

Biological Resources Technical Report

Galway Downs Project Site

Unincorporated Riverside County, California

FINAL REPORT



Project Case No./Title: Galway Downs. Revision No. 1 to Conditional Use Permit No. 02303 (CUP 2303R1), Change of Zone CZ 220000, and Exception No. 9 to Riverside County Noise Ordinance No. 847. HANS 2039, Amendment JPR 10-12-27-01

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GLOSSARY

APNs	Assessor's Parcel Numbers
BMPs	Best Management Practices
CAPSA	Criteria Area Plant Survey Areas
CDFG	California Department of Fish and Game (CDFW effective Jan 1 st 2013)
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Ranks
CUP	Conditional Use Permit
CWA	Clean Water Act
DBESP	Determination of Biological Equivalent or Superior Preservation
EIR	Environmental Impact Report
FESA	federal Endangered Species Act
GIS	Geographic Information System
HANS	Habitat Acquisition and Negotiation Strategy
JPR	Joint Project Review
MBTA	Migratory Bird Treaty Act
MSHCP	Multiple Species Habitat Conservation Plan
NCCP	Natural Communities Conservation Plan
NEPSA	Narrow Endemic Plant Survey Area
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
OHWM	Ordinary High Water Mark
PQP	Public/Quasi Public
RCA	Western Riverside County Regional Conservation Authority
RCIP	Riverside County Integrated Project
RWQCB	Regional Water Quality Control Board
SCE	State Candidate Endangered
SSC	California Species of Special Concern
SWAP	Southwest Area Plan
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

INTRODUCTION

The following biological technical report describes a detailed assessment of potential sensitive natural resources located within and immediately adjacent to the Galway Downs Project Site. Specifically, the report has been prepared to support the California Environmental Quality Act (CEQA), Environmental Impact Report (EIR) and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) documentation, compliance, and review process conducted by the County of Riverside Environmental Programs Division (EPD). As discussed below, the assessment includes a thorough literature review, site reconnaissance characterizing baseline conditions (including floral and faunal and dominate vegetation communities), focused sensitive species surveys, impact analysis, and proposed mitigation/conservation measures, as required.

PROJECT LOCATION & DESCRIPTION

The 241.60-acre onsite (Onsite) and 5.27-acre offsite (Offsite), project site (Project Site, 246.87-acres total) is located within Assessor's Parcel Numbers (APNs) Onsite: 927-160-001 and 927-160-002, Offsite portion of 927-160-041, 927-690-005 and Right-of-Ways. The Project Site is located within United States Geological Survey (USGS) 7.5' Series Pechanga Quadrangle, Township 8 South, Range 1 West, Section 18, extending south of Los Caballos Road, east/north of Los Corralitos Road, and west of Pauba Road, as shown in Figure 1, *Project Site Map*. Offsite road improvements are proposed within the Right-of-Way of Los Caballos Road, Pauba Road and State Route 79 at the intersections of Los Caballos and Pauba Roads. An Eastern Municipal Water District (EMWD) sewer connection is proposed to extend north from the northwest corner of the Project Site to De Portola Road.

The Project Site is located within the Western Riverside County MSHCP Southwest Plan Area, partially within Subunit 2 – Temecula Creek & Pechanga Creek. The Project Site is located partially within MSHCP Criteria Cells 7134 and 7185, as shown in Figure 2, *MSHCP Relationship Map* (Western Riverside County Regional Conservation Authority (RCA) Geographic Information System (GIS) Data Downloads 2025). The offsite proposed EMWD sewer connection is located within and bisects Proposed Constrained Linkage 24. The entire onsite region of the Project Site completed the MSHCP Habitat Acquisition and Negotiation Strategy (HANS 2039) and Joint Project Review (JPR 10-12-27-01) process and a consistency determination was issued on January 6th, 2011 with no onsite conservation required (RCA 2011). An amendment to the JPR (JPR 10-12-27-01) will be processed for the additional 2.62-acres of offsite impacts which extend into Criteria Cells 7134 and 7185.

Galway Downs is an existing events facility located at 38801 Los Corralitos Road within the Southwest Area Plan (SWAP) General Plan portion of unincorporated western Riverside County. The existing facility encompasses 241.60-acres, and consists of a multi-faceted events facility that operates as a traditional equestrian facility the majority of the time but also hosts a variety of other activities on the weekends. Specifically, Galway Downs includes a variety of existing recreational and event related facilities, including a horse racetrack and equestrian facilities; polo fields; lodging facilities; restaurants; retail space; mobile home park with club house; grooms' quarter; barn structures; office space; and horse corrals. The existing facility operates under several

approved Conditional Use Permits (CUPs), including CUP 001127, CUP 00966, CUP 01615, and CUP 02303.

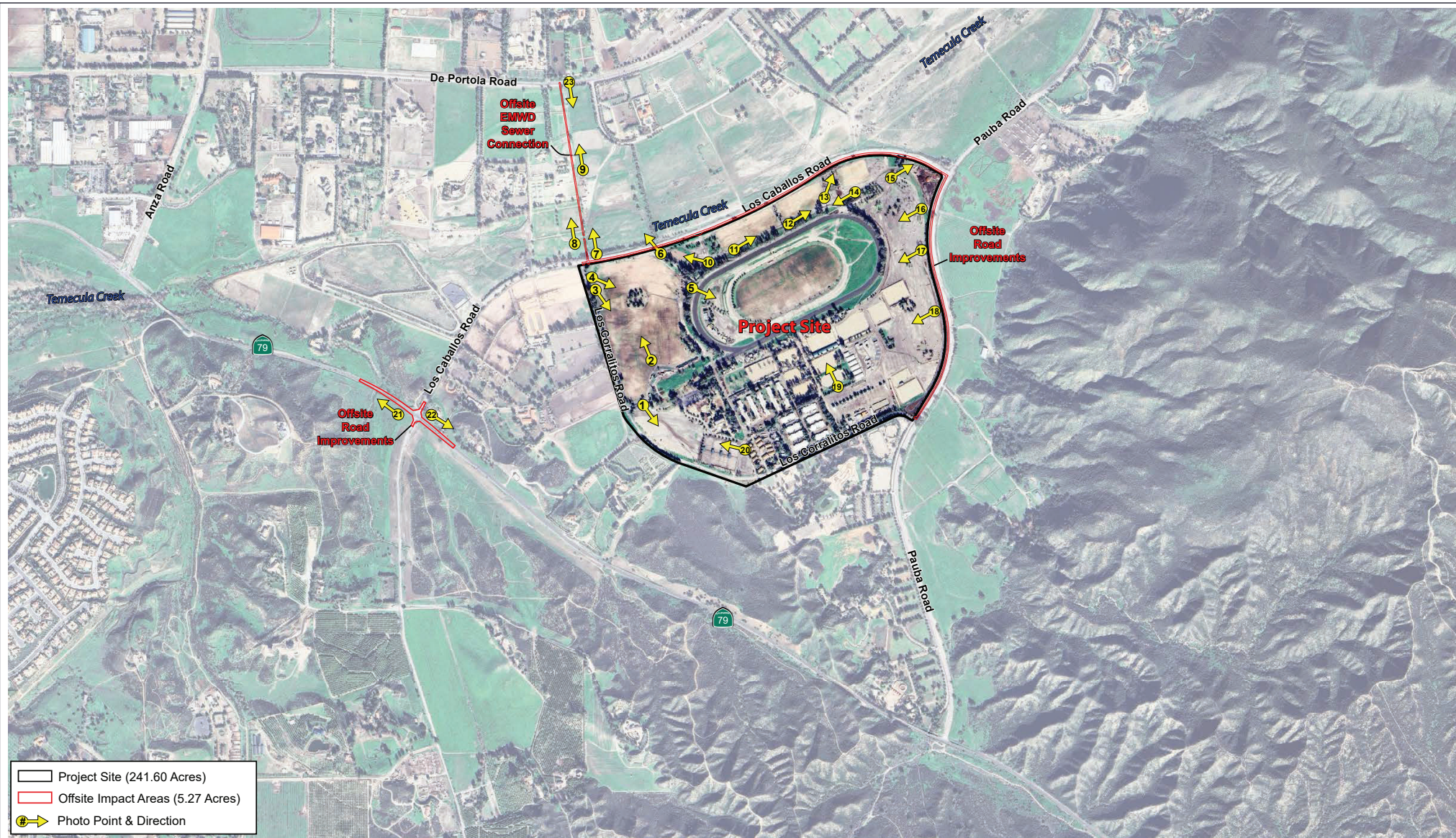
The Project Applicant (SFT Realty Galway Downs, LLC) is seeking approval of Revision No. 1 to CUP 02303 (CUP 02303R1), a Change of Zone (CZ 22000010), and Exception No. 9 to Riverside County Noise Ordinance No. 847. The primary use of the site would continue to be equestrian related. The proposed project would generally allow the applicant to 1) make physical and operational modifications on the property to elevate the caliber of equestrian events that can be hosted on the site; 2) permit a portion of the site to host non-equestrian sporting events (primarily on the weekends); and 3) designate areas of the site where exterior sound amplification can occur between 8 a.m. and 10 p.m., without need to seek a separate permission for every event that includes sound amplification audible for a distance greater than 200 feet from the source.

The CUP No. 02303 would also allow for the construction/installation of several new structures and to permit structures previously installed on site without issuance of appropriate permits. In total, 57,052 s.f. of new structures would be constructed on the site, in addition to an equestrian recreational vehicle park, award/ceremony area, Equestrian Park Model Lodging area, and employee housing area. No permanent roofed structures would be built in the equestrian recreational vehicle park area or in the award/ceremony area. Details of the Equestrian Park Model Lodging area and employee housing area would be determined in the future in conjunction with future Plot Plan applications for those areas, but the analysis in this EIR is based upon up to 36 Equestrian Park Model Lodging units and 18 employee housing units.

Exception No. 9 to Riverside County Noise Ordinance No. 847 is sought by the Project Applicant pursuant to Section 7.a.3 of Ordinance No. 847. Exception No. 9 would allow for sound amplifying equipment to operate on certain portions of the property between 8 a.m. and 10 p.m. without need to seek a separate permission for every event that includes sound amplification.

The CZ 22000010 is sought by the Project Applicant to amend Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348 to allow for operational enhancements at the site, which specifically would add new definitions for three uses; add a list of conditionally permitted uses within the WC-E zone for Class II Equestrian Establishments of over 200 acres; slightly modify the General Standards applicable to the WC zone to expressly prohibit parking on public streets during special occasion events; modify the development standards for Class II equestrian establishments to clarify areas that qualify as equine lands; and add new development standards Wine Country Equestrian Park Model Lodging and Equestrian Recreation Vehicle Parks. The governmental approvals requested from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a Conditional Use Permit (CUP 02303R1);
2. Issuance of Exception No. 9 to Riverside County Ordinance No. 847;
3. Adoption by ordinance of a Change of Zone (CZ 22000010); and
4. Certification of this EIR.



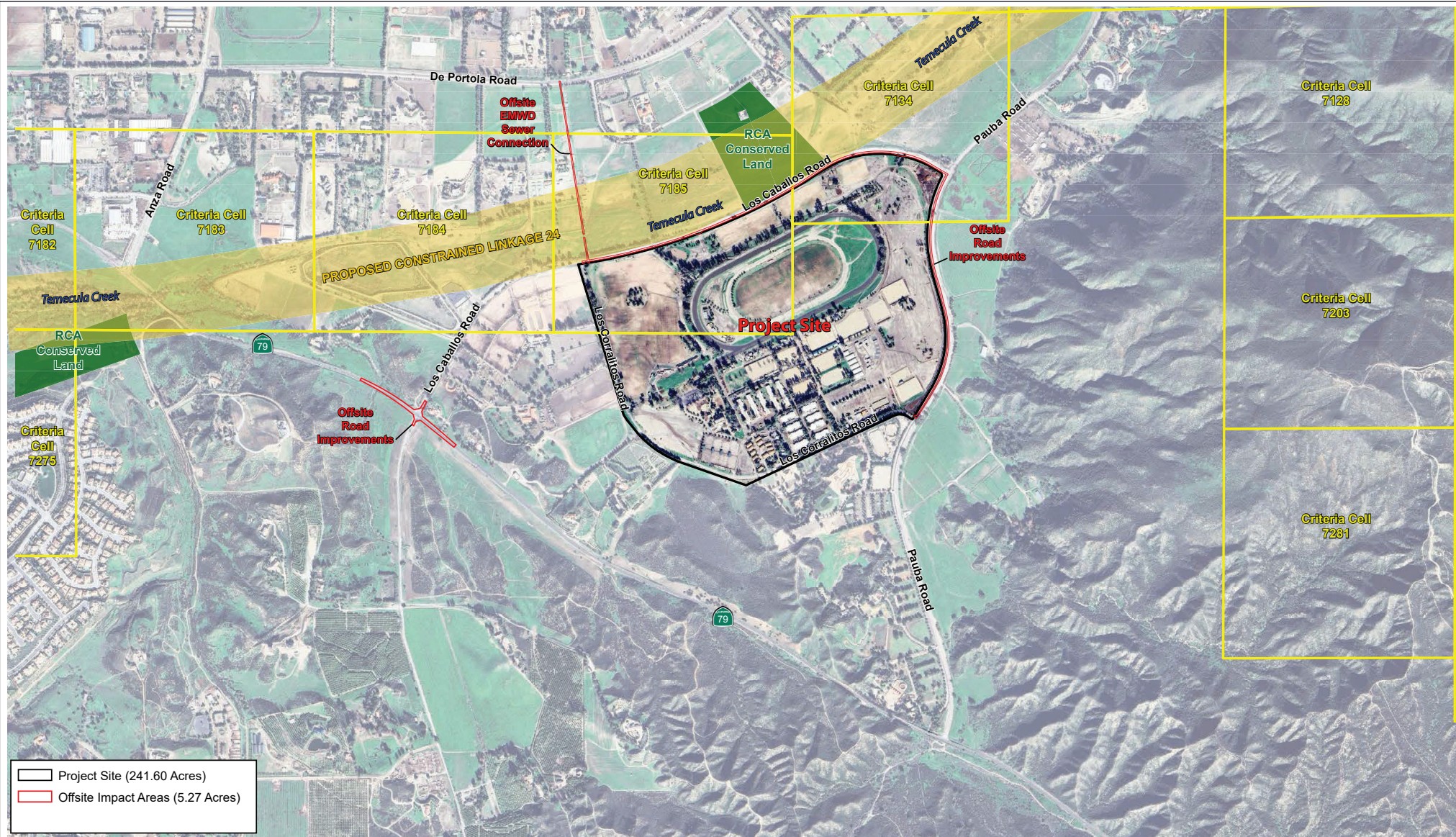
Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 1 - Project Site Map

*Biological Resources Technical Report
Galway Downs Project Site*

CADRE
Environmental

↑
N
1 inch = 1,000 feet



Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 2 - MSHCP Relationship Map
 Biological Resources Technical Report
 Galway Downs Project Site

CADRE
 Environmental

1 inch = 1,000 feet

METHODOLOGY

The following section details the methods implemented prior to and during the reconnaissance and focused survey conducted throughout the Project Site.

LITERATURE REVIEW

Existing biological resource conditions within and adjacent to the Project Site were initially investigated through review of pertinent scientific literature and industry standard databases including but not limited to the following:

- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants in California (CNPS 2025).
- United States Fish and Wildlife Service (USFWS) Species Occurrence Database (USFWS 2025a).
- The Information for Planning and Consultation (IPaC) database from the USFWS (USFWS 2025b).
- USFWS Critical Habitat Mapper (USFWS 2025c).
- The California Natural Diversity Database (CNDDDB) (CDFW 2025a), a California Department of Fish and Wildlife (CDFW) Natural Heritage Division species account database.
- Special Animals (CDFW 2025b).
- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2025c).
- Endangered, Threatened, and Rare Plants of California (CDFW 2025d).
- Special Vascular Plants and Bryophytes List (CDFW 2025e).
- iNaturalist Database. (iNaturalist 2025).
- eBird (eBird 2025).
- County of Riverside Municipal Codes (County of Riverside 2025).
- County of Riverside General Plan (Southwest Area Plan).

FIELD SURVEYS

An initial reconnaissance survey of the Project Site was conducted by Cadre Environmental on March 17th, 2025 in order to characterize and identify potential wildlife habitats, sensitive resources, and to establish the accuracy of the data identified in the literature search and previous surveys.

Geologic and soil maps were examined to identify local soil types that may support sensitive taxa. Aerial photograph, topographic maps, and vegetation and rare plant maps prepared by previous studies in the region were used to determine community types and other physical features that may support sensitive plants/wildlife, uncommon taxa, or rare communities that occur within the Project Site.

The MSHCP has determined that all of the sensitive species potentially occurring within the Project Site have been adequately covered (MSHCP Table 2-2 Species Considered for Conservation Under the MSHCP Since 1999, 2004). However, additional surveys may be required for narrow endemic plant, criteria area, and specific wildlife species if

suitable habitat is documented onsite and/or if the property is located within a predetermined “Survey Area” (MSHCP 2004). Based on the initial MSHCP review of predetermined Survey Areas, habitat assessments and focused surveys (as warranted) were conducted for the following seven (7) species.

