	1,280-1,400	

A. Type of Project: Site Specific ☒; Countywide ☐; Community ☐; Policy ☐.

B. Total Project Area: 619.1± acres

Residential Acres: 347.00	Lots: 463	Units: 1,103 – 1,362	Projected No. of Residents: 4,541
Commercial Acres: 76.50	Lots: 5 lots	Sq. Ft. of Bldg. Area: 285,000	Est. No. of Employees: 1,100
Industrial Acres: NA	Lots: NA	Sq. Ft. of Bldg. Area: NA	Est. No. of Employees: NA

Other: RV Spaces – 320
Modular Housing: 300-500
(also shows in residential unit and residents count.)

C. Assessor's Parcel No(s): 751-020-002, 003, 006, 007 (and off-site parcel 751-020-010)

Street References: Ave 62 on north; Ave 64 on south; Tyler St on east; Harrison St on west

D. Section, Township & Range Description or reference/attach a Legal Description: Section 5 Township 7 South, Range 8 East, SBB&M.

E. Brief description of the existing environmental setting of the project site and its surroundings: Predominantly rural agriculture with undeveloped and fallow ag lands, increasing urbanization associated with Thermal Club/Kohl Ranch south of Cochran Airport to immediate northeast, Desert Mirage High School and Las Palmas Elementary 0.50 miles to south, CVWD WRP No. 4 2 miles to east, and community of Mecca 5 miles to east.

F. Other Public Agency Involvement and Required Permits: Regional Water Quality Control Board, Coachella Valley Water District.

II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** Agriculture. The proposed Project includes a General Plan Amendment, Change of Zone, Specific Plan of Land Use and a subdivision map. The subject property is located in the ECVAP and is currently designated *Agriculture* but is located in an area of the eastern Coachella Valley that has been undergoing community-wide planning and urbanization. The property is also located immediately north of lands of the Torres-Martinez Desert Cahuilla. Lands to the immediate east and northeast include Kohl Ranch and the Thermal Cub developments. The subject property is located immediately east of the Vista Santa Rosa Community.

The ECVAP states that the *"The Land Use Plan focuses on preserving the unique features in the Eastern Coachella Valley area and, at the same time, guides the accommodation of future growth. To accomplish this, more detailed land use designations are applied than for the countywide General Plan."* The subject property lies both adjacent to and in proximity of such transitional land uses. Also relevant are issues of environmental justice, including reducing unique or compounded health risks in disadvantaged communities, promoting civic engagement in public decision-making process, and prioritizing improvements and programs that address the needs of disadvantaged communities. The proposed Specific Plan will address land use and overall General Plan consistency, which will be further addressed in the Draft EIR.

- 2. Circulation:** Harrison St. & Ave 62: Expressway; Tyler St.: Secondary; Ave 64: Major. The subject property is currently accessible from partially improved Ave 62, Harrison Street and

Tyler Street; Ave 64 along the property's south boundary has not yet been improved. The subject property will have good access to regional facilities including Harrison Street and the Highway 86 Expressway. The proposed Specific Plan will address Circulation Element issues and overall General Plan consistency, which will be further addressed in the Draft EIR.

3. **Multipurpose Open Space:** The ECVAP Trails Plan calls for Class I bike paths along Harrison Street, Ave 62, future Ave 63 (not proposed for development as a public street), and Tyler Street. The ECVAP also calls for a "Combination Trail" (Regional Trail / Class 1 Bike Path). The proposed Specific Plan will address multipurpose open space and related issues and overall General Plan consistency, which will be further addressed in the Draft EIR.

Coachella Valley MSHCP: The proposed Project is located within the boundaries of the CVMSHCP but is located outside and more than 2 miles northeast of the nearest CVMSHCP Conservation Area. The proposed Project would be subject to payment of the CVMSHCP development impact fee.

4. **Safety:** Seismic Safety (Liquefaction), Wind Erosion. The proposed Project site is not located within or near a wildland fire hazard area. The south half of the subject property is located within a 100-Year inundation area with maximum depths of 1-foot. The subject property is mapped as Zone X (Area of Minimal Flood Hazard) and an area mapped as 'Area of Reduced Flood Risk Due to Levee'. on FEMA Panel 06065C291OH.
5. **Noise:** The subject property is located primarily within Zone D of the Airport Land Use Compatibility Plan and is located outside the 60 dB CNEL for the Jackie Cochran Regional Airport. A portion of the southwest corner of the site is in Zone E. The proposed Specific Plan will address Noise Element and overall General Plan consistency, which will be further addressed in the Draft EIR including noise from future vehicular traffic associated with the Project on adjoining arterial roadways.
1. **Housing:** The proposed Project would be located in the eastern Coachella Valley on currently vacant agricultural lands. A range of housing, including estate lots, attached single family, modular workforce housing and an RV park for seasonal use are proposed within the Project. Workforce housing may be made available for off-season farmworker housing as well. Employment opportunities will also be created within the Project, which can make access to employment less expensive for on-site residents.
6. **Air Quality:** CV PM10 SIP (Non-attainment for ozone and PM10). The proposed Project is an equestrian-centered mixed-use development with a range of residential product, neighborhood and tourist commercial services and hospitality uses. There are no sensitive receptors on the site but at buildout the Project could have up to 1,362 residential units and 320 RV spaces. Both year-long and seasonal employment will be created by the Project, as will educational opportunities in equine care and event management. The proposed Specific Plan will address Air Quality Element issues and overall General Plan consistency, which will be further addressed in the Draft EIR.
7. **Healthy Communities:** Although planned on agricultural lands, the proposed Project is located in an urbanizing area of the east Coachella Valley. Community centers, schools, a substantial roadway network and other community services have been in development over the past few decades.

a) Environmental Justice Summary: Relevant issues include diversity of available housing, access to commercial and other services, reducing unique or compounded health risks, promoting economic development and employment opportunities, promoting civic engagement in public decision-making process, and prioritizing improvements and programs that address the needs of disadvantaged communities. Parks, trails and open space are also being identified and developed. Issues of land use compatibility, pollution exposure, access to nutritious food and healthcare, safe and sanitary housing and opportunities for physical activity are issues associated with the Healthy Communities Element and will be further addressed in the Draft EIR.

B. General Plan Area Plan(s): East Coachella Valley Area Plan (ECVAP)

C. Foundation Component(s): Agriculture

D. Land Use Designation(s): Agriculture

E. Overlay(s), if any: NA

F. Policy Area(s), if any: ECVAP

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** Agriculture, Tribal Lands, Rural Community, Business Park, High Density Residential, Very Low Density Residential, Commercial Retail

2. **Foundation Component(s):** Agriculture, Community Development, Open Space

3. **Land Use Designation(s):** Agriculture, Medium Density Residential, Conservation

4. **Overlay(s), if any:** NA

5. **Policy Area(s), if any:** ECVAP

H. Adopted Specific Plan Information. NA

1. **Name and Number of Specific Plan, if any:** Thermal Ranch Specific Plan

2. **Specific Plan Planning Area, and Policies, if any:** NA

I. Existing Zoning: W-2 and A-2-10 (Heavy Agriculture)

J. Proposed Zoning, if any: Specific Plan

K. Adjacent and Surrounding Zoning: Specific Plan, W-2, A-1-10, A-2-10, R-4.

II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☒ Aesthetics

☒ Hazards & Hazardous Materials

☒ Recreation

☒ Agriculture & Forest Resources

☒ Hydrology / Water Quality

☒ Transportation

- ☒ Air Quality
- ☒ Biological Resources
- ☒ Cultural Resources
- ☒ Energy
- ☒ Geology / Soils
- ☒ Greenhouse Gas Emissions

- ☒ Land Use / Planning
- ☐ Mineral Resources
- ☒ Noise
- ☒ Paleontological Resources
- ☒ Population / Housing
- ☒ Public Services

- ☒ Tribal Cultural Resources
- ☒ Utilities / Service Systems
- ☐ Wildfire
- ☒ Mandatory Findings of Significance

III. DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. **A MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

- ☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
- ☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
- ☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
- ☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new

significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.


Signature


Printed Name

5/23/23
Date

For: John Hildebrand
Planning Director

IV. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed project to determine any potential significant impacts upon the environment that would result from construction and implementation of the project. In accordance with California Code of Regulations, Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
1. Scenic Resources				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure C-8 "Scenic Highways"; Thermal Ranch Specific Plan application; Environmental Site Survey conducted by Terra Nova Planning & Research, Inc.

Setting: The proposed Thermal Ranch Specific Plan Project is located in a predominantly flat rural agricultural area of the eastern Coachella Valley. The Project area provides significant views of the Santa Rosa Mountains to the west and southwest, the San Jacinto Mountains to the northwest, and the Mecca Hills and Little San Bernardino Mountains to the east and northeast. These features constitute scenic vistas for much of the eastern Coachella Valley.

There are no significant scenic resources, such as trees, rock outcroppings and unique or landmark features, on the subject property or in the Project vicinity.

The proposed Project will include residential and non-residential buildings of up to 65 feet in height. Equestrian event and some work areas will also include lighting for evening events and competitions. Development will occur along all four arterial roadways bounding the property. Surrounding development includes agriculture, equestrian, planned community development and scattered residential. The Specific Plan will detail lighting, building massing and other development parameters that may affect scenic resources in the area.

Findings of Fact:

- a) **No Impact.** There are no officially designated or eligible state scenic highways in the Project area, nor any locally designated scenic corridor (ECVAP Figure 10). The nearest scenic highway is Highway 111 at Avenue 62, approximately 3.50 miles east of the Project site.
- b) **Less Than Significant Impact.** There are no trees, rock outcroppings or unique or landmark features on the Project site. It is currently farmland, with associated structures such as shops and sheds in its center.

The Project site is located approximately 2.5 miles northeast of the Santa Rosa Mountains and more than six miles southwest of the Little San Bernardino Mountains, both ranges considered scenic vista for much of the Coachella Valley (Exhibit 1, 2, and 3). Significant scenic resources in the area consist of mid- and higher elevations of the Santa Rosa and Santa Jacinto Mountains to the northwest, west and south. Currently, the Project area consists of vacant land, mobile home parks, farms and related operations, scattered residential and planned community development to the northeast. While upper elevations of the mountains are visible from the subject property, their immediate scenic value is diminished to some extent by distance.

The Project proposes landscape buffers between bounding arterial roadways and on-site development. With the exception of commercial and resort commercial uses planned along Harrison Street where buildings up to 50 feet in height may occur, Project development along its perimeter will be relatively limited in height. With planned perimeter landscape buffers, the Project is not expected to result in the creation of an aesthetically offensive development that would also be open to public view. Therefore, Project impacts are expected to be less than significant.

Temporary visual impacts will include the presence of construction equipment and personnel, the movement of construction vehicles on area roadways and at vehicle staging areas, vehicle safety barriers, and material stockpiling. However, these activities will be temporary and end once construction is complete. Therefore, a less than significant impact is anticipated.

- c) **Less Than Significant With Mitigation.** The Project site is in an area that can best be characterized as rural or non-urbanized, and urbanizing. Surrounding development is dominated by cultivated and fallow fields and a variety of agricultural buildings, but urbanization is proceeding to the north and east. The proposed Project would bound the subject site with decorative block walls and landscaping, and a variety of development including single-family homes, RV and modular workforce housing, resort condominiums and commercial services. At this writing it is uncertain whether or to what extent the proposed Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, potential impacts could be significant.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

2. Mt. Palomar Observatory

- a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

☐☒☐☐

Source(s): GIS database, Ord. No. 655 (Regulating Light Pollution); Google Earth, 2022; Thermal Ranch Specific Plan application.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Setting:

Mt. Palomar Observatory is a major scientific resource located in San Diego County approximately 5.5 miles south of the Riverside County border and 45± miles southwest of the Project site. In general, astronomic observatories need to be sited at least 30 to 40 miles away from large, brightly lit areas, such as cities and other urban concentrations to ensure adequate dark skies for observing. To minimize nighttime light pollution within the region surrounding the observatory, the County of Riverside enforces Ordinance No. 655 (Regulating Light Pollution). This ordinance establishes two zones for specific lighting controls based on distance from the Observatory: Zone A encompasses a sphere with a 15-mile radius; Zone B encompasses a 45-mile radius from the Observatory. The intent of the ordinance is to restrict urban lighting that could interfere with operations at the observatory.

Findings of Fact:

- a) **Less Than Significant With Mitigation.** The Project site is located at the outer edge of the 45-mile Zone B radius and is separated from the observatory by elevated terrain of the Santa Rosa and San Jacinto Mountains. The Project could generate relatively high levels of lighting. Therefore, the Project has the potential to cause impacts to the observatory which will be further assessed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

3. Other Lighting Issues	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Expose residential property to unacceptable light levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Thermal Ranch Specific Plan application; Environmental Site Survey conducted by Terra Nova Planning & Research, Inc.

Setting:

As noted above, the Project planning area is predominantly rural but with increasingly urban uses in the vicinity, including the Thermal Club development to the northeast and the night-lite sports stadium of the Desert Mirage High School located 0.50 miles southeast of the Project site.

Findings of Fact:

- a, b) **Potentially Significant Impact.** The proposed Project includes extensive equestrian facilities, including event venues where night lighting is expected to allow evening events. Commercial and resort lighting could also have significant adverse impacts on night skies if not properly managed. The Project EIR should further examine the potential adverse impacts Project lighting could have on night skies and on residential lands within and beyond the Project boundary.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE & FOREST RESOURCES Would the project:				
4. Agriculture	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure OS-2 "Agricultural Resources"; State of California Williamson Act Contract Lands, California Department of Conservation, 2017; Riverside County Land Information Service (Map My County) GIS database, Thermal Ranch Specific Plan application.

Setting:

The subject property is located in the agricultural region of the eastern Coachella Valley in central Riverside County. Agriculture is an industry of major economic importance to the valley, county and state. All but the southwest corner of the subject property is designated as Prime Farmland, the balance being designated as Farmland of State-wide Importance. Other lands surrounding the site also include Prime Farmland, Farmland of State-wide Importance, Unique Farmland and Farmland of Local Significance. The subject and surround agricultural lands are also served by imported Colorado River water provided by the Coachella Branch of the All-American Canal and associated facilities and irrigation distribution system operated by the US Bureau of Reclamation and CVWD.

Findings of Fact:

a-d) **Potentially Significant Impact.** The proposed Project would result in the conversion of approximately 619.1± acres of Prime farmlands. The Project would necessitate a General Plan Amendment and Change of Zone, these and much of the surrounding lands being designated for agricultural uses. The subject property is not under a Williamson Act contract, and surrounding lands under a Williamson Act contract are limited to a small area south of the Project site and are designated as "Williamson Act Non-Renewal". The proposed Project would constitute a major change in land use from agriculture to diverse urban development and the associated extension of public services and utilities. Therefore, the Project has the potential to also cause or induce conversion of other agricultural lands to other uses which will be further assessed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. Forest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure OS-3a "Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas," Figure OS-3b "Forestry Resources Eastern Riverside County Parks, Forests, and Recreation Areas," Thermal Ranch Specific Plan application.

Setting:

Neither the Project site nor surrounding lands include forests or timberlands.

Findings of Fact:

- a-c) **No Impact.** The Project site does not contain any forested lands and Project area vegetation is limited to scattered agricultural crops, scattered trees, shrubs and ruderal growth along the roadway. Project lands are not zoned for forest land, timberland, or timberland zoned Timberland Production. There will be no conflict with existing zoning for, or cause rezoning of such lands. There are no forest lands or forest uses in the Project area. Therefore, the Project will have no direct or indirect impact on the conversion of forest land to non-forest use.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

AIR QUALITY Would the project:				
6. Air Quality Impacts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County General Plan, Riverside County Climate Action Plan (“CAP”), SCAQMD CEQA Air Quality Handbook; “Air Quality Management Plan 2016,” South Coast Air Quality Management District; “Coachella Valley PM₁₀ State Implementation Plan,” 2003; “EPA Green Book Designated Non-Attainment Areas for All Criteria Pollutants,” as of December 5, 2013; “Table C-1: 2006-2008 Thresholds for Construction and Operation,” South Coast Air Quality Management District, revised October 21, 2009; Riverside County General Plan/Eastern Coachella Valley Community Plan, 2004. Thermal Ranch Specific Plan application.

Setting:

Regional and local agencies have assumed some responsibility for assuring that state and federal air quality standards are achieved. For the Coachella Valley, the South Coast Air Quality Management District (SCAQMD) is responsible for establishing air quality measurement criteria and relevant management policies for the Salton Sea Air Basin (SSAB). The 2003 PM₁₀ Coachella Valley State Implementation Plan (CVSIP) was jointly developed by the SCAQMD, Coachella Valley Association of Governments (CVAG) and its member jurisdictions (including the County) and was approved by the USEPA. The 2003 PM₁₀ CVSIP updated the 1990 plan, which was drafted as a requirement of the federal Clean Air Act to demonstrate expeditious attainment of PM₁₀ standards.¹ On April 18, 2003, USEPA approved the updated CVSIP.

The SSAB, including the Coachella Valley, is subject to the provisions of the SCAQMD Rule Book,² which sets forth policies and other measures designed to meet federal and state ambient air quality standards. These rules, along with SCAQMD’s 2016 Air Quality Management Plan are intended to satisfy the planning requirements of both the federal and state Clean Air Acts. The SCAQMD also monitors daily pollutant levels and meteorological conditions throughout the District.

Air Quality Standards

Federal and state air quality standards established for specific pollutants, which are called “criteria pollutants,” are designed to protect the general population and especially that segment of the population that is most susceptible to respiratory distress or infection, including the elderly, children, asthmatics, or those weak from disease or illness. The following air pollutants are collectively known as criteria air pollutants and are defined as those pollutants for which established air quality standards have been adopted by federal and state governments:

Ozone (O₃) is a pungent, colorless, toxic gas, and a component of photochemical smog. It is formed when byproducts of combustion react in the presence of ultraviolet sunlight. This process takes place in the atmosphere where oxides of nitrogen combine with reactive organic gases, such as hydrocarbons. Exposure to ozone can result in diminished breathing capacity, increased sensitivity to infections, and inflammation of the lung tissue. Children and people with pre-existing lung disease are most susceptible to the effects of ozone.

Carbon Monoxide (CO) is a colorless, odorless, toxic gas and a byproduct from the partial combustion of fossil fuels, most notably from automobiles and other motor vehicles. Carbon monoxide passes through the lungs directly into the blood stream and reduces the amount of oxygen reaching the vital organs, such as the heart, brain and tissues. In high concentrations, carbon monoxide can contribute to the development of heart disease, anemia, and impaired psychological behavior. Individuals that have heart and blood diseases, smokers, babies in utero, and people with chronic hypoxemia are most susceptible to the effects of CO. The SSAB is in non-attainment for the federal 8-hour O₃ standard.

¹ 2003 Coachella Valley PM₁₀ State Implementation Plan, August 1, 2003.

² South Coast Air Quality Management District Rules and Regulations, Adopted February 4, 1977.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Nitrogen Oxide (NO_x) includes Nitric oxide (NO) and Nitrogen dioxide (NO₂), which are the primary oxides of nitrogen, and combined are known as nitrogen oxides. These oxides are produced at high temperatures during combustion as byproducts of motor vehicles, power plants, and off-road equipment. NO_x contributes to the formation of ozone serving as the primary receptor of ultraviolet light and initiating the photochemical reaction. Short-term exposure to nitrogen dioxide can result in airway constriction, diminished lung capacity, and is highly toxic by inhalation. Populations living near roadways are more likely to experience effects of nitrogen oxides due to elevated exposure to motor vehicle exhaust. The SSAB is in attainment for NO₂.

Sulfur Dioxide (SO₂) results from the combustion of high-sulfur content fuels, such as coal and petroleum. Sources include motor vehicle fuel combustion, chemical manufacturing plants, and sulfur recovery plants. Sulfur dioxide is a colorless, pungent, extremely irritating gas that can cause airway constriction and severe breathing difficulties in asthmatics. High levels of exposure can cause fluid accumulation in the lungs, damage to lung tissue, and sloughing off of cells lining the respiratory tract. The SSAB is in attainment for SO₂.

Particulate Matter (PM₁₀ and PM_{2.5}) consist of fine suspended particles of ten microns or smaller in diameter, and are the byproducts of road dust, sand, diesel soot, windstorms, and the abrasion of tires and brakes. The elderly, children and adults with pre-existing respiratory or cardiovascular disease are most susceptible to the effects of PM. Elevated PM₁₀ and PM_{2.5} levels are also associated with an increase in mortality rates, respiratory infections, occurrences and severity of asthma attacks and hospital admissions. The SSAB is a non-attainment area for PM₁₀ and is classified as attainment/unclassifiable for PM_{2.5}.

Volatile Organic Compounds (VOC) are also known as Reactive Organic Gas (ROG). This class of pollutants has no state or federal ambient air quality standards and is not classified as criteria pollutants; however, they are regulated because they are responsible for contributing to the formation of ozone. They also contribute to higher PM₁₀ levels because they transform into organic aerosols when released into the atmosphere. VOCs pose a health threat when people are exposed to high concentrations. Benzene, for example, is a hydrogen component of VOC emissions known to be a carcinogen.

Lead (Pb) occurs in the atmosphere as particulate matter resulting from the manufacturing of batteries, paint, ink, and ammunition. Exposure to lead can result in anemia, kidney disease, gastrointestinal dysfunction, and neuromuscular and neurological disorders. Babies in utero, infants, and children are especially susceptible to health risks associated with exposure to lead by impacting the central nervous system and cause learning disorders. The SSAB is in attainment for lead.

Attainment Criteria

The air quality of a particular locale is considered to be in attainment if the measured ambient air pollutant levels for O₃, CO, SO₂ (1-hour and 24-hour), NO₂, and PM₁₀ and PM_{2.5} are not exceeded and all other standards are not equaled or exceeded at any time in any consecutive three-year period. Attainment also assumes the national standards (other than O₃, PM₁₀, and those based on annual averages or arithmetic mean) are not exceeded more than once per year. The O₃ standard is in attainment when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

Table 2: Salton Sea Air Basin Designation Status

Criteria Pollutants	Federal Designation	State Designation
Ozone – 8-hour standard	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
PM ₁₀	Nonattainment	Nonattainment
PM _{2.5}	Attainment	Attainment ¹
Lead	Attainment	Attainment

¹ City of Calexico is classified as non-attainment area.

Source: EPA Green Book, November 30, 2020; CARB, July 2019.

Table3: Emissions Thresholds for SCAQMD

Criteria Pollutant	Daily Threshold (pounds)
Carbon Monoxide (CO)	550
Oxides of Nitrogen (NO _x)	100
Volatile Organic Compounds (VOC)	75
Oxides of Sulfur (SO _x)	150
Particulate Matter (PM ₁₀)	150
Particulate Matter (PM _{2.5})	55
Source: SCAQMD daily thresholds for construction and operation within the Coachella Valley, April 2019.	

Findings of Fact: The subject 619.1±-acre property is currently in active cultivation and is subject to seasonal disturbance and susceptibility to wind and water erosion. Surrounding lands are in a variety of uses with agriculture being predominant, and also with fallow natural areas, as well as several equestrian uses, scattered residential, the Thermal Club to the immediate northeast and the CVUSD Mirage High School and Las Palmas Elementary Schools to the southwest. Lands of the Torres-Martinez Tribe are located immediately south of the subject property.