Section 6.1.2 Riparian, Riverine, Vernal Pool Species

- Riverside fairy shrimp (*Streptocephalus woottoni*), Federal Endangered (FE);
- vernal pool fairy shrimp (*Branchinecta lynchi*), Federal Threatened (FT);
- least Bell's vireo (*Vireo bellii pusillus*), FE, State Endangered (SE);
- southwestern willow flycatcher (*Empidonax traillii extimus*), FE, SE;
- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), SE;

Wildlife Species

- burrowing owl (*Athene cunicularia*), State Candidate Endangered (SCE).

A habitat assessment was also conducted for, but not limited to, the following target species not covered by the MSHCP.

- Crotch's bumble bee (*Bombus crotchii*) – SCE

Vegetation Communities/Habitat Classification Mapping

Natural community names and hierarchical structure follows the CDFW “List of California Terrestrial Natural Communities” and/or Holland (1986) classification systems, which have been refined and augmented where appropriate to better characterize the habitat types observed onsite when not addressed by the MSHCP classification system.

Floristic Plant Inventory

A general plant survey was conducted throughout the Project Site during the initial reconnaissance in a collective effort to identify all species occurring onsite. All plants observed during the survey efforts were either identified in the field or collected and later identified using taxonomic keys. Plant taxonomy follows Jepson Flora Project (eds.) (Jepson eFlora 2025). Scientific names are included only at the first mention of a species; thereafter, common names alone are used.

Wildlife Resources Inventory

All animals identified during the reconnaissance survey by sight, call, tracks, scat, or other characteristic sign were documented. In addition to species actually detected, expected use of the site by other wildlife was derived from the analysis of habitats on the site, combined with known habitat preferences of regionally occurring wildlife species. Vertebrate taxonomy followed in this report is according to the Center for North American Herpetology (2025) for amphibians and reptiles, the American Ornithological Society (2025) for birds, and American Society of Mammalogists (2025) for mammals. Both common and scientific names are used during the first mention of a species; common names only are used in the remainder of the text.

Regional Connectivity/Wildlife Movement Corridors

The analysis of wildlife movement corridors associated with the Project Site and immediate vicinity is based on information compiled from literature, analysis of the aerial photograph and direct observations made in the field during the reconnaissance site visit.

A literature review was conducted that includes documents on island biogeography (studies of fragmented and isolated habitat “islands”), reports on wildlife home range sizes and migration patterns, and studies on wildlife dispersal. Wildlife movement studies conducted in southern California were also reviewed. Use of field-verified digital data, in conjunction with the GIS database, allowed proper identification of regional vegetation communities and drainage features. This information was crucial to assessing the relationship of the Project Site to large open space areas in the immediate vicinity and was also evaluated in terms of connectivity and habitat linkages. Relative to corridor issues, the discussions in this report are intended to focus on wildlife movement associated within the Project Site and the immediate vicinity.

Crotch’s Bumble Bee Surveys

The following section is excerpted and/or summarized directly from the document prepared by Huffman Environmental “*2025 Proposed Project Galway Downs Crotch’s Bumblebee Summary Report, Riverside, California*” (Huffman Environmental 2025).

A habitat assessment was conducted on May 8th, 2025, by CBB approved biologist and surveyors, Garrett Huffman and Blanca Martinez. The primary objective of the assessment was to identify optimal nectar resources, thereby determining areas with the highest likelihood of CBB occurrence. Nectar patches were delineated based on the relative abundance of blooming or soon-to-bloom floral species known to be preferred by CBB. These mapped patches defined the CBB Survey Area.

Excluded habitat types were determined based on the absence or scarcity of suitable nectar resources. Habitat types unlikely to support foraging or presenting low detectability for CBB included disturbed or developed areas (e.g., access roads), riparian communities with limited floral resources, and non-native grasslands dominated by invasive species that had already senesced. Survey areas were delineated using GPS polygons collected in Field Maps (ArcGIS), and dominant nectar species were recorded on digital datasheets via the Fulcrum mobile application. Nectar patches were reevaluated during each subsequent survey round to guide survey effort. Once a nectar patch senesced, it was revisited briefly to confirm its low suitability and was not surveyed further.

Three survey rounds were conducted on May 8th, 27th, and June 11th, 2025 maintaining a minimum of two weeks between each survey in accordance with protocol guidelines. Survey efforts were scheduled to coincide with the peak blooming periods of potential nectar and pollen sources and the expected active flight periods of CBB. Biologists concentrated their efforts in areas with the highest quality and density of flowering plant species commonly associated with CBB foraging behavior.

Survey speed was generally maintained at a rate of approximately three acres per hour, although this rate was adjusted at the discretion of the biologist based on environmental

conditions. Factors influencing survey pace included nectar source availability, floral density, overall vegetation cover, terrain complexity, and observed invertebrate activity. Surveys were conducted using a combination of meandering transects and passive visual monitoring with the aid of binoculars. If a bee individual was encountered, it was observed and identified through a combination of field observation and photography, without physical capture. All surveys were conducted under protocol-defined weather conditions, which included ambient temperatures between 60°F and 90°F, sustained wind speeds less than 10 mph, and the absence of fog or precipitation (CDFW, 2023).

MSHCP Focused Burrowing Owl Surveys

The MSHCP has determined that all of the sensitive species potentially occurring onsite have been adequately covered (MSHCP Table 2-2 Species Considered for Conservation Under the MSHCP Since 1999, 2004). However, additional surveys may be required wildlife species if suitable habitat is documented onsite and/or if the property is located within a predetermined “Survey Area” (MSHCP 2004).

The Project Site occurs partially within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented within and adjacent to the Project Site including foraging habitat. Therefore, focused surveys were conducted by Cadre Environmental during the spring of 2025. In accordance with the MSHCP Burrowing Owl Survey Instructions (2006), survey protocol consists of two steps, Step I – Habitat Assessment and Step II – Locating Burrows and Burrowing Owls. Step II is comprised of two parts, Part A: Focused Burrow Surveys and Part B: Focused Burrowing Owl Surveys. Each step is briefly outlined below, followed by the methodology and results of each survey conducted within the Project Site. All initial habitat assessment, burrow and focused surveys were conducted by Ruben Ramirez, Cadre Environmental. Surveys were conducted during weather that is conducive to observing owls outside their burrows and detecting burrowing owl sign. Surveys were not conducted during rain, high winds (> 20 mph), dense fog, or temperatures over 90 °F. None of the surveys were conducted within five (5) days of measurable precipitation. In addition to the MSHCP guidelines, field notes were taken daily. These notes recorded the date, location, animal species observed, and general habitat characteristics of each area and habitat examined that day.

Step I – Habitat Assessment

Step 1 of the MSHCP habitat assessment for burrowing owl consists of a walking survey to determine if suitable habitat is present onsite. Cadre Environmental conducted the habitat assessment on March 17th 2025. Upon arrival at the Project Site, and prior to initiating the assessment survey, Cadre Environmental used binoculars to scan all suitable habitats on and adjacent to the property, including perch locations, to ascertain owl presence.

All suitable areas of the Project Site were surveyed on foot by walking slowly and methodically while recording/mapping areas that may represent suitable owl habitat onsite. Primary indicators of suitable burrowing owl habitat in western Riverside County include, but are not limited to, native and non-native grassland, interstitial grassland within shrub lands, shrub lands with low density shrub cover, golf courses, drainage ditches,

earthen berms, unpaved airfields, pastureland, dairies, fallow fields, and agricultural use areas. Burrowing owls typically use burrows made by fossorial mammals, such as California ground squirrels (*Otospermophilus beecheyi*) or badgers (*Taxidea taxus*), but they often utilize man-made structures, such as earthen berms, cement culverts, cement, asphalt, rock, or wood debris piles, or openings beneath cement or asphalt pavement. Burrowing owls are often found within, under, or in close proximity to man-made structures.

According to the MSHCP guidelines, if suitable habitat is present, the biologist should also walk the perimeter of the property, which consists of a 150-meter (approximately 500 feet) buffer zone around the Project Site boundary. If permission to access the buffer area cannot be obtained, the biologist shall not trespass, but visually inspect adjacent habitats with binoculars. Results from the habitat assessment indicated that suitable burrowing owl burrows and foraging habitat were documented within and adjacent to the Project Site. Accordingly, if suitable habitat is documented onsite, both Step II surveys and the 30-day pre-construction surveys are required in order to comply with the MSHCP guidelines.

Step II – Locating Burrows and Burrowing Owls

Concurrent with the initial habitat assessment, a detailed focused burrow survey was conducted and included documentation of appropriately sized natural burrows or suitable man-made structures that may be utilized by burrowing owl - as part of the MSHCP protocol, which is described below under Part A. Focused Burrow Survey. The MSHCP protocol indicated that no more than 100 acres should be surveyed per day/per biologist. A total of 74-acres of suitable habitat was documented within the Project Site burrowing owl Survey Area.

Part A: Focused Burrow Survey

A systematic survey for burrows, including burrowing owl sign, was conducted by walking across all suitable habitats mapped within the Project Site on March 17th, 2025. Pedestrian survey transects were spaced to allow 100% visual coverage of the ground surface. The distances between transect centerlines were no more than 20 meters (approximately 66 ft.) apart, and owing to the terrain, often much smaller. Transect routes were also adjusted to account for topography, general ground surface visibility and/or complete lack of suitable habitat. All observations of suitable burrows or dens, natural or man-made, or sightings of burrowing owl, were recorded and mapped during the survey.

Part B: Focused Burrowing Owl Surveys

Four (4) focused burrowing owl surveys were conducted within the Project Site on March 23rd, April 13th, May 15th and 31st, 2025 from one hour before sunrise to two hours after sunrise or in the early evening two hours before sunset to one hour after sunset. All surveys were conducted following MSHCP guidelines and 2012 CDFW Staff Report on Burrowing Owl Mitigation recommended survey procedures. During visual surveys, all potentially suitable burrow or structure entrances were investigated for signs of owl occupation, such as feathers, tracks, or pellets, and carefully observed to determine if burrowing owls utilize these features, when present. All burrows are monitored at a short

distance from the entrance, and at a location that would not interfere with potential owl behavior, when present. In addition to monitoring potential burrow locations, all suitable habitats in the Project Site were surveyed.

- Survey 1 - March 23th 6:30am - 9:00am, 53°F to 58°F, winds 2-6 mph, no rain
- Survey 2 - April 13th 6:30am - 9:00am, 57°F to 60°F, winds 0-4 mph, no rain
- Survey 3 - May 15th 6:30am - 9:00am, 55°F to 64°F, winds 4-10 mph, no rain
- Survey 4 - May 31st 6:30am - 9:00am, 62°F to 74°F, winds 2-8 mph, no rain

Jurisdictional Delineation

The Project Site was assessed for potential jurisdiction by the United States Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB). Non-wetland waters of the United States were assessed based on the limits of the Ordinary High-Water Mark (OHWM) as determined by erosion, the deposition of vegetation or debris, and changes in vegetation and soil characteristics. The assessment utilized the methodology for routine wetland determination according to the methods outlined in the USACE Wetland Delineation Manual (Environmental Laboratory 1987) and the Arid West Wetland Delineation Supplement and updated regulatory guidance letters (USACE 2008). Wetlands are identified by the presence of three characteristics: hydrophytic vegetation, wetland hydrology, and hydric soils.

MSHCP Riparian/Riverine/Vernal Pool Resources

The Project Site was assessed for potential jurisdiction by MSHCP Section 6.1.2. Regulated activities within inland streams, wetlands and riparian areas in Western Riverside County California fall under the jurisdiction of the MSHCP Section 6.1.2. The MSHCP requires, among other things, assessments for riparian/riverine and vernal pool resources. As projects are proposed within the MSHCP Plan Area, an assessment of the potentially significant effects of those projects on riparian/riverine areas, and vernal pools are required, as currently mandated by CEQA, using available information augmented by project-specific mapping provided to and reviewed by the permittee's biologist(s). Riparian/riverine areas and vernal pools are defined for this section as follows in accordance with Section 6.1.2, Vol. I, of the Final MSHCP Plan:

“Riparian/Riverine Areas are lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year.” (MSHCP 2004)

It is assumed the first part of the definition defines riparian habitat, and the second part defines riverine areas. Vernal pools are defined as:

“...seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant

species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season". (MSHCP 2004)

EXISTING ENVIRONMENTAL SETTING

As previously stated, the Project Site is an existing equestrian and events facility located at 38801 Los Corralitos Road within the SWAP General Plan portion of unincorporated western Riverside County. The existing facility encompasses approximately 241.60 acres, and consists of a multi-faceted events facility that operates as a traditional equestrian facility the majority of the time but also hosts a variety of other activities on the weekends. The Project Site is heavily impacted with vegetation communities documented onsite including developed (equestrian and events center) and disturbed habitat, as shown in Figure 3, *Vegetation Communities Map*, Figures 4 to 15, *Current Project Site Photographs*, and outlined in Table 1, *Project Site Vegetation Community Acreages*.

Table 1.
Project Site Vegetation Community Acreages

Vegetation Community	Onsite (ac)	Offsite (ac)	Project Site Total (ac)
Developed	205.48	4.23	209.71
Disturbed	34.89	0.54	35.43
Ephemeral Drainage	0.32	0.01	0.33
Open Water	0.31	--	0.31
Non-Native Grassland/Live Stock Feed Yards	0.29	0.49	0.78
Coast Live Oak	0.18	--	0.18
Disturbed Southern Willow Scrub	0.13	--	0.13
	241.60	5.27	246.87

Source: Cadre Environmental 2025.

VEGETATION COMMUNITIES

Developed

The majority of the Project Site is characterized as developed including but not limited to all equestrian and event center facilities. Vegetation within this region is primarily ornamental vegetation including but not limited to turf, Eucalyptus trees (*Eucalyptus* sp.), Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinthifolia*), Australian blackwood (*Acacia melanoxylon*), European olive (*Olea europaea*), Mexican fan palm (*Washingtonia robusta*), chinaberry (*Melia azedarach*), Canary Island date palm (*Phoenix canariensis*), bougainvillea (*Bougainvillea* sp.), shamel ash (*Fraxinus uhdei*), rose (*Rosa* sp.), hottentot fig (*Carpobrotus edulis*), and pine (*Pinus* sp.). A few native trees including blue elderberry (*Sambucus cerulea*) and western sycamore (*Platanus racemosa*) were also located within this region of the Project Site. Non-native species documented within the understory of the ornamental vegetation include cheeseweed (*Malva parviflora*), red-stemmed filaree (*Erodium cicutarium*), Australian saltbush

(*Atriplex semibaccata*), pineapple weed (*Matricaria discoidea*), shepherds' purse (*Capsella bursa-pastoris*), California bur clover (*Medicago polymorpha*), prostrate knotweed (*Polygonum aviculare*), lambs' quarters (*Chenopodium album*), Russian thistle (*Salsola tragus*), and non-native grasses.

Disturbed

Disturbed regions of the Project Site include areas devoid of vegetation including event center parking areas and select equestrian facilities.

Ephemeral Drainage

A well-defined unvegetated ephemeral drainage enters the northeast region of the Project Site and drains in a western direction where it is captured in a detention basin (Open Water) which is bordered by disturbed southern willow scrub. The basin overflows into a channel which exits the Project Site through a culvert extending north under Los Caballos Road and drains into Temecula Creek. The offsite alignment for the Project's sewer connection to the new Eastern Municipal Water District (EMWD) main within De Portola Road also traverses a short reach of Temecula Creek (ephemeral drainage).

Open Water

An inundated detention basin captures flows from a well-defined unvegetated ephemeral drainage extending in a western direction through the northern region of the Project Site.

Non-Native Grassland/Live Stock Feed Yards

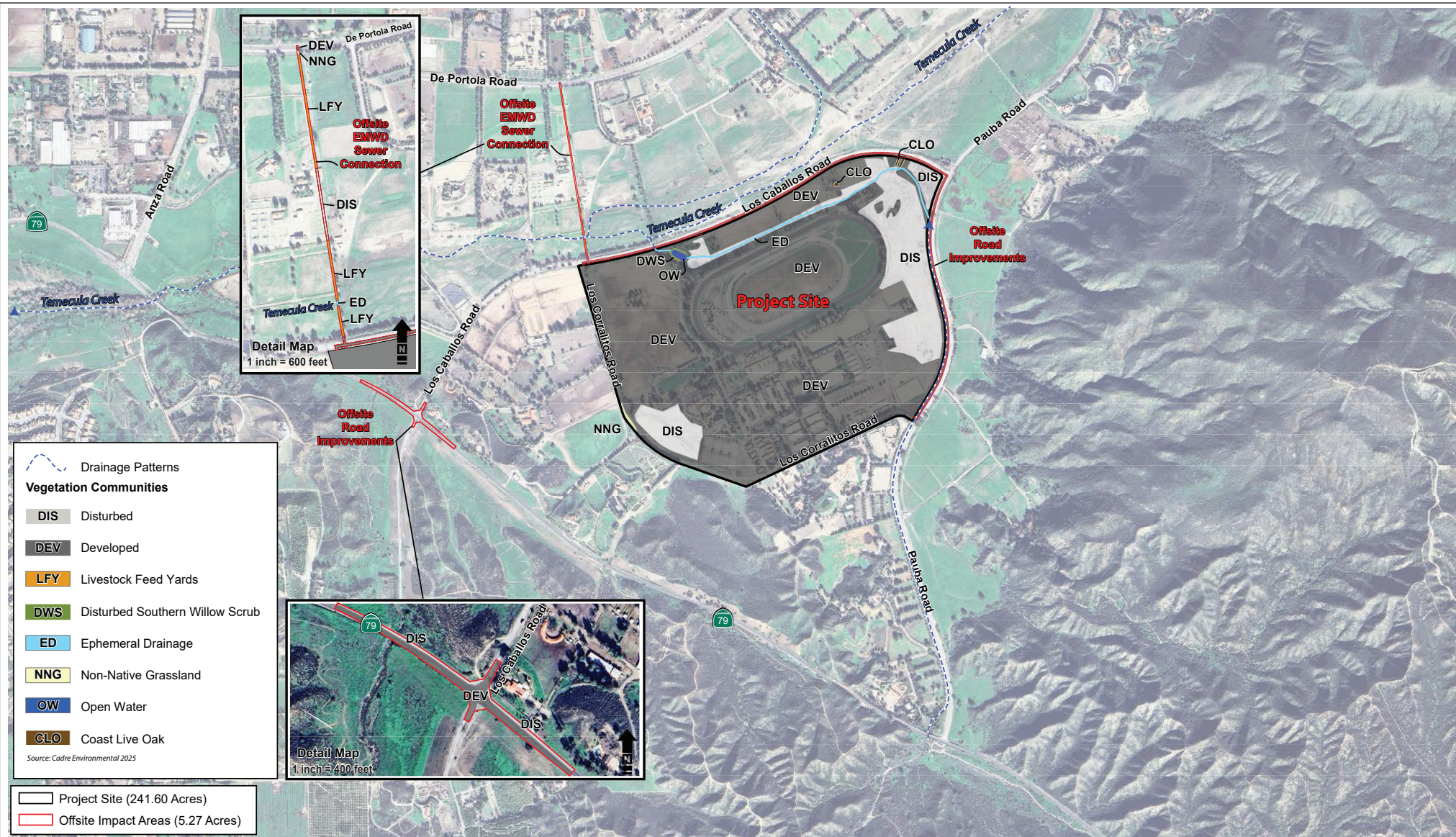
Non-native grassland areas are dominated by false barley (*Hordeum murinum*), Mediterranean grass (*Schismus barbatus*), wild oat (*Avena fatua*), ripgut grass (*Bromus diandrus*), foxtail chess (*Bromus madritensis* ssp. *rubens*), stinknet (*Oncosiphon piluliferum*), cheeseweed, Russian thistle, common fiddleneck (*Amsinckia intermedia*), doveweed (*Croton setigerus*), common sow thistle (*Sonchus oleracens*), tocalote (*Centaurea melitensis*), pigweed (*Amaranthus albus*), black mustard (*Brassica nigra*), London rocket (*Sisymbrium irio*), and red-stemmed filaree. Livestock feed yards are generally devoid of vegetation with non-native grasses and ruderal species reestablishing as listed above.

Coast Live Oak

A few mature coast live oaks (*Quercus agrifolia*) are located in the northeast region of the Project Site.

Disturbed Southern Willow Scrub

The northern region of the open water basin is bordered by disturbed southern willow scrub and dominated by scattered arroyo willow (*Salix lasiolepis*) saplings, Eucalyptus, annual sunflower (*Helianthus annuus*), mulefat (*Baccharis salicifolia*), tocalote, and non-native grasses.



Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 3 - Vegetation Communities Map
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Environmental

1 inch = 1,000 feet



PHOTOGRAPH 1 - Southward view of event parking area in western region of Project Site.



PHOTOGRAPH 2 - Northward view of soccer fields in western region of Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map

Figure 4 - Current Project Site Photographs
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PHOTOGRAPH 3 - Southward view of sump located in the northwestern region of Project Site.



PHOTOGRAPH 4 - Southeastern view of soccer fields in western region of Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 5 - Eastward view of central region of Project Site - equestrian center.



PHOTOGRAPH 6 - Northward view of culvert which extends north from the Project Site to Temecula Creek.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 7 - Northward view of EMWD proposed sewer alignment extending north of Project Site.



PHOTOGRAPH 8 - Northward view of EMWD proposed sewer alignment extending north of Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 9 - Northward view of EMWD proposed sewer alignment extending north of Project Site.



PHOTOGRAPH 10 - Northwest view of onsite detention basin and disturbed southern willow scrub.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 11 - Eastward view of ephemeral drainage which bisects the northern region of Project Site.



PHOTOGRAPH 12 - Eastward view of ephemeral drainage which bisects the northern region of Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 13 - Northeast view of equestrial facilities.



PHOTOGRAPH 14 - Westward view of ephemeral drainage which bisects the northern region of Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 15 - Concrete debris pile in northeast region of Project Site - Suitable burrowing owl refugia.



PHOTOGRAPH 16 - Southwest view of equestrian facilities and ephemeral drainage which bisects the northern region of Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 17 - Westward view of equestrian facilities.



PHOTOGRAPH 18 - Northwest view of equestrian facilities.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 19 - Northward view of equestrian facilities.



PHOTOGRAPH 20 - Northwest view of equestrian facilities in the southwest region of the Project Site.

Refer to Figure 1 for Photographic Key - Project Site Map

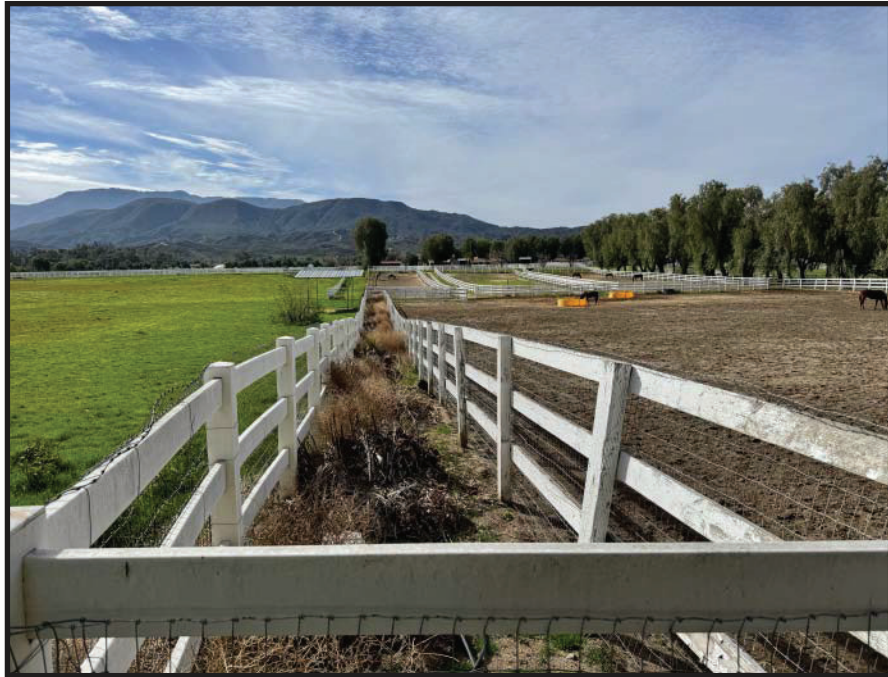


PHOTOGRAPH 21 - Northwest view of offsite impact area from the intersection of SR79 and Los Caballos Road.



PHOTOGRAPH 22 - Southeast view of offsite impact area from the intersection of SR79 and Los Caballos Road.

Refer to Figure 1 for Photographic Key - Project Site Map



PHOTOGRAPH 23 - Southward view of EMWD proposed sewer alignment extending south of De Portola Road.

Refer to Figure 1 for Photographic Key - Project Site Map

SOILS

The Soil Survey of Western Riverside Area has classified the Project Site as follows (U.S. Department of Agriculture 2025), as shown in Figure 16, *Soils Association Map*:

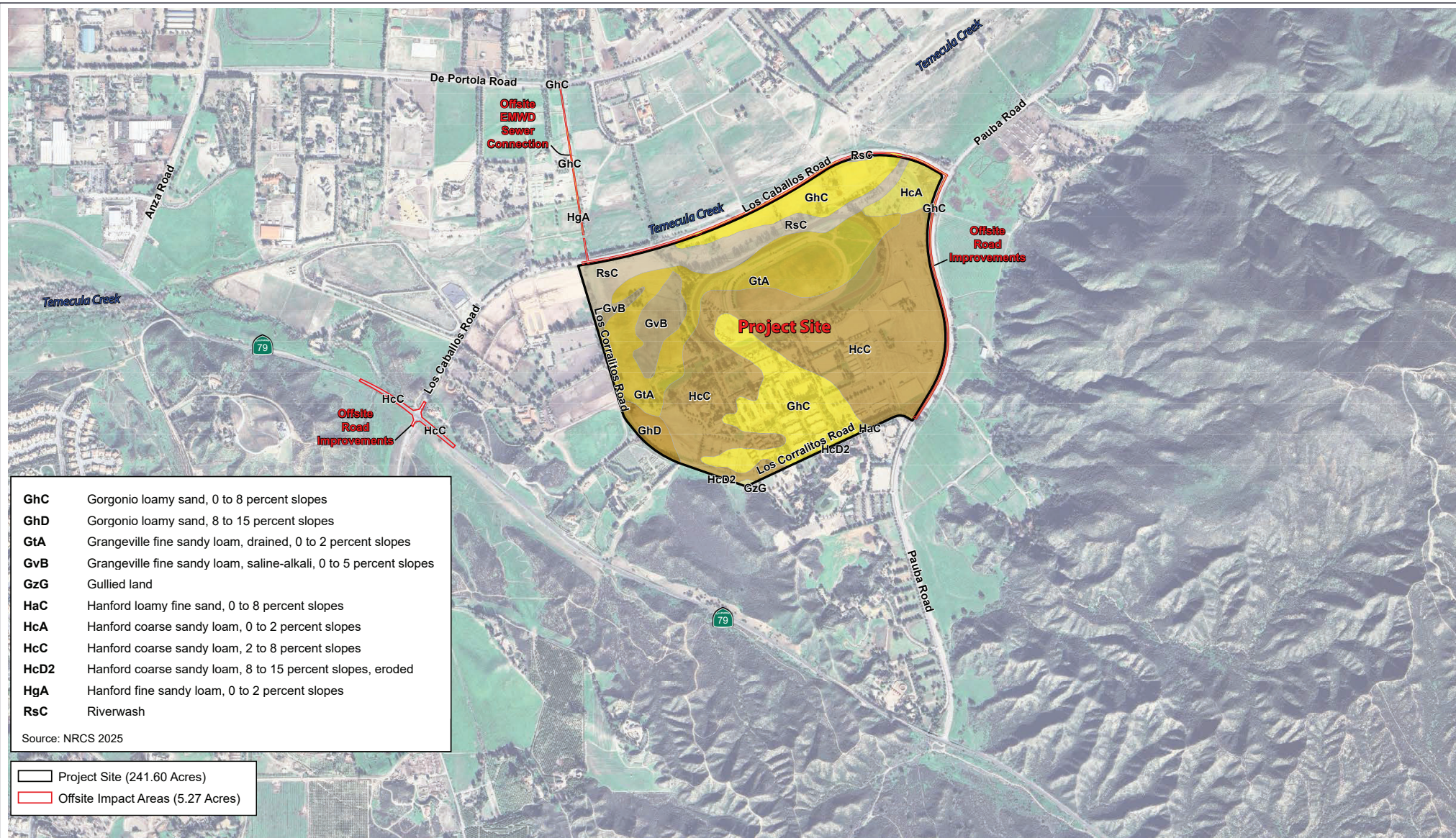
- GhC - Gorgonio loamy sand, 0 to 8 percent slopes
- GhD - Gorgonio loamy sand, 8 to 15 percent slopes
- GtA - Grangeville fine sandy loam, drained, 0 to 2 percent slopes
- GvB - Grangeville fine sandy loam – saline-alkaline, 0 to 5 percent slopes
- GzG - Gullied land
- Hac - Hanford loamy fine sand, 0 to 8 percent slopes
- HcA - Hanford coarse sandy loam, 0 to 2 percent slopes
- HcC - Hanford coarse sandy loam, 2 to 8 percent slopes
- HcD2 - Hanford coarse sandy loam, 8 to 15 percent slopes, eroded
- HgA - Hanford fine sandy loam, 0 to 2 percent slopes
- RsC - Riverwash

GENERAL WILDLIFE SPECIES

General wildlife species documented within or adjacent to the Project Site during the focused surveys include western toad (*Anaxyrus boreas*), Baja California tree frog (*Pseudacris hypochondriaca*), red-tailed hawk (*Buteo jamaicensis*), sharp-shinned hawk (*Accipiter striatus*), red-shouldered hawk (*Buteo lineatus*), American kestrel (*Falco sparverius*), killdeer (*Charadrius vociferus*), barn owl (*Tyto alba*), Nuttall's woodpecker (*Picoides nuttallii*), turkey vulture (*Cathartes aura*), rock dove (*Columba livia*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), Cassin's kingbird (*Tyrannus vociferans*), western kingbird (*Tyrannus verticalis*), hooded oriole (*Icterus cucullatus*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), cliff swallow (*Petrochelidon pyrrhonota*), bushtit (*Psaltiriparus minimus*), American crow (*Corvus brachyrhynchos*), yellow rumped warbler (*Setophaga coronata*), warbling vireo (*Vireo gilvus*), western meadowlark (*Sturnella neglecta*), house finch (*Haemorhous mexicanus*), northern flicker (*Colaptes auratus*), northern mockingbird (*Mimus polyglottos*), lesser goldfinch (*Spinus psaltria*), song sparrow (*Melospiza melodia*), lark sparrow (*Chondestes grammacus*), house sparrow (*Passer domesticus*), white crowned sparrow (*Zonotrichia leucophrys*), western bluebird (*Sialia mexicana*), red-winged blackbird (*Agelaius phoeniceus*), European starling (*Sturnus vulgaris*), desert cottontail rabbit (*Sylvilagus audubonii*), and California ground squirrel.

JURISDICTIONAL RESOURCES

The well-defined unvegetated ephemeral drainage which enters the northeast region of the Project Site and drains in a western direction where it is captured in a detention basin represents a potential resource regulated by the USACE, RWQCB and CDFW, as shown in Figure 17, *Jurisdictional Resources Map*. The detention basin overflows into a channel which exits the Project Site through a culvert extending north under Los Caballos Road and drains into Temecula Creek. The offsite EMWD sewer connection alignment also traverses a short reach of Temecula Creek (ephemeral drainage) which represents a potential resource regulated by the USACE, RWQCB and CDFW, as shown in Figure 17, *Jurisdictional Resources Map*.



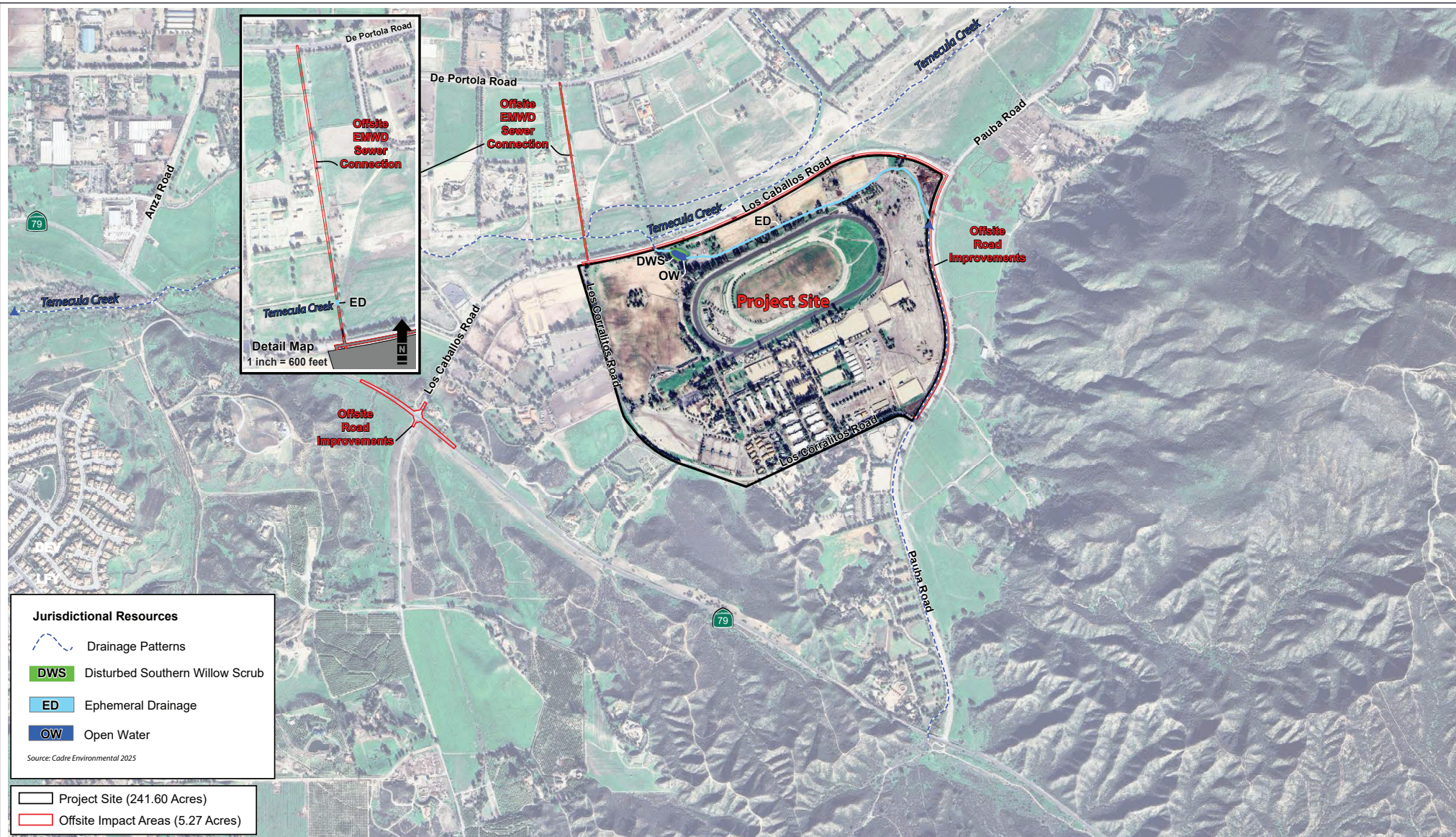
Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 16 - Soils Association Map

*Biological Resources Technical Report
Galway Downs Project Site*

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1 inch = 1,000 feet



Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 17 - Jurisdictional Resources Map
 Biological Resources Technical Report
 Galway Downs Project Site

SENSITIVE BIOLOGICAL RESOURCES

The following discussion describes the plant and wildlife species present, or potentially present within the property boundaries, that have been afforded special recognition by federal, state, or local resource conservation agencies and organizations, principally due to the species' declining or limited population sizes, usually resulting from habitat loss. Also discussed are habitats that are unique, of relatively limited distribution, or of particular value to wildlife. Protected sensitive species are classified by state and/or federal resource management agencies, or both, as threatened or endangered, under provisions of the state and federal endangered species act. Vulnerable or "at-risk" species that are proposed for listing as threatened or endangered (and thereby for protected status) are categorized administratively as "candidates" by the USFWS. CDFW uses various terminology and classifications to describe vulnerable species. There are additional sensitive species classifications applicable in California. These are described below.