- a) **Potentially Significant Impact.** Unincorporated County lands, including the Project planning area, are subject to the provisions of the 2016 South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan, which describes the District's plan to achieve Federal and State air quality standards set forth in Federal and State Clean Air Acts. The eastern Coachella Valley is located in the Salton Sea Air Basin (SSAB) and is subject to the rules and regulations imposed by the SCAQMD, including Rule 403-1, which governs fugitive dust emissions from construction within the Coachella Valley. The Project will result in a substantial change in land use. The current SCAQMD plans for the Coachella Valley are based, in part, on the land use designations that were in place when the plans were drafted. The intensification in land use proposed for the Project site has the potential to be inconsistent with the SCAQMD plans. This potential will be further analyzed in the forthcoming EIR.
- b, c) **Potentially Significant Impact.** An impact is considered potentially significant if concentrations of emissions exceed the State or Federal Ambient Air Quality Standards. The two primary pollutants of concern in the Coachella Valley, are ozone (O₃) and particulate matter (PM₁₀ and PM_{2.5}).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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South Coast Air Quality Management District (SCAQMD), in conjunction with the Coachella Valley Association of Governments (CVAG), Riverside County and other local jurisdictions, prepared the "2003 Coachella Valley PM₁₀ State Implementation Plan," which includes PM₁₀ control program enhancements and requests an extension of the region's PM₁₀ attainment date. The Coachella Valley is designated as a serious non-attainment area for PM₁₀ and is subject to the 2003 State Implementation Plan (SIP) and local dust control regulations and guidelines. A State Implementation Plan that addresses how Southern California will meet federal standards for finer particulate matter (PM_{2.5}) was adopted in 2007. The Coachella Valley is designated as unclassifiable/attainment for PM_{2.5}.

At this time, it is not known whether or to what extent development and improvements facilitated by the proposed Project will impact non-attainment criteria pollutants, or whether they will expose sensitive receptors to substantial pollutant emissions. The County has determined that an air quality study and report should be prepared to further evaluate the potential for significant levels of air pollutants related to the Project. To determine if the Project has the potential to result in significant adverse localized air quality impacts, the appropriate Localized Significance Threshold (LST) Look-Up Table for SRA 30 (Coachella Valley) should be utilized. LSTs will be evaluated and summarized in the aforementioned air quality impact analysis and presented in the forthcoming EIR. Potential air quality impacts will be assessed in an air quality analysis and further documented in the forthcoming EIR.

- d) **Potentially Significant Impact.** Development and improvements facilitated by the proposed Project, including the equestrian center and related operations, have the potential to result in short-term and long-term odors. While construction-related odors would be temporary and quickly dispersed below detectable levels as distance from the construction area increases, equestrian operations could pose a long-term impact to local air quality and should be further considered and assessed. During operation, development facilitated by the proposed Project in addition to the equestrian facilities will include restaurants and other uses that could emit odors. Impacts will be evaluated in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

BIOLOGICAL RESOURCES Would the project:

7. Wildlife & Vegetation

a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

☐ ☒ ☐ ☐

b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?

☐ ☒ ☐ ☐

c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?

☐ ☒ ☐ ☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Coachella Valley Multiple Species Habitat Conservation Plan, September 2008; "County of Riverside General Plan, Eastern Coachella Valley Area Plan, 2015., On-site Inspection; Thermal Ranch Specific Plan application.

Setting:

The subject 619.1±-acre property is fully in active cultivation and has been for several decades. The site also houses four outbuildings and a maintenance shed but is otherwise vacant. On the south, the site is bounded by the future Avenue 64 and lands owned by CVWD and serving local agricultural drainage. Lands to the south and west include a mix of native and non-native vegetation. The subject and surrounding properties are located within the boundaries of the Coachella Valley MSHCP and approximately 2.25 miles northeast of the Santa Rosa and San Jacinto Mountains Conservation Area (CA), which is comprised primarily of Sonoran creosote scrub and desert dry wash woodland on lower elevations, and Sonoran mixed wood and succulent scrub in the upper elevations. The site is also located approximately three miles northwest of the Coachella Valley Stormwater Channel and Delta Conservation Area, which comprised predominantly of desert saltbush scrub, mesquite hummocks and desert sink scrub.

Findings of Fact:

- a) **Less Than Significant With Mitigation.** The proposed Project involves the development of an equestrian-oriented mixed-use community that will include a full range of equestrian facilities, including barns and stables, haybarns and other storage buildings, event space and related commercial space which will occupy approximately half the site. The balance of the development will include estate homes, a variety of single-family homes, commercial and resort commercial uses, workforce housing and RV park. The proposed Project is located within the boundaries of the Coachella Valley MSHCP and would be subject to the development impact fee established by the CVMSHCP. The forthcoming EIR will determine whether and to what extent buildout of the Specific Plan will conflict with the CVMSHCP, and further evaluate the potential for development facilitated by the proposed Project to adversely affect sensitive biological resources.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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b-c) **Less Than Significant With Mitigation.** Approximately 15 sensitive biological species are known to occur, or could potentially occur, in the project vicinity, including burrowing owl (*Athene cunicularia*), Crissal Thrasher (*Toxostoma crissale*), other sensitive bird species, including the southwestern willow flycatcher (*Empidonax traillii extimus*) and the Loggerhead Shrike (*Lanius ludovicianus*). Burrowing owls have been detected in the project vicinity. Both the shrike and owl are designated California Species of Special Concern and are protected by the federal Migratory Bird Treaty Act. Other sensitive species that could occur in the project vicinity include Couch's Spadefoot (*Scaphiopus couchii*). Potential impacts to sensitive plant and wildlife species and habitats in the area shall be fully evaluated in the forthcoming EIR.

d) **Less Than Significant With Mitigation.** The subject property is currently open agricultural lands that is unfenced and fully accessible to a variety of wildlife. This condition also occurs on most of the surrounding lands, which include disturbed lands, lands in cultivation and native undisturbed lands. It is uncertain whether the proposed Project will impede the use of the land by migratory species, or native wildlife nurseries in the planning area.

The Project could result in direct and indirect adverse impacts to nearby but off-site migratory birds. All nesting birds are protected by the Migratory Bird Treaty Act (MBTA). To comply with the MBTA, site disturbances that occur between February 1 and August 31 and have the potential to impact nesting birds may require a biologist to conduct nesting bird surveys. Construction outside the January 1 and August 31 period or implementation of the surveys and appropriate avoidance measures may help to ensure that potential impacts to nesting birds are reduced to less than significant levels. Nonetheless, potential impacts to the movement of any native resident or migratory fish or wildlife species will be fully evaluated in the forthcoming EIR.

e) **Less Than Significant With Mitigation.** It is uncertain whether the proposed Project could have a substantial adverse effect on any sensitive natural community identified in the CVMSHCP or other local or regional plans, policies, and regulations. The Project could potentially introduce a wide variety of landscape materials to the site, which could include invasive species if not properly addressed in Project design standards and guidelines. Potential impacts are mitigable with approval of and adherence to an approved plant list. The Project EIR will also evaluate indirect effects from the proposed Project, including its proposed plant list.

f-g) **No Impact.** There are no wetlands, marshes or vernal pools on or in the vicinity of the Project site. No impact will occur.

The County is a permittee under the CVMSHCP/NCCP; a comprehensive regional plan that addresses the conservation needs of a variety of wildlife species in the Coachella Valley region. The Project site is located within the CVMSHCP/NCCP planning area, but is not located within a CVMSHCP conservation area and it is anticipated that on-site habitat has been removed over the course of decades of active cultivation. Nonetheless, a biological resources study is being prepared for the proposed Project site and its findings will be evaluated in the forthcoming EIR for the Proposed Project.

Mitigation Measures: See forthcoming EIR.

Mitigation Monitoring and Reporting: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES Would the project:				
8. Historic Resources				
a) Alter or destroy a historic site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): On-site reconnaissance survey; County of Riverside General Plan, Eastern Coachella Valley Area Plan 2015; Project Application Materials

Setting:

The Project site encompasses 619.1± acres generally located between the Santa Rosa foothills and the Coachella Valley Stormwater Channel; the entire subject site is in active cultivation and has been for several decades. The site is occupied by five agricultural out-buildings, include hay sheds and an equipment/shop building, all of which date from at least 1985 (Google Earth). The age of these existing structures has not yet been determined. There is no evidence of building foundations or other structures that might imply earlier development or occupation during historic times. Surrounding lands have mostly been disturbed for agriculture and other uses for many years.

The subject property does not appear to harbor nor is it located near important historic structures that could be affected directly or indirectly by the proposed Project. Nonetheless, a cultural (historic and archaeological) resources survey and report are being prepared for the proposed Project site and its findings will be incorporated into the forthcoming Environmental Impact Report.

Findings of Fact: While it is unlikely that historic sites or structures have occurred on the subject property, the identification of important historic sites and structures elsewhere in the area warrant a more comprehensive assessment of the site for potentially significant resources of historic value to the community.

A, b) **Less Than Significant Impact.** Based upon current knowledge of the subject and surrounding properties, there is a low possibility that the subject property harbors significant historic resources. Project impacts are expected to be less than significant. Nonetheless, a cultural (historic and archaeological) resources survey and report are being prepared on the proposed Project and its findings will be incorporated into the forthcoming Draft Environmental Impact Report.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

9. Archaeological Resources				
a) Alter or destroy an archaeological site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan, ECVAP and General Plan EIR, 21015; On-Site Inspection, Project Application Materials,

Setting:

The subject property is vacant and has been in active cultivation for several decades. The site is also occupied by what appear to be modern era agricultural out-buildings. Surrounding lands include extensive agricultural lands, both active and fallow, as well as heretofore undisturbed lands adjacent to and in proximity of the Project site that include stands of mesquite that may have served as an important food source for native Cahuilla peoples. Lands within the Reservation boundary of the Torres-Martinez Desert Cahuilla Indians are located immediately south, a short distance west and southeast of the subject property.

In the Project vicinity, numerous Native American cultural resources have been found and documented, including fish traps, pottery scatters, grinding rocks, trail segments, and rock cairn features. While the Project planning area does not provide perennial or even seasonal waters sources, native habitat probably provided valuable food and fiber resources.

Findings of Fact:

- a, b) **Less Than Significant With Mitigation.** Archaeological resources can be buried or otherwise made obscure by land disturbance, including activities associated with agriculture and other types of disturbance and development. Therefore, the existing and long-established cultivation of the subject property does not preclude the harboring of sensitive or significant archaeological resources. Therefore, a cultural (historic and archaeological) resources survey and report are being prepared on the proposed Project and its findings will be incorporated into the forthcoming Environmental Impact Report.
- c) **Less Than Significant With Mitigation.** Any surface evidence of historic or prehistoric human burials or cremations has been erased by the years of agricultural activity, including the installation of irrigation lines and tile drains, annual discing and other site preparations for growing. Nonetheless, a professional archaeologist may be able to detect signs of burial or cremation. While surface evidence may not be identified, mitigation could include site monitoring during ground disturbances. The forthcoming EIR should address this potential and provide appropriate mitigation and monitoring.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

ENERGY Would the project:

10. Energy Impacts

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"); Meeting California's Renewable Portfolio Standard, IID, July 2018; Project Application Materials.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Setting:

Electricity

Primary energy sources include fossil fuels (oil, coal and natural gas), nuclear, and renewable sources such as wind, solar, geothermal, and hydropower. In addition to utility-provided electrical power, many homes and business are installing rooftop solar and storage, and new construction and renovation is required to conform to the state's strict green building code, which further serves to ensure that energy resources are used economically and wisely. Both the regulatory environment and the economy have moved aggressively toward greater energy efficiency and reliance on non-polluting renewables sources.

The Project site is located within the electric power service boundaries of the Imperial Irrigation District (IID). IID is California's sixth-largest electrical utility, and its third largest public power utility. IID began generating and distributing electricity in 1936, using small hydropower units it installed along its own system of irrigation canals. The IID 2020 power mix is comprised of 41% "eligible" renewable sources (including biomass and biowaste), 28.5% natural gas, 3.5% nuclear and 21.2% identified as unspecified sources for power purchased on the open market.

Natural Gas

Natural gas services in the Project area are provided in the Coachella Valley by Southern California Gas Company (SoCalGas). Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the valley near and parallel to Interstate-10 and continue west to Los Angeles. The pipelines include one 30-inch line and two 24-inch lines, with pressures of 2,000 pounds per square inch (psi). There is currently no natural gas service in the Project. The closest high pressure natural gas lines are located within the Highway 111 right of way approximately 3 miles east of the Project site, and in Monroe Street at Ave 54 3 miles to the north of the site. At this time, it is not known whether lower pressure distribution lines extend to the Project vicinity.

Alternative Energy

IID continues to meet or exceed California's Renewable Portfolio Standard primarily with local resources. As noted above, in 2020 IID's power mix included 41% renewable sources. There is also large-scale wind power production in the Coachella Valley. There are no utility-scale renewable energy facilities in the Project area. It should be noted that SoCalGas is developing "green" sources of natural gas that may reduce GHG and other emissions associated with its use.

The Project has the potential to generate substantial electric power on-site through the use of roof-top solar photovoltaic systems, solar thermal for hot water, process heat and by other means.

Findings of Fact:

- a, b) **Less Than Significant With Mitigation.** Environmental and societal issues associated with energy sources, efficiency of use and associated emissions of criteria pollutants and greenhouse gases (GHGs) is a central focus of land use and environmental planning. The proposed Project would constitute a substantial new demand for energy for a wide range of uses, including space heating and cooking, lighting, hot water, process heat, and electric power. It is not yet known whether or to what extent the construction and/or operation of the proposed Project could significantly impact the environment as a result of wasteful, inefficient, or unnecessary consumption of energy resources. Uses will range from a substantial equestrian center with up to 2,700 horses on site at one time, up to 4,541 residents, 275,000 square feet of commercial space and hotel and other resort uses, and 10,000 square feet of office space.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Project Specific Plan will discuss sustainability, including energy production and use. The Specific Plan's policies, standards and guidelines will be analyzed in the EIR. At that time, mitigation measures, if needed, will be included in the EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

GEOLOGY AND SOILS Would the project directly or indirectly:

11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones

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a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Source(s): Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones," GIS database; Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022; Guidelines For Evaluating And Mitigating Seismic Hazards in California", Special Publication 117, 2008.

Setting:

The proposed Project is located within a central portion of the Coachella Valley, which is a rift valley associated with the San Andreas Fault System in Southern California. The valley is located in the northwestern portion of the Salton Trough, a tectonic depression roughly 130 miles long and 70 miles wide that extends from the San Geronio Pass to the Gulf of Mexico. Tectonically, the valley is a deep fault graben formed by tectonic movement along the San Andreas Fault (SAF), a continental transform fault that extends roughly 808 miles through California. SAF forms the tectonic boundary between the Pacific and North American tectonic plates, which are sliding past one another at a rate of about 50 millimeters per year. It is a complex strike-slip fault that represents a continuous zone of faulting from the San Francisco area to the Salton Sea. Motion accommodated by the fault zone is distributed along a complex system of interrelated faults. The local segment of the SAF has not produced any large surface-rupturing earthquakes in historic times. This fault segment has the potential to generate a magnitude 7.2 earthquake and peak ground accelerations in the Coachella/Thermal area greater than 0.5g.

Findings of Fact:

a) **No Impact.** The nearest Alquist-Priolo Earthquake Fault Zone is associated with the San Andreas Fault approximately 5.5 miles northeast of the Project site. The subject property is not located within, or in proximity to, an Alquist-Priolo Zone, nor are any other active or potentially active faults located in proximity of the subject property. Therefore, no impacts associated with fault rupture will occur onsite.

Mitigation: None required.

Monitoring: None required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. Liquefaction Potential Zone				
a) Be subject to seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure S-3 “Generalized Liquefaction,” Geology Report

Setting:

The subject property and a substantial portion of lands on the valley floor in the eastern Coachella Valley are subject to a liquefaction hazard. Liquefaction occurs primarily in saturated, loose, fine- to medium-grained soils in areas where the groundwater table is within approximately 50 feet of the surface. The Project site is mapped in a “High” Liquefaction Zone as set forth in the ECVAP (Chapter 6 Figure 14) due to shallow groundwater and susceptible sediments. Distance from areas of active faulting may serve to reduce the liquefaction potential in this area.

Findings of Fact:

- a) **Less Than Significant With Mitigation.** While the physical conditions that create a liquefaction hazard cannot be easily modified, specific methods of construction can substantially address these hazards and ensure the integrity of structures if liquefaction occurs. These include optimum soil compaction, use of spreads footings to reduce foundation distortion during a seismic event with on-site liquefaction, and by other means. A Project-specific geotechnical report is being prepared which will further assess the Project’s vulnerability to geotechnical hazards. The Project geotechnical report and EIR will evaluate the potential liquefaction hazard in greater detail and set forth mitigation that can reduce this hazard.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

13. Ground-shaking Zone				
a) Be subject to strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure S-4 “Earthquake-Induced Slope Instability Map,” and Figures S-13 through S-21 (showing General Ground Shaking Risk); Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022; Guidelines For Evaluating And Mitigating Seismic Hazards in California”, Special Publication 117, 2008.

Setting:

The subject property and the entire Coachella Valley are subject to significant ground shaking during a major earthquake on a nearby fault. The San Andreas Fault is capable of generating a moment magnitude 7.4 earthquake. At least two active branches of the San Andreas Fault Zone pass northwest/southeast through the valley and occur within 5.5 miles of the site. The Project planning area could be significantly affected by ground shaking due to faulting along the San Andreas Fault Zone. Other faults in the region, such as the San Jacinto and San Gorgonio Pass faults, also have the potential to produce strong ground shaking in the Project area.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) **Less Than Significant With Mitigation.** The planning area would be exposed to strong ground shaking during a major quake on nearby faults, and could expose people and structures to risks associated with strong seismic ground shaking. A variety of foundation and building construction methods can be used to reduce the effects of strong ground shaking and increase the integrity of building and other structures during such events. The forthcoming EIR will consider site and building design and engineering that mitigates the ground shaking threat in the area.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

14. Landslide Risk

- a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

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Source(s): On-site Inspection, Riverside County General Plan Figure S-5 “Regions Underlain by Steep Slope”; Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022; Guidelines For Evaluating And Mitigating Seismic Hazards in California”, Special Publication 117, 2008.

Setting:

The subject property is essentially flat with a mild gradient to the south and southeast, which is consistent with the area-wide agricultural drain system that serves the subject and surrounding properties. Therefore, there will be no threat of landslides on the site as a function of site topography. However, these soils are described as generally consisting of unconsolidated, very fine-grained sand and silty sand and trenches and excavations in such soils can result in slope failure.

Findings of Fact:

- a) **Less Than Significant With Mitigation.** As noted, the subject property has a mild gradient consistent with the area-wide agricultural drain system that serves the subject and surrounding properties. Therefore, there will be no threat of landslides on the site as a function of site topography. However, site development that may result in temporary excavations varying up to a depth of up to 8± feet, with potentially deeper localized removals. Based on the physical properties of the onsite soils, temporary excavations exceeding 4 feet in height could collapse and should be cut back based on the stability of the temporary slopes. Applicable requirements of the California Construction and General Industry Safety Orders, the Occupational Safety and Health act of 1970 and the Construction Safety Act should also be followed. Therefore, hazards associated with landslide or slope failure can be mitigated to less than significant levels with properly prescribed grading and excavation protocols. This hazard and appropriate mitigation measures will be discussed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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15. Ground Subsidence

a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?

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Source(s): Riverside County General Plan Figure S-7 "Documented Subsidence Areas Map; Coachella Valley Water Management Plan", Coachella Valley Water District, January 2012; Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022; Guidelines For Evaluating And Mitigating Seismic Hazards in California", Special Publication 117, 2008.

Setting:

Ground subsidence is the gradual settling or sinking of the ground surface with little or no horizontal movement. During this process, water contained in subsurface clay layers is squeezed out, and the clay is compacted by the weight of overlying sediments. Subsidence can result in structural damage to structures that are sensitive to slight changes in elevation, such as larger buildings, canals and channel lining, and wells. Subsidence can also result in changes to surface drainage, reductions in aquifer storage capacity, and the formation of earth fissures.

In the Coachella Valley and at the subject and surrounding properties, subsidence is primarily associated with long-term groundwater extraction, although it may also be induced by strong seismic groundshaking. Regional subsidence is most likely to occur in the central and southeasterly portions of the Valley, which are underlain by numerous clay layers that separate water-producing zones. Land at or near the Valley margins is also particularly susceptible to subsidence.

Findings of Fact:

a) **Less Than Significant With Mitigation.** Preliminary geotechnical analysis, including soils analysis, indicates that on-site soils have the potential for shrinkage and subsidence of between 19% and 25% with proper excavation and recompaction. Therefore, hazards associated with soil subsidence can be mitigated to less than significant levels with properly prescribed grading, excavation and recompaction protocols. This hazard and appropriate mitigation measures will be discussed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

16. Other Geologic Hazards

a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

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Source(s): On-site Inspection; Project Application Materials; Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022; Guidelines For Evaluating And Mitigating Seismic Hazards in California", Special Publication 117, 2008.

Setting:

The subject property is located east of the east margin of the Santa Rosa Mountains on the valley floor. The site is not located near any large body of water that could be subject to seiching or cause associated flooding in the area. Neither is the site in proximity of any volcanic or related hazard area, being located

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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approximately 40 miles northwest of the Salton Sea volcanic region where cinder cone, mud pots and other signs of volcanic and magmatic hazards are known to exist. Neither is the subject property subject to mud flows associated with unstable unconsolidated slopes or in areas of steep slopes denuded by fire. Other geological hazards that occur in the Project vicinity have a less than significant potential to affect the subject property.

Findings of Fact:

- a) **No Impact.** The Project site is not within an area of influence for seiche, mudflow or volcanic hazards. It occurs in the center of the east valley, on flat topography with no water body or slope in its vicinity. There is no potential for any of these geologic hazards, and no impact will occur.

Mitigation: None required.

Monitoring: None required.

17. Slopes				
a) Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riv. Co. 800-Scale Slope Maps; On-site Inspection; Project Application Materials; Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022.

Setting:

The subject property has a mild gradient consistent with the area-wide agricultural drain system that serves the subject and surrounding properties. The Project grading generally respects the existing topography and no manufactured slopes are proposed.

Findings of Fact:

- a, b, c) **Less Than Significant.** The subject property is essentially flat and gently slopes to the southeast. The proposed Project calls for the general maintenance of the current site topography and plans to connect to the CVWD sanitary sewer system negating the need for on-site septic. There will be limited and less than significant impacts associated either slopes, either natural or manufactured. No slopes greater than 2:1 are planned. In some locations and for some improvements, trenching may require standard shoring during installation of infrastructure. Project grading is not anticipated to affect on-site soil conditions or depth to groundwater. These conditions and potential hazards will be further assessed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Soils				
a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): U.S.D.A. Soil Conservation Service Soil Surveys, Project Application Materials, On-site Inspection, Soils Report

Setting:

The subject property and surrounding areas are underlain by geologically young (late-Quaternary) alluvial deposits. These soils are described as generally consisting of unconsolidated, very fine-grained sand and silty sand. Near-surface soils are classified as sandy Silt (SM-ML), silty Sand (SM), and low plasticity Silt (ML) with minimal clay encountered. Based on these soil classifications, the site soils are considered Very Low in expansion potential (Expansion Index not greater than 20). The subject property and surrounding lands are identified as having a high potential for wind erosion.