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The CDFW, USFWS, and special groups like the California Native Plant Society maintain watch lists of such resources. For the purpose of this assessment sources used to determine the sensitive status of biological resources are:

Plants: USFWS (2025), CNDDDB (CDFW 2025a), CDFW (2025d, 2025e), CNPS (2025), and Skinner and Pavlik (1994),

Invertebrate - Crotch's bumble bee *Bombus crotchii*: Leif Richardson, Paul Williams, Robbin Thorp and Sheila Colla, et al. (2022), CDFW (2019), CDFW (2023), Hatfield, et al. (2019).

Wildlife: California Wildlife Habitat Relationships (2008), Ornithological Society (2025), American Society of Mammalogists (2025), eBird (2025), iNaturalist (2025), USFWS (2025a), CNDDDB (CDFW 2025a), and CDFW (2012, 2025b, 2025c, 2025f)

Habitats: CNDDDB (CDFW 2025a, 2025f).

FEDERAL PROTECTION AND CLASSIFICATIONS

The Federal Endangered Species Act of 1973 (FESA) defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range..." Threatened species are defined as "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined as follows in Section 3(18) of the FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the USFWS, through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification as forms of a "take." These interpretations, however, are generally considered and applied on a case-by-case

basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants. Recently, the USFWS instituted changes in the listing status of former candidate species. Former C1 (candidate) species are now referred to simply as candidate species and represent the only candidates for listing. Former C2 species (for which the USFWS had insufficient evidence to warrant listing at this time) and C3 species (either extinct, no longer a valid taxon or more abundant than was formerly believed) are no longer considered as candidate species. Therefore, these species are no longer maintained in list form by the USFWS, nor are they formally protected. However, some USFWS field offices have issued memoranda stating that former C2 species are henceforth to be considered Federal Species of Concern. This term is employed in this document but carries no official protections. All references to federally protected species in this report (whether listed, proposed for listing or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS. For purposes of this assessment, the following acronyms are used for federal status species:

FE	Federal Endangered
FT	Federal Threatened
FPE	Federal Proposed Endangered
FPT	Federal Proposed Threatened
FC	Federal Candidate for Listing

The designation of critical habitat can also have a significant impact on the development of land designated as “*critical habitat*.” The FESA prohibits federal agencies from taking any action that will “*adversely modify or destroy*” critical habitat (16 U.S.C. § 1536(a)(2)). This provision of the FESA applies to the issuance of permits by federal agencies. Before approving an action affecting critical habitat, the federal agency is required to consult with the USFWS who then issues a biological opinion evaluating whether the action will “*adversely modify*” critical habitat. Thus, the designation of critical habitat effectively gives the USFWS extensive regulatory control over the development of land designated as critical habitat.

The federal Migratory Bird Treaty Act (MBTA) makes it unlawful to “*take*” any migratory bird or part, nest, or egg of such bird listed in wildlife protection treaties between the United States and Great Britain, the Republic of Mexico, Japan, and the Union of Soviet States. For purposes of the MBTA, “*take*” is defined as to pursue, hunt, capture, kill, or possess or attempt to do the same.

The Bald Eagle and Golden Eagle Protection Act explicitly protects the bald eagle and golden eagle and imposes its own prohibition on any taking of these species. As defined in this act, take means to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb. Current USFWS policy is not to refer the incidental take of bald eagles for prosecution under the Bald Eagle and Golden Eagle Protection Act (16 U.S.C. Sections 668-668d).

STATE PROTECTION AND CLASSIFICATIONS

California's Endangered Species Act (CESA) defines an endangered species as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." The State defines a threatened species as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species." Candidate species are defined as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission.

Article 3, Sections 2080 through 2085, of CESA addresses the taking of threatened or endangered species by stating "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided..." Under CESA, "take" is defined as "...hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the state to allow "take" require "...permits or memorandums of understanding..." and can be authorized for "...endangered species, threatened species, or candidate species for scientific, educational, or management purposes." Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

Additionally, some sensitive mammals and birds are protected by the State as Fully Protected Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively. California Species of Special Concern (SSC) listings include special status species, including all state and federal protected and candidate taxa, Bureau of Land Management and US Forest Service sensitive species, species considered to be declining or rare by the National Audubon Society, and a selection of species which are considered to be under population stress but are not formally proposed for listing. This list is primarily a working document for the CDFW's CNDDDB project. Informally listed taxa are not protected per se but warrant consideration in the preparation of biotic assessments. For some species, the CNDDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nest sites. For the purposes of this assessment, the following acronyms are used for State status species:

SE	State Endangered
ST	State Threatened

SCE	State Candidate Endangered
SCT	State Candidate Threatened
SFP	State Fully Protected
SP	State Protected
SR	State Rare
SSC	California Species of Special Concern
SWL	California Watch List

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, “It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In addition, under California Fish and Game Code Section 3503.5, “it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto”. Passerines and non-passerine land birds are further protected under California Fish and Game Code 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

California Native Plant Society

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in the State. This organization has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of rare, threatened, or endangered vascular plant species of California (Tibor 2001). The list serves as the candidate list for listing as threatened and endangered by CDFW. The CNPS has developed five categories of rarity references as California Rare Plant Ranks (CRPR):

CRPR 1A	Plants presumed extirpated in California and either rare or extinct elsewhere
CRPR 1B	Rare, threatened, or endangered in California and elsewhere.
CRPR 2A	Plants presumed extirpated in California but common elsewhere
CRPR 2B	Plants rare, threatened, or endangered in California but more common elsewhere
CRPR 3	Plants about which we need more information – a review list.
CRPR 4	Species of limited distribution in California (i.e., naturally rare in the wild), but whose existence does not appear to be susceptible to threat.

As stated by the CNPS:

“Threat Rank is an extension added onto the California Rare Plant Rank and designates the level of endangerment by a 1 to 3 ranking with 1 being the most endangered and 3 being the least endangered. A Threat Rank is present for all California Rare Plant Rank 1B's, 2's, 4's, and the majority of California Rare Plant Rank 3's. California Rare Plant Rank 4 plants are seldom assigned a Threat Rank of 0.1, as they generally have large enough populations to not have significant threats to their continued existence in California; however, certain conditions exist to make the plant a species of concern and hence be assigned a California Rare Plant Rank. In addition, all California Rare Plant Rank 1A (presumed extinct in California), and some California Rare Plant Rank 3 (need more information) plants, which lack threat information, do not have a Threat Rank extension.” (CNPS 2025)

0.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2	Fairly threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3	Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

SENSITIVE HABITATS

Natural communities are evaluated using NatureServe's Heritage Methodology, the same system used to assign global and state rarity ranks for plant and animal species in the CNDDB. The basic ranking concepts of rarity and threats used in the "Heritage Methodology" since the 1970's remain the same, using the best and most recent scientific information available. For rarity, the ranking involves the knowledge of range and distribution of a given type of vegetation, and the proportion of occurrences that are of good ecological integrity. Threats and trends are likewise considered in categories such as residential and commercial development, agriculture, energy production and mining, and invasive and other problematic species and genes (among others). Threat scope (typically assessed within a 20-year timeframe for vegetation) and severity are used to calculate an overall threat score, which is added to the overall rarity score for a single rank of 1 through 5. Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (state) rank ranging from 1 (very rare and threatened) to 5 (demonstrably secure). Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents. (CDFW 2025f)

No sensitive natural communities listed by CDFW as sensitive were documented within or adjacent to the Project Site.

SENSITIVE PLANTS

The following discussion is presented in two (2) parts:

- I) MSHCP Plant Species Subject to Focused Surveys or Evaluated by Habitat Suitability Assessment;
- II) Special-Status Plant Species Potentially Occurring within Project Site.

I: MSHCP Plant Species Subject to Focused Surveys or Evaluated by Habitat Suitability Assessment

The Project Site is not located within an MSHCP Narrow Endemic Plant Species Survey Area (NEPSA); therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.1.3.

The Project Site is not located within an MSHCP Criteria Area Plant Species Survey Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2.

No state or federally listed threatened or endangered plant species were documented or expected to occur onsite based on a lack of suitable habitat, as outlined in Table 2, *Sensitive Plant Species with Potential to Occur within Project Site*.

II: Special-Status Species Potentially Occurring within Project Site

No suitable habitat was documented within the Project Sites for special-status plants or species not covered under the MSHCP, as outlined in Table 2, *Sensitive Plant Species with Potential to Occur within Project Site*.

Table 2.
Sensitive Plant Species with Potential to Occur within Project Site.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
Chaparral sand-verbena (<i>Abronia villosa</i> var. <i>aurita</i>) CRPR List 1B.1	Sandy soils in sage-scrub, chaparral.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats.
Munz's onion (<i>Allium munzii</i>) FE/ST CRPR List 1B.1 MSHCP Covered/MSHCP Narrow Endemic Plant Survey Area Species	Restricted to mesic clay soils in western Riverside County, CA within needlegrass grassland annual grassland, open coastal sage scrub, or occasionally, in cismontane juniper woodlands.	<u>No Potential</u> . No suitable clay substrate detected onsite. Project Site not located within NEPSA.

Species Name (Scientific Name) Status	Habitat Description	Comments
San Diego ambrosia (<i>Ambrosia pumila</i>) FE CRPR List 1B.1 MSHCP Covered/NE	Chaparral, coastal sage scrub, valley and foothill grassland, vernal pools. Often in disturbed habitats.	<u>Potential</u> . Perennial species not detected onsite. Project Site not located within NEPSA.
Rainbow manzanita (<i>Arctostaphylos rainbowensis</i>) CRPR List 1B.1 MSHCP Covered	Perennial evergreen shrub generally occurring within chaparral habitats.	<u>No Potential</u> . Perennial species not expected or detected onsite based on a lack of suitable habitat.
Jaeger's milkvetch (<i>Astragalus pachypus</i> var. <i>jaegeri</i>) CRPR List 1B.1 MSHCP Covered	Perennial shrub generally occurs within chaparral, cismontane woodland, coastal scrub and valley/foothill grassland habitats (CNPS 2025).	<u>No Potential</u> . Perennial species not expected or detected onsite based on a lack of suitable habitat.
San Jacinto Valley crownscale (<i>Atriplex coronata</i> var. <i>notatior</i>) FE CRPR List 1B.1 MSHCP Criteria Area Plant Survey Area (CAPSA) CA Endemic	The San Jacinto Valley crownscale occurs primarily in floodplains that support alkali scrub, alkali playas, vernal pools, and occasionally alkali grasslands.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.
Parish's brittlescale (<i>Atriplex parishii</i>) CRPR List 1B.1 MSHCP CAPSA	Parish's brittlescale is a small prostrate to decumbent annual, white scaly, and is often much less than eight inches in length. It blooms May to October. This species occurs on alkali or saline flats, alkali meadows, and in or along the margins of vernal pools or playa depressions.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.
Davidson's saltscale (<i>Atriplex serenana</i> var. <i>davidsonii</i>) CRPR List 1B.2 MSHCP CAPSA	Davidson's saltscale is a decumbent to ascending annual that is sparsely scaly. It blooms April to October. It grows on coastal bluffs and alkaline alluvial terraces, and on alkali or saline flats in interior areas such as western Riverside County.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
Nevin's barberry (<i>Berberis nevinii</i>) FE/SE CRPR List 1B.1	Perennial evergreen shrub generally blooming from March to June within chaparral, cismontane woodland, coastal scrub and riparian scrub habitats (CNPS 2025),	<u>No Potential</u> . Perennial species not expected or detected onsite based on a lack of suitable habitat.
Thread-leaved brodiaea (<i>Brodiaea filifolia</i>) FT/SE CRPR List 1B.1 MSHCP Covered	Typically occurs on gentle hillsides, valleys, and floodplains in semi-alkaline flats of riparian areas, vernal pools, mesic southern needlegrass grassland, mixed native-annual grassland, and alkali grassland plant communities in association with clay, clay loam, or alkaline silty-clay soils.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or clay soils.
Plummer's mariposa lily (<i>Calochortus plummerae</i>) CRPR List 4.2 MSHCP Covered	Granitic, rock soils within chaparral, cismontane woodland, coastal sage scrub, lower montane coniferous forest, and valley and foothill grassland.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils (granitic and rocky).
Intermediate mariposa lily (<i>Calochortus weedii</i> var. <i>intermedius</i>) CRPR List 1B.2 MSHCP Covered	Perennial bulbiferous herb which generally blooms from May to July within coastal sage scrub, chaparral and grassland habitats (CNPS 2025)	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats.
Payson's jewelflower (<i>Caulanthus simulans</i>) CRPR List 4.2 MSHCP Covered	Annual herb generally blooming from February to June within chaparral and costal scrub habitats in association with granitic and sandy substrates (CNPS 2025).	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.
Lakeside ceanothus (<i>Ceanothus cyaneus</i>) CRPR List 1B.2	Perennial evergreen shrub generally blooming from April to June in chaparral and closed-cone coniferous forest habitat CNPS 2025)	<u>No Potential</u> . Perennial species not detected onsite.
Vail Lake ceanothus (<i>Ceanothus ophiophilus</i>) FT/SE CRPR List 1B.1	Perennial evergreen shrub generally blooming from February to March in chaparral habitats with gabbroic outcrops CNPS 2025)	<u>No Potential</u> . Perennial species not expected or detected onsite based on a lack of suitable habitat.

Species Name (Scientific Name) Status	Habitat Description	Comments
Smooth tarplant (<i>Centromadia pungens</i> ssp. <i>laevis</i>) CRPR List 1B.1 MSHCP Covered	Alkaline soils in chenopod scrub, meadows and seeps, playas, and disturbed habitats.	<u>No Potential</u> . No suitable alkali substrate detected onsite.
Parry's spineflower (<i>Chorizanthe parryi</i> var. <i>parryi</i>) CRPR List 1B.1 MSHCP Covered	Sandy or rocky soils in open habitats of chaparral and coastal sage scrub.	<u>No Potential</u> . No suitable habitat detected onsite.
Long-spined spineflower (<i>Chorizanthe polygonoides</i> var. <i>longispina</i>) CRPR List 1B.2	Annual herb generally blooming from April to July in chaparral, coastal scrub, meadows and grassland habitats – often associated with clay substrates (CNPS 2025)	<u>No Potential</u> . No suitable clay substrate detected onsite.
Slender-horned spineflower (<i>Dodecahema leptoceras</i>) FE/SE CRPR List 1B.1 MSHCP Covered	Sandy soils in alluvial scrub, chaparral, cismontane woodland.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.
Multi-stemmed dudleya (<i>Dudleya multicaulis</i>) CRPR List 1B.2 MSHCP NEPSA	Many-stemmed dudleya is a succulent perennial in the stonecrop family. It blooms April to July. This species is known from several southern California counties, and typically occurs in dry, stony places on heavy soils in scrub and grassland habitats below 2,000 feet elevation. Many-stemmed dudleya is most often associated with clay soils in barren, rocky places, or thinly vegetated openings in chaparral, coastal sage scrub, and southern needlegrass grasslands.	<u>No Potential</u> . No suitable undisturbed vegetation or clay soils documented within the Project Site.
Palmer's grapplinghook (<i>Harpagonella palmeri</i>) CRPR List 4.2 MSHCP Covered	Annual herb generally blooming from March to May in open grassy areas within chaparral, coastal scrub, grassland habitats in association with clay substrates (CNPS 2025).	<u>No Potential</u> . No suitable clay substrate detected onsite.

Species Name (Scientific Name) Status	Habitat Description	Comments
Graceful tarplant (<i>Holocarpha virgata</i> ssp. <i>elongata</i>) CRPR List 4.2	This plant is endemic to Orange County, Riverside County and San Diego County. It is known from heavy clay soils around vernal pools and wet meadows. Elevation: 60 – 1100 meters Blooming period: May – November.	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.
Mesa horkelia (<i>Horkelia cuneata</i> ssp. <i>puberula</i>) CRPR List 1B.1	Perennial herb which generally blooms from February to September within chaparral (maritime), cismontane woodland and coastal scrub with sandy or gravelly substrates. (CNPS 2025)	<u>No Potential</u> . Perennial species not detected onsite.
San Diego sunflower (<i>Hulsea californica</i>) CRPR List 1B.3	Perennial herb generally blooming from April to June in chaparral, lower/upper montane coniferous forest.	<u>No Potential</u> . Perennial species not detected onsite based on a lack of suitable habitat.
Coulter's goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>) CRPR List 1B.1 MSHCP CAPSA Species	Coulter's goldfields is associated with low-lying alkali and saline habitats along the coast and inland valleys. The majority of the populations are associated with coastal salt marsh. In Riverside County, Coulter's goldfields primarily grow in highly alkaline, silty clays associated with the Traver-Domino-Willows soils, and usually in the wet areas in the alkali vernal plain community.	<u>No Potential</u> . No suitable alkali substrate detected onsite. Project Site not located within CAPSA.
Robinson's pepper-grass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>) CRPR List 4.3	Annual herb generally blooming from January to July within chaparral and coastal scrub habitats (CNPS 2025).	<u>No Potential</u> . The species is not expected to be present based on a lack of suitable undisturbed habitats or soils.
Orcutt's linanthus (<i>Linanthus orcuttii</i>) CRPR List 1B.3	Annual herb generally blooming from May to June in chaparral, lower montane coniferous forest, and pinyon/juniper woodland habitats (CNPS 2025).	<u>No Potential</u> . No suitable habitat detected onsite.

Species Name (Scientific Name) Status	Habitat Description	Comments
Felt-leaved monardella (<i>Monardella hypoleuca</i> ssp. <i>lanata</i>) CRPR List 1B.2	Perennial rhizomatous herb generally blooming from June to August within chaparral and cismontane woodland habitats (CNPS 2025).	<u>No Potential.</u> Perennial species not detected onsite based on a lack of suitable habitat.
Hall's monardella (<i>Monardella macrantha</i> ssp. <i>hallii</i>) CRPS List 1B.3	Perennial rhizomatous herb generally blooming from June to October within upland forest, chaparral, cismontane woodland and valley/foothill grasslands (CNPS 2025).	<u>No Potential.</u> Perennial species not detected onsite based on a lack of suitable habitat.
Chaparral nolina (<i>Nolina cismontana</i>) CRPR List 1B.2	Perennial evergreen shrub generally blooming from May to July in chaparral and coastal scrub habitats (CNPS 2025)	<u>No Potential.</u> Perennial species not detected onsite based on a lack of suitable habitat and substrates.
Spreading navarretia (<i>Navarretia fossalis</i>) FT CRPR List 1B.1 MSHCP Covered/NE	Vernal pools, playas, chenopod scrub, marshes and swamps (assorted shallow freshwater).	<u>No Potential.</u> No suitable habitat detected onsite. Project Site not located within NEPSA.
California Orcutt grass (<i>Orcuttia californica</i>) FE/SE CRPR List 1B.1 MSHCP Covered/NE	Vernal pools.	<u>No Potential.</u> No suitable habitat detected onsite. Project Site not located within NEPSA.
Gander's ragwort (<i>Packera ganderi</i>) SR CRPR List 1B.2	Perennial herb generally blooming from April to June in chaparral and gabbroic outcrops (CNPS 2025).	<u>No Potential.</u> Perennial species not detected onsite based on a lack of suitable habitat and substrates.
Parry's tetracoccus (<i>Tetracoccus dioicus</i>) CNPR List 1B.2	Perennial deciduous shrub generally blooming from April to May in chaparral and coastal scrub habitats (CNPS 2025).	<u>No Potential.</u> Perennial species not detected onsite.
Wright's trichocoronis (<i>Trichocoronis wrightii</i> var. <i>wrightii</i>) CRPR List 2B.1 MSHCP NEPSA	The historic known range of Wright's trichocoronis includes the Great Valley of central California, western Riverside County, and south Texas and adjacent northeast Mexico. This plant grows in meadows and seeps, marshes, riparian scrub, and vernal pools. Wright's trichocoronis blooms May to September.	<u>No Potential.</u> No suitable undisturbed vegetation or soils documented within the Project Site.

Species Name (Scientific Name) Status	Habitat Description	Comments
Occurrence Assessment Potential – Suitable vegetative habitat, soils, record of occurrence within and/or adjacent to Project Site. No Potential – No suitable vegetative habitat, soils, and/or record of occurrence within and/or adjacent to Project Site. California Native Plant Society (CNPS): California Rare Plant Rank (CRPR) CRPR 1A – plants presumed extirpated in California and either rare or extinct elsewhere CRPR 1B – plants rare, threatened, or endangered in California, but more common elsewhere CRPR 2A – plants presumed extirpated in California but common elsewhere CRPR 2B – plants rare, threatened, or endangered in California but more common elsewhere CRPR 3 – plants about which we need more information, a review list CRPR 4 – plants of limited distribution, a watch list .1 – Seriously endangered in California .2 – Fairly endangered in California .3 – Not very endangered in California Federal (USFWS) Protection and Classification FE – Federally Endangered FT – Federally Threatened FC – Federal Candidate for Listing State (CDFW) Protection and Classification SE – State Endangered ST – State Threatened SR – State Rare MSHCP NE – Narrow Endemic CAPSA - Criteria Area Plant Survey Area		

Source : Cadre Environmental 2025.

SENSITIVE WILDLIFE

Suitable habitat was documented onsite for one (1) special-status invertebrate species not covered under the MSHCP including Crotch's bumble bee (*Bombus crotchii*) State Candidate Endangered (SCE), as outlined in Table 3, *Sensitive Wildlife Species with Potential to Occur within Project Site*. Suitable scattered foraging habitat for the Crotch's bumble bee is present with the Project Site and nesting habitat onsite where debris piles were documented. Burrows representing suitable nesting resources were also documented within this region of the Project Site. As stated by Hatfield, et al.:

“Bombus crotchii inhabits open grassland and scrub habitats. Nesting occurs underground. Male’s perch and chase moving objects in search of mates. This species is classified as a short-tongued species, whose food plants include Asclepias, Chaenactis, Lupinus, Medicago, Phacelia, and Salvia (Williams et al. 2014). Bumble bees are social insects that live in colonies composed of a queen, workers, and reproductives (males and new queens). Colonies are annual and only the new, mated queens overwinter. These queens emerge from hibernation in the early spring and immediately start foraging for pollen and nectar and begin to search for a nest site. Nests are often located underground in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. Initially, the queen does all of the foraging and care for the colony until the first workers emerge and assist with these duties. Bumble bees collect both nectar and pollen of the plants that they pollinate.

In general, bumble bees forage from a diversity of plants, although individual species can vary greatly in their plant preferences, largely due to differences in tongue length. Bumble bees are well-known to engage in “buzz pollination,” a very effective foraging technique in which they sonicate the flowers to vibrate the pollen loose from the anthers. Tomatoes (Solanaceae), blueberries (Ericaceae), and many other important food plants are pollinated by bumble bees in this way.” Hatfield, et al. (2019).

The Crotch’s bumble bee was not documented onsite following focused surveys conducted during the spring of 2025 (Huffman Environmental 2025).

A review of historic aerials was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. Historic aerials taken in 2011 and 2023 represent an ideal baseline during which known (previously documented) inundated vernal pools and seasonal depressions can easily be seen. As previously stated, an inundated detention basin captures flows from a well-defined unvegetated ephemeral drainage extending in a western direction through the northern region of the Project Site. This feature represents low quality habitat for vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and western spadefoot (*Spea hammondi*). No direct impacts to the open basin are proposed.

The Project Site occurs partially within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented within the property including foraging habitat documented within the northern region of the Project Site. Based on the presence of suitable habitat, focused MSHCP burrowing owl surveys were conducted during the spring of 2025. No burrowing owl or characteristic sign such as white-wash, feathers, tracks, or pellets were detected within or immediately adjacent to the Project Site during the 2025 survey efforts.

A total of ten (10) sensitive wildlife species have potential to occur or were observed within the Project Site including western spadefoot (*Spea hammondi*), grasshopper sparrow (*Ammodramus savannarum*), sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Astur cooperii*), northern harrier (*Circus hudsonius*), white-tailed kite (*Elanus leucurus*), California horned lark (*Eremophila alpestris actia*), Stephens' kangaroo rat (*Dipodomys stephensi*), bobcat (*Lynx rufus*), mountain lion (*Puma concolor*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). As previously stated, the MSHCP has determined that these sensitive species potentially occurring within Project Site have been adequately covered (MSHCP Table 2-2 Species Considered for Conservation Under the MSHCP Since 1999, 2004). Sensitive species that can be excluded from occurring onsite or known to occur within the region with potential to occur onsite are presented in Table 3, *Sensitive Wildlife Species with Potential to Occur within Project Site*.

Table 3.
Sensitive Wildlife Species with Potential to Occur within Project Site.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
INVERTEBRATES		
Crotch's bumble bee (<i>Bombus crotchii</i>) SCE	Range extends from southern to northern California within a variety of habitats including grassland, scrub, chaparral and desert habitats. Food plants include but are not limited to the following genera: <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Cordylanthus</i> , <i>Dendromecon</i> , <i>Medicago</i> , <i>Eschscholzia</i> , <i>Chaenactis</i> , <i>Eriogonum</i> , <i>Hypericum</i> , <i>Lantana</i> , <i>Lupinus</i> , <i>Salvia</i> , <i>Asclepias</i> , <i>Cirsium</i> , <i>Monardella</i> , <i>Keckiella</i> , <i>Acmispon</i> , <i>Euthamia</i> , <i>Ehrendorferia</i> , <i>Vicia</i> , and/or <i>Trichostema</i> .	<u>Potential</u> . Suitable foraging and nesting habitat documented within Project Site. Not detected onsite during spring 2025 focused surveys (Huffman Environmental 2025).
Vernal pool fairy shrimp (<i>Branchinecta lynchi</i>) FT MSHCP Covered Species	Vernal pool fairy shrimp is restricted to seasonal vernal pools (Eng, Belk, and Eriksen 1990; USFWS 1994). The vernal pool fairy shrimp prefers cool-water pools that have low to moderate dissolved solids, are unpredictable, and often short lived (Eriksen and Belk 1999, MSHCP 2004).	<u>Potential</u> . The open water detention basin represents low quality habitat for the species.
Monarch butterfly (<i>Danaus plexippus</i>) FPT	Winter migrant along CA coast. Known to roost in eucalyptus trees. Usually encountered in lowland areas. Obligate milkweed host plant (primarily <i>Asclepias</i> spp.) during larval stage. Nectar and milkweed resources are often associated with riparian corridors. Overwinter in groves along the coast of California and Baja	<u>No Potential</u> . No food sources documented onsite and Western migratory monarchs typically overwinter in groves along the coast.

Species Name (Scientific Name) Status	Habitat Description	Comments
	California, typically close to the coast, populated by a variety of tree species, including blue gum eucalyptus (<i>Eucalyptus globulus</i>), Monterey pine (<i>Pinus radiata</i>), and Monterey cypress (<i>Hesperocyparis macrocarpa</i>).	
Riverside fairy shrimp (<i>Streptocephalus woottoni</i>) FE MSHCP Covered Species	<i>S. woottoni</i> is restricted to deep seasonal vernal pools/ephemeral ponds, and stock ponds and other human modified depressions (Eng, Belk, and Eriksen 1990, USFWS 1993, USFWS 2001). Riverside fairy shrimp prefer warm-water pools that have low to moderate dissolved solids, are less predictable, and remained filled for extended periods of time (MSHCP 2004).	<u>Potential</u> . The open water detention basin represents low quality habitat for the species.
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>) FE/SCE MSHCP Covered	Quino checkerspot butterfly (QCB) is restricted to low elevation meadow habitats or clearings usually characterized by clay or cryptogamic deposits, inhabited by host plants including <i>Plantago erecta</i> , <i>Plantago patagonica</i> , <i>Castilleja exserta</i> , and <i>Cordylanthus rigidus</i> . Adult QCB often occur on open or sparsely vegetated rounded hilltops, ridgelines, and occasionally rocky outcrops. (MSHCP 2004)	<u>No Potential</u> . No suitable host plants detected within the Project site.

Species Name (Scientific Name) Status	Habitat Description	Comments
AMPHIBIANS		
Arroyo toad <i>(Anaxyrus californicus)</i> FE/SSC MSHCP Covered Species	Shallow, slow moving active and braided stream channels with sandy substrates for breeding, bench and terrace habitats for foraging and aestivation, willow scrub, coastal sage scrub and riparian/oak woodlands.	<u>No Potential</u> . No suitable breeding habitat documented within or adjacent to the Project Site.
Western spadefoot <i>(Spea hammondi)</i> FPT/SSC MSHCP Covered Species	The western spadefoot population is patchily but widely distributed throughout the Riverside Lowlands and San Jacinto Foothills Bioregions. Habitat for this species includes suitable breeding habitat below 1500 meters (i.e., vernal pools or other standing water is free of exotic species) secondary habitats including adjacent chaparral, sage scrub, grassland, and alluvial scrub habitats (MSHCP 2004).	<u>Potential</u> . The open water detention basin represents potential breeding habitat for the species and adjacent uplands foraging habitat.
REPTILES		
Southern California legless lizard <i>(Anniella stebbinsi)</i> SSC	Occurs in moist warm loose soil with plant cover. Moisture is essential. Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks.	<u>No Potential</u> . No suitable habitat was documented within the Project Site based on a lack of mesic conditions.
Orange-throated whiptail <i>(Aspidoscelis hyperythra)</i> SWL MSHCP Covered Species	The orange-throated whiptail occurs primarily in a wide variety of habitats but is more closely tied to coastal sage scrub and chaparral habitats with less than 90 percent vegetative cover.	<u>No Potential</u> . No suitable habitat was documented within the Project.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
Coastal western whiptail (<i>Aspidoscelis tigris stejnegeri</i>) SSC MSHCP Covered Species	The coastal western whiptail occurs in a wide variety of habitats including coastal sage scrub, desert scrub, Riversidean alluvial fan scrub, woodlands, grasslands, playas, and respective ecotones between these habitats (MSHCP 2004).	<u>No Potential</u> . No suitable habitat was documented within the Project.
San Diego banded gecko (<i>Coleonyx variegatus abbotti</i>) SSC MSHCP Covered Species	San Diego banded gecko is a microhabitat generalist and also occurs in habitats ranging from cismontane chaparral and desert scrub to open sand dunes and arid tropical forests (MSHCP 2004).	<u>No Potential</u> . No suitable habitat was documented within the Project.
Western pond turtle (<i>Emys marmorata</i>) FPT/SSC MSHCP Covered Species	The western pond turtle inhabits slow moving permanent or intermittent streams, small ponds, small lakes, reservoirs, abandoned gravel pits, permanent and ephemeral shallow wetlands, stock ponds, and sewage treatment lagoons (Rathbun <i>et al.</i> , 1992; Holland, 1994). Pools are the preferred habitat within streams (Bury, 1972, MSHCP 2004).	<u>No Potential</u> . Not detected onsite.
Coast patch-nosed snake (<i>Salvadora hexalepis virgultea</i>) SSC	The coast patch-nosed snake prefers brushy coastal sage scrub/ chaparral habitats.	<u>No Potential</u> . No suitable habitat was documented within the Project.
Red-diamond rattlesnake (<i>Crotalus ruber</i>) SSC MSHCP Covered Species	The red-diamond rattlesnake is often found in areas with dense vegetation especially chaparral and sage scrub up to 1,520 meters in elevation (MSHCP 2004).	<u>No Potential</u> . No suitable habitat was documented within the Project.
Granite night lizard (<i>Xantusia henshawi henshawi</i>) MSHCP Covered Species	Restricted to narrow microenvironment conditions where it is rarely found far from rock outcrop crevices massive rocks, rock outcrops, and	<u>No Potential</u> . No suitable habitat was documented within the Project.