Findings of Fact:

- a) **Less Than Significant With Mitigation:** The soils and occasionally windy conditions at the subject and surrounding properties create a high potential for significant soils erosion during all stages of site disturbance and development. A wide range of best management practices are available that can be applied during site grading, excavation and other soil-disturbing activities that can effectively mitigate this erosion potential which will be evaluated in the forthcoming EIR. Related measures are also set forth in the air quality discussion of this IS and the forthcoming EIR.
- b,) **Less Than Significant Impact:** Soils on the subject property are expected to have limited clay components or to thus be of an expansive nature. On-site soils are generally sandy Silt (SM-ML), silty Sand (SM), and low plasticity Silt (ML) with minimal clay encountered. Nevertheless, the results of the site-specific geotechnical analysis will be analyzed in the EIR.
- c) **No Impact.** While site conditions, including site soils and elevated groundwater, would be a constraint on the use of on-site septic tanks, the proposed project will connect to the CVWD wastewater collection and treatment system, making the issue of on-site soils for septic tank use moot. Therefore there will be no impact associated with the use of septic tanks.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. Wind Erosion and Blowsand from project either on or off site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?				

Source(s): Riverside County General Plan Figure S-8 "Wind Erosion Susceptibility Map," Ord. No. 460, Article XV & Ord. No. 484; On-site Inspection; Project Application Materials; Updated Geotechnical Report, Equestrian Estates Development, Petra Geosciences, April 13, 2022.

Setting:

The subject property and surrounding lands are identified as having a high potential for wind erosion. The subject property and surrounding areas are underlain by geologically young (late-Quaternary) alluvial deposits. These soils are described as generally consisting of unconsolidated, very fine-grained sand and silty sand. near-surface soils are classified as sandy Silt (SM-ML), silty Sand (SM), and low plasticity Silt (ML) with minimal clay encountered.

Findings of Fact:

- a) **Less Than Significant With Mitigation:** The soils and occasionally windy conditions at the subject and surrounding properties create a high potential for significant soil erosion during all stages of site disturbance and development. A wide range of best management practices are available that can be applied during site grading, excavation and other soil-disturbing activities that can effectively mitigate this erosion potential which will be evaluated in the forthcoming EIR. Related measures are also set forth in the air quality discussion of this IS and the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

GREENHOUSE GAS EMISSIONS Would the project:				
20. Greenhouse Gas Emissions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan, Riverside County Climate Action Plan ("CAP"), Project Application Materials.

Setting:

Air quality has become an increasing concern because of human health issues, but also because air pollutants are contributing to global warming and climate change. The primary contributor to air pollution is the mining and burning of fossil fuels through the use of automobiles, power and heat generators, and industrial processes. Emissions from the combustion or extraction and use of fossil fuels are responsible for the poor air quality that is evident in industrial centers worldwide.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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In 1992, the United States joined other countries around the world in signing the United Nations Framework Convention on Climate Change (UNFCCC) with the goal of controlling greenhouse gas emissions. A Climate Change Action Plan was created in the United States based on the UNFCCC signing, and provides more than 50 voluntary programs aimed at reducing GHG emissions. The State of California has developed new laws and regulations to reduce these emissions. State legislation and regulations call for better integrated land use planning, and curtailing energy production away from nonrenewable sources and toward new renewable sources, such as solar and wind.

California SB 375 in part implements greenhouse gas reduction targets set forth in AB 32 and encourages regional land use planning to reduce vehicle miles traveled and requires jurisdictions to adopt a sustainable communities strategy. The California Air Resources Board is continuing to draft regulations to implement the Scoping Plan. Senate Bill 2X requires that by the year 2020, 33% of the electricity used in California is from renewables, to help reduced GHG emissions in the state.

Greenhouse gases (GHG), including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases (hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride), are released into the atmosphere through natural processes and human activities. These gases are termed greenhouse gases due to their shared characteristic of trapping heat, and they are believed to be responsible for the global average increase in surface temperatures of 0.7-1.5°F that were observed during the 20th century. The quantity of greenhouse gases in the atmosphere has increased significantly over a relatively short period. Carbon dioxide is the primary greenhouse gas that has raised the most concern of atmospheric scientists due to current atmospheric levels, current and projected emission levels. Sources of GHGs include burning of fossil fuels, emission of volatile gases including and especially natural gas, and other chemical compounds. Development facilitated by the proposed Project could result in increased emissions of GHGs.

The proposed Project will generate GHGs from both construction and operation. Certain components of the Project, i.e. the equestrian use, may make additional contributions to Project GHG emissions that should be examined and quantified to the greatest extent practicable. Sources of GHG emissions that should be evaluated in the EIR include those from anticipated stationary and mobile sources, off-gassing, and from any other project construction and maintenance activities that have the potential to emit GHGs. Post-construction emissions should also be quantified, including the proposed equestrian use, to determine whether and how the Project can minimize GHG emissions.

Findings of Fact:

- a, b) **Potentially Significant Impact:** The proposed Project would include over 1,000 homes, 285,000 square feet of commercial space, a resort hotel, villas and related uses, an RV park and 223.1± acres of equestrian center capable of boarding up to 2,700 horses at any given time. The Project would provide for neighborhood commercial services and on-site workforce housing, both of which, once built, will serve to reduce post-construction vehicle trips and vehicle miles traveled (VMTs). The subject property is located away from existing urban centers and services but in an area that is becoming progressively more urban.

It is also uncertain whether and to what extent the proposed Project, which requires a General Plan Amendment to the Foundational Element and a change of zoning, can be found to be consistent and in conformance with regional planning targets and goals against which a given project's impacts are also to be measured. The Project EIR will evaluate the proposed Project's potential to generate significant GHG emissions and whether and to what extent Project emissions conflict with applicable plans, programs and/or regulations.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

HAZARDS AND HAZARDOUS MATERIALS Would the project:

21. Hazards and Hazardous Materials

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

☐ ☐ ☒ ☐

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ ☐ ☒ ☐

c) Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

☐ ☐ ☒ ☐

d) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?

☐ ☐ ☐ ☒

e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

☐ ☐ ☐ ☒

Source(s): Project Application Materials; County of Riverside Environmental Impact Report No. 521 Public Review Draft, February 2015; California Department of Toxic Substances Control "EnviroStor" Database, accessed August 2022.

Setting:

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under Title 22 of the California Code of Regulations (CCR), the term "hazardous substance" refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) ignitability; (2) corrosivity; (3) reactivity; and (4) toxicity.

A hazardous material is defined as a substance or combination of substances which may either (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed.

The subject property is located one-half mile north of the Desert Mirage High School and the Las Palmas Elementary School located at the northeast corner of Tyler Street and Ave 66.

Existing land uses are largely agricultural with increasing urbanization to the north and east, including the Thermal Landfill, a site identified on the Cortese List as a source of "metals, organochlorine pesticides and polynuclear aromatic hydrocarbons". The landfill, which is approximately 2.5 miles northeast of the subject property, was closed in 1972. On July 27, 2016, DTSC approved the Removal

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Action Workplan and an agency-approved maintenance plan is in effect. There are no other hazardous material sites in proximity of the subject property. There are no large or small commercial enterprises, auto dealerships with related maintenance facilities, gasoline service stations, restaurants and other potential generators of hazardous materials in the Project vicinity. The site has been in active agriculture for many years and includes crop and materials storage facilities in site. A Phase I Environmental Site Assessment will be conducted to further assess the potential for hazardous materials either on-site or in the Project vicinity.

Findings of Fact:

- a, b, c) **Less Than Significant Impact:** The proposed Project would result in a mix of residential, commercial, resort, RV park and equestrian uses on 619.1± acres. None of the planned uses is expected to involve the routine transport, loading or unloading of hazardous materials that could pose a threat to the public. Limited fuel storage will be associated with the equestrian center and manure will be collected and hauled off-site daily. Neither is the Project expected to create a significant potential for foreseeable upset of hazardous materials or otherwise create such a hazardous condition either during construction or operation. A comprehensive circulation and mobility network is being developed for the Project, and bounding roadways are of arterial scale and will be developed in accordance with the County General Plan Circulation Element. The project is not expected to interfere with any emergency response plan or program. Nonetheless, a Phase I ESA is being prepared and the potential of the project to generate such impacts will be further analysed in the forthcoming EIR.
- d, e) **No Impact:** The proposed Project site is located one-half mile north of the Desert Mirage High School and the Las Palmas Elementary School. While the Project is not expected to generate emissions or handle hazardous or acutely hazardous materials, substances, neither is it located within the identified on-half mile area of influence. It should also again be noted that the subject and surrounding lands have been in active agriculture for many years, has not been the site of any commercial or industrial activities, and is not include on any list of hazardous materials sites.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

22. Airports

a) Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County General Plan Figure S-20 “Airport Locations”; RivCo GIS database; Google Earth; Riverside County ALUCP—East County Airports Background Data (December 2004 Draft); Riverside County Airport Land Use Compatibility Plan Policy Document (Amended September 2006).

Setting:

The proposed project site is located 1.25± miles southwest of the nearest runway of the County-owned and operated Jacqueline Cochran Regional Airport ((JCRA; aka Thermal Airport), which consists of a long north-south runway and a shorter NW/SE runway, as well as a variety of hangers, offices and other buildings and facilities. Nearly the entire Project site is located within Land Use Compatibility Zone D for the airport (a small portion in the S/W corner is in Zone E). The proposed Project’s uses and densities/intensities are generally consistent with the Basic Compatibility Criteria in Table 2A of the Airport Land Use Compatibility Plan (ALUCP), except for single-family estate homes proposed in Planning Area 2.

The entire project site lies outside of the 60 dB CNEL contour for the ultimate buildout of the airport (See Exhibit JC-6 on p. E6-6 of the ALUCP). In fact, the entire project site lies outside of the 55 dB CNEL contour. As shown in Table 2B on page 2-23 of the ALUCP, residential uses are considered “clearly appropriate” outside of the 55 dB CNEL contour.

Findings of Fact:

- a, b) **Less Than Significant With Mitigation:** As noted, the proposed Project is located more than one mile southwest of the JCRA and well outside the future 60 dB and 55 dB CNEL contours for the airport. All but a limited portion is located in Land Use Compatibility Zone D, which allows or conditionally allows for the proposed uses with the possible exception of estate lots planned on the northern portion of the project site.

The project is subject to review by the County Airport Land Use Commission (ALUC) and the matter will be brought before the Commission for review and consideration. Pursuant to consultation with ALUC staff, the Project proponent is preparing an ALUC application as well as a bird/airport impact analysis and management plan. The potential impacts of the Project in the JCRA will be further analysed in the forthcoming EIR.

- c) **Less Than Significant With Mitigation:** As noted, all but a small portion of the Project site is located within Land Use Compatibility Zone D, which is characterized as an area associated with primary traffic patterns and runway buffer areas. would the project result in a safety hazard for people residing or working in the project area. Proposed development densities and future occupancy levels fall within allowable or conditionally allowable ranges. Maximum building/structure heights will be 65± feet and below the 70-foot limit set for Zone D. Pursuant to consultation with ALUC staff, the Project proponent is preparing an ALUC application as well as a bird/airport impact analysis and management plan. The potential impacts of the Project in the JCRA will be further analyzed in the forthcoming EIR.

- d) **No Impact:** The proposed project site is not located within the vicinity of a private airstrip, or heliport. Therefore, there will be no impacts to such uses or to the proposed Project.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY Would the project:				
23. Water Quality Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan Figure S-9 "Special Flood Hazard Areas," Figure S-10 "Dam Failure Inundation Zone," Riverside County Flood Control District Flood Hazard Report/Condition, GIS database; Exhibit A; "Eastern Coachella Valley Stormwater Master Planning, CVWD 2015; "Water Quality Control Plan, Colorado River Basin – Region 7," California Regional Water Quality Control Board, State Water Resources Control Board, 2019.

Setting:

The proposed Project site is located in an area with extensive cultivation supported by a network of water lines, tile drains and agricultural drains, including drains along Harrison Street to the immediate west, and the future Ave 64 along the Project's south boundary. The site occurs at 140± feet below mean sea level (-140'). The average annual rainfall in the area is 3± inches and the estimated 100-year 6-hour storm rainfall in the area ranges between 2.65 and 2.79 inches.

The property is subject to local flooding primarily from the Santa Rosa Mountains to the west. The site is also located west of the Coachella Valley Stormwater Channel (CVSC) and one mile west of the 100-Year flood plain associated with this major drainage feature. The south half of the subject property is designated Zone X on the FEMA Flood Insurance Rate Maps with reference to a 2018 FEMA *Letter of Map Revision*". The Zone X designation indicates inundation threat of less than 1-foot in depth and partially associated with a reduced flood risk due to levee protection. The referenced levee is presumably the Dike No 4 protective levee to the west built by the US Bureau of Reclamation.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The subject property is within the boundaries of the CVWD 2015 *Eastern Coachella Valley Stormwater Master Plan*. This plan shows an east-west “open channel” along Ave 64 (south Project boundary) designated as “N01” and extending from just east of Jackson Street east to its discharge into the CVSC. The N01 channel is also called out as the “*Avenue 64 Evacuation Channel*” with its future location to be along the north side of Ave 64. The master plan also identified open channel “N01-02 within or along Harrison Street (west Project boundary).

Findings of Fact:

- a) **Less Than Significant With Mitigation.** The proposed Project will convert approximately 619.1± acres of active cropland into a series of urban uses, including up to 1,303± residences, a 320 space RV park, 275,000 square feet of commercial space, 10,000 square feet of office space, 150± hotel rooms, and a 223.1± acre equestrian center with capacity for up to 2,700 horses. The Project would include a 7± acre resort-oriented recreational water feature. The Project is to connect to the CVWD sanitary sewer system and no on-site septic tanks are contemplated. Existing and future stormwater drains are planned by CVWD along the site’s south and west boundaries. Their effects on the proposed Project are not known at this time, nor are the potential effects of the proposed Project on these facilities and on related water quality issues associated with the proposed development. Therefore, it is uncertain whether or to what extent the proposed Project may violate water quality standards or waste discharge requirements, or whether it could otherwise substantially degrade surface or ground water quality. Potential impacts may be mitigable and these issues will be addressed in detail in the forthcoming EIR.
- b) **Less Than Significant With Mitigation.** The subject property has been in active cultivation for several decades and during that time has relied upon groundwater and imported Colorado River water to irrigate multiple crops per year. In more recent times, CVWD has established plans to treat Colorado River water and irrigation tail water for future potable uses. In the meantime, CVWD is actively recharging the Lower Whitewater Subbasin in which the Project site is located via its Thomas Levy Groundwater Recharge Facilities located upgradient of the site and approximately 4 miles to the west. A master landscape plan is under development and is expected to prescribe to CVWD’s landscape and irrigation ordinance. The forthcoming EIR will clarify Project demand and potential impacts to water supplies. A Water Supply Assessment (WSA) is being prepared for the proposed Project and will be reviewed by the CVWD. Therefore, the forthcoming WSA and EIR will determine whether the Project will substantially decrease groundwater supplies, interfere substantially with groundwater recharge or have other effects that may impede sustainable groundwater management of the basin.
- c, e, g) **Less Than Significant Impact.** The proposed Project is located on generally flat to gently sloping lands that drain to the southeast. Annual and 100-year rainfall are relatively low, and the Project appears to have numerous opportunities for the creation of on-site stormwater facilities, including retention basins. The overall drainage pattern on site and in the vicinity are not expected to be affected by the proposed Project. A detailed grading and drainage plan and associated hydrology analysis are under development and will be reviewed by CVWD and will be assessed in the forthcoming EIR.

With appropriate on-site stormwater capture, conveyance and retention, the proposed Project is not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. The difference in stormwater runoff between the undeveloped and developed state will be retained on site.

As noted, the overall gentle gradient of the subject and surrounding lands is from northwest to southeast. The area is in active cultivation and CVWD maintains numerous agricultural drains that convey high groundwater and other runoff from these lands and convey them to the Coachella valley Stormwater Channel to the east. Therefore, in the Project area sheet flows prevail and concentrations of flows are along paved roadways. The Project is not anticipated to substantially interrupt, impeded or redirect local or regional flows.

- d, f) **Less Than Significant Impact.** As noted, the subject and surrounding properties are largely in active cultivation and have been carefully graded to maximize efficient irrigation. Discernable flow patterns in the area are associated with street runoff and conveyance and local agricultural drains that help to lower the perched, salty water table and allow crop cultivation. Project development will include best management practices, on-site stormwater capture, conveyance and retention.

The above referenced East Coachella Valley Stormwater Management Plan has been designed to anticipate the future conversion of lands in this area from agricultural to urban uses, A system of open channels and pipes are planned to intercept and convey area-wide runoff to the Coachella Valley Stormwater Channel to the east. Any increases in runoff associated with development of the proposed project will be retained on site and is not anticipated to create or make a significant contribution to runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Nor is the Project expected to generate substantial additional sources of polluted runoff, with the implementation of best management practices required by the County through project-specific WQMPs and SWPPPs which will be further assessed in the forthcoming EIR.

- h) **Less Than Significant With Mitigation.** The subject property is potentially subject to local 100-Year flooding primarily from the Santa Rosa Mountains to the west. The site is also located west of the Coachella Valley Stormwater Channel (CVSC) and one mile west of the 100-Year flood plain associated with this major drainage feature. The south half of the subject property is designated Zone X on the FEMA Flood Insurance Rate Maps with reference to a 2018 FEMA *Letter of Map Revision*". The Zone X designation indicates inundation threat of less than 1-foot in depth and partially associated with a reduced flood risk due to levee protection. A CVWD open stormwater channel is planned along the intervening Ave 64 right of way that, once constructed, will offer at least some protection against this flooding (inundation) threat. It should be noted that the mapped inundation threat appears to be associated with the assumed failure of the Dike 4 protective levee to the west, although the significance of that threat appears limited. The subject property is not located downstream of any large water storage facility and is not subject to tsunami or seiches. The Project includes a 231± acre equestrian center a portion of which would be located within the identified 1-foot inundation area as shown on the current FEMA maps. Whether and to what degree Project inundation could risk the release of pollutants is uncertain and will be further analysed in the forthcoming EIR.

- i) **Less Than Significant Impact.** The proposed Project will be required to comply with all applicable stormwater management plans and water quality plans of CVWD and the Regional Water Quality Control Board. The Project site is located 4 miles west of major CVWD groundwater recharge facilities and will have no effect on them or their function. Therefore, the Project is not expected to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE AND PLANNING Would the project:				
24. Land Use				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan and ECVAP, 2015; RivCo GIS database; Project Application Materials.

Setting:

The Project site is currently designated “Agriculture” in the Foundation Element and the Eastern Coachella Valley Area Plan (ECVAP) of the General Plan. Surrounding lands are also designated Agriculture to the north and west, as well as Low Density Residential and planned development to the north and east. The site is located in an area of the eastern Coachella Valley that has been undergoing community-wide planning and urbanization. The property is also located immediately north of lands of the Torres-Martinez Desert Cahuilla. Lands to the immediate east and northeast include Kohl Ranch and the Thermal Cub Developments. The Desert Mirage High School and Las Palmas Elementary School are located approximately one-half mile south of the subject property on Tyler Street. The subject property is located immediately east of the Vista Santa Rosa Community.

The applicant proposes a land use change of the Foundation Element designation to “Community Development” and also proposed to apply a variety of ECVAP land use designations consistent with proposed underlying land uses. Consistency zoning is also proposed and a part of this Project, with proposed zoning designations that correspond to the proposed ECVAP and use designations. The Project application includes Tentative Tract Map (TTM) No. 38531, Tentative Tract Map (TTM) No. 38578, two plot plan applications, and a General Plan Amendment (GPA) and Change of Zone (CZ).

The ECVAP states that the “*The Land Use Plan focuses on preserving the unique features in the Eastern Coachella Valley area and, at the same time, guides the accommodation of future growth. To accomplish this, more detailed land use designations are applied than for the countywide General Plan.*” The subject property lies both adjacent to and in proximity of such transitional land uses. The proposed Specific Plan will address land use and overall General Plan consistency.

Findings of Fact:

- a) **No Impact.** The subject property is a contiguous holding of 619.1± acres bounded on all sides by existing and future arterial-scale roadways. The entire site is being planned through the development of a Specific Plan. There are no contiguous or nearby residential neighborhoods, the nearest “neighborhood” with existing residential development being widely scattered and on larger lots. There are no existing residences on the site. Therefore, the project will not physically divide an established community.
- b) **Potentially Significant Impact.** The subject property is located at the western edge of transitional land uses that have for many years been evolving away from agriculture to a variety of urban uses, including planned mixed-use developments that are building out under approved Specific Plans, including Kohl Ranch and others. Smaller-scale equestrian-oriented ranch development has also occurred to the immediate east and northwest. The nearest urban center is the community of Mecca located 5± miles southeast of the subject property.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The proposed project would constitute a major encroachment into otherwise solidly agricultural lands that are well served by CVWD/USBR irrigation systems, tile drainage and agricultural drain facilities. These circumstances raise concerns regarding the direct and induced conversion of prime and other valuable and limited farmland to urban uses, which may conflict with County land use designations and intent. It is unclear whether or to what extent the proposed Project may cause a significant environmental impact due to a conflict with the General Plan or ECVAP land use plans, land use patterns and/or policy, or regulations adopted to avoid or mitigate an environmental effect, including the loss of valuable farmland. Therefore, these issues will be thoroughly evaluated in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

MINERAL RESOURCES Would the project:

25. Mineral Resources

a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?

☐
☐
☐
☒

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐
☐
☐
☒

c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?

☐
☐
☐
☒

Source(s): Riverside County General Plan Figure OS-6 "Mineral Resources Area"; "Soils Survey of Riverside County, California, Coachella Valley Area," U.S. Soil Conservation Survey, September 1980 (as amended); Mineral Land Classification: Aggregate Materials in the Palm Springs Production-Consumption Region, Special Report 159," California Department of Conservation, Division of Mines and Geology, 1988.

Setting:

In the Coachella Valley, mineral resources are largely limited to aggregates, such as sand, gravel, and crushed stone. These are major components of concrete, plaster, stucco, road base and fill, which are essential to the construction industry. There are important deposits of these materials that occur within the region that are being actively developed.

Other mineral deposits in the region are generally limited to rocky outcroppings within the Little San Bernardino and Santa Rosa Mountains and have not been mined. These resources include copper, limestone, specialty sands, and tungsten. There are decorative stone deposits that are being mined on public land in the Painted Hills area west of Desert Hot Springs, as well as clay deposits at the base of the Mecca Hills east of Thermal on public and private land. These may be used as an impermeable layer for lining landfills, ponds, and similar construction applications, and some of these deposits have been permitted for mining.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The subject property is located on the Valerie Quad of the *Mineral Land Classification Map* published by the California Department of Conservation-Division of Mines and Geology (now the California Geological Survey). The mineral mapping and classification identifies aggregate materials in the 629± square mile Palm Springs Production-Consumption Region. The report was prepared to determine quantities of available aggregate resources, and to evaluate the adequacy of permitted aggregate reserves for meeting the future needs of each region. The State estimates that the Palm Springs region contains 3.2± billion tons of aggregate resources. The report assigned Mineral Resource Zone (MRZ) classifications to all lands within the region. MRZ classifications describe the location of significant PCC-grade aggregate deposits as follows.

MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. Includes Quaternary alluvial deposits of the central upper Coachella Valley, the Imperial Formation of the Indio Hills, Garnet Hill, the hills west of Whitewater River Canyon, and the Borrego Formation of the southeastern Coachella Valley.

MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. Includes the following areas: 1) Whitewater River floodplain extending from the Whitewater River Trout Farm to the City of Palm Springs, 2) San Gorgonio River floodplain from Cabazon to its confluence with the Whitewater River, 3) the river channel in the lower part of Little Morongo Canyon, 4) a small alluvial wash north of Thousand Palms, 5) the confluent alluvial fans of Berdoo and West Berdoo Canyons, 6) the alluvial fan of Fargo Canyon, 7) an alluvial fan north of Indio, and 8) an alluvial wash and fan east of Thermal.

MRZ-3: Areas containing mineral deposits, the significance of which cannot be evaluated from available data. Includes lands composed of Cabazon Fonglomerate, Ocotillo Conglomerate, Painted Hills Formation, Palm Springs Formation, Mecca Formation, and metamorphic rocks of the San Jacinto Mountains and the San Gorgonio Complex.

The subject property and surrounding lands are located south and outside of mineral resource mapping, the closest mapped area occurring one mile to the north and designated as MRZ-1 with known localities where sand and/or aggregate have previously been mined. Mapping for the subject and nearby lands appears to indicate that no significant mineral resources occur or are expected to occur in this area. The proposed Project area and much of the surrounding land is in active agriculture, is developed or otherwise unavailable for mining. The Coachella Valley has nearly a dozen permitted aggregate operations, which contain approximately 272 million tons of mineable aggregate. These reserves are expected to meet the demand and provide adequate supply at current rates of consumption for approximately 130 years.

Findings of Fact:

a, b, c) **No Impact.** The subject property is located on the valley floor and approximately 2.8 miles east of alluvial washes emanating from the Santa Rosa Mountains. On-site soils are sands and silt and are not considered a potential source of aggregate and a limited source for sand. The nearest mapped mineral resource zone is located one mile north. The site is not mapped or otherwise identified as a locally-important mineral resource recovery site delineated on the County General Plan or the ECVAP. The subject property is not located in proximity to any existing or abandoned quarries or mines.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Furthermore, the Project planning area has been in active cultivation for many years and in recent time has experienced encroaching urbanization from the north and east, further reducing the site and vicinity's value as a mineral resource area. The local market is demonstrably well supplied for the foreseeable future through a variety of active mining permits in the valley and vicinity. The proposed project will have no impact on or result in the loss of known or suspected mineral resources of local, regional or state-wide value.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

NOISE Would the project result in:

26. Airport Noise

a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?

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b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

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Source(s): Riverside County General Plan Figure S-20 "Airport Locations," County of Riverside Airport Facilities Map; Google Earth; Riverside County ALUCP—East County Airports Background Data (December 2004 Draft); Riverside County Airport Land Use Compatibility Plan Policy Document (Amended September 2006).

Setting:

Noise can be defined as "unwanted sound." Excessive and/or sustained noise can contribute to both temporary and permanent physical impairments, such as hearing loss and increased fatigue, as well as stress, annoyance, anxiety, and other psychological reactions in humans. The evaluation and mitigation of noise in a community is essential to protecting the health and welfare of the general public, and preserving the inherent value of recreation, open space, and conservation lands. Furthermore, it can help define the need for additional remedial measures that mitigate noise problems. Noise propagation can also be affected by terrain and surrounding development.

The proposed Project site is located 1.25± miles southwest of the nearest runway of the County-owned and operated Jacqueline Cochran Regional Airport ((JCRA; aka Thermal Airport), which consists of a long north-south runway and a shorter NW/SE runway, as well as a variety of hangars, offices and other buildings and facilities. Nearly the entire Project site is located within Land Use Compatibility Zone D for the airport (a small portion in the S/W corner is in Zone E). All of the proposed Project uses and densities/intensities are consistent with the Basic Compatibility Criteria in Table 2A of the Airport Land Use Compatibility Plan (ALUCP), except for single-family estate homes proposed in Planning Area 2.

The entire project site lies outside of the 60 dB CNEL contour for the ultimate buildout of the airport (See Exhibit JC-6 on p. E6-6 of the ALUCP). In fact, the entire project site lies outside of the 55 dB CNEL contour. As shown in Table 2B on page 2-23 of the ALUCP, residential uses are considered "clearly appropriate" outside of the 55 dB CNEL contour.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The subject property is not located in the vicinity of a private airstrip, and therefore would not expose people residing or working in the project area to excessive noise levels from such a source.

Findings of Fact:

- a) **Less Than Significant Impact.** The proposed project site is located 1.25± miles southwest of the nearest runway of the County-owned and operated Jacqueline Cochran Regional Airport. The entire Project site lies outside of the future 60 dB CNEL contour for the ultimate buildout of the airport (See Exhibit JC-6 on p. E6-6 of the ALUCP). In fact, the entire project site lies outside of the 55 dB CNEL contour.

Pursuant to consultation with ALUC staff, the Project proponent is preparing an ALUC application as well as a bird/airport impact analysis and management plan. The potential impacts of the Project in the JCRA will be further analysed in the forthcoming EIR.

- b) **No Impact.** The subject property is not located within two miles of a private runway or airstrip.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

27. Noise Effects by the Project

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Generation of excessive ground-borne vibration or ground-borne noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan, Table N-1 ("Land Use Compatibility for Community Noise Exposure"), Project Application Materials; Google Earth; Riverside County ALUCP—East County Airports Background Data (December 2004 Draft); Riverside County Airport Land Use Compatibility Plan Policy Document (Amended September 2006).

Setting:

The County regulates noise-generating activities and requires that daytime noise levels for sensitive receptors not exceed exterior 65 dBA CNEL at the property line, and 45 dBA CNEL or less for all interior areas. Existing land uses within the planning area and vicinity include extensive agriculture, vacant lands, and ranchette development. The Thermal Cub motorsport-oriented mixed-use development is located a short distance to the northeast and may be a source of intermittent noise that could impact the subject property. There are no other potentially substantial noise generators in the Project vicinity. Traffic volumes on local streets are quite low and do not currently constitute a substantial source of community noise.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- a) **Less Than Significant With Mitigation.** Buildout of the Project will result in site preparation, limited demolition, grading, excavation, construction, paving, and related activities. Construction will result in localized and temporary increases in ambient noise levels and may impact sensitive receptors. The County recognizes that construction noise is difficult to control and restricts allowable hours to between 7:00 a.m. and 7:00 p.m. These restrictions, muffling of construction equipment, and other measures will reduce, to some extent, construction noise impacts on surrounding land uses. Impacts will be temporary and will end once construction is complete. There are currently very few sensitive receptors adjacent to or near the subject property. Nonetheless, the EIR will quantify and analyze construction impacts and determine whether mitigation measures will be required.

Long-term operation of the various Project components will result in permanent and intermittent sources of increased ambient noise in the surrounding area. However, proposed land uses are generally consistent with the proposed urban commercial and residential environment, and noise sources are expected to be similar to those already operating in the surrounding area, including motorsport, equestrian and other activities.

New Project-related noise sources are expected to include vehicle traffic, commercial and other loading areas, mechanical equipment such as heating, ventilation, and air conditioning (HVAC) units, loading and unloading operations, and parking lot activities. The 231± acre equestrian center will include multiple horse rings that also serve as event space to horse shows and related events. It is not yet known whether a public announcement system or other amplified speakers will be a part of that land use, and will be further analysed in the forthcoming EIR.

- b) **Less Than Significant Impact.** Development of the proposed project will require the use of trenching, excavation, grading and compaction equipment, all of which have the potential to generate substantial ground vibrations. Impacts would be short-term in nature and would occur during the less sensitive daytime hours. In the overall, these impacts are expected to be less than significant. The proposed Project is not expected to generate excessive ground-borne vibration or ground-borne noise levels. Nonetheless, potential impacts will be further evaluated in the EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

PALEONTOLOGICAL RESOURCES:

28. Paleontological Resources

- a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?

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Source(s): Riverside County General Plan Figure OS-8 "Paleontological Sensitivity," Paleontological Resource Impact Mitigation Program ("PRIMP") Report; Paleontological Resources Technical Report City of La Quinta General Plan 2010 Update.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Setting:

In general, the defining character of fossils or fossil deposits is their geologic age, which is typically older than 10,000 years, the generally accepted temporal boundary marking the end of the last late Pleistocene glaciation and the beginning of the current Holocene epoch. Fossil resources generally occur in areas of sedimentary rock (e.g., sandstone, siltstone, mudstone, claystone, and shale) or fluvial sands, mud, and silt. Occasionally fossils may be exposed at the surface through the process of natural erosion or as a result of human disturbances; however, they generally lay buried beneath surficial soils. Thus, the absence of fossils on the surface does not preclude the possibility of them being present in subsurface deposits, while the presence of fossils at the surface is often a good indication that more remains may be found in the subsurface.

The County General Plan maps large portions of the Coachella Valley, including the subject property, as having a high sensitivity for the occurrence of paleontological resources. In the project vicinity, these are largely associated with fossil bivalves from earlier stands of Ancient Lake Cahuilla, which reached an elevation of approximately 42 feet above mean sea level. Evidence of this high stand can be clearly seen along the edge of the Santa Rosa Mountains where a “bathtub” ring can be seen.

In addition to lacustrine sediments from the Coachella soil series and fluvial sediments from the Gilman soil series, several shell and shell fragments of freshwater mollusks have been observed in the project vicinity. Previous paleontological surveys conducted in the area have identified three species of freshwater mollusks, *Physa* sp., *Tryonia* sp., and *Gyraulus* sp., which are among the most common species of freshwater mollusks to be found in the lakebed sediments. While the lakebed sediments are often called the Quaternary Lake Cahuilla beds (Rogers 1965; Dibblee 1954:Plate 3; Scott 2010), no Pleistocene-age fossils localities have been reported from these lakebed sediments or their equivalent strata in the Coachella Valley (CRM TECH 2010).

The subject property is essentially flat and featureless, having been graded over the course of many years to facilitate crop irrigation. There are no unique geologic features on the site or in the vicinity.

Findings of Fact:

- a) **Less Than Significant With Mitigation.** The Project area is designated with a “High” (Ha) potential for sensitive paleontological resources. The site has been disturbed by extensive agricultural activity for many years, which has included mass grading, installation of sub-surface tile drains, a network of main and lateral irrigation lines, and field discing multiple times a year. Prior to construction of the USBR Dike 4 flood protection levee to the west, the site was subject to sediment deposition from mountain and foothill runoff and appears to continue to be subject to such depositions in large storm events discharging from Martinez Canyon to the south.

Based upon these previous disturbances and the nature of the fluvial deposits at and around the site, the project area has a low potential to harbor significant vertebrate fossil remains. Extensive research, specimen collection and documentation have been conducted in the area and there is limited potential for new species of invertebrates to be identified. However, a paleontological resource assessment will be conducted to establish site-specific conditions and the likelihood of occurrence of resources on the site. Buildout of the proposed project is not expected to have significant adverse impacts on paleontological or associated geologic resources. Nonetheless, a paleontological resources survey and report is being prepared to further evaluate the potential for the proposed project to impact such resources.

There are no unique geologic features on the site or in the vicinity.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

POPULATION AND HOUSING Would the project:

29. Housing

a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

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b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

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c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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Source(s): Project Application Materials, GIS database, Riverside County General Plan Housing Element

Setting:

Based upon a census tract review of changes in population in the Coachella Valley, the Project site and surrounding areas have shown zero or negative population growth between the period of 2000 and 2020. The Project planning area includes the unincorporated communities of Thermal and Mecca located three and five miles northeast and east, respectively. These two communities had a combined population of approximately 7,100 in 2019 and are more than 99% Hispanic/Latino (American Community Survey, 2015-2019). Between 2010 and 2020, the community saw a 4% drop in population. While there was strong development interest in the eastern Coachella Valley prior to 2008 (Great Recession), renewed interest and development has only recently begun to expand in this area. The US 2020 Census Data indicates that within a three-mile radius of the Project site there was a total permanent population of 7,492, of which 93% identified as Hispanic or Latino.

A visual survey of lands within one mile of the subject property indicates that there are approximately 118 dwelling units in this area, including mobile home parks and single family homes.

Findings of Fact:

- a) **No Impact.** There are no dwelling units on the subject property, which is separated from surrounding lands by existing and future arterial roadways. Therefore, the proposed Project will not displace existing people or housing, nor would its development necessitate the construction of replacement housing elsewhere.
- b) **Less Than Significant With Mitigation.** The proposed Project will create up to 1,362 new dwelling units ranging from estate lot parcels to modular housing, attached single-family and condominiums. An RV park providing up to 320 RV spaces is also proposed. Based on current average household size in the area, the Project could generate a peak on-site population of 4,541. Much of this housing is expected to house employees of the various on-site land uses,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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and the modular housing is viewed as “workforce” housing (300-500 units). It should be noted that the proposed 340 resort condominiums are planned for possible “extended stay” use. Condos may also be made available to the planned hotel and added to the hotel rental pool when available. The Project is projected to generate approximately 1,100 permanent part-time and full-time jobs with a higher seasonal workforce population expected during the equestrian event season, which extends from October to April.

The equestrian component of the Project is modeled from applicant's experience with an existing equestrian center located north of the subject property. The proposed Project equestrian component will employ between 250 and 300 staff during peak season (October-April) of which 50 to 100 are residents in the desert and are assumed to already have housing. The equestrian center will also annually secure and pay for seasonal housing for up to 200 additional employees, including hotel rooms, short-term apartment and condo rentals, as well as 6-month leases in homes throughout the Coachella Valley. Although some of the activities at the existing facility may be relocated to the proposed Project, it is expected that the existing equestrian center will continue to operate with modified activities. These modifications are not part of the proposed Project.

At this time, it is uncertain whether or to what extent the proposed Project could create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income. The issue will be further researched and analysed in the forthcoming EIR.

- c) **Potentially Significant Impact.** As noted, the subject property is located at the edge of transitioning land uses, shifting away from agriculture to a variety of urban uses. While the Project will generate a variety of new jobs ranging from those associated with the proposed equestrian component, to professional and managerial associated with commercial, service and administrative jobs the Project will also result in the expansion of existing and creation of new arterial roadways and will extend domestic water and sanitary sewer services to the area. Therefore, the Project could induce substantial unplanned population growth through the creation of new homes and businesses and/or indirectly through the extension of roads or other infrastructure that could support additional urban development in the area. These potential impacts will be further researched and analysed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

30. Fire Services

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Source(s): Riverside County General Plan Safety Element; Google Earth.

Setting:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Fire protection services are provided to the Project area and the surrounding communities by the Riverside County Fire Department under a contract with CalFire. Stations in the Project vicinity include:

- Station 39 at 86911 58th Ave, Thermal: located three miles to the east with a response time of approximately five minutes.
- Station 40 at 91350 66th Ave, Mecca: located five miles to the east with a response time greater than five minutes.
- Station 70 at 54001 Madison St, La Quinta: located five miles to the northwest with a response time greater than five minutes.
- Station 79 at 1377 6th St, Coachella: located six miles to the north with a response time in excess of five minutes.

The County Fire Department is also contemplating a new fire station in the vicinity of Ave 62 and Monroe Street, approximately three miles west of the Project site. The exact location of this future station has not yet been determined.

Findings of Fact:

- 30) **Less Than Significant With Mitigation.** The subject property is located mid-way between County Fire stations located in the communities of Mecca and Thermal and Station 70 located in La Quinta. Stations 39 and 40 may be able to meet a 5-minute response time, while other nearby stations will require more time to respond. If necessary, a variety of mitigation measures may be available to avoid, minimize and mitigate the future need for fire protection services. Fire safety and the adequacy of existing facilities will be further analysed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

31. Sheriff Services

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Source(s): Riverside County General Plan; Riverside County Sheriff's Department web site, <https://www.riversidesheriff.org> accessed 8.19.22.

Setting:

The County Sheriff's Department provides law enforcement and corrections services to the unincorporated areas and several incorporated jurisdictions in Riverside County, as well as certain Native American Tribes. The department also performs the functions of the County Coroner's Office, being responsible for recovering deceased persons within the county and conducting autopsies. The department also provides services such as air support, special weapons teams for high-risk critical incidents, forensics services and crime laboratories, homicide investigations, and academy training to smaller law enforcement agencies within the county and in surrounding counties.

The nearest Riverside County Sheriff's Station is located at 86625 Airport Boulevard in Thermal. The City of La Quinta also contracts with the County Sheriff's Department and provides mutual aid across the County Sheriff's various clients in the Coachella Valley. The La Quinta station is located at 78-495 Calle Tampico, approximately 10 miles northwest of the subject property. The County charges development impact fees to off-set the costs of new criminal justice public facilities. These fees are based on the type of development (single-family, multi-family, commercial, office and industrial).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

- 31) **Less Than Significant With Mitigation.** The County Sheriff's Department utilizes a patrol beat system to patrol prescribed geographic areas which allows patrolling officers to respond immediately to a call for service. Response times are a function of distance between the responding officer and the location of the call for service; therefore, response times can vary and are also prioritized based on incident urgency. The proposed Project will include a variety of uses, some of which may choose to have their own private security, which may serve to deter and, if necessary, augment Sheriff services. Whether and to what degree existing levels of law enforcement service are adequate to meet the Project's demand will be further evaluated in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

32. Schools

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): School District correspondence, GIS database; Project Application Materials; CVUSD Web site: <https://www.cvusd.us> accessed 8.18.22.

Setting:

The subject property is located within the boundaries of the Coachella Valley Unified School District (CVUSD), which has its headquarters in Thermal. It serves a population that is approximately 80% Hispanic. The CVUSD has 14 elementary schools, 3 middle schools and 3 high schools, plus one continuation high school and one special school for teenage mothers. The oldest schools in CVUSD include: Coachella Valley High (joined the CVUSD in the 1960s when created out of Coachella Public Schools); Palm View opened in 1939; Bobby Duke and Peter Pendelton schools opened in the 1940s; and Valley View school opened in the 1950s. Mecca and Oasis schools were county schools, so was Kokell school in Thermal; they joined the CVUSD in the 1970s. In the Project vicinity, the Desert Mirage High School and the Las Palmas Elementary School are located one-half mile south of the site at the northeast corner of Tyler Street and Avenue 66.

Findings of Fact:

- 32) **Less Than Significant Impact.** The potential of the Project to generate students and demand for Pre-K thru 12 educational services has not yet been fully analysed. While up to 1,362 dwelling units are proposed, many of these will be occupied on a seasonal basis. In addition, planned extended-stay condos are not expected to be a source of "household formation" or student generation. The school district will be the beneficiary of development impact fees associated with the buildout of the Project, which will address potential facility needs associated with the Project's impacts on the school district. The net increase in student demand associated with the Project will be further analysed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
33. Libraries	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Riverside County General Plan; Riverside County Library System web site accessed 8.19.22.

Setting:

The Mecca Library is located at 91620 Ave 66, Mecca, approximately 5.5 miles east of the Project site. The Mecca Library offers a full range of information services and assistance, Children's programs, Literacy tutoring, English as a Second Language classes, Internet access, Word processors, Large Print books, Audio books, DVDs and videos, Music CDs and cassettes, Newspapers and magazines, Live Online Homework Help, Tax forms, Copiers, and downloadable audio books.

The Coachella Library, a branch of the Riverside County Library System, is located at 1500 Sixth Street, Coachella, approximately 5 miles north of the subject property. The Coachella Library provides a number of services and resources to the local community. These include lending books and DVDs, free wireless internet and a variety of events for the entire family.

The La Quinta Library is located at 78-275 Calle Tampico, approximately 9 miles northwest of the subject property. As with other members of the Riverside County Library System, the La Quinta Library offers a variety of services to all residents. In addition to the substantial physical and digital collections, staff are available to help find answers, connect visitors with career and resume assistance, help learn English, or provide study space. Staff facilitate securing library cards, access to meeting rooms, wireless printing and other services.

Findings of Fact:

- 33) **Less Than Significant Impact.** The subject property is within 5± miles of two County Libraries (Coachella and Mecca) and about 9 miles southwest of the La Quinta Library. Demand for library services has changed over the years with easy access to virtual libraries, current research and a wide range of media. Nonetheless, libraries continue to play an important community role, including serving as a venue for community events and activities. The proposed project is expected to generate a less than significant additional demand form library services in the Project planning area.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

34. Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan; JFK Memorial Hospital web site

Setting:

Local and regional facilities include the John F. Kennedy (JFK) Memorial Hospital in Indio, Eisenhower Medical Center (EMC) in Rancho Mirage, and Desert Regional Medical Center in Palm Springs. JFK is located nearest to the subject property, at 47-111 Monroe Street, approximately 8 miles north of the proposed Project site. This facility contains 158 beds, offers a variety of inpatient and outpatient services, and includes a 24-hour emergency room. JFK provides a full range of medical services, including surgical, cardiology, gastrointestinal, diagnostic imaging, and outpatient rehabilitation. The hospital also provides obstetrics and houses an orthopedic/bone/joint institute.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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There are also a variety of urgent and immediate care clinics and other medical offices in the region. The Indio Family Care Center is located on 47-923 Oasis Street. Services include primary care, family planning, prenatal care, childcare and nutrition. Although all emergency services are not offered at this clinic, walk-in patients are welcome and will be referred to an emergency facility as needed.

Mecca Health Clinic is located at 91275 Ave 66, Mecca, approximately 5.25 miles east of the subject property. Mecca Health Clinic is operated by Inncare, a private, non-profit organization providing an array of comprehensive primary care services to residents throughout Imperial and Riverside Counties. Inncare is a Federally Qualified Health Center and a Federal Public Health Service (PHS) employer. In 1970, Inncare became the first federally funded migrant health center in the United States. In addition to a health clinic, Inncare also provides dental clinics and Women/Infant/Children Nutrition (WIC) Education Centers.

Findings of Fact:

- 34) **Less Than Significant Impact.** The subject property is located within the service boundaries of the John F. Kennedy (JFK) Memorial Hospital in Indio, approximately 8 miles to the north. It is also located within about five miles of a full-service medical clinic in the community of Mecca. The proposed Project should be well served by existing medical providers and the development is not expected to have a significant impact on the ability of these providers to provide services to the project and the surrounding community.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

RECREATION Would the project:

35. Parks and Recreation

a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): GIS database, Ord. No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications), Ord. No. 659 (Establishing Development Impact Fees), Parks & Open Space Department Review; Desert Recreation District web site (www.myrecreationdistrict.com) accessed 8.19.22.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Setting:

The subject property is located in a rural but urbanizing portion of eastern Coachella Valley. Local and regional park and open space and recreational resources include Lake Cahuilla Veterans County Park and the Santa Rosa and San Jacinto National Monument.