Species Name (Scientific Name) Status	Habitat Description	Comments
	flaking granite, in a variety of desert, chaparral, and woodland habitats (MSHCP 2004).	
San Bernardino mountain kingsnake (<i>Lampropeltis zonata parvirubra</i>) MSHCP Covered Species	San Bernardino mountain kingsnake occurs in well-illuminated canyons with rocky outcrops or rock talus in association with big cone spruce and various canyon chaparral species at lower elevations, and with black oak, incense cedar, Jeffrey pine, and ponderosa pine at higher elevations (MSHCP 2004).	<u>No Potential</u> . No suitable habitat was documented within the Project.
Coast horned lizard (<i>Phrynosoma blainvillii</i>) SSC MSHCP Covered Species	The horned lizard occurs primarily in scrub, chaparral, and grassland habitats. The species is common in most areas of the Plan Area except where adjacent to urban situations (MSHCP 2004).	<u>No Potential</u> . No suitable habitat was documented within the Project.
Granite spiny lizard (<i>Sceloporus orcuttii</i>) MSHCP Covered Species	Granite spiny lizard is often present under granite flakes on boulders, being the most abundant lizard on rock outcrops in Riverside County (MSHCP 2004).	<u>No Potential</u> . No suitable habitat was documented within the Project.
Two-striped gartersnake (<i>Thamnophis hammondi</i>) SSC MSHCP Covered Species	Marsh and swamp, riparian scrub, riparian woodland, and wetland. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	<u>No Potential</u> . No suitable habitat was documented within the Project.
BIRDS		
Tri-colored blackbird (<i>Agelaius tricolor</i>) ST/SSC MSHCP Covered Species	Marshes and grasslands. Breeding colonies require nearby water, nesting substrate, and open range foraging habitat of natural grassland, woodland, or agricultural cropland.	<u>No Potential</u> . No suitable habitat was documented within the Project.

Species Name (Scientific Name) Status	Habitat Description	Comments
Sharp-shinned hawk <i>(Accipiter striatus)</i> SWL MSHCP Covered Species	For the purpose of the conservation analysis, potential habitat for the sharp-shinned hawk includes montane coniferous forest for potential breeding areas (none have been documented) and riparian scrub, woodland, and forest habitat, oak woodland and forest, chaparral, coastal sage scrub, desert scrub, and Riversidean alluvial fan sage scrub for foraging. (MSHCP 2004)	<u>Present.</u> Observed during 2025 focused surveys. The Project Site provides suitable foraging habitat.
Cooper's hawk <i>(Astur cooperii)</i> SSC MSHCP Covered Species	Cooper's hawk is most commonly found within or adjacent to riparian/oak forest and woodland habitats. This uncommon resident of California increases in numbers during winter migration.	<u>Potential.</u> The large ornamental trees provide suitable nesting habitat. The Project Site provides suitable foraging habitat.
Southern California rufous-crowned sparrow <i>(Aimophila ruficeps canescens)</i> SWL MSHCP Covered Species	Southern California rufous-crowned sparrow is a non-migratory bird species that primarily occurs within sage scrub and grassland habitats and to a lesser extent chaparral sub-association (Unitt 2004). This species generally breeds on the ground within grassland and scrub communities in the western and central regions of California.	<u>No Potential.</u> No suitable breeding habitat was documented within the Project Site.
Golden eagle <i>(Aquila chrysaetos)</i> SWL, SFP MSHCP Covered Species	Within southern California, the species prefers grasslands, brushlands (coastal sage scrub and chaparral), deserts, oak savannas, open coniferous forests, and montane valleys (Garrett and Dunn 1981, MSHCP 2004)	<u>No Potential.</u> No suitable breeding habitat was documented within the Project Site.

Species Name (Scientific Name) Status	Habitat Description	Comments
Grasshopper sparrow (<i>Ammodramus savannarum</i>) SSC MSHCP Covered Species	The grasshopper sparrow generally prefers moderately open grasslands and prairies with patchy bare ground (MSHCP 2004).	<u>Potential</u> . The non-native grassland provides suitable breeding and foraging habitat for the species.
Bell's sage sparrow (<i>Artemisiospiza belli belli</i>) SWL MSHCP Covered Species	Bell's sage sparrow is an uncommon to fairly common but localized resident breeder in dry chaparral and coastal sage scrub along the coastal lowlands, inland valleys, and in the lower foothills of local mountains (MSHCP 2004).	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.
Turkey vulture (breeding) (<i>Cathartes aura</i>) MSHCP Covered Species	The focus of this planning effort is on the nesting of the turkey vulture. There are two recorded nest sites within the Plan Area: Bernasconi Hills near Lake Perris and Rawson Canyon near Lake Skinner (MSHCP 2004).	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.
Cactus wren (<i>Campylorhynchus brunneicapillus</i>) SSC MSHCP Covered Species	This species is a rare localized resident that is found in maritime succulent scrub and coastal sage scrub that contain <i>Opuntia</i> thickets.	<u>No Potential</u> . No suitable habitat was documented within the Project Site.
Burrowing owl (<i>Athene cunicularia</i>) SCE/SSC MSHCP Covered Species	The burrowing owl uses predominantly open land, including grassland, agriculture (e.g., dry-land farming and grazing areas), playa, and sparse coastal sage scrub and desert scrub habitats (Garrett and Dunn 1981). Some breeding burrowing owls are year-round residents and additional individuals from the north may winter throughout the MSHCP Area Plan (MSHCP 2004).	<u>No Potential</u> . Not detected during focused surveys conducted in spring 2025.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
Ferruginous hawk (<i>Buteo regalis</i>) SWL MSHCP Covered Species	Range-wide, within California, ferruginous hawks' winter in open terrain and grasslands of plains and foothills (Grinnell and Miller 1944). Within southern California, including the ferruginous hawks typically winter in open fields, grasslands, and agricultural areas.	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.
Northern harrier (<i>Circus hudsonius</i>) SSC MSHCP Covered Species	The northern harrier frequents open wetlands, wet/lightly grazed pastures, fields, dry uplands/prairies, mesic grasslands, drained marshlands, croplands, meadows, grasslands, open rangelands, fresh and saltwater emergent wetlands.	<u>Potential</u> . May occasionally forage onsite.
Western yellow-billed cuckoo (<i>Coccyzus americanus occidentalis</i>) FT/SE MSHCP Covered Species	Although the preferred habitat, riparian scrub and forest, is well distributed at scattered locations within the Plan Area in the Riverside Lowland Bioregions, the western yellow-billed cuckoo apparently no longer inhabits much of this habitat (MSHCP 2004).	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
White-tailed kite (<i>Elanus leucurus</i>) SFP MSHCP Covered Species	The white-tailed kite is found in riparian, oak woodlands adjacent to large open spaces including grasslands, wetlands, savannahs and agricultural fields. This non-migratory bird species occurs throughout the lower elevations of California and commonly nests in coast live oaks (Unitt 2004).	<u>Potential</u> . May occasionally forage onsite.

Species Name (Scientific Name) Status	Habitat Description	Comments
Southwestern willow flycatcher <i>(Empidonax traillii extimus)</i> FE/SE MSHCP Covered Species	The southwestern willow flycatcher is narrowly distributed at few locations within the Plan Area. Although the preferred habitat, riparian woodland and select other forests, is well distributed within all bioregions and spread over the entire Plan Area, few current locations for the willow flycatcher have been documented (MSHCP 2004).	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
California horned lark <i>(Eremophila alpestris actia)</i> SWL MSHCP Covered Species	Habitat for the California horned lark includes agriculture (field croplands), grassland, cismontane alkali marsh, playa and vernal pool habitat, Riversidean alluvial fan sage scrub, and coastal sage scrub (Garrett and Dunn 1988). It has been recorded in chaparral and riparian habitat - however these are not typical habitats used by the species.	<u>Potential</u> . The open disturbed areas provide suitable foraging habitat for the species.
Prairie falcon <i>(Falco mexicanus)</i> SWL MSHCP Covered Species	Habitat use of the prairie falcon includes annual grasslands to alpine meadows. The prairie falcon is associated primarily with perennial grasslands, savannahs, rangeland, some agricultural fields during the winter season, and desert scrub areas, all typically dry environments of western North American where there are cliffs or bluffs for nest sites (MSHCP 2004)	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.

Species Name (Scientific Name) Status	Habitat Description	Comments
American peregrine falcon (<i>Falco peregrinus anatum</i>) MSHCP Covered Species	Throughout the species' range, peregrine falcons are found in a large variety of open habitats, including tundra, marshes, seacoasts, savannahs and high mountains (AOU 1998, MSHCP 2004).	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.
Yellow-breasted chat (<i>Icteria virens</i>) SSC MSHCP Covered Species	The yellow-breasted chat is associated with riparian woodland and riparian scrub habitats (MSHCP 2004)	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
Loggerhead shrike (<i>Lanius ludovicianus</i>) SSC MSHCP Covered Species	Loggerhead shrike prefer open ground for foraging and thick trees and shrubs including sage scrub, chaparral, and desert scrub habitats for nesting.	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.
Downy woodpecker (<i>Picoides pubescens</i>)	Potential habitat for the downy woodpecker includes riparian scrub, woodland, forest, and oak woodland habitat in all Bioregions within the Plan Area (MSHCP 2004).	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
Coastal California gnatcatcher (<i>Polioptila californica californica</i>) FT/SSC MSHCP Covered Species	The coastal California gnatcatcher is a non-migratory bird species that primarily occurs within sage scrub habitats in coastal southern California dominated by California sagebrush (<i>Artemisia californica</i>), and California buckwheat (<i>Eriogonum fasciculatum</i>).	<u>No Potential</u> . No suitable habitat was documented within the Project Site.

Species Name (Scientific Name) Status	Habitat Description	Comments
Yellow warbler (<i>Setophaga petechia</i>) SSC MSHCP Covered Species	Habitat characteristics of the yellow warbler are well known to include riparian scrub and forest and woodland (MSHCP 2004)	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
Tree swallow (<i>Tachycineta bicolor</i>) MSHCP Covered Species	Suitable habitat is provided for the tree swallow by the riparian forest and woodland up through the lodgepole pine belt for breeding habitats. It frequents valley foothill and montane riparian habitats below 2,700 meters (9,000 feet) for breeding within its range (MSHCP 2004).	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
Least Bell's vireo (<i>Vireo bellii pusillus</i>) FE/SE MSHCP Covered Species	Least Bell's vireo resides in riparian habitats with a well-defined understory including southern willow scrub, mule fat, and riparian forest/woodland habitats.	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Project Site. The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species.
Yellow-headed blackbird (<i>Xanthocephalus xanthocephalus</i>) SSC	Prefers freshwater marshes habitat dominated by cattails and tule.	<u>No Potential</u> . No suitable marsh habitat was documented within or adjacent to the Project Site.
MAMMALS		
Pallid bat (<i>Antrozous pallidus</i>) SSC	In California, the species as occurring in a variety of habitats, including coniferous forests, oak woodlands, brushy terrain, rocky canyons, open farmland, and desert. Roosts are selected on the basis of temperature/proximity to foraging habitat. They are generalists in their roosting requirements, using a variety of	<u>No Potential</u> . No suitable roosting habitat documented within Project Site.

Species Name (Scientific Name) Status	Habitat Description	Comments
	structures including rock crevices, tree hollows, mines/caves, structures.	
Northwestern San Diego pocket mouse (<i>Chaetodipus fallax fallax</i>) MSHCP Covered Species	The northwestern San Diego pocket mouse occurs throughout the Plan Area in coastal sage scrub (including Diegan and Riversidean upland sage scrubs and alluvial fan sage scrub), sage scrub/grassland ecotones, chaparral at all elevations up to 6,000 feet (MSHCP 2004).	<u>No Potential</u> . No suitable breeding habitat was documented within the Project Site.
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>) SSC	A wide variety of habitats including woodlands and arid grasslands. Roosts in mines and caves.	<u>No Potential</u> . No suitable roosting habitat documented within Project Site.
Dulzura kangaroo rat (<i>Dipodomys simulans</i>) MSHCP Covered Species	The Dulzura kangaroo rat occurs throughout the Plan Area in coastal sage scrub (including Diegan and Riversidean upland sage scrubs and alluvial fan sage scrub), sage scrub/grassland ecotones, chaparral, and desert scrubs at all elevations up to 2,600 feet (MSHCP 2004)	<u>No Potential</u> . No suitable habitat documented onsite
San Bernardino kangaroo rat (<i>Dipodomys merriami parvus</i>) FE/SE/SSC MSHCP Covered Species	Alluvial sage scrub on alluvial fans, flood plains, along washes, in adjacent upland areas, and in areas with historic braided stream channels; these habitats characterized by sand, loam, sandy loam, or gravelly soils. Prefers the more open early and intermediate phases of alluvial sage scrub, but mature sage scrub is important as refugia during floods.	<u>No Potential</u> . No suitable habitat documented onsite.

Species Name (Scientific Name) Status	Habitat Description	Comments
Stephens' kangaroo rat (<i>Dipodomys stephensi</i>) FT/ST MSHCP Covered Species	The Stephens' kangaroo rat is found almost exclusively in open grasslands or sparse shrublands with cover of less than 50 percent during the summer (MSHCP 2004).	<u>Potential</u> . Historic records of the species onsite (USFWS 2001, 2002, CNDDB 2002)
Western mastiff bat (<i>Eumops perotis californicus</i>) SSC	Western mastiff bats are found in a variety of biotic environments from low desert scrub to chaparral, oak woodland and ponderosa pine.	<u>No Potential</u> . No suitable roosting habitat documented within Project Site.
San Diego black-tailed jackrabbit (<i>Lepus californicus bennettii</i>) MSHCP Covered Species	The San Diego black-tailed jackrabbit in open habitats, primarily including grasslands, sage scrub, alluvial fan sage scrub, and Great Basin sage scrub.	<u>Potential</u> . Suitable foraging habitat documented within the non-native grassland habitats onsite.
Bobcat (<i>Lynx rufus</i>) MSHCP Covered Species	The bobcat requires large expanses of relatively undisturbed brushy and rocky habitats near springs or other perennial water sources.	<u>Potential</u> . The offsite temporary impact area within Proposed Constrained Linkage 24 may be utilized for local and regional movement.
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>) MSHCP Covered Species	The San Diego desert woodrat is found throughout the Plan Area in sage scrub and chaparral wherever there are rock outcrops, boulders, cactus patches and dense undergrowth (MSHCP 2004).	<u>No Potential</u> . No suitable habitat or nests documented onsite.
Pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>) SSC	Usually associated with rugged canyons, high cliffs, and rock outcroppings. Roosts in rock crevices and caves during the day; may also roost in buildings or under roof tiles (Ziener et al. 1988-1990).	<u>No Potential</u> . No suitable roosting habitat documented onsite.
Big free-tailed bat (<i>Nyctinomops macrotis</i>) SSC	Desert habitats. Roosts in rock crevices in cliffs	<u>No Potential</u> . No suitable roosting habitat documented onsite.

Species Name (Scientific Name) Status	Habitat Description	Comments
Los Angeles pocket mouse <i>(Perognathus longimembris brevinasus)</i> SSC MSHCP Covered Species	The Los Angeles pocket mouse appears to be limited to sparsely vegetated habitat areas in patches of fine sandy soils associated with washes or of aeolian (windblown) origin, such as dunes (MSHCP 2004)	<u>No Potential</u> . No suitable habitat documented onsite.
Mountain lion <i>(Puma concolor)</i> MSHCP Covered Species	Mountain lions use rocky areas, cliffs, and ledges that provide cover within open woodlands and chaparral, as well as riparian areas that provide protective habitat connections for movement between fragmented core habitats (MSHCP 2004)	<u>Potential</u> . The offsite temporary impact area within Proposed Constrained Linkage 24 may be utilized for local and regional movement.
American badger <i>(Taxidea taxus)</i> SSC	The American badger prefers friable soils in open grassland and scrub habitat in southern California.	<u>No Potential</u> . No burrows documented onsite.
Occurrence Assessment Potential – Suitable vegetative habitat, soils, record of occurrence within and/or adjacent to Project Site. No Potential – No suitable vegetative habitat, soils, and/or record of occurrence within and/or adjacent to Project Site. Present – Species detected onsite. Federal (USFWS) Protection and Classification FE – Federally Endangered FT – Federally Threatened FPT – Federally Proposed Threatened FC – Federal Candidate for Listing State (CDFW) Protection and Classification SE – State Endangered ST – State Threatened SCE – State Candidate Endangered SSC – State Species of Special Concern SWL – California Watch List SPF – State Fully Protected		

Sources: Cadre Environmental 2025.

Critical habitat designations by the USFWS were researched to determine if any of the Project Site is located within or adjacent to USFWS critical habitat. The Project Site does not occur within or adjacent to a designated critical habitat for federally endangered or threatened species.