Lake Cahuilla Veterans County Park

Lake Cahuilla Veterans Regional Park encompasses 710-acres with expansive lawns and picturesque mountain views, situated at the base of the Santa Rosa Mountains 5 miles west of the subject property. With 96 individual and group campsites, Lake Cahuilla is a natural getaway and easy destination and escape to the many outdoor activities available. Activities include fishing in the 135-acre lake, hiking and horseback riding on nearby trails. Open grass areas with picnic tables and barbecues are ideal for special events. The park is owned and operated by the Riverside County Regional Park and Open-Space District.

Desert Recreation District

The subject property is located within the 1,800 square mile service area of the Desert Recreation District, which for more than 70 years has been providing residents and visitors recreational services in the Greater Coachella Valley. The District provides barrier-free, safe services to unincorporated areas of the Coachella Valley and municipalities. It is the largest park and recreation district in California, and manages, maintains and assists in maintaining over 30 parks and recreation facilities.

The District creates and delivers quality programs, services and classes, and facilitates leisure opportunities through partnerships with private and public agencies and other entities providing the public personal benefits such as physical fitness, relaxation and revitalization, stronger and healthier families, enriching the lives for persons with disabilities, and economic benefits through more productive and healthier citizens and increased tourism. District facilities in the Project vicinity include the Bagdouma Park Community Center in Coachella, the Mecca Community Center and Pool at 65-250 Cahuilla Street in Mecca, and the Indio Community Center located at 45-871 Clinton Street in Indio.

Findings of Fact:

A, b, c) **Less Than Significant Impact.** The proposed Project is a mixed-use, equestrian-oriented resort community that will provide permanent and seasonal housing, hotel and resort facilities, neighborhood commercial services and an extensive equestrian center and resort-oriented water feature. Individual residential areas and subdivisions include park and other recreational amenities. Potential impacts associated with on-site recreation activities and feasible mitigation measures will be analyzed in the forthcoming EIR.

Identified nearby recreational and open space facilities and opportunities include Lake Cahuilla Veterans County Park and the numerous trails and open space of the Santa Rosa and San Jacinto Mountains National Monument located two miles to the southwest. The Project is expected to generate a less than significant demand for off-site recreational and/or park facilities. However, potential impacts to local and regional park, including the payment of any required fees, will be further analyzed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
36. Recreational Trails	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Include the construction or expansion of a trail system?				

Source(s): Riverside County General Plan Figure C-6 Trails and Bikeway System;

Setting:

The Coachella Valley is internationally known for its diverse and challenging hiking trails in the desert foothills and mountains, the seismic fault zones and along various canyons and drainages where wildlife and a wide variety of endemic plants are to be found. Trail opportunities in the Project vicinity include the Martinez Trail located approximately three miles to the south and the Boo Hoff trail described below:

Boo Hoff Trail: is a strenuous 8.8 mile hike with an elevation change of 1,916 feet traces the history of trail use in the Santa Rosas. The trail started as an historic Indian path and was later improved by the Desert Riders and is named for a founder of the group. Access to the trail can be reached from the vicinity of Lake Cahuilla just south of Avenue 58. The Boo Hoff trail takes hikers into the Santa Rosa and San Jacinto Mountains National Monument and the Santa Rosa Wilderness.

Findings of Fact:

- a) **Less Than Significant Impact.** The residents and guests of the proposed Project will have access to the numerous trails located in the valley and the surrounding hills and mountains. The Project site is in proximity to the Santa Rosa and San Jacinto Mountains National Monument and numerous other hiking venues. The Project is anticipated to have a less than significant trails impact as discussed in the EIR, and will not require trail construction or expansion.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

TRANSPORTATION Would the project:				
37. Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Cause an effect upon, or a need for new or altered maintenance of roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Cause an effect upon circulation during the project's construction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate emergency access or access to nearby uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Riverside County General Plan; ECVAP; Project Application Materials; Caltrans Traffic Census; CVAG Traffic Census; SunLine Transit Agency web site (<https://www.sunline.org>) accessed 8.19.22.

Setting:

The subject property is located in a predominantly rural agricultural area but one that has been progressively transitioning to urban uses. The County General Plan Circulation Element update recognizes the ongoing changes in land use in this area and has planned a network of major and arterial roadways to address anticipated future demand. The subject property is bounded by planned major roadways of all four sides, including: Ave 62 on the north (Expressway: 128' to 220' RW); Ave 64 (Major (118' RW); Tyler Street on the east (Secondary: 100' RW); and Harrison Street on the west (Expressway: 128' to 220' RW). Of these four bounding streets, three are partially constructed and Ave 64 has not been uniformly graded or otherwise improved.

Surrounding elements of the roadway network include the Highway 86 Expressway and interchange at its intersection with Ave 62, and the bridging of the Coachella Valley Stormwater Channel at Ave 62 and at Airport Boulevard (Ave 56) four miles to the north. Harrison Street provides major north-south circulation north to the City of Coachella and south to its intersection with the Highway 86 Expressway south of the County Line in Imperial Valley.

Traffic data collected for the 2015 County General Plan Update and from the Caltrans annual census indicates that traffic volumes on major roadways in the Project vicinity are low. Only two major roadways (Harrison Street and the Highway 86 Expressway) have cited existing Caltrans traffic volumes. In the vicinity of the Project, Harrison Street two-way 2009 volumes averaged 12,000 vehicles per day (VPD). According to the 2017 traffic census conducted by the Coachella Valley Association of Governments (CVAG), the 2017 volumes on Harrison Street south of Airport Boulevard (Ave 56) were 7,568 VPD.

Ave 62 currently provides important east-west connectivity but volumes on this roadway east of Highway 111 are also low. The CVAG traffic census for Ave 62 east of Harrison Street indicates that 2006 volumes were 1,577 VPD, increasing to 1,596 VPD in 2010 and reaching 2,626 VPD in 2017. Meanwhile, County traffic data indicates that volumes on Ave 62 east of Harrison Street were 1,124 VPD (data may have been affected by Co-Vid, being collected in April 2019).

The Highway 86 Expressway provides divided highway connectivity between the Coachella Valley and Imperial Valley to the south. At its intersection with State Highway 111 between Ave 62 and 64 the average traffic volumes were 15,300 VPD.

Transit Service

The Project area is provided bus service by the SunLine Transit Agency, a joint powers authority operating in the Coachella Valley. Route 9 generally extends east from Harrison Street along Ave 66 to the community of Mecca, where it follows a partial loop north and then south to Hammond Road and southeast to the community of North Shore. Route 9 also interconnects with Route 8 which provides service to the northwest and the communities of Coachella and Indio. Data for the 2018-19 season indicates that Route 9 had an average weekday passenger load of 430 passengers. It should be noted that this route has changed since the referenced reporting period.

Findings of Fact:

- a) **Potentially Significant Impact.** It is uncertain whether the proposed Project conforms to County roadway classification and improvement requirements for roadways bounding the site. There are also legitimate questions about the roadway classification assignments themselves,

including Ave 62, which has a limited area to serve and terminates at the Santa Rosa Mountains. The General Plan also calls for significant multi-modal improvements within the roadway paved sections and parkways, which have not yet been made clear in the Project application materials. Therefore, additional information and analysis is needed to determine whether the proposed Project conflicts with any County roadway classification, program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This issue will be further researched and analysed in the forthcoming EIR.

- b) **Potentially Significant Impact.** The site of the proposed Project is somewhat isolated from urban areas where commercial and other services are provided. The Project calls for approximately 150,000 square feet of neighborhood commercial uses, which may reduce the need for off-site travel from other Project uses, and the generation of associated vehicle trips and miles traveled.

Therefore, it is uncertain whether or to what extent Project-related vehicle miles traveled may exceed applicable thresholds of significance. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. The Project does not meet this criterion. Therefore, potential impacts could be significant. A project-specific traffic impact analysis is being prepared, which will evaluate the Project's potential to generate motor vehicle trips and the level of vehicle miles traveled that could result from buildout and operation and will be further analyzed in the forthcoming EIR.

- c, d) **Less Than Significant Impact.** The proposed Project is bounded by arterial roadways with varying rights-of-way and improvements called for in the County General plan. In addition to specific improvements proposed for these bounding roadways, a substantial network of internal roads is also set forth in the Project Specific Plan. Review of the proposed improvements to County and internal roadways does not indicate any meaningful potential for the Project to increase hazards associated with roadway geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. While farm equipment and related vehicles will continue to use the existing and future Project-bounding roadways, no significant incompatibilities are anticipated. Therefore, potential impacts associated with hazardous design are expected to be less than significant.

The Project will incrementally increase a mix of traffic especially along Ave 62, Tyler Street and Harrison Street. Initially, construction traffic will increase followed by Project occupant traffic (residences, business owners, equestrian guests, etc.). Project buildout could occur over 10 or more years. Construction entrances must not interfere with through-traffic or increase hazards. Additional maintenance on existing roads will be necessary to address increased wear on paved surfaces and other roadway improvements, and initial roadway widening in some areas will be required early in construction and incrementally through Project completion. Along Project-bounding arterial roadways the Project will provide a half-width improvement. Anticipated incremental off-site road improvement and maintenance are not expected to cause a direct need for other new or altered roadway maintenance.

- e) **Less Than Significant Impact.** Prior to the issuance of any site-disturbing permits, including grading permits, the Project contractor will be required to provide the County with a Traffic Control Plan (TCP) that will be implemented during the development of the site. The TCP will ensure adequate turn lanes and stacking distances to ensure that regular travel on adjoining and nearby roadways safely and efficiently operate during Project construction. Therefore, no significant impacts are anticipated.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- f) **Less Than Significant Impact.** As noted in response 37. (e), during Project construction the contractor will be required to implement a County-approved TCP. This will ensure that there are no significant impedances to emergency vehicle access or circulation during Project construction. Post-construction, the Project off-site roadway improvements will significantly enhance roadway capacity of and accessibility to the arterial-scale roadways that will bound the Project. Therefore, the Project's construction and occupation are expected to have a less than significant impact on emergency access to the Project site or to nearby properties and land uses.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

38. Bike Trails

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- a) Include the construction or expansion of a bike system or bike lanes?

Source(s): Riverside County General Plan and ECVAP, 2015; Project Application Materials;

Setting:

The arterial roadways bounding the 619.1-acre site are only partially constructed, providing one paved travel lane in each direction and with most of the current right of way unimproved; Ave 64 currently is unimproved along and east and west of the subject property. The planned major roadways include: Ave 62 on the north (Expressway: 128' to 220' RW); Ave 64 (Major (118' RW); Tyler Street on the east (Secondary: 100' RW); and Harrison Street on the west ((Expressway: 128' to 220' RW).

The ECVAP calls for Class I bike paths along Ave 62, Tyler Street and Harrison Street. Bike facilities along Ave 64 are planned as a "Combination Trail (Regional Trail / Class 1 Bike Path)". The ECVAP also calls for two (crossing) mid-section north-south Class I bikeways, which would bifurcate the subject property east-west and north-south. The ECVAP describes the combined trail/class I bike path as follows:

"Combination Class I Bikeway / Regional Trails

Combination Class I Bikeway/Regional Trails (Combination Trails) function as regional connectors linking together the urban and rural communities and major water bodies and Regional parks in Riverside County and provide opportunities for long-distance users to take advantage of this system for long one-way or loop-type trips. This system also links together existing and planned Class I Bikeways, Regional Trails, and other types of trails to enhance Riverside County residents' access to the trail system.

Combination Class I Bikeway/Regional Trails (Combination Trails) include both a Class I Bikeway, with a 20' wide paved surface, marked for two-way traffic, for use primarily by bicyclists and pedestrians, and a Regional Urban and Rural Trail, with a 10' – 12' wide soft surface, for use primarily by equestrians and pedestrians, located either in tandem on one side of a street, river, or other major linear feature, or in "split" fashion, with one function (Class I Bikeway) of the Combination Trail located on one side of the street or other linear geographical feature, and the other type (Regional Urban or Rural Trail) located on the other side of the street or linear feature.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Combination Trails generally require 30' wide easements where both components of the trails are situated in tandem on one side of a street or linear feature. Where the trail components are split along a street or other linear feature, the easements required will generally be the same as for Class I Bikeways (generally 20' wide) and Regional Urban and Rural Trails (generally 20' wide) when built separately. Unless maintained by a County Service Area (CSA) or a special parks district, Combination Trails are usually maintained by the Riverside County Regional Park and Open Space District, or by the Transportation Department through a Landscape and Lighting Maintenance District."

Findings of Fact:

- a) **Less Than Significant With Mitigation.** The proposed Project provides arterial rights of way that may not be consistent with the County General Plan Roadway Classifications. The preliminary cross sections also do not provide adequate parkway for or the delineation of trails and bikeways as described in the General Plan and the ECVAP. It is unclear that the trail and bike improvements called for along Ave 64 can be constructed within the proposed parkway. However, adjustments to the proposed roadway widths and/or parkway improvements of sufficient width can be secured by revisions to the Specific Plan and/or conditions of approval. Therefore, the EIR will consider the Project design and analyze its conformance with the General Plan.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

39. Tribal Cultural Resources

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

☒ ☐ ☐ ☐

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

☒ ☐ ☐ ☐

Source(s): Torres Martinez Desert Cahuilla Indian Land Status Map, 2002; Native American Heritage Commission Guidelines for Native American Monitors/Consultants, 2005; OPR Tribal Consultation Guidelines, 2005.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Setting:

The subject property is vacant and has been in active cultivation for several decades. The site is also occupied by what appear to be modern era agricultural out-buildings. Surrounding lands include extensive agricultural lands, both active and fallow, as well as heretofore undisturbed lands adjacent to and in proximity of the Project site that include stands of mesquite and associated habitat that may have served as an important food source for native Cahuilla peoples. Lands within the Reservation boundary of the Torres-Martinez Desert Cahuilla Indians are located immediately south of the site, as well a short distance west and southeast of the subject property.

In the Project vicinity, numerous Native American cultural resources have been found and documented, including fish traps, pottery scatters, grinding rocks, trail segments, and rock cairn features. While the Project planning area does not provide perennial or even seasonal waters sources, native habitat probably provided valuable food and fiber resources.

Findings of Fact:

- a, b) **Potentially Significant Impact.** Tribal resources can be buried or otherwise made obscure by land disturbance, including activities associated with agriculture and other types of disturbance and development. Therefore, the existing and long-established cultivation of the subject property does not preclude the harboring of sensitive or significant archaeological resources. The County will conduct Tribal Consultation under the requirements of SB 18 and AB 52 to assure that Tribal concerns regarding their cultural resources are addressed. In addition, a cultural (historic and archaeological) resources survey and report are being prepared on the proposed Project. The results of consultation and report findings will be incorporated into the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

UTILITIES AND SERVICE SYSTEMS Would the project:				
40. Water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source(s): Coachella Valley Water District Urban Water Management Plan, 2019; 2020 Coachella Valley Regional Urban Water Management Plan, 2021; Project Application Materials,

Setting:

The Coachella Valley Water District (CVWD) provides domestic water to the Project area. Its primary source of water is groundwater extracted from deep wells within the Whitewater River Subbasin. Currently, CVWD has a 30" water main within Harrison Street immediately west of the subject property that is available to serve the proposed project. A Water Supply Assessment (WSA) is being prepared for the proposed Project.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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CVWD has been addressing the historical declines in groundwater levels in the eastern portion of the Whitewater River Subbasin, which in part led to the development of the Thomas E. Levy Groundwater Recharge Basins at the west terminus of Ave 62 and behind the USBR Dike 4 protective levee. CVWD also delivers imported Colorado River water from the Coachella Canal to meet the agricultural and golf course irrigation needs in the East Valley. CVWD provides imported Colorado River water to 32 golf courses in the area to offset groundwater production as a form of in-lieu replenishment. Since 2005, groundwater levels across most of the East Whitewater River Subbasin have risen significantly, and historical artesian conditions have returned to a wide area, which is evidence that groundwater recharge efforts have been effective at abating historical overdraft.

Future planned replenishment projects include: 1) Phase 2 of the Oasis In Lieu Recharge Project, a source-substitution project that involves construction of a canal water distribution system in the Oasis area to provide imported Colorado River water for agricultural irrigation in lieu of groundwater pumping; 2) development of a recycled water project at WRP 4 for additional source substitution; and 3) connection of five additional golf courses to receive Colorado River water or a blend of recycled water.

Findings of Fact:

- a) **Less Than Significant With Mitigation.** The Project will require connections to the community domestic water network and the sanitary sewer systems both operated by CVWD. The project may also be required to participate in some way in the development of planned regional flood control facilities, which include an open stormwater channel planned along the Ave 64 right of way immediately south of the subject property and which may be co-terminus with an existing agricultural drain. Water and sewer mains of sufficient size to serve the proposed Project have been identified adjacent to or in proximity of the subject property and will be extended into the development site. Potential impacts and feasible mitigation measures associated with this infrastructure will be analyzed in the forthcoming EIR.
- b) **Less Than Significant With Mitigation.** The entire subject property is currently in active agriculture for seasonal truck crops with multiple crops being harvested per year. Irrigation water is imported from the Colorado River via the All-American Canal and the Coachella Branch Canal, which terminates at Lake Cahuilla. Water demand associated with the proposed project is not yet known nor how it may compare with current ag-related water demand. Due to the scope of the proposed project, a Water Supply Assessment is being prepared to evaluate long-term water supplies and Project impacts with will be disclosed and analyzed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

41. Sewer

a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Source(s): Coachella Valley Water District Sanitation Master Plan Update, 2020; Draft Program Environmental Impact Report; Department of Environmental Health Review.

Setting:

The Project site and surrounding lands are served by the CVWD Wastewater Reclamation Plant No 4 (WRP-4), which is located 2.25 miles east of the subject property on the west bank of the Coachella Valley Stormwater Channel (CVSC). WRP 4 is the District's second largest wastewater reclamation plant in terms of treatment capacity and provides collection service to approximately 63,000 people in the cities of La Quinta, Mecca, Palm Desert, and Thousand Palms. The facility is permitted under an NPDES permit to discharge a maximum monthly average daily effluent flow of 9.9 mgd to the Coachella Valley Stormwater Channel.

WRP 4's annual average influent flows have remained relatively constant over the past few years (2015-2019), averaging 5.0 mgd. WRP 4 uses two secondary treatment systems operating in parallel to provide biochemical oxygen demand and total suspended solids (TSS) reduction: a lagoon treatment system with a permit capacity of 7.0 mgd and a Biolac® activated sludge treatment system with a permit capacity of 2.9 mgd. In addition to the secondary treatment systems, WRP 4 also has a new headworks facility (constructed in 2015), a disinfection and dechlorination system, and solids handling facilities.

A 42-inch gravity sewer that connects to WRP-4 has been identified within the Ave 62 right of way on the north side of the subject property. CVWD has been contacted and an information request made to get clarification and additional information on nearby sewer lines and the feasibility of the Project connecting to same.

Findings of Fact:

a, b) **Less Than Significant Impact.** While verification is forthcoming from CVWD, it appears that the proposed Project can utilize existing surplus capacity in local sewerage collection lines and treatment capacity at WRP-4 without requiring the construction or relocation of sewer lines or treatment facilities and would cause no or less than significant environmental effects. CVWD has been contacted and an information request made to get clarification and additional information on nearby sewer lines and the feasibility of the Project connecting to same. Location of and Project impacts on CVWD sewer facilities will be further clarified and evaluated in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

42. Solid Waste

a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Source(s): Riverside County General Plan, 201; CalRecycle, 2022.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Setting:

Burrtec Waste and Recycling Services provides solid waste and recycling collection services to the unincorporated communities of Thermal, Mecca and the Project site. Solid waste that is collected from the Project area is transported to the Mecca II Landfill, which is located south of the Project in the unincorporated community of Mecca. The Mecca II Landfill has a permitted capacity of 452,182 cubic yards and a maximum disposal capacity of 400 tons per day. This landfill is slated to close in 2098. The Riverside County Lamb Canyon Landfill, which can also serve the eastern Coachella Valley, has a permitted capacity of 33,041,000 cubic yards and a maximum disposal capacity of 5,000 tons per day. This landfill had an estimated closure date of 2021. However, by increasing the landfill's maximum elevation and with grading plan modifications the total design capacity has been increased from 33,041,000 cubic yards to 38,935,653 cubic yards. These and other management action have extended the estimated closure date from 2021 to 2029. This landfill is equipped to accept construction, demolition materials, and non-RCRA hazardous waste (CalRecycle 2022).

Findings of Fact:

- a, b) **Less Than Significant Impact.** Riverside County contracts with Burrtec for solid waste collection and disposal services in the Project area. Burrtec operates several regional Materials Recovery Facilities (MRFs) for sorting and processing of recyclables. It transports solid waste to Transfer Stations, which is then transported to one of six County landfills that have available capacity, including Mecca Landfill, Lamb Canyon Landfill in Mecca, Beaumont and Badlands Landfill in Moreno Valley. The Project will generate a substantial volume of construction and post-construction solid waste, including a wide range of construction materials. Much of the solid waste generated will be recyclable.

Post-development, the Project is expected to generate a full range of consumer waste typical of households and retail commercial uses. The Project will also generate a substantial waste stream of horse manure. Based upon a peak horse occupancy of 2,700 animals the project could generate up to 140,000± pounds of manure daily. These materials are to be removed from the site on a daily basis and anticipated to go to an approved composting facility to be recycled into soil amendments and comparable uses.

Local and regional landfills appear to have sufficient capacity to meet the near and mid-term needs of the proposed Project which will be further disclosed and discussed in the forthcoming EIR. Impacts to landfills will be limited and temporary and, therefore, are considered less than significant.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

43. Utilities

Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Electricity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source(s): Project Application Materials, Utility Companies

Setting:

The proposed Project site is located in the following utilities' service districts: Imperial Irrigation District (IID)-electricity; Coachella Valley Water District (CVWD)-water, sewer, flood control; Southern California Gas Company (SCG or SoCalGas)-natural gas; Frontier Communications, Time-Warner, Spectrum Communications-Telecommunications.

Electric Power: Imperial Irrigation District: IID is California's sixth-largest electrical utility, and its third largest public power utility. Primary energy sources include fossil fuels (oil, coal and natural gas), nuclear, and renewable sources such as wind, solar, geothermal, and hydropower. The IID 2020 power mix is comprised of 41% "eligible" renewable sources (including biomass and biowaste), 28.5% natural gas, 3.5% nuclear and 21.2% identified as unspecified sources for power purchased on the open market. In addition to utility-provided electrical power, many homes and business are installing rooftop solar and storage, and new construction and renovation is required to conform to the state's strict green building code, which further serves to ensure that energy resources are used economically and wisely. Both the regulatory environment and the economy have moved aggressively toward greater energy efficiency and reliance on non-polluting renewables sources.

Natural Gas: Southern California Gas Company (SCG, SoCalGas, The Gas Company): Natural gas services in the Project area are provided in the Coachella Valley by Southern California Gas Company (SoCalGas). Natural gas supplies are transported from Texas to the Coachella Valley through three east-west trending gas lines, which cross the valley near and parallel to Interstate-10 and continue west to Los Angeles. The pipelines include one 30-inch line and two 24-inch lines, with pressures of 2,000 pounds per square inch (psi). There is currently no natural gas service in the Project vicinity. The closest high pressure natural gas lines are located within the Highway 111 right of way approximately 3 miles east of the Project site, and in Monroe Street at Ave 54 also 3 miles to the north of the site. At this time, it is not known whether lower pressure distribution lines extend to the Project vicinity.

Communications Systems: Frontier Communications, Time-Warner, Spectrum Communications: At this writing it is uncertain in whose service district the subject property is located. The planning area is somewhat removed from urban development, but service appears to be in proximity to the site, specifically east on Ave 62. The forthcoming EIR will further research and document available communication services.

Streetlighting: There is one streetlighting on the southeast corner of Tyler Street and Ave 62. There are no other streetlights in the Project vicinity. It is anticipated that the Project will be conditioned to provide street lighting at major intersections and entrances A landscape and lighting district may be required to ensure power and maintenance of streetlight. The forthcoming EIR will further research and document existing and needed street lighting.

Findings of Fact:

a) **Less Than Significant With Mitigation:** IID currently has transmission and distribution lines in the Project vicinity and, pending further load analysis, may be able to immediately provide power for initial phases of Project development. The Project is also anticipating that it will provide a new substation on site to ensure adequate capacity for the subject and future projects. Power lines currently bound the subject property on the east, west and south, with higher voltage transmission located along the south boundary. Impacts associated with the proposed substation, which typically requires 2± acres, will be further analyzed in the forthcoming EIR.

b) **Less Than Significant Impact:** The closest high pressure natural gas lines are located within the Highway 111 right of way approximately 3 miles east of the Project site, and in Monroe Street at Ave 54 also 3 miles to the north of the site. At this time, it is not known whether lower pressure distribution lines extend to the Project vicinity. However, it is expected that extension of gas lines will occur within existing road rights-of-way and will have a less than significant impact on the environment as will be analyzed in more detail in the forthcoming EIR.

c) **Less Than Significant Impact:** The closest location of telecommunication systems is on Avenue 62 a short distance east of the subject property. The extent of available services is not known. However, it is expected that extension of telecommunication lines will occur within existing road rights-of-way and will have a less than significant impact on the environment.

d) **Less Than Significant Impact:** Electric power is readily available to the subject property and will allow the immediate and on-going installation of appropriate street lighting. There is an existing street light at the intersection of Ave 62 and Tylor Street. With power lines on three of the four site boundaries, no significant impacts due to the addition of street lighting is expected to occur.

E, f) **Less Than Significant Impact:** The maintenance of public facilities, including roads, power lines, irrigation lines and other infrastructure, is expected to occur within existing and future road rights of way and easements, in areas that have already been heavily disturbed by ongoing agriculture. No other governmental services that may be provided to the proposed Project are expected to result in significant environmental impacts. Therefore, the maintenance of these public facilities and project-serving governmental services for the Project is not expected to result in significant environmental effects but nonetheless will be further discussed in the forthcoming EIR.

Mitigation: See forthcoming EIR.

Monitoring: See forthcoming EIR.

WILDFIRE If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:

44. Wildfire Impacts

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure S-11 “Wildfire Susceptibility”, GIS database; Fire Hazard Severity Zone Online GIS Map by CAL FIRE, <http://egis.fire.ca.gov/FHSZ/>, Accessed Oct. 2021; Project Application Materials

Setting:

Wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. A wildland-urban interface is an area where urban development is located in proximity to open space or “wildland” areas. The potential for wildland fires represents a hazard where development is adjacent to open space or within proximity to wildland fuels or designated fire severity zones.

The California Department of Forestry and Fire Protection (Cal Fire) has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps place areas of the state into different fire hazard severity zones (FHSZ) based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. In addition to establishing local, state or federal responsibility for wildfire protection in a specific area, CALFIRE designates areas as very high fire hazard severity (VHFHS) zones or non-VHFHS zones. There are no such designated lands in the Project area.

As part of this mapping system, land where CALFIRE is responsible for wildland fire protection and generally located in unincorporated areas is classified as a State Responsibility Area (SRA). Federal lands within the planning area are classified as Federal Responsibility Area (FRA). Where local fire protection agencies, such as the County Fire Department, are responsible for wildfire protection, the land is classified as a Local Responsibility Area (LRA). The closest FHSZ in an SRA is located approximately two miles west of the Project site.

CALFIRE currently identifies the planning area as Local Responsibility Areas but inclusive of FRA zones on Torres-Martinez lands to the immediate south. The nearest mapped fire hazard zone is designated “Moderate” and is associated with the Santa Rosa Mountains foothills two miles to the southwest.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Findings of Fact:

a-d) **No Impact.** The planning area is located within a LRA responsibility zone but outside any mapped fire hazard zone, the nearest being associated with foothills two miles to the southwest. The County maintains a Multi-Hazard Functional Plan that addresses the planned response to extraordinary emergency situations, including natural or human-caused disasters. The Specific Plan would not impair the adopted emergency response plan.

The implementation of the Specific Plan has a very limited potential to exacerbate wildfire risks in the planning area or on surrounding lands. The Project is not expected to create a significant exposure threat to occupants or surrounding receptors to pollutant concentrations from a wildfire. The County will require the installation or maintenance of associated infrastructure (such as roads, emergency water sources, power lines or other utilities), as needed, in individual development projects within the Specific Plan area as development plans are reviewed.

The wildland fire hazard in the Project area is very low due to the predominance of agricultural lands, flat terrain and limited areas of vegetation. The amount of fuel available for wildland fires on adjoining lands is very limited, and the distance between stands of vegetation will make it difficult for fires to spread easily. In the future developed areas, the landscape vegetation will be carefully maintained and watered regularly, creating conditions that limit the possibility for vegetation fires to ignite and spread. The development of the Specific Plan is not expected to increase exposure of people or structures to significant fire or fire-related risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:

45. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

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☐

Source(s): Staff Review, Project Application Materials

Findings of Fact: Project development will impact local and regional air quality, will result in increased traffic, noise and lighting, and will result in other changes to the quality of the environment. The entirety of the subject property is and has been in active cultivation for several decades. It is believed that no native (or non-native) vegetation remains on the site beyond one tree and ruderal (disturbed) areas along the adjoining public roads with will be further analyzed in the forthcoming EIR. Most surrounding lands are in a similar state and also provide no or limited habitat value. The Project areas has been home to Native Americans for many centuries and the potential exists for sensitive cultural resources to be encountered during site development.

A cultural resources assessment will be conducted on the subject property and results reported in the forthcoming EIR. With proper mitigation as will be analyzed and discussed in the forthcoming EIR, implementation of the proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

46. Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Source(s): Staff Review, Project Application Materials

Findings of Fact: This Initial Study determines that the proposed Project has the potential to result in cumulatively considerable effects without adequate mitigation. These potential areas of impact include air quality, cultural resources, land use compatibility, agricultural lands, energy, transportation and others. Therefore, the forthcoming EIR will evaluate the potential cumulative effects associated with implementation of the proposed Project.

47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Source(s): Staff Review, Project Application Materials

Findings of Fact: The Project proposes the develop a mixed-use resort residential community centered around an equestrian center with up to 2,700 horses during peak events. Potential adverse effects include dust and other pollutant emissions that could affect public health on-site and on neighboring lands and roadways. The Project Specific Plan depicts equestrian areas, including back of house functions and how they are managed. The forthcoming Draft EIR will address air quality and other areas of potential adverse effects. As appropriate, mitigation will be recommended to ensure that the proposed Project does not result in environmental effects which would cause substantial adverse effects, either directly or indirectly.

V. EARLIER ANALYSES

Earlier environmental analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations, Section 15063 (c) (3) (D). In this case, a brief discussion should identify the following:

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Earlier analyses used in preparing this Initial Study include those cited in each analysis category set forth above. Additional analysis that has or that may be used in preparing the forthcoming EIR include the Riverside County 2015 General Plan Update and associated 2015 Final EIR No. 521 (SCH No. 2009041065); City of Coachella General Plan Draft EIR, 2015; Coachella Valley Multiple Species Habitat Conservation Plan EIR/EIS, amended August 2016.

Location Where Earlier Analyses, if used, are available for review:

Location: County of Riverside Planning Department
4080 Lemon Street 12th Floor
Riverside, CA 92501
and online

Revised: 5/22/2023 1:22 PM
Y:\Planning Master Forms\Templates\CEQA Forms\EA-IS_Template.docx

Thermal Ranch IS/NOP Comments Received:

5.25.23 – NAHC
6.02.23 – Rincon Band of Luiseno Indians
6.22.23 – Lozeau Drury
6.22.23 – Sierra Club, San Geronimo Chapter
6.22.23 – CA Dept of Conservation, Division of Land Resource Protection
6.26.23 – CA Dept. of Fish and Wildlife
6.26.23 – Stephanie Ambriz
6.27.23 – Cecilia Lemus
6.27.23 – Clara Nieblas
6.27.23 – Geena Vescial
6.27.23 – Leadership Council Email Letter submittal
6.27.23 – Ernest Nunez
6.27.23 – Lupita Lua email
6.27.23 – Jessica Gascon
6.27.23 – Mariela Vescial
6.27.23 – Alyssa Torres
6.27.23 – Julissa Felix
6.28.23 – Adriana Torres
7.10.23 – Lloyd Zola

County Hearing Agenda comment:

7.9.23 – Brad Anderson



ACTING CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning & Research

May 25, 2023

MAY 31 2023

Russell Brady
County of Riverside
4080 Lemon St, 12th Floor
Riverside, CA 92501

STATE CLEARINGHOUSE

Re: 2023050624, Thermal Ranch Specific Plan et al, Riverside County

Dear Mr. Brady:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Brady, Russell

From: Deneen Pelton <DPelton@rincon-nsn.gov>
Sent: Friday, June 2, 2023 3:30 PM
To: Brady, Russell
Cc: Cheryl Madrigal; Shuuluk Linton
Subject: Thermal Ranch SP

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

This email is written on behalf of Rincon Band of Luiseño Indians, ("Rincon Band" or "Band"), a federally recognized Indian Tribe and sovereign government.

The Band has received the notification for the above referenced project. The location identified within project documents is not within the Band's specific Area of Historic Interest (AHI).

At this time, we have no additional information to provide. We recommend that you directly contact a Tribe that is closer to the project and may have pertinent information.

Thank you for submitting this project for Tribal review. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749-1092 or via electronic mail at crd@rincon-nsn.gov.

Thank you for the opportunity to protect and preserve our cultural assets.

Deneen Pelton

Cultural Resources Department Coordinator

Cultural Resources Department

Rincon Band of Luiseño Indians

1 West Tribal Road | Valley Center, CA 92082

Office: 760-749-1092 ext. 322

Fax: 760-888-2016

Email: dpelton@rincon-nsn.gov



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Subject: FW: Thermal Ranch - SCH 2023050624
Date: Thursday, June 22, 2023 at 4:15:40 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: JEREMY SMITH <jeremy@thermalranchca.com>
CC: Depalatis, Paul <pdepalatis@msaconsultinginc.com>, John Criste <jcriste@terranovalplanning.com>, Kimberly Cuza <kcuza@terranovalplanning.com>, Martin Magana <mmagana@maganaconsulting.com>, Stephanie Smith <:ssmith@szrlaw.com>
Attachments: image001.jpg

See below as an FYI that Lozeau Drury who I believe typically represents the carpenters union is asking questions about this project.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Madeline Dawson <madeline@lozeaudrury.com>
Sent: Thursday, June 22, 2023 1:46 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Thermal Ranch - SCH 2023050624

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Mr. Brady,

I have a few questions regarding the Thermal Ranch project located at Harrison Street and Ave 62.

1. How tall are proposed buildings for the hotel and residential components of the project?
2. What type of parking will be included in this project? Will parking be all surface level or is there any structured parking?

Thank you,
Madeline Dawson

--

Madeline Dawson (she/her)
Legal Assistant
Lozeau | Drury LLP
1939 Harrison Street, Suite 150

Oakland, CA 94612
(510) 836-4200
(510) 836-4205 (fax)
madeline@lozeaudrury.com

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[County of Riverside California](#)



SAN GORGONIO CHAPTER

Regional Groups Serving Riverside and San Bernardino Counties: Big Bear, Los Serranos, Mojave, Moreno Valley, Mountains, Tahquitz, Santa Margarita

VIA ELECTRONIC MAIL rbrady@Rivco.org

June 22, 2023

Russell Brady
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Re: Thermal Ranch Specific Plan Case No. SP00401, General Plan Amendment No. GPA 2300001, Change of Zone No. CZ 2300003, Tentative Tract Map No. 38578, Tentative Tract Map No. 38531; Plot Plan Nos. 230035 & 230038

Dear Mr. Brady:

The Sierra Club is a national non-profit organization with over 3 million members, of whom over 1,000 are members of the Tahquitz Group representing eastern Riverside County and the Morongo Basin. The Tahquitz Group focuses on conservation, environmental protection, and environmental and social justice issues.

The Sierra Club concurs with the list of issues to be included in the EIR delineated in the Notice of Preparation and believes that the following specific matters be addressed:

Aesthetic and Scenic Resources. The EIR should address the effect of 6 story buildings on community character and the broad vistas currently available in this area. The EIR should consider an alternative that limits building height to two or three stories to be in character with the general area.

Air Quality and Greenhouse Gas/Climate Change/Energy. The EIR should specify and evaluate the efficacy of specific measures to be included in the Specific Plan and included as either project design elements or mitigation measures designed to limit air quality impacts and GHG emissions. These would include requiring that the project be zero net energy including future building and vehicle electrification through solar energy production, ensuring that all buildings maximize the incorporation of passive and active energy conservation measures, etc.

Environmental/social Justice. The NOP states in the background section:

“The subject property lies both adjacent to and in proximity of such transitional land uses. Also relevant are issues of environmental justice, including reducing unique or compounded health risks in disadvantaged communities, promoting civic engagement in the public decision-making process, and prioritizing improvements and programs that address the needs of disadvantaged communities.”

However, environmental justice is not specifically called out as a topic in the EIR. Rather, it is supposed to be obliquely covered in terms of “land use and overall General Plan consistency”. We believe that is inadequate, and that environmental/social justice should be addressed as a separate focused issue in the EIR. Further, the Project Description section of the NOP states:

At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.60 to 27.3 units per acre, and up to 320 RV spaces. *During the off-season of April through September, planned workforce housing (modulars and RV spaces) may be made available to accommodate local farmworkers (emphasis added).*

The EIR should address whether this would be made a condition of approval of the Specific Plan, whether it meets state requirements for provision of affordable housing and how it would be accomplished and still maintain zero net energy. Additionally, the EIR should address all direct and indirect impacts on existing disadvantaged communities in the general area of Coachella, including potential displacement, diminution of political power, and change in community character; and should ensure that the project (through tax increment or other mechanism) results in infrastructure investment and provision of public facilities and services in the areas of greatest need.

Land Use Compatibility. The EIR should address the rationale for a change in the Foundation Element from Agriculture to Community Development at this time, and how the proposed development would comply with all relevant goals, policies, and actions contained in the 6th Cycle Housing Element.

Transportation. The EIR should address what offsite transportation improvements would be required to handle the traffic generated by the project, including for any special events that might occur there, how these would be funded and maintained, and how that infrastructure would impact the surrounding areas.

Thank you for the opportunity to comment. Please include us on the list for all public notices regarding this project.

Sincerely,

A handwritten signature in blue ink that reads "Bill Havert". The signature is fluid and cursive, with the first name "Bill" being more prominent than the last name "Havert".

Bill Havert, Co-Chair
Environmental Justice Committee
Tahquitz Group
San Geronio Chapter

A handwritten signature in blue ink that reads "Gary Gray". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Gray".

Gary Gray, Co-Chair
Environmental Justice Committee
Tahquitz Group
San Geronio Chapter



JUNE 22, 2023

VIA EMAIL: RBRADY@RIVCO.ORG

County of Riverside Planning Department
Russell Brady, Senior Planner
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Dear Mr. Brady:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE THERMAL RANCH SPECIFIC PLAN PROJECT, SCH#2023050624

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of an Environmental Impact Report for the Thermal Ranch Specific Plan Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments with respect to the Final Environmental Impact Report for the Desert Retreat Specific Plan Project.

Project Description

The Thermal Ranch Specific Plan Project includes accompanying Tentative Tract Map Nos. 38531 and 38578, two plot plan applications, and a General Plan Amendment (GPA) and Change of Zone (CZ). This equestrian oriented development Project is proposed on 619.1-acres and will be comprised of a mix of uses including and centered around a 223.1-acre equestrian center and related show facilities, including barns, stabling and related equestrian services. Water, sewer and electric power will be extended to serve the proposed Project. The equestrian center will require approximately 300 staff and may have up to 8,100 visitors comprised of riders, trainers, stable hands, and visitors on peak event days.

Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.

All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Consistent with CEQA Guidelines, DOC recommends the consideration of agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."])

Mitigation through agricultural easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. Indeed, the recent judicial opinion in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 ("KG Farms") holds that agricultural conservation easements on a 1 to 1 ratio are not alone sufficient to adequately mitigate a project's conversion of agricultural land. KG Farms does not stand for the proposition that agricultural conservation easements are irrelevant as mitigation. Rather, the holding suggests that to the extent they are considered, they may need to be applied at a greater than 1 to 1 ratio, or combined with other forms of mitigation (such as restoration of some land not currently used as farmland).

DOC recommends further discussion of the following issues:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.

- Proposed mitigation measures for all impacted agricultural lands within the proposed project area.

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Thermal Ranch Specific Plan Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

Monique Wilber

Monique Wilber

Conservation Program Support Supervisor



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 26, 2023
Sent via email

Russell Brady
Senior Planner
County of Riverside Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Subject: Notice of Preparation of a Draft Environmental Impact Report
Thermal Ranch Specific Plan et al
State Clearinghouse No. 2023050624

Dear Mr. Brady:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the County of Riverside Planning Department for the Thermal Ranch Specific Plan et al (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.). CDFW expects that it may

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT LOCATION

The Project site is located in the southeast portion of the Coachella Valley in the central unincorporated area of Riverside County (Assessor's Parcel Numbers 751-020-002, 003, 006, 007, and off-site parcel 751-020-010). The Specific Plan Area is bound by the following streets: 62nd Avenue on the north, Tyler Street on the east, 64th Avenue on the south, and Harrison Street on the west. The Project site is located within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). The Project vicinity includes Tribal and allottee lands under the jurisdiction of the Torres Martinez Desert Cahuilla Indians, including lands to the immediate south and to the southwest.

PROJECT DESCRIPTION SUMMARY

The proposed Project includes two plot plan changes, Tentative Tract Map (TTM) Nos. 38531 and 38578, a General Plan Amendment, and a Change of Zone. The two plot plan changes would allow development to commence in PA-1 (Equestrian Center) and PA-4 (Horse Park Workforce Housing). TTM No. 38531 would subdivide the property into nine large parcels, and TTM No. 38578 would further subdivide PA-2 (Estate Residential) into 132 individual residential estate lots and PA-3 into 390 single-family detached lots and single-family attached lots. The Project proposes to change the General Plan from "Agriculture" to "Community Development." and to change consistency zoning from "Heavy Agriculture" to "Specific Plan." The proposed Project would convert approximately 619.1 acres of active cropland into a series of urban uses, including a 223.1-acre equestrian center; a mix of residential neighborhoods, workforce housing, estate lots, single-family attached and detached homes; condominiums with up to 1,362 dwelling units ranging in densities from 0.60 to 27.3 units per acre; 275,000 gross leasable square feet of retail and other commercial space including 75,000 square feet of equestrian event-related retail space and 10,000 square feet of office space; up to 150,000 square feet of retail space; and a 150 room hotel. The Project would also include a 7-acre resort-oriented recreational water feature.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County of Riverside Planning Department in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife

(biological) resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009²). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDB@wildlife.ca.gov or <https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

² Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused CVMSHCP surveys, completed by a CVMSHCP Acceptable Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

Burrowing Owl (*Athene cunicularia*)

The Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill."

CDFW recommends that the County of Riverside Planning Department follow the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation* (Department of Fish and Game, March 2012); available for download from CDFW's website:

<https://www.wildlife.ca.gov/conservation/survey-protocols>. The Staff Report on Burrowing Owl Mitigation, specifies three steps for project impact evaluations:

- a. A habitat assessment;
- b. Surveys; and
- c. An impact assessment

As stated in the Staff Report on Burrowing Owl Mitigation, the three progressive steps are effective in evaluating whether a project will result in impacts to burrowing owls, and the information gained from the steps will inform any subsequent

avoidance, minimization, and mitigation measures. Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

Within the 2012 Staff Report, the minimum habitat replacement recommendation was purposely excluded as it was shown to serve as a default, replacing any site-specific analysis and discounting the wide variation in natal area, home range, foraging area, and other factors influencing burrowing owls and burrowing owl population persistence in a particular area. It hypothesized that mitigation for permanent impacts to nesting, occupied, and satellite burrows and burrowing owl habitat should be on, adjacent or proximate to the impact site where possible and where habitat is sufficient to support burrowing owls present. If mitigation occurs offsite, it should include (a) permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) be sufficiently large acreage with the presence of fossorial mammals. Furthermore, the report noted that suitable mitigation lands should be based on a comparison of the habitat attributes of the impacted and conserved lands, including but not limited to: type and structure of habitat being impacted or conserved; density of burrowing owls in impacted and conserved habitat; and significance of impacted or conserved habitat to the species range-wide.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018³).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

³ CDFW, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency, Department of Fish and Wildlife: March 20, 2018 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would “feasibly attain most of the basic objectives of the Project,” and would avoid or substantially lessen any of the Project’s significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a “no project” alternative (CEQA Guidelines § 15126.6[e]).

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The County of Riverside Planning Department should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. Sensitive plant communities with ranks S-1 or S-2 have the potential to or have been documented to occur within or adjacent to the project area, including, but not limited to chaparral sand-verbena (*Abronia villosa* var. *aurita*).
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: burrowing owl (*Athene cunicularia*), black-tailed gnatcatcher (*Polioptila melanura*), Crissal thrasher (*Toxostoma crissale*), vermilion flycatcher (*Pyrocephalus rubinus*), and Palm Springs round-tailed ground squirrel (*Xerospermophilus tereticaudus chlorus*).
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation

is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving Out of Harm's Way*: To avoid direct mortality to any non-listed terrestrial wildlife, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to inspect the Project area prior to any Project activities. Any individuals found shall not be harassed and shall be allowed to leave the Project area unharmed. If needed, a qualified biologist may guide, handle,

or capture an individual non-listed wildlife species to move it to a nearby safe location within nearby refugium, or it shall be allowed to leave the Project site of its own volition. Capture methods may include hand, dip net, lizard lasso, snake tongs and snake hook. If the wildlife species is discovered or is caught in any pits, ditches, or other types of excavations, the qualified biologist shall release it into the most suitable habitat nearby the site of capture. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Only biologists with appropriate authorization by CDFW shall move CESA-listed or other special-status species. Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project; unless this Project is proposed to be a covered activity under the CVMSHCP. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. CDFW must comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specify a mitigation monitoring and reporting program that will meet the requirements of CESA.

Based on review of CNDDDB and Biogeographic Information and Observation System (BIOS), and/or knowledge of the project site/vicinity/general area, CDFW is aware that the following CESA-listed species have the potential to occur onsite/have previously been reported onsite are Coachella Valley fringe-toed lizard (*Uma inornata*).