REGIONAL CONNECTIVITY/WILDLIFE MOVEMENT CORRIDORS

Overview

Wildlife corridors link areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they prohibit the infusion of new individuals and genetic information (MacArthur and Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990). Corridors effectively act as links between different populations of a species. A group of smaller populations (termed “demes”) linked together via a system of corridors is termed a “metapopulation.” The long-term health of each deme within the metapopulation is dependent upon its size and the frequency of interchange of individuals (immigration vs. emigration). The smaller the deme, the more important immigration becomes, because prolonged inbreeding with the same individuals can reduce genetic variability. Immigrant individuals that move into the deme from adjoining demes mate with individuals and supply that deme with new genes and gene combinations that increases overall genetic diversity. An increase in a population’s genetic variability is generally associated with an increase in a population’s health. Corridors mitigate the effects of habitat fragmentation by:

- (1) allowing animals to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity;
- (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and
- (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover). A number of terms have been used in various wildlife movement studies, such as “wildlife corridor”, “travel route”, “habitat linkage”, and “wildlife crossing” to refer to areas in which wildlife moves from one area to another. To clarify the meaning of these terms and facilitate the discussion on wildlife movement in this study, these terms are defined as follows:

Travel Route: A landscape feature (such as a ridge line, drainage, canyon, or riparian strip) within a larger natural habitat area that is used frequently by animals to facilitate movement and provide access to necessary resources (e.g., water, food, cover, den sites). The travel route is generally preferred because it provides the least amount of topographic resistance in moving from one area to another; it contains adequate food, water, and/or cover while moving between habitat areas; and provides a relatively direct link between target habitat areas.

Wildlife Corridor: A piece of habitat, usually linear in nature, that connects two or more habitat patches that would otherwise be fragmented or isolated from one another. Wildlife corridors are usually bounded by urban land areas or other areas unsuitable for wildlife. The corridor generally contains suitable cover, food, and/or water to support species and facilitate movement while in the corridor. Larger, landscape-level corridors (often referred to as “habitat or landscape linkages”) can provide both transitory and resident habitat for a variety of species.

Wildlife Crossing: A small, narrow area, relatively short in length and generally constricted in nature, that allows wildlife to pass under or through an obstacle or barrier that otherwise hinders or prevents movement. Crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. These are often “choke points” along a movement corridor.

Wildlife Movement within Project Site

The onsite regions of the Project Site, including offsite road improvements are not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor. As previously stated, the Project Site is an existing equestrian and events facility located at 38801 Los Corralitos Road within the SWAP General Plan portion of unincorporated western Riverside County. The existing facility encompasses approximately 241.60 acres, and consists of a multi-faceted events facility that operates as a traditional equestrian facility the majority of the time but also hosts a variety of other activities on the weekends. The Project Site is heavily impacted, with vegetation communities documented onsite including developed (equestrian and events center) and disturbed habitat, as shown in Figure 3, *Vegetation Communities Map*, Figures 4 to 15, *Current Project Site Photographs*, and outlined in Table 1, *Project Site Vegetation Community Acreages*. The offsite proposed EMWD sewer connection is located within and bisects Proposed Constrained Linkage 24, which contributes to local and regional wildlife movement. As stated by the MSHCP:

“Proposed Linkage 24 is comprised of the portion of Temecula Creek east of Redhawk Parkway and west of Pauba Road. This Linkage provides Habitat for wetland species and a connection to Core Areas in Wilson Valley. The Linkage is constrained by existing roadways and planned community Development. Planning Species for which Habitat is provided for within this Linkage include bobcat, mountain lion, Stephens' kangaroo rat, Aguanga kangaroo rat, western pond turtle, yellow warbler, southwestern willow flycatcher, arroyo chub, loggerhead shrike, tree swallow, white-tailed kite, Cooper's hawk and least Bell's vireo. In addition to maintenance of habitat quality, maintenance of existing floodplain processes along Temecula Creek is important for these species. While specific studies of movement along this Linkage have not been conducted, it likely provides for movement of common mammals such as bobcat.”
(MSHCP 2004)

All offsite impacts within the EMWD sewer connection will be temporary. In addition, the active channel of Temecula Creek (0.01-acre) will be avoided by implementing directional drilling.

REGIONAL AND REGULATORY SETTING

LOCAL/MSHCP CONSISTENCY ANALYSIS

Western Riverside County Multiple Species Habitat Conservation Plan Compliance Analysis

The proposed Project Site is located completely within the MSHCP, which is a comprehensive multi-jurisdictional effort that includes western Riverside County and eighteen (18) cities including the County of Riverside. Rather than addressing sensitive species on an individual basis, the MSHCP focuses on conservation of 146 species, including those listed at the federal and state levels and those that could become listed in the future. The MSHCP proposed a reserve system of approximate 500,000 acres, of which 347,000 acres are currently within public ownership and 153,000 acres will need to be assembled from lands currently in private ownership. The MSHCP allows the County and other permittees to issue take permits for listed species so that applicants do not need to receive endangered species incidental take authorization from the USFWS and CDFW.

On June 7th, 2003, the County Board of Supervisors adopted the MSHCP, certified the Environmental Impact Report/Environmental Impact Statement, and authorized the Chairman to sign the Implementing Agreement with the respective wildlife agencies. The Incidental Take Permit was issued by the wildlife agencies on June 22nd, 2004. The County of Riverside is a Permittee under the MSHCP.

MSHCP Reserve Design & Criteria Area Objectives

Reserve Design Analysis - The Project Site is located within the Western Riverside County MSHCP Southwest Plan Area, partially within Subunit 2, Temecula Creek & Pechanga Creek. The Project Site is located partially within MSHCP Criteria Cells 7134 and 7185, as shown in Figure 2, *MSHCP Relationship Map* (RCA GIS Data Downloads 2025). The offsite proposed EMWD sewer connection is located within and bisects Proposed Constrained Linkage 24. The entire onsite region of the Project Site completed the MSHCP HANS 2039 and JPR (JPR 10-12-27-01) process and a consistency determination was issued on January 6th, 2011 with no onsite conservation required (RCA 2011). An amendment to the JPR will be processed for the additional 2.62-acres of offsite impacts which extend into Criteria Cells 7134 and 7185 (Amendment Area).

The proposed project proposes road improvements to 2.16-acres of road improvements to the developed regions of Los Caballos Road and Pauba Road within the Amendment Area located in Criteria Cells 7134 & 7185. All impacts will occur within the Covered Roads layer including 100-foot width for Los Caballos Road and 110-foot wide Pauba Road. No road improvements outside of an MSHCP Covered Roads layer are proposed.

The construction of the EMWD sewer connection will result in temporary impacts to 0.17-acre of disturbed habitat and 0.29-acre of active livestock feed yards (non-native grassland) within Criteria Cell 7185 and Proposed Constrained Linkage 24. Temporary impact areas will be recontoured to preexisting conditions following construction of the sewer connection and all staging would occur within the proposed temporary impact area.

The proposed action would not conflict with reserve design goals for Criteria Cells 7134 & 7185 due to the fact that all permanent impacts will occur within the development regions of the Covered Roads Layer and remaining impacts within Criteria Cell 7185 and Proposed Constrained Linkage 24 will be temporary.

Covered Roads - The proposed project proposes 2.16-acres of road improvements to the developed regions of Los Caballos Road and Pauba Road within the Amendment Area. All impacts will occur within the Covered Roads layer including 100-foot width for Los Caballos Road and 110-foot wide Pauba Road. No road improvements outside of an MSHCP Covered Roads layer are proposed within the Amendment Area.

Public Quasi Public Lands - The Amendment Area is not located within or adjacent to Public Quasi-Public (PQP) lands.

MSHCP Sensitive Species Surveys

MSHCP Narrow Endemic Plant Species - The Project Site is not located within a predetermined survey area for MSHCP narrow endemic sensitive plants; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.1.3.

MSHCP Criteria Area Species - The Project Site is not located within an MSHCP Criteria Area Species Survey Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2.

MSHCP Amphibian and Mammal Species - The Project Site is not located within an MSHCP Amphibian or Mammal Species Survey Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2.

MSHCP Burrowing Owl -The Project Site occurs partially within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented within the property including foraging habitat documented within the Project Site. Based on the presence of suitable habitat, focused MSHCP burrowing owl surveys were conducted during the spring of 2025. No burrowing owl or characteristic sign such as white-wash, feathers, tracks, or pellets were detected within or immediately adjacent to the Project Site during the 2025 survey efforts. At a minimum, an MSHCP 30-day preconstruction survey will be required immediately prior to the initiation of construction to ensure protection for this species and compliance with the conservation goals as outlined in the MSHCP. If burrowing owls are detected onsite during the burrowing owl 30-day preconstruction survey, a burrowing owl relocation plan will be developed for the passive/active translocation of individuals as directed by the County of Riverside EPD and MSHCP wildlife agencies. Following completion of the

burrowing owl 30-day preconstruction survey and compliance with MSHCP species guidelines, if detected, the project will be consistent with MSHCP Section 6.3.2.

MSHCP Coastal California Gnatcatcher - The MSHCP guidelines require implementation of avoidance measures to ensure compliance with prescribed conservation goals and objectives for the coastal California gnatcatcher. No suitable habitat is present within or adjacent to the Amendment Area. No mitigation or avoidance measures proposed.

Delhi Sands Flower Loving Fly - The Amendment Area is not located within or adjacent to areas mapped as Delhi soils. No mitigation or avoidance measures proposed.

Potential Planning Species Assessment - Potential habitat for four (4) MSHCP Subunit 2, Temecula Creek & Pechanga Creek planning species including Cooper's hawk, (*Astur cooperii*), white-tailed kite, (*Elanus leucurus*), bobcat (*Lynx rufus*) and mountain lion (*Puma concolor*) is located within the Amendment Area. The proposed action would not conflict with reserve design goals or *MSHCP Planning Species* within Criteria Cells 7134 & 7185 due to the fact that all permanent impacts will occur within the development regions of the Covered Roads Layer and remaining impacts within Criteria Cell 7185 and Proposed Constrained Linkage 24 will be temporary.

Species not Adequately Covered - No suitable habitat for the twenty-eight (28) MSHCP species not adequately covered was detected within the Amendment Area. No mitigation or avoidance measures proposed.

MSHCP Riparian, Riverine, Vernal Pool Resources (Section 6.1.2)

Regulated activities within inland streams, wetlands and riparian areas in Western Riverside County California fall under the jurisdiction of the MSHCP. The MSHCP requires, among other things, assessments for riparian/riverine and vernal pool resources. As projects are proposed within the MSHCP Plan Area, an assessment of the potentially significant effects of those projects on riparian/riverine areas, and vernal pools are required, as currently mandated by CEQA, using available information augmented by project-specific mapping provided to and reviewed by the permittee's biologist(s). Riparian/riverine areas and vernal pools are defined for this section as follows in accordance with Section 6.1.2, Vol. I, of the Final MSHCP Plan:

“Riparian/Riverine Areas are lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year.” (MSHCP 2004)

It is assumed the first part of the definition defines riparian habitat, and the second part defines riverine areas. Vernal pools are defined as:

“...seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the

growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season". (MSHCP 2004)

MSHCP Riparian/Riverine/Vernal Pool Resources

MSHCP Section 6.1.2 Vernal Pool Resources

A review of historic aerials was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. Historic aerials taken in 2011 and 2023 represent an ideal baseline during which know (previously documented) inundated vernal pools and seasonal depressions can easily be seen. As previously stated, an inundated detention basin (0.31-acre open water) captures flow from a well-defined unvegetated ephemeral drainage extending in a western direction through the northern region of the Project Site. This feature represents low quality habitat for vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and western spadefoot (*Spea hammondi*). No direct impacts to the 0.31-acre open water basin will occur as a result of the proposed project. No mitigation or focused surveys proposed or required.

Although the inundated detention basin represents suitable habitat for fairy shrimp and western spadefoot, the features is not characterized as a vernal pool based on the fact that the depression was created to reduce and capture flows and no vernal pool indicator plant species were detected within the feature. No vernal pools are present onsite. The project is consistent with MSHCP Section 6.1.2.

MSHCP Section 6.1.2 Riverine Resources – As stated by the RCA:

"According to the December 14, 2010, Riparian/Riverine letter report prepared by TeraCor, the project site contains six potential features as shown on Exhibit 1 and 2 of the TeraCor letter report. TeraCor determined that Features 1, 2, 3, 5, and 6 are related to the existing equestrian activities on the site. Feature 4 is a regularly maintained drainage swale in the eastern portion of the property that does not connect to any downstream hydrologic features. TeraCor concluded that the six potential features do not support any riparian/riverine areas or vernal pools. The soils which include Hanford coarse sandy loam, 0–2%, 2–8%, and 8–15%; Hanford loamy fine sand, 0–8%; Grangeville fine sandy loam, 0–2%; gullied land; Gorgonio loamy sand, 0–8% and 8–15%; saline-alkali, 0–5%; and riverwash does not support suitable habitat for fairy shrimp. Based on the information provided by TeraCor, the project demonstrates compliance with Section 6.1.2 of the MSHCP." (RCA JPR 10-12-27-10)

However, a well-defined unvegetated ephemeral drainage (0.32-acre) which enters the northeast region of the Project Site and drains in a western direction where it is captured in a detention basin (open water), represents a potential MSHCP Section 6.1.2 riverine resource, as shown in Figure 17, *Jurisdictional Resources Map*. The detention basin overflows into a channel which exits the Project Site through a culvert extending north

under Los Caballos Road and drains into Temecula Creek. The offsite EMWD sewer connection impact area also traverses a short reach of Temecula Creek (ephemeral drainage) which represents an MSHCP Section 6.1.2 riverine resource. The active channel of Temecula Creek (0.01-acre) will be avoided by implementing directional drilling. To ensure no direct or indirect impacts occur to Section 6.1.2 riverine resources (Temecula Creek), the following avoidance measures will be implemented and included as conditions of approval.

- Contractor shall submit a boring plan, frac-out prevention and cleanup plan, and a containment and cleanup plan, as applicable. Specifically, A boring plan shall, at a minimum, include: 1) a sketch of the construction site, including equipment staging areas, approximate location of drill entry and exit points and the approximate location of access roads in relation to the surrounding area; 2) proposed depth of bore and statement of streambed condition (subsurface strata and percent of gravel and cobble) that support the depth of the bore; 3) approximate length of bore (50-foot increments); 4) type and size of boring equipment to be used (categorized as mini, mid or maxi); 5) estimated time to complete bore; and 6) list of lubricants and HDD additives to be used. A frac-out prevention plan shall, at a minimum, include: 1) name(s) and phone numbers of biological monitor(s), third-party monitors, and crew supervisor(s); 2) site-specific resources of concern (if applicable, include factors such as possible presence of sensitive species/resources); 3) specific qualifications for monitors; and 4) monitoring protocols (include biological monitoring and frac-out monitoring). A containment and clean-up plan shall, at a minimum include: 1) staging location of vacuum trucks and equipment, equipment list, and necessary hose lengths at each location. The contractor shall ensure that the necessary emergency response equipment and materials, as outlined in the contaminant and cleanup plan are readily available at the entry and exit pits or off-site location during drilling operations.
- A biological monitor experienced in delineating Section 6.1.2 riverine resources must be present during all phases of project related impacts associated with the EMWD sewer construction activities including but not limited to installation of sediment control measures. The biological monitor will initially assess the proposed EMWD sewer alignment prior to the initiation of construction to designate avoidance areas and monitor the installation of exclusionary silt fencing between the impact and avoidance area. A biological monitor shall be present during all HDD activities and have the authority to cease operations if any direct or indirect impacts to a jurisdictional resource may occur as a result of the proposed action.
- Tailboard meetings will be held before work each day to discuss site management, compliance with avoidance measures, and safety along with other topics. The biological monitor will be present during tailboard meetings at locations where HDD and jack-and-bore activities are being performed.
- All project related impacts including but not limited to access, trenching, stockpiling, parking, and staging will occur with the designated temporary impact areas and outside of designated avoidance areas. No crossing of Temecula Creek (designated avoidance area) will be permitted.

- Prior to initiation of construction all sediment and erosion control measures outlined in the boring plan, frac-out prevention and cleanup plan, and a containment and cleanup plan will be installed by the contractor. Specifically, Best Management Practices (BMPs) including sediment control measures will be implemented to ensure no indirect impacts to Section 6.1.2 riverine resources occur as a result of the proposed action including but not limited to the use of erosion control blankets, soils stabilizers and siltation fencing. Silt fencing must be erected around all holes, trenches or work areas until project completion.
- Spill kits and cleanup materials will be available on site prior to any construction activities.
- The biological monitor or contractor will notify the appropriate agencies immediately upon discovery of any inadvertent release to a Section 6.1.2 riverine resource including County of Riverside EPD, California Department of Fish and Wildlife, Regional Water Quality Control Board and United States Army Corps of Engineers, as applicable.
- Temporary impact areas will be recontoured to preexisting conditions following construction of the sewer connection and all staging would occur within the proposed temporary impact area.

MSHCP Riparian Birds - No suitable habitat for the least Bell's vireo, southwestern willow flycatcher or western yellow-billed cuckoo was detected within or adjacent to the Project Site; therefore, no surveys are required (RCA GIS Data Downloads 2025). The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat. The project is consistent with MSHCP Section 6.1.2.

MSHCP Section 6.1.2 Riparian Resources - A total of 0.13-acre of Section 6.1.2 riparian habitat, disturbed southern willow scrub is located onsite. Impacts to this resource has been avoided. The project is consistent with MSHCP Section 6.1.2.

MSHCP Urban/Wildlands Interface Guidelines

The MSHCP Urban/Wildlands Interface guidelines presented in Section 6.1.4 are intended to address indirect effects associated with locating commercial, mixed uses and residential developments in proximity to a MSHCP Conservation Area. The proposed project is located immediately south of Proposed Constrained Linkage 24, RCA conserved land and all MSHCP Urban/Wildlands Interface guidelines are applicable, as listed below.