Coachella Valley Multiple Species Habitat Conservation Plan

Within the Inland Deserts Region, CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the CVMSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on September 9, 2008. The CVMSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the CVMSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the CVMSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the CVMSHCP please go to: <http://www.cvmshcp.org/>.

The proposed Project occurs within the CVMSHCP area and is subject to the provisions and policies of the CVMSHCP. In order to be considered a covered activity, Permittees should demonstrate that proposed actions are consistent with the CVMSHCP and its associated Implementing Agreement.

Regardless of whether take of threatened and/or endangered species is obtained through the CVMSHCP or through a CESA ITP, the DEIR needs to address how the proposed Project will affect the conservation objectives of the CVMSHCP. Therefore, all surveys required by the CVMSHCP to determine consistency should be conducted and results included in the DEIR so that CDFW can adequately assess whether the Project will impact the CVMSHCP.

CDFW Lake and Streambed Alteration Program

Depending on how the Project is designed and constructed, the Project applicant may need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources.

CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification package, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Construction Noise

Project-related construction has the potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project. CDFW recommends that the DEIR include an analysis of impacts to wildlife from Project-related construction noise, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.

Construction may result in substantial noise through road use, equipment, and other Project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 dB⁴. Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats^{5,6,7,8}. Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise^{9,10}. Noise has also been shown to reduce the density of nesting birds¹¹ and cause increased stress that results in decreased immune

4 Barber, J. R., K. R. Crooks, and K. M. Fristrup. 2009. The costs of chronic noise exposure for terrestrial organisms. *Trends in Ecology and Evolution* 25:180-189.

5 Sun, J. W. C., and P. M. Narins. 2005. Anthropogenic sounds differentially affect amphibian call rate. *Biological Conservation* 121:419-427.

6 Patricelli, G., and J. J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment. *Auk* 123:639-649.

7 Gillam, E. H., and G. F. McCracken. 2007. Variability in the echolocation of *Tadarida brasiliensis*: effects of geography and local acoustic environment. *Animal Behaviour* 74:277-286.

8 Slabbekoorn, H., and E. A. P. Ripmeester. 2008. Birdsong and anthropogenic noise: Implications and applications for conservation. *Molecular Ecology* 17:72-83.

9 Rabin, L. A., R. G. Coss, and D. H. Owings. 2006. The effects of wind turbines on antipredator behavior in California ground squirrels (*Spermophilus beecheyi*). *Biological Conservation* 131:410-420.

10 Quinn, J. L., M. J. Whittingham, S. J. Butler, W. Cresswell, J. L. Quinn, M. J. Whittingham, S. J. Butler, W. Cresswell, and W. Noise. 2017. Noise, predation risk compensation and vigilance in the chaffinch *Fringilla coelebs*. *Journal of Avian Biology* 37:601-608.

11 Francis, C. D., C. P. Ortega, and A. Cruz. 2009. Noise pollution changes avian communities and species interactions. *Current Biology*

responses¹². The County of Riverside Planning Department should include measures in the DEIR to ensure the following: restricting the use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning); restricting the use of generators except for temporary use in emergencies; provide power to sites by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems; ensure the use of noise suppression devices such as mufflers or enclosure for generators; and sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

Artificial Nighttime Lighting

The Project will introduce new sources of artificial lighting. CDFW recommends that the DEIR include lighting design specifications for all artificial nighttime lighting that will be used by the Project, an analysis of the direct and indirect impacts of artificial nighttime lighting on biological resources, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant. The direct and indirect impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife should be analyzed, and appropriate avoidance and minimization measures should be included in the DEIR.

Artificial nighttime lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation¹³. Many species use photoperiod cues for communication (e.g., bird song¹⁴), determining when to begin foraging¹⁵, behavioral thermoregulation¹⁶, and migration¹⁷. Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species

19:1415–1419.

¹² Kight, C. R., and J. P. Swaddle. 2011. How and why environmental noise impacts animals: An integrative, mechanistic review. *Ecology Letters* 14:1052–1061.

¹³ Gatson, K. J., Bennie, J., Davies, T., Hopkins, J. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. *Biological Reviews*, 88.4: 912-927.

¹⁴ Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. *The Condor* 108:130–139.

¹⁵ Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* 19:1123–1127.

¹⁶ Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. *Ecology* 58:98–108.

¹⁷ Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. *Frontiers in Ecology and the Environment* 2:191–198.

that experience it⁸. The County of Riverside Planning Department should include measures in the DEIR to ensure the following: eliminate all nonessential lighting throughout the Project area; avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active; lighting for Project activities is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>); the use of LED lighting with a correlated color temperature of 3,000 Kelvins or less; proper disposal of hazardous waste; and recycling of lighting that contains toxic compounds with a qualified recycler.

Landscaping

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in any Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE: <https://calscape.org/>. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <https://saveourwater.com/>. CDFW also recommends that the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP "Table 4-112: Coachella Valley Native Plants Recommended for Landscaping" (pp. 4-180 to 4-182; <https://cvmshcp.org/plan-documents/>).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES

Russell Brady, Senior Planner
County of Riverside Planning Department
June 26, 2023
Page 15 of 14

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Thermal Ranch Specific Plan et al (SCH No. 2023050624) and recommends that the County of Riverside Planning Department address CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to Alyssa Hockaday, Senior Environmental Scientist (Specialist), at Alyssa.Hockaday@wildlife.ca.gov or (760) 920-8252.

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec:

Heather Brashear, Senior Environmental Scientist (Supervisor), CDFW
Heather.Brashear@Wildlife.ca.gov

Vincent James, U.S. Fish and Wildlife Service
Vincent_james@fws.gov

Rollie White, U.S. Fish and Wildlife Service
Rollie_white@fws.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

Subject: FW: NO Thermal Ranch !
Date: Tuesday, June 27, 2023 at 12:28:03 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terravaplaning.com>, Kimberly Cuza <kcuza@terravaplaning.com>
CC: JEREMY SMITH <jeremy@thermalranchca.com>
Attachments: image001.jpg

See below that we will log as an NOP comment

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Stephanie Ambriz <stephanie.ambriz1@gmail.com>
Sent: Monday, June 26, 2023 9:29 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: NO Thermal Ranch !

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Dear Russell Brady,

strongly oppose and raise concerns

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development. This development will waste over 30,000 gallons of water daily for the horses consumption alone, without accounting for the cleaning of their stalls or the restaurants, homes, and RV park down the street from communities with arsenic contaminated water. We demand solutions not luxury developments for the rich.

We will not discuss ways to mitigate the impacts of this Project or potential community

benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For example, the developer and county promised the community a park with the Thermal Racetrack as well as affordable housing and water infrastructure with the approval of the Thermal Beach Club.

In summary, our ECV communities are not for sale. Our communities will not settle for broken promises in hopes of basic necessities like water, housing, and clean air. Our communities will continue to oppose and fight back against luxury developments. ECV no se vende.

Stephanie Ambriz
Special Educator & Naturalist

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[County of Riverside California](#)

Subject: FW: Thermal Ranch Specific Plan
Date: Tuesday, June 27, 2023 at 1:43:35 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovalplanning.com>, Kimberly Cuza <kcuza@terranovalplanning.com>
CC: JEREMY SMITH <jeremy@thermalranchca.com>
Attachments: image001.jpg

Another comment to include for the NOP.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Cecilia L <cecy.lemus1995@gmail.com>
Sent: Tuesday, June 27, 2023 1:20 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Thermal Ranch Specific Plan

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Dear Russell Brady,

I would like to raise concerns regarding the Thermal Ranch Specific Plan. I am a resident of Indio, California. I was born and raised in this desert and have seen the 'developments' over the years that are mainly tourism, music festivals, and luxury projects. All of these have not only been heavily supported but also encouraged by the county.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community can not and will not support another luxury development. There are many examples that can and will be shared with the public on past broken promises, should the community's concerns be dismissed.

We have reservations about discussing ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises.

In summary, it is of best interest to the community for you not to continue with the proposed plans.

Cecilia A. Lemus

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[County of Riverside California](#)

Subject: FW: Thermal Ranch Club
Date: Tuesday, June 27, 2023 at 2:17:45 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovalplanning.com>, Kimberly Cuza <kcuza@terranovalplanning.com>
CC: JEREMY SMITH <jeremy@thermalranchca.com>
Attachments: image001.jpg

More NOP comments

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Clara nieblas <clara.nieblas101@gmail.com>
Sent: Tuesday, June 27, 2023 1:52 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Thermal Ranch Club

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Dear Russell Brady,

I would like to strongly oppose and raise concerns regarding the Thermal Ranch Specific Plan. I am an Art Educator and community organizer but most importantly a long time Coachella resident who cares about our people and land. I and many others cannot stand to see another luxury resort built for wealthy families while our own community still has not had basic needs met as well as suffer the horrible environmental impacts this Ranch will cause.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community can not and will not support another luxury development.

We have reservations about discussing ways to mitigate the impacts of this Project or

potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For example, Thermal Racetrack promised money for the community and a park both never happened. Thermal Beach Club also promised water infrastructure, affordable housing, and \$ for community; none have happened.

Here are some environmental impacts to consider. 1 horse consumes 10 gallons of water daily, there will be over 3,000 horses = over 30,000 gallons of water daily
This doesn't account for water to clean horse stalls, especially their feces (140,000lbs of manure) which will also leak/seep into groundwater. Also, more than 8,000 people expected for events traffic will further impact air quality while we already have a large number of community members with asthma problems because of the ECVs poor air quality.

In summary, I am worried about the gentrification and displacement of existing communities as well as the environmental impacts this development will cause. Most of the jobs offered will be temporary and seasonal. Our communities are more than a workforce! I hope that you will heavily consider the concerns of the people who live here instead of wealthy developers who want to make money from tourists.

Best,

Clara Nieblas

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[County of Riverside California](#)

Subject: FW: Opposition of Thermal Ranch
Date: Tuesday, June 27, 2023 at 3:30:47 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovaplanning.com>, Kimberly Cuza <kcuza@terranovaplanning.com>
CC: JEREMY SMITH <jeremy@thermalranchca.com>
Attachments: image001.jpg

NOP comments

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Geena Vescial <geenaart@gmail.com>
Sent: Tuesday, June 27, 2023 2:51 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Opposition of Thermal Ranch

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Dear Russell Brady,

I would like to voice my concerns regarding the Thermal Ranch Specific Plan. I am Geena Vescial. A California Naturalist and native to the Coachella Valley.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For example, multiple broken promises all throughout our desert like the GREEN LEAF energy plant in Mecca that is creating poor air quality for its residents.

In summary, we are taking a stand against this environmentally hazardous and unnecessary

proposal when the residents of this community are in greater need of basic necessities that are constantly being ignored by our county.

Sincerely,

Geena

Bachelors of Science, California Naturalist

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[County of Riverside California](#)

Subject: FW: Thermal Ranch Comment Letter
Date: Tuesday, June 27, 2023 at 3:37:57 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovaplanning.com>, Kimberly Cuza <kcuza@terranovaplanning.com>
CC: JEREMY SMITH <jeremy@thermalranchca.com>
Attachments: ~WRD2367.jpg, image001.jpg, Thermal Ranch SP Comment Letter.pdf

NOP comments from Leadership Counsel actually.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Lupita Lua <mlua@leadershipcounsel.org>
Sent: Tuesday, June 27, 2023 3:18 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Cc: Rebecca Zaragoza <rzaragoza@leadershipcounsel.org>; Mariela Loera <mloera@leadershipcounsel.org>; Perry Elerts <pelerts@leadershipcounsel.org>; Ashley Werner <awerner@leadershipcounsel.org>; Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Office of 2nd District Supervisor <District2@rivco.org>; District3 <District3@Rivco.org>; District 4 Supervisor V. Manuel Perez <District4@RIVCO.ORG>; District 5 <District5@rivco.org>
Subject: Thermal Ranch Comment Letter

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Please see the attached comment letter on the NOP for Thermal Ranch.

Lupita Lua (she/her/ella)
Policy Advocate (Coachella)
Leadership Counsel for Justice and Accountability
85350 Bagdad Ave, Coachella, CA. 92236
Cell: (760) 848-6853
Website: www.leadershipcounsel.org

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June 27, 2023

County of Riverside
Planning Department
4080 Lemon Street,
Riverside, CA. 92501

Sent via email

Dear Russell Brady,

Leadership Counsel for Justice and Accountability (LCJA) provides these comments in collaboration with residents and community members who live and work in the Eastern Coachella Valley (ECV). Residents have been asking for years the County of Riverside promote low income and affordable housing in the ECV, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community can not and will not support another luxury development.

Community has reservations about discussing ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For example, the County uses settlement funds from Colmac Energy to fund street sweeping projects in the Palm Springs area rather than help community residents in Mecca, who live next to and suffer the most from air pollution from the Desert View Power Plant. Further, past luxury development projects like the Thermal Club and the Thermal Reach Club have both committed funding to community benefits but have failed to follow through on these commitments. The Thermal Club funding that was meant for a community park in Thermal was never allocated, and the community has still not seen any benefits from the funding committed by Kohl Ranch for infrastructure in the ECV. The community is tired of the ongoing false promises made by project developers and the County's inability to enforce their commitments.

Additionally, because the County does not have a compliant housing element it lacks authority to approve this Project. Further, this Project would not comply with the County's duty to affirmatively further fair housing (AFFH). Gov. Code, § 8899.50, subd. (a)(1). However, if this site is to be developed, in a way that prioritizes community needs, below is a discussion of recommended impacts that should be thoroughly analyzed through an EIR and suggested mitigation measures.

I. The County Lacks Authority to Approve this Project Because it Lacks an Adequate Housing Element

As mentioned above, the County lacks authority to approve this Project because it does not have a compliant housing element. The County was required to adopt a legally-compliant housing element for the 2021-2029 housing element planning period (the Sixth Cycle) no later than October 15, 2021. While the County adopted a Sixth Cycle Housing Element on September 28, 2021 (Housing Element), that Housing Element does not substantially comply with the requirements of the Housing Element Law, as detailed in December 30, 2021, findings by the California Department of Housing and Community Development (HCD). As a result of not having an adequate Housing Element, a court can enter an injunction restricting the County's ability to approve new commercial, industrial, and luxury housing development, as well as an award of attorneys' fees of costs. Cal. Gov. Code § 65755; Code. Civ. Proc. § 1021.5.

Before approval or consideration of any project the County should first adopt a compliant housing element, which must include policies like inclusionary zoning requirements and other fair housing programs which would alter the viability and design of this Specific Plan and/or other developments. The County should also finalize the Thermal Community Plan it discusses in the Housing Element, to ensure this Project and others do not commit County resources and time to projects which might conflict with the Thermal Community Plan and go against community priorities.

II. The Project Would Violate AFFH if Approved

Given the Project's location and the fact that it includes 1,362 dwelling units, it is essential not only from a CEQA perspective that the County analyze and fully mitigate the Project's impacts on housing, but it is also necessary in order for the County to comply with its duty to affirmatively further fair housing and not take any action that is materially inconsistent with that duty. Gov. Code § 8899.50. To meet this requirement, the County should take into account historic patterns of segregation and barriers to opportunities for people of color in order to promote an inclusive and diverse community.

It is difficult to ascertain how another luxury development in Thermal would comply with the County's duty to take actions which further fair housing. To the contrary if the County approves this Project it will be running afoul of its duty to further fair housing in the region. This Project is designed to cater to vacationers and resort style living, with events bringing in around 8,000 guests per day per event. It is designed to promote privacy and exclusivity. To resolve this conflict the County must not approve another luxury development in Thermal, and must work with project consultants to designate and design as many units as feasible for the low, very low, and extremely low regional housing needs allocation ("RHNA") income categories and

providing housing for residents with special needs such as single parents, residents with disabilities, and multigenerational households. Truly diverse communities should allow access to housing for residents of all income levels and special needs.

III. The County Must Commit to Community Engagement

If this area were to be developed, in a way that meets community priorities it is imperative the County commits to doing robust public outreach and engagement. Development of this area will have potential impacts on an overburdened community and make it all-the-more important that the County provide meaningful, accessible, and extensive community engagement opportunities for residents to learn about projects and their cumulative impacts, as well as, provide feedback throughout the project's consideration, development, and implementation. These community engagement opportunities should be made accessible to ECV community members by conducting them in languages spoken by community members, which include Spanish and Purépecha, or by providing interpretation

We ask the county to make sure residents will be able to attend these meetings as most of the ECV residents who would be the most impacted by this project are farmworkers who tend to work in the mornings, making them unavailable to attend meetings scheduled during the morning and afternoons in Riverside. Community members should also be given timely notice so that they have the opportunity to prepare comments in advance and take time off from work if necessary. Due to the project's close proximity to residents in Thermal, including sensitive receptors like mobile home parks and schools, the County must be diligent in its outreach and engagement efforts to prevent and mitigate potential environmental and public health impacts.

IV. The Project Must Consider Existing Environmental Conditions of the ECV

CEQA requires lead agencies to consider the existing environmental conditions and how projects might impact those conditions. Here the Project is proposed near the unincorporated communities located in the ECV which include: Thermal, Oasis, Mecca, and North Shore. These communities, where more than 90% of individuals are of Latinx descent, are composed of mostly agricultural workers whose primary language is Spanish. Additionally, many residents are also of *Purépecha* descent, an indigenous community from western Mexico who speak *Purépecha*. It is crucial to take into account the characteristics of the ECV's community members as many of them are already burdened by socio-economic factors that impact communities of color the most.

CalEnviroScreen—a screening tool used to help identify communities disproportionately burdened by pollution—indicates that the community of Thermal has a score on the 72nd percentile and a pollution burden in the 76th percentile, making Thermal one of the most pollutant burden communities in California. Some of the issues that impact the livelihoods and health of Eastern Coachella Valley residents include: groundwater contaminants, exposure to

extreme heat temperatures, and air pollution. The region is in the 85th percentile for ozone pollution, 75th for drinking water contamination, and in the 94th percentile for pesticides and solid waste.

Further, the region's socioeconomic factors highlight some of the disparities Thermal and the broader ECV face in comparison to the rest of the State. The chart below was taken from Calenviroscreen and shows just how severe the socioeconomic conditions in Thermal are. Yet, the County continues to prioritize the interests of developers by placing a luxury equestrian center here, which will only further drive these socioeconomic disparities and burdens.

Socioeconomic Factors	
Education	96
Linguistic Isolation	99
Poverty	89
Unemployment	97
Housing Burden	64

V. The EIR Must Consider Project Alternatives

The EIR must seriously consider Project Alternatives. CEQA Guidelines Section 15126.6(a). For example, the EIR should consider alternative locations for this and other proposed projects. This Project as proposed would disproportionately harm an already overburdened community of color. Given the proposed Project's location in an area with extremely poor existing environmental conditions, the Project is more likely to result in significant negative impacts to public health, air quality, energy use, aesthetics, noise, and more. The County must consider alternative project locations in areas with better environmental conditions and/or fewer sensitive receptors in order to minimize the project's impacts to the environment and human beings. The location also has sensitive receptors and has a long history of unequal land zoning that has placed environmentally damaging industries near low-income residents of color. The EIR must include a discussion of alternative locations that minimizes the project's environmental and health impacts on nearby communities.

Alternatives should also consider different housing and density options. Residents in the ECV have long asked for low income, affordable housing, and workforce housing which this project does not seem to bring. Instead the Project appears to bring luxury estate homes to the area and only enough workforce housing to house the workers of the equestrian center. This does not align with Community needs or priorities.

VI. The EIR Must Thoroughly Analyze the Project's Various Potentially Significant Environmental Impacts

A. The EIR must Comply with All Local and State Land Use Plans

Under CEQA the County is required to ensure any proposed project does not conflict with any existing State or local land use plans. The County must find that this Project does not conflict with the County's General Plan, Environmental Justice Element, or Climate Action Plan. All of these plans have policies and protections in place for community members that should be applied and enforced onto any development in the County. For example, these plans include policies that discourage sprawl, encourage electric vehicles and public transportation options, and policy HC 3.4 states the County will provide for a range of housing options to accommodate a range of income levels and household types. As currently proposed it appears that this Project will conflict with many of the County policies found in its General Plan. Given this Project will require a zone change, the County will also need to make a finding that this Project is a compatible land use in the area. For reasons raised in this letter and previous letters regarding luxury development in the ECV, we do not believe this Project is a compatible land use.

B. The EIR Must Analyze Air Quality and GHG Impacts

This Project will have significant energy impacts and demands, as well as, produce significant greenhouse gasses (GHGs). The County must consult with the Imperial Irrigation District (IID) to ensure that the utility can adequately and reliably supply energy to the Project without increasing the risks of blackouts, or to the detriment of other communities. We recommend any developer generate renewable onsite power through rooftop solar throughout a project. This would include on top of residential and commercial buildings. There may be additional opportunities for solar above parking lots or in the planned open space. Solar panels would reduce the Project's energy demand on the County and IID, and reduce the Project's GHG emissions.

There are further feasible mitigation measures that the EIR should include to mitigate GHG impacts. Those are:

- Odor management plan
- Manure management plan
- Dust mitigation measures and plan
- No natural gas to the Project except for commercial kitchens, all residential ovens, stoves, and fireplaces would be electric
- Renewable Energy Generation
- Electric Vehicle Charging Stations

- Electric Bike Charging Stations
- Ridesharing Programs
- Public Transportation opportunities
- Evergreen native vegetation
- Electric vehicles, machinery tools
- Local hiring provisions
- All buildings should be LEED Certified Platinum
- Energy Efficient Appliances

1. AB617/CERP

The Project will likely have significant air quality impacts given the size and nature of the Project. To ensure the air quality in the ECV does not worsen it is imperative that the Project complies with all of the applicable South Coast Air Quality Management District rules and regulations, as well as, the California Air Resources Board's rules and regulations. Contrary to the Initial Study which states "in general the air quality in the Coachella Valley is good," the air quality in the ECV is in fact not "good." Initial Study at p. 3. The ECV is currently classified as a "severe-15" non-attainment area for the 2015 Ozone NAAQS, and is not in attainment for either of the PM2.5 standards. Failure to meet these standards has led to worse public health in the region. The EIR must analyze the impact this Project will have on the air basin and the ability of the region to meet its federal attainment standards by the federally mandated deadlines.

The Project site is also located in the Assembly Bill (AB) 617 ECV boundary, which has a Community Emission Reduction Plan (CERP)¹ that aims to address air pollution impacts in environmental justice communities. The ECV CERP is a critical part of implementing AB 617 (Health and Safety Code Section 44391.2), a California law that addresses the disproportionate impacts of air pollution in environmental justice communities by requiring local air districts and the state Air Resources Board to reduce air pollution in these most impacted communities. The ECV CERP aims to address sources of pollution impacting the ECV including, but not limited to, fugitive road dust and diesel mobile sources. Existing Thermal luxury developments, including the Thermal Racing Club and Thermal Airport, have been identified by the South Coast AQMD and ECV residents as projects directly impacting and exacerbating air quality concerns in the ECV and Thermal in particular. Given the Project falls within the AB 617 area and likely will contribute to air pollution, we ask any project at this site to comply with all measures outlined in the CERP and other air quality improvement and mitigation plans under the local air district.