- The project will be conditioned to control the quantity and quality of runoff from the site entering the MSHCP Conservation Area. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into MSHCP Conservation Areas.
- The project will be conditioned to ensure land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as

manure, which are potentially toxic or may adversely affect wildlife species, habitat or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. The greatest risk is from landscaping fertilization overspray and run-off.

- The project will be conditioned to ensure night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area is not increased.
- The project will be conditioned to ensure proposed noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards.
- The project will be conditioned to ensure the restriction of invasive, non-native plant species listed in Table 6-2 of the MSHCP during approving landscape plans will avoid the use of invasive species for the portions of the project that are adjacent to the MSHCP Conservation Area. Considerations in reviewing the applicability of this list shall include proximity of planting areas to the MSHCP Conservation Areas, species considered in the planting plans, resources being protected within the MSHCP Conservation Area and their relative sensitivity to invasion, and barriers to plant and seed dispersal, such as walls, topography and other features.
- The project will be conditioned to ensure proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping into the MSHCP Conservation Areas. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or appropriate mechanisms.
- The project will be conditioned to ensure manufactured slopes associated with the proposed site development shall not extend into the MSHCP Conservation Area.

Following implementation of all UWIG guidelines listed above, the project is compliant with MSHCP Section 6.1.4.

MSHCP Fuels Management Guidelines

The fuels management guidelines presented in Section 6.4 of the MSHCP are intended to address brush management activities around new development within or adjacent to MSHCP Conservation Areas. The proposed project is located immediately south of Proposed Constrained Linkage 24, RCA conserved land and all MSHCP and MSHCP fuels Management Guidelines are applicable. The proposed project does not propose any fuel reduction activities within or adjacent to Proposed Constrained Linkage 24 or RCA conserved land. The project is compliant with MSHCP Section 6.4.

County of Riverside General Plan – Southwest Area Plan

SWAP 23.1 - Provide stepping-stone habitat linkages for the California gnatcatcher as well as other species through the preservation of land from the Santa Rosa Plateau to the Santa Margarita Reserve in San Diego County.

The proposed action would not impact open space habitats or linkages between the Santa Rosa Plateau and the Santa Margarita Reserve in San Diego County. The proposed project would not conflict with policy SWAP 23.1.

SWAP 23.2 - Conserve the Tenaja corridor, which promotes large mammal movement between the Cleveland National Forest and the Santa Rosa Plateau.

The proposed action would not impact open space habitats or linkages between Cleveland National Forest and the Santa Rosa Plateau. The proposed project would not conflict with policy SWAP 23.2.

SWAP 23.3 - Maintain habitat connectivity within Murrieta Creek, Temecula Creek, Lower Tualal Creek, Lower Warm Springs Creek, and Pechanga Creek to facilitate wildlife movement and dispersal, (especially for the California gnatcatcher and Quino checkerspot butterfly) and conservation of wetland species.

The proposed action would not impact open space habitats or linkages between, within or adjacent to Murrieta Creek, Temecula Creek, Lower Tualal Creek, Lower Warm Springs Creek, and Pechanga Creek. All offsite impacts within the EMWD sewer connection will be temporary. In addition, the active channel of Temecula Creek (0.01-acre) will be avoided by implementing directional drilling. The proposed project would not conflict with policy SWAP 23.3.

SWAP 23.4 - Conserve habitat connections to the Agua Tibia Wilderness, Arroyo Seco, and Wilson Valley.

The proposed action would not impact open space habitats or linkages between, within or adjacent to Agua Tibia Wilderness, Arroyo Seco, and Wilson Valley. The proposed project would not conflict with policy SWAP 23.4.

SWAP 23.5 - Conserve the large block of habitat containing clay soils east of Interstate 215 and south of Scott Road for the Quino checkerspot butterfly and other narrow endemic species such as Munz's onion, California Orcutt grass and spreading navarretia.

No Porterville soils are located within the Project Site. The proposed project would not conflict with policy SWAP 23.5.

SWAP 23.6 - Incorporate a watershed management program into the preservation of wildlife movement and dispersal of wetland species within Pechanga Creek.

The proposed action would not impact open space habitats or linkages between, within or adjacent to Pechanga Creek. The proposed project would not conflict with policy SWAP 23.6.

SWAP 23.7 - Consider the movement of larger mammals such as the mountain lion, bobcat, and mule deer between the Santa Ana and Mount Palomar Mountains.

The proposed action would not impact open space habitats or linkages between, within or adjacent to the Santa Ana and Mount Palomar Mountains. The proposed project would not conflict with policy SWAP 23.7.

SWAP 23.8 - Protect sensitive biological resources in SWAP through adherence to policies found in the Multiple Species Habitat Conservation Plans, Environmentally Sensitive Lands, Wetlands, and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element.

The entire onsite region of the Project Site completed the MSHCP HANS 2039 and JPR (JPR 10-12-27-01) process and a consistency determination was issued on January 6th, 2011 with no onsite conservation required (RCA 2011). An amendment to the JPR will be processed for the additional 2.62-acres of offsite impacts which extend into Criteria Cells 7134 and 7185. The proposed project would not conflict with policy SWAP 23.8.

County of Riverside Municipal Code

Chapter 4.62, MSHCP Mitigation Fee, BIO-CM1

The County of Riverside's Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the County General Plan and proposed development projects. As stated by the County of Riverside, the following are provisions within the Counties Municipal Code that are relevant to the proposed project.

“Sec. 4.62.070 – Western Riverside County Multiple Species Habitat Conservation Plan mitigation fee. In order to assist in providing revenue to acquire and conserve lands necessary to implement the MSHCP, the Western Riverside County Multiple Species Habitat Conservation Plan mitigation fee shall be paid for each residential unit, development project or portion thereof to be constructed. Five categories of the fee are defined and include: (1) residential units, density less than 8.0 dwelling units per acre; (2) residential units, density between 8.1 and 14.0 dwelling units per acre; (3) residential, density greater than 14.1 dwelling units per acre; (4) commercial acreage; and (5) industrial acreage. Because there can be mixed traditional commercial, industrial and residential uses within the same project, for fee assessment purposes only, the commercial or industrial acreage fee shall be applied to the whole project based upon the existing underlying zoning classification of the property at the time of issuance of a building permit. Subject to an adjustment of the fee as set forth in Section 4.62.160 of this chapter, the following fee shall be paid for each development project within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan fee area:“

Sec. 4.62.090 – Imposition of Fees. Notwithstanding any provision of Ordinance No. 457 to the contrary, no building permit shall be issued for any residential unit or development project except upon the condition that the Western Riverside County Multiple Species Habitat Conservation Plan fee required by this chapter be paid.

Sec. 4.62.100 Payment of Fees. The fee shall be paid as follows:

- *The fee shall be paid in full at the time a certificate of occupancy is issued for the residential unit or development project or upon final inspection, whichever occurs first. No final inspection shall be made, and no certificate of occupancy shall be issued, prior to full payment of the Western Riverside County MSHCP Fee. However, this section shall not be construed to prevent payment of the fee prior to the issuance of an occupancy permit or final inspection.*
- *A fee shall be assessed one time per lot or parcel except in cases of changes in land use. The fee required to be paid when there is a change in land use shall be reduced by the amount of any previously paid fee for that property. No refunds shall be provided for changes in land use to a lower fee category. It shall be the responsibility of the applicant to provide documentation of any previously paid fee.*
- *The fee for commercial and industrial development projects shall be paid in its entirety for the project area and shall not be prorated. The fee required to be paid shall be the fee in effect at the time of payment.*
- *There shall be no deferment of the fee beyond final inspection or issuance of certificate(s) of occupancy.*
- *Notwithstanding any other written requirements to the contrary, the fee shall be paid whether or not the development project is subject to city conditions of approval imposing the requirement to pay the fee.*
- *If all or part of the development project is sold prior to payment of the fee, the project shall continue to be subject to the requirement to pay the fee as provided herein.*
- *For development projects which the city does not require a final inspection or issuance of a certificate of occupancy, the fee shall be paid prior to any use or occupancy.*
- *For purposes of this chapter, congregate care residential facilities and recreational vehicle parks shall pay the commercial acreage fee.”*

The project applicant shall pay MSHCP Local Development Mitigation fees as established by the RCA and implemented by the County of Riverside. Five categories of the fee are defined, include and are effect till June 30th, 2026: Residential, density less than 8.0 dwelling units per acre \$4,486 per dwelling unit; Residential, density between 8.1 and 14.0 dwelling units per acre \$1.870 per dwelling unit; Residential, density greater than 14.1 dwelling units per acre \$827 per dwelling unit; Commercial \$20,191 per acre; and

Chapter 4.64, Stephens' Kangaroo Rat (SKR) Mitigation Fee

“4.64.060 Stephens' Kangaroo Rat Mitigation fee. All applicants for development permits within the boundaries of the fee assessment area who cannot satisfy mitigation requirements through on-site mitigation as determined through the environmental review process shall pay a mitigation fee of five hundred dollars (\$500.00) per gross acre of the parcels proposed for development. However, for single-family residential development, wherein all lots within the development are greater than one-half acre in size, a mitigation fee of two hundred twenty-five dollars (\$250.00) per residential unit shall be paid; and for agricultural development which requires a development permit excluding the construction of single-family residences in connection with the agricultural development, a mitigation fee of one hundred dollars (\$100.00) or one percent of the valuation of the buildings to be constructed whichever is greater shall be paid, provided that at no time shall such fee exceed the amount required to be paid if a fee of five hundred dollars (\$500.00) per gross acre were applied to the parcel proposed for agricultural development. The determination of value or valuation of an agricultural building shall be made by the building official.”

“4.64.070 Imposition of fee. No development permit for real property located within the boundaries of the fee assessment area shall be issued or approved except upon the condition that on-site mitigation will be provided as determined through the environmental review process or the mitigation fee required by this chapter be paid, and it is determined that the development will not jeopardize the implementation of a habitat conservation plan for the Stephens' Kangaroo Rat.”

“4.64.080 Payment of fee. The mitigation fee shall be paid upon issuance of a grading permit or a certificate of occupancy or upon final inspection, whichever occurs first. Payment of the mitigation fee shall satisfy county conditions of approval previously placed on development permits with regard to impact mitigation for the Stephens' Kangaroo Rat which have not been previously satisfied and no further review and approval pursuant to the provisions of this chapter shall be required. The total number of surface acres of land within each phase shall be determined through a physical survey prepared by a licensed surveyor or registered civil engineer.”

A total of 0.69-acre of the offsite temporary impact area including the proposed EMWD sewer line extension occurs within the SKR Fee Area outlined in the Riverside County SKR HCP. The project applicant shall pay the fees pursuant to County Ordinance 663.10 for the SKR HCP Fee Assessment Area as established and implemented by the County of Riverside (**BIO-CM2** SKR Fee Area).

County of Riverside Protected Trees

The following regulations apply to tree removal within Riverside County.

- Riverside County Ordinance No. 449.
- Riverside County Ordinance No. 559.
- The Riverside County Oak Tree Management Guidelines address the treatment of oak woodlands and their preservation.

Several mature regulated coast live oak trees are located within the northeast region of the Project Site. No coast live oak trees will be directly or indirectly impacted. The proposed project would not conflict with any County of Riverside protected tree ordinance or oak tree management guidelines. To ensure compliance with County of Riverside protected tree ordinance or oak tree management guidelines and following avoidance measures will be implemented and included as conditions of approval.

1. A certified arborist shall delineate a protected zone of existing coast live oaks adjacent to the proposed impact area and the results submitted to the County of Riverside EPD for review and approval.
2. No construction activities, staging or placement of structures shall occur within the protected zone of any existing oak tree.
3. Landscaping, trenching or irrigation systems shall not be installed within the existing protected zone of any oak tree, unless recommended by a certified arborist.

FEDERAL

Federal Endangered Species Act

The MSHCP serves as an HCP pursuant to Section 10(a)(1)(B) of the FESA of 1973, allowing participating jurisdictions to authorize "take" of plant and wildlife species. The MSHCP has been issued under this Section and provides incidental take for all covered species.

Clean Water Act

The Clean Water Act, Section 401 provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 requires a project operator to obtain a federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain state certification, thereby ensuring that the discharge will comply with provisions of the CWA. The Regional Water Quality Control Board administers the certification program in California. Section 404 establishes a permit program administered by the USACE that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. The USACE implementing regulations are found at 33 CFR 320 and 330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the United States Environmental Protection Agency in conjunction with the

USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

Wetland Definition Pursuant to Section 404 of the Clean Water Act

Aquatic resources, including riparian areas, wetlands, and certain aquatic vegetation communities, are considered sensitive biological resources and fall under the jurisdiction of several regulatory agencies. The USACE exerts jurisdiction over waters of the United States, including all waters that are subject to the ebb and flow of the tide; wetlands and other waters such as lakes, rivers, streams (including intermittent or ephemeral streams), mudflats, sandflats, sloughs, prairie potholes, vernal pools, wet meadows, playa lakes, or natural ponds; and tributaries of the above features. The extent of waters of the United States is generally defined as the portion that falls within the limits of the OHWM. The OHWM is defined as the “line on the shore established by the fluctuation of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.”

On April 21, 2020 the U.S. Environmental Protection Agency (EPA) and the USACE published the Navigable Waters Protection Rule to define “Waters of the United States” in the Federal Register. The April 2020 definition includes four simple categories of jurisdictional waters, including: (1) the territorial seas and traditional navigable waters; (2) perennial and intermittent tributaries to those waters; (3) certain lakes, ponds and impoundments; and (4) wetlands adjacent to jurisdictional waters.

The April 2020 definition provides clear exclusions for many water features that traditionally have been regulated, such as ephemeral drainages. The April 2020 definition has been formally adopted by EPA and the USACE and was used for this Jurisdictional Delineation.

Wetlands, including swamps, bogs, seasonal wetlands, seeps, marshes, and similar areas, are defined by USACE as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3[b]; 40 CFR 230.3[t]). Indicators of three wetland parameters (i.e., hydric soils, hydrophytic vegetation, and wetlands hydrology), as determined by field investigation, must be present for a site to be classified as a wetland by USACE (USACE 1987).

It is important to note that the RWQCB definition of wetland was redefined and the new definition went into effect May 28th, 2020. The definition of a wetland is as follows: An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area’s vegetation is dominated by hydrophytes or the area lacks vegetation. This RWQCB modified three-parameter definition is similar to the federal definition in that it identifies three wetland characteristics that determine the

presence of a wetland: wetland hydrology, hydric soils, and hydrophytic vegetation. Unlike the federal definition, however, the RWQCB wetland definition allows for the presence of hydric substrates as a criterion for wetland identification (not just wetland soils) and wetland hydrology for an area devoid of vegetation (less than 5% cover) to be considered a wetland.

However, if any vegetation is present, then the USACE delineation procedures would apply to the vegetated component (i.e., hydrophytes must dominate). Examples of waters that would be considered wetlands by the RWQCB definition, but not by the federal wetland definition, are non-vegetated wetlands, or wetlands characterized by exposed bare substrates like mudflats and playas, as long as they meet the three-parameters as described in the RWQCB definition. It is important to note that while the USACE may not designate a feature as a wetland, that feature could be considered a special aquatic site or other water of the U.S. by the USACE and potentially subject to USACE jurisdiction.

Migratory Bird Treaty and Bald and Golden Eagle Protection Acts

Migratory birds including resident raptors and passerines are protected under the federal MBTA. The MBTA of 1918 implemented the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada. Similar conventions between the United States and Mexico (1936), Japan (1972) and the Union of Soviet Socialist Republics (1976) further expanded the scope of international protection of migratory birds. Each new treaty has been incorporated into the MBTA as an amendment and the provisions of the new treaty are implemented domestically. These four treaties and their enabling legislation, the MBTA, established Federal responsibilities for the protection of nearly all species of birds, their eggs and nests. The MBTA made it illegal for people to "take" migratory birds, their eggs, feathers or nests. Take is defined in the MBTA to include by any means or in any manner, any attempt at hunting, pursuing, wounding, killing, possessing or transporting any migratory bird, nest, egg, or part thereof. The Bald and Golden Eagle Protection Act affords additional protection to all bald and golden eagles.

STATE

California Endangered Species Act

The CESA is similar to FESA in that it contains a process for listing of species regulating potential impacts to listed species. Section 2081 of the CESA authorizes the CDFW to enter into a memorandum of agreement for take of listed species for scientific, educational, or management purposes. The MSHCP serves as an HCP pursuant the Natural Communities Conservation Plan (NCCP) under the NCCP Act of 2001, allowing participating jurisdictions to authorize "Take" of plant and wildlife species.

As stated by CDFW:

"On June 22, 2004, the Department issued NCCP Approval and Take Authorization for the Western Riverside County MSCHP per Section 2800 et seq. of the California Fish and Game Code. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss

and the incidental take of covered species in association with activities covered under the permit.” (CDFG 2004)

California Fish and Game Code 3503 and 3513

As stated by CDFW:

“CHAPTER 1. General Provisions [3500 - 3516] (Chapter 1 enacted by Stats