¹ South Coast AQMD, ECV CERP, (July, 2021) available at <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf?sfvrsn=9>

C. The EIR Must Analyze VMT Impacts

This Project will likely have significant and unavoidable traffic impacts due to the estimated vehicle miles traveled (VMT) generated by a project of this size and scale. Therefore, the County should include all feasible mitigation measures which reduce VMTs. Some of those mitigation measures should include, but not be limited to: public transportation stops at and near the Project, connective trails and bike lanes throughout the project, electric bike charging stations, local hiring provisions, and a community rideshare program.

The Project should also include safety features for pedestrians and bicyclists. These measures would include, but not be limited to: HAWK Systems, adequate sidewalks, protected bike lanes, adequate pedestrian safety signage, and school crossing guards.

D. The EIR Must Analyze Heat Impacts

Heat-related illnesses and death are on the rise in the ECV, and will only continue to go up as temperatures increase due to climate change. This poses a serious health threat to the County and its inhabitants. As such, this Project should incorporate mitigation measures to protect residents and the community at large from extreme heat. These measures should include, but not be limited to adequate air conditioning, evergreen native vegetation, reflective paints and ground cover to reduce the heat island effect, and adequate medical services.

E. The EIR Must Analyze Housing and Growth Impact

Given the Project's location and the fact that it includes 1,362 dwelling units and additional jobs in a rural community, the EIR for the Project must include an analysis of its growth-inducing impacts and impacts on housing. The County should ensure it is meeting its Regional Housing Needs Allocation, and require a percentage of the units in the Specific Plan be for affordable housing for low, very-low, and extremely low income households.

F. The EIR Must Analyze Water and Wastewater Impacts

With less Colorado River water to use in the foreseeable years and increasing demands on the available water, it is vital that the County work with the Coachella Water Authority (CWA) and other Groundwater Sustainability Agencies (GSAs) to balance and accurately account for anticipated water demand on the Indio Subbasin. The County must consult with these GSAs to ensure there will be a reliable supply of water for the Project. Such analysis should account for worsening climate change impacts and increased risk of worsening drought conditions.

Additionally, with the Coachella Valley Water District (CVWD) recently announcing it will be reducing groundwater replenishment by up to 35,000 acre-feet over the next few years, it is crucial that the County analyze potential groundwater impacts on local communities. Many areas in the Eastern Coachella Valley (ECV) have high levels of arsenic and other contaminants which could be made worse by increased groundwater demand and lower replenishment. Supplying water and water-related infrastructure for this Project should not come at the detriment of other communities or impact other communities existing water supply.

Colorado River restrictions and mitigation measures should also be included and considered in the analysis. These mitigation measures should include but are not limited to: having a drought-resistant native vegetation plan, water-saving appliances, rainwater harvesting system, leak detection, monitoring and repair program, incentives for saving water, drip irrigation, and educational information for residents and community members. Lastly, any project should avoid wasteful water uses, including resort-oriented recreational water features, as proposed in this project (IS at p.37).

In summary, the EIR for this project must include a full water budget outlining where all the water for this project will come from, how much water will be needed, and all its uses. If the project will be dependent on groundwater, it must include potential negative impacts to nearby domestic wells and small water systems, impacts to groundwater storage, land subsidence, and groundwater quality and a plan to mitigate potential negative impacts. Last, the EIR must include a climate change impact analysis and drought contingency plan for water use during drought declarations.

G. The EIR Must Analyze Impacts to Biological Resources

Approximately 15 sensitive biological species are known to occur, or could potentially occur, in the project vicinity, including burrowing owl (*Athene cunicularia*), Crissal Thrasher (*Toxostoma crissale*), other sensitive bird species, including the southwestern willow flycatcher (*Empidonax traillii extimus*) and the Loggerhead Shrike (*Lanius ludovicianus*). Burrowing owls have been detected in the project vicinity. Both the shrike and owl are designated California Species of Special Concern and are protected by the federal Migratory Bird Treaty Act. Other sensitive species that could occur in the project vicinity include Couch's Spadefoot (*Scaphiopus couchii*).

Any project at his location must ensure it does not jeopardize the continued existence of these protected species. The area is also covered by the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), meaning the County is obligated under the MSHCP to submit the project to the Coachella Valley Conservation Commission (CVCC) for a Joint Project Review (JPR) before proceeding with any further processing of the proposal. It is crucial that any development comply with the CVMSHCP to ensure protections to imperiled species.

H. The County Must Analyze and Mitigate Public Health Impacts

CEQA requires the County in an EIR to include a sufficient discussion of the significant impacts of the Project, not merely a determination of whether an impact is significant. As such the EIR for this Project and others should analyze the human health impacts of air quality changes from the project, pesticide exposure, traffic safety, extreme heat exposure, emergency service availability, and all other potential health impacts from a proposed land use.

The EIR must also explain the nature and magnitude of the impact. *See Cleveland National Forest*, Cal.5th at pp. 514–515. The County must not only analyze potential human health impacts for the project, but also describe them to give the general public notice as to how their health might be affected. Courts have set aside EIRs which fail to properly describe health impacts. *See, Bakersfield Citizens for Local Control v. City of Bakersfield*, (2004) 124 Cal.App.4th 1184, at 1220, “[a]fter reading the EIR's, the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin.” As such the EIR must include human health studies to inform residents what the health impacts will be from this and other projects. The EIR must not rely on raw data and units per ton to try and communicate health impacts. This information does not give residents any sense of what the health impacts of the project are going to be. *See Sierra Club v. Cty. of Fresno*, 6 Cal. 5th 502, 520, 241 Cal. Rptr. 3d 508, 524, 431 P.3d 1151, 1164 (2018) (The raw numbers estimating the tons per year of ROG and NOx from the Project do not give any information to the reader about how much ozone is estimated to be produced as a result.).

VII. The EIR Must Analyze Cumulative Impacts

A proper cumulative impacts analysis considers the incremental impact of a project in the context of the impacts of past, present, and reasonably foreseeable future projects. (CEQA Guidelines at § 15065, subd. (a)(3); *Communities for a Better Environment v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 118 “[T]he guiding criterion on the subject of cumulative impact is whether any additional effect caused by the proposed project should be considered significant given the existing cumulative effect.”). The EIR for the Project must consider past, present, and future development near and around Thermal and the ECV and analyze the incremental impacts of the Project as well as the individual impacts.

VIII. The Project Should Incorporate Mitigation Measures

An EIR must describe and adopt *all* feasible mitigation measures to avoid or minimize the significant environmental impacts of a project. Pub. Resources Code, § 21002; CEQA Guidelines, § 15126.4, subd. (a)(1). “Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified.” CEQA Guidelines, § 15126.4, subd. (a)(1)(B). The lead agency is expected to develop mitigation

measures in an open process and consider measures proposed by other interested agencies and the public. *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.

Further, compliance with local, state, or federal regulations alone is often not enough or per se sufficient evidence to show no significant impact is likely to occur. *Kings Co v. Hanford* (1990) 221 CA3d 692, 712-718 (agency erred by “wrongly assuming that, simply because the smokestack emissions would comply with applicable regulations from other agencies regulating air quality, the overall project would not cause significant effects to air quality.”); *Citizens for Non-Toxic Pest Control v. Dept. Food & Agr.* (1986) 187 CA3d 1575, 1587-88 (state agency may not rely on registration status of pesticide to avoid CEQA review).

Beyond the mitigation measures already suggested in this letter, the County should also do the following to lessen the environmental impact of the Project:

- Develop a Dust Suppression Plan and mitigation measures to reduce dust emissions
- Develop a Manure and Odor Management Plan
- Develop an Event Traffic Plan
- Add a bus stop or route, invest in public transportation options
- Ride share program
- Electric Vehicle charging stations
- Avoid and reduce unnecessary water use
- Post signage during events and for heavy duty truck management
- Allocate a percentage of the homes for low income affordable housing

IX. Conclusion

Leadership Counsel for Justice and Accountability provides these comments and recommendations in relation to the Notice of Preparation of a Draft Environmental Impact Report for the Thermal Ranch Specific Plan. LCJA worked closely with residents of the ECV area near the location of the proposed Project to provide these comments. Community residents desire to be included in the decision-making processes, want to prevent environmental harm to the community, and want the County to promote investments and policies that advance community priorities over luxury development projects and incompatible land uses.

Sincerely,



Lupita Lua
Policy Advocate

Leadership Counsel for Justice and Accountability
Eastern Coachella Valley
Cell: (760) 848-6853
Email: mlua@leadershipcounsel.org

Perry Elerts

/s/ Perry Elerts
Staff Attorney
Leadership Counsel for Justice and Accountability
Eastern Coachella Valley
Cell: (951) 321-9441
Email: pelerts@leadershipcounsel.org

Subject: FW:
Date: Tuesday, June 27, 2023 at 3:55:17 PM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovaplanning.com>, Kimberly Cuza <kcuza@terranovaplanning.com>
CC: JEREMY SMITH <jeremy@thermalranchca.com>
Attachments: image001.jpg

NOP comments

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Ernest Nunez <nunez.ernest18@gmail.com>
Sent: Tuesday, June 27, 2023 3:50 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject:

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Dear Russell Brady,

I would like to express concerns regarding the Thermal Ranch Specific Plan. My name is Ernest Nunez and a former resident of Thermal.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments.

There are communities with dangerously contaminated water and toxic air qualities which makes the residents of Thermal (and surrounding communities) at risk for respiratory and skin diseases. Until these problems are fixed appropriately, we oppose any and every new luxury development.

Sincerely,

Ernest Nunez
Former resident of Thermal, CA.

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[County of Riverside California](#)

Subject: FW: Thermal Ranch
Date: Wednesday, June 28, 2023 at 7:59:23 AM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovalplanning.com>, Kimberly Cuza <kcuza@terranovalplanning.com>
Attachments: image001.jpg

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



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From: Jessica Gascon <jessikagascon@gmail.com>
Sent: Tuesday, June 27, 2023 4:39 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Thermal Ranch

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Dear Russell Brady,

I would like to raise concerns regarding the Thermal Ranch Specific Plan. I am a long time resident of the Coachella Valley, originally born and raised in the Eastern Coachella Valley just like many others.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises.

Sincerely,

Jessica Gascon

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[County of Riverside California](#)

Subject: FW: Opposition of Thermal Ranch
Date: Wednesday, June 28, 2023 at 7:59:22 AM Pacific Daylight Time
From: Brady, Russell <rbrady@RIVCO.ORG>
To: John Criste <jcriste@terranovaplanning.com>, Kimberly Cuza <kcuza@terranovaplanning.com>
Attachments: image001.jpg

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



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From: marielavescial@aol.com <marielavescial@aol.com>
Sent: Tuesday, June 27, 2023 5:00 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Opposition of Thermal Ranch

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Dear Russell Brady,

I would like to raise concerns regarding the Thermal Ranch Specific Plan. I am registered nurse at Eisenhower Hospital in Palm Desert.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises.

In summary, low income residents need the support of their county because as natives to the Coachella Valley they should be priority to housing and not be burdened with the negative

impacts that the wealthy will bring to build the Thermal Ranch, the beach club, horse track etc. It will do more harm than good.

Sincerely,

Mariela

-

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[County of Riverside California](#)

Dear Russell Brady,

I would like to raise concerns regarding the Thermal Ranch Specific Plan. My name is Alyssa Torres and I am an incoming senior at Cal State San Marcos and a part of the community of Coachella.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For example, the failure of relocation for the hundreds of families that still face inadequate access to dignifying and safe housing throughout the Eastern Coachella Valley.

In summary, I hope you take these experiences into consideration and are able to create positive change for our communities, something that has been missing for a long time.

Sincerely,

Alyssa Torres

Dear Russell Brady,

I would like to raise concerns regarding the Thermal Ranch Specific Plan. I am Julissa Felix, an incoming Senior at Coachella Valley High School. I am born and raised in the Coachella valley and community involvement is very important to me.

Our community has been asking for years for the County of Riverside to promote low-income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. The community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For instance, communities that still lack the most basic infrastructural requirements and the urgent need to relocate hundreds of families who are living in dangerous housing but whose petitions are continually denied owing to ineffective county efforts.

In summary, I am completely opposed to this development and the usage of resources that might be put to far better use for the community. If you care about our communities families and way of life, you must make sure that human needs come before any revenue or funding for more animals we can do without.

Sincerely,

Julissa Felix

Dear Russell Brady,

I would like to [raise personal concerns] regarding the Thermal Ranch Specific Plan. My name is Adriana Torres, a rising Junior at Stanford University but most importantly a concerned resident of the Eastern Coachella Valley, specifically the community of North Shore.

Our community has been asking for years for the County of Riverside to promote low income and affordable housing in the Eastern Coachella Valley, and address the history of segregation and fair housing issues in the ECV. Rather than address fair housing issues, the County is continuing to ignore the wishes and desires of residents and continues to approve luxury developments in the ECV. Community will not support another luxury development.

We will no longer discuss ways to mitigate the impacts of this Project or potential community benefits, due to the repeated failure of the County to keep any of its previous commitments and promises. For example, communities still lacking basic infrastructure needs and the much needed relocation of hundreds families dealing with unsafe housing conditions who's requests continue to be ignored and relocation made impossible due to inefficient efforts on the county's part.

In summary, as a resident I am completely against this build and allocation of resources that could be used in much more beneficial ways for the community. If you care about our families and way of life you must ensure you are prioritizing human needs before any profits or resources for additional animals we can do without in our communities. .

Sincerely,

Adriana Torres

Brady, Russell

From: Brad Anderson <ba4612442@gmail.com>
Sent: Sunday, July 9, 2023 4:35 PM
To: TLMA Planning Hearings; Brady, Russell
Subject: Written Public Comment Agenda Item: 4.1 of Riverside County Directors Hearing July 10, 2023

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July 9, 2023

Riverside County Planning Department (RCPD)
Directors Hearing (scoping session)
County Administrative Center
12th Floor Conference Room A
4080 Lemon Street
Riverside, CA. 92501

Re: Written Public Comment for agenda Item: 4.1 (Thermal Ranch - EIR)

Dear Riverside County Planning Department officials,

Please consider the topics of concern that are stated below in regards to the proposed Environmental Impact Report (EIR) that may be constructed for the proposed Thermal Ranch project.

Having been employed by different Governmental agencies that allowed for unhindered access to areas of discussion (Agenda Item: 4.1) and many other near-by properties. Included areas East of the proposed Thermal Beach club location where "Very Suspicious Fire's" were discovered on Tribal lands that housed green waste composing activities years prior. Of course that composing location was not detailed in the Riverside County Planning department official documents that also misconstrued the exact details related to near-by street destinations in relationship to the proposed Thermal Beach and Surf Club project.

So, It critical that Riverside County Planning Department officials conduct this proposal as ethically as possible.

Item's of concern:

1) Increases in traffic/pollution/use of natural resources (Water) and electricity (IID - Substation)

Roadways should be adapted for regional growth- not just around this one proposed project. Pollution will be produced by vehicles/buildings and livestock (Ground water maybe at risk of contamination from livestock care and natural discharges from animals that are permanently housed on location and visiting animals)

Water resources should be allocated to establish documented exsisting communities first -

Electricity infrastructure that will be demanded by the Thermal Ranch proposal should be totally financed by that organization - up to and Including the costs of all undergrounding of power supply lines within and surrounding that site.

2) excesses water run-off (drainage)

It's been established that the Southeast corner of that property was a natural (possibly man-made) drainage area that extends West to East along the non-existing accessible 64 Ave. roadway. - It's critical that any and all excess water drainage stays within that proposed development site.

Other near-by properties (Kohl's Ranch) has many different areas that have been allowed to become community hazards (Vector Incubators) due to non-maintenance and or neglected community responsibilities for their neighbors.

3) It's critical to be as transparent as possible with all aspects/elements of the proposed Thermal Ranch project. Open detention/retention ponds should be discouraged, it's suggesting that covered drainage fields should be designated for Public health concerns (stagnation of water - should be eliminated or reduced) - Animal waste needs to be contained and managed to eliminate contamination of useable resources and to control potential Vectors.

Private and community swimming pools should be recommended to be reduced in size (Preserve Water/other resources). External heat reduction devices (livestock fans) should be powered by potential renewable sources (Sun generation).

This planned development has a number of proposed workforce housing accommodation with areas for RV hookups - It is feasible to potentially consider the addition of a private community of homes to adapt to community needs for cost effective housing for families of that already long established community. Open spaces will be lost with the development of the proposed Thermal Ranch project - greater "setbacks" should be considered for every building and Walls (FENCES) that will enclose that development.

Thank you,

Brad Anderson | 37043 Ferber Dr. Rancho Mirage, CA. 92270
Ba4612442@gmail.com

Brady, Russell

From: Lloyd Zola <lloyd@metis-env.com>
Sent: Monday, July 10, 2023 11:24 AM
To: Brady, Russell
Subject: Comments on the Thermal Ranch Specific Plan Notice of Preparation and Initial Study

CAUTION: This email originated externally from the Riverside County email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

As a fulltime resident of the Coachella Vally and a planning professional with over 45 years' experience preparing environmental impact reports and planning documents, including specific plans, I offer the comments below in response to the Notice of Preparation (NOP) and Initial Study (IS) for the Thermal Ranch Specific Plan. I also request the following:

1. Please include these comments in the written record for the EIR. While it is clear that the scoping meeting was continued from June 19 to July 10, it is unclear as to whether the public review period for the NOP is still open and the County is still accepting written comments.
2. Please provide me with written notice of the availability of the EIR for the Thermal Rancho Specific Plan and notice of public hearings for the project.
3. Please provide me with written notice as to when and where the Specific Plan can be reviewed. It is my understanding that County departments are still reviewing the Specific Plan and it is therefore not yet available for the public to review. It has been my experience that revisions to the Specific Plan, sometime substantial revisions, can result from the agencies comments on a specific plan, and that such revisions could require modifications to the types and extent of environmental studies that would be needed compared to what may be known at the outset of County staff's review. It is difficult to review an Initial Study and NOP for an EIR on a specific plan without also being able to review the specific plan itself. Many times, there are details provided in a specific plan that have a direct bearing on needed specific environmental analyses that would not be apparent without reviewing the Specific Plan document.

PROJECT DESCRIPTION

4. The NOP refers to "Plot Plan Nos. 230035 & 230038." While NOP Exhibits 9 and 10 appear to be plot plans for Specific Plan areas SP-1 and SP-4, both numbered "Plot Plan PPXXXX." Are NOP Exhibits 9 and 10 the final plot plans that will be evaluated in the EIR?
5. Although not mentioned in the NOP, the Initial Study states that an "on-site electric power substation" is planned. The EIR should include a detailed description of the substation and address impacts associated with construction and operation of the substation where relevant throughout the EIR. The agency or agencies responsible for review and approval of the substation should also be identified in the EIR.
6. Also not included in the NOP is the statement on page 24 of the Initial Study is that the project "has the potential to generate substantial electric power on-site through the use of roof-top solar photovoltaic systems, solar thermal for hot water, process heat and by other means." Unless the Specific Plan actually commits to providing onsite renewable energy generation, the EIR should not assume such energy would, in fact, be generated and thereby reduce the project's net energy demand. If the Specific Plan does commit to onsite renewable energy generation, the EIR should fully describe the

types, locations, and amount of energy to be generated and analyze the impacts of constructing and maintaining such energy generation facilities where relevant throughout the EIR.

7. Development of 1,362 dwelling units is proposed. The EIR project description should address the extent to which such housing would be part of the Coachella Valley's overall housing inventory, reserved for exclusive use of participants in the site's equestrian activities, or some combination of the two. Such information would have direct bearing on analysis of vehicle miles traveled; energy consumption; mobile source GHG and air pollutant emissions; and public services, facilities, and utilities.
8. Development of "up to 150,000 square feet of retail space in Planning Area 6" on 21.4± acres, which is identified in the IS but not the NOP, should be further defined in the EIR. For example, to what extent is this commercial space intended to serve onsite visitors and residents or to serve general commercial needs of offsite residents and businesses. Such information would have direct bearing on analyzing vehicle miles traveled and mobile source GHG and air pollutant emissions. While IS page 55 states this commercial development "may reduce the need for off-site travel from other Project uses, and the generation of associated vehicle trips and miles traveled," the IS fails to acknowledge that the relative isolation of the project and the large scale of proposed commercial use could also increase the amount of associated vehicle trips and miles traveled from offsite locations to the onsite commercial center and also serve as an inducement for adjacent unplanned growth.
9. KQED's 11 pm news feature on the project broadcast Friday July 7, including statements from the applicant, seemed to indicate that facilities would be moving from their existing site to the Thermal Ranch site. The IS/NOP seems to indicate, however, that facilities would not be relocating to the project site. If relocation of existing facilities is not part of the project, the EIR should undertake its environmental studies based on onsite activities being new additions to the environment and assume no reduction of activities at the existing site. To the extent the EIR might assume existing facilities would move to the site and attempt to address net impacts (e.g., total onsite use minus existing activities moving to the site), the EIR should also address impacts associated with new uses on the sites from which activities might move to Thermal Ranch.

IMPACT CONCLUSIONS

10. The NOP states that natural gas lines "will need to be extended and applicant is consulting with SoCalGas on this line extension, which will be described and analysed in the forthcoming EIR." Page 24 of the IS states the "closest high pressure natural gas lines are located within the Highway 111 right of way approximately 3 miles east of the Project site, and in Monroe Street at Ave 54 3 miles to the north of the site. At this time, it is not known whether lower pressure distribution lines extend to the Project vicinity." While the Initial Study acknowledges that there is "currently no natural gas service in the Project vicinity," the IS concludes on page 62 that impacts associated with natural gas service would be less than significant. The IS also states on page 63 that it is "expected that extension of gas lines will occur within existing road rights-of-way and will have a less than significant impact on the environment as will be analyzed in more detail in the forthcoming EIR."
 - a. Without an actual plan for natural gas extension, it cannot be known with certainty that the extension of gas service to the site would occur exclusively within existing roadway rights-of-way or that necessary excavations for natural gas pipeline extension(s) would occur exclusively within soils previously disturbed by roadway construction. Instead, the IS prematurely concludes that analyses to be undertaken "in more detail in the forthcoming EIR" will show impacts to be less than significant.
 - b. The EIR should also explore the feasibility of the project being all electric and not extending natural gas service. An all-electric project would reduce stationary source GHG and air pollutant emissions and eliminate impacts associated with a major extension of natural gas facilities.

11. As a matter of general practice, unless sufficient information and analysis has been undertaken in the IS to substantiate a significance conclusion, the IS should conclude that a potentially significant impact would result. Thus, the IS should not conclude:
 - a. Environmental Issues that will be studied “in more detail in the forthcoming EIR” will be less than significant until they have, in fact, been studied in more detail in the EIR; or that
 - b. Environmental issues for which analysis has yet to be undertaken would be “significant but mitigable” until relevant studies have been undertaken to identify a significant impact and mitigation measures are identified that would, in fact, reduce the significant impact to less than significant. Examples of the Initial Study concluding an impact would be significant but mitigable based on studies yet to be undertaken and mitigation measure yet to be identified abound throughout the Initial Study.
12. Given the (1) amount of housing and commercial use proposed for the site, (2) the lack of definition as to the extent onsite housing would attract permanent or seasonal residents, and the extent to which 150,000 s.f. of general commercial would serve offsite market areas, the IS should not conclude the project would be consistent with CEQA Guidelines Section 15064.3 unless a detailed VMT analysis demonstrates that no significant VMT impact would occur.

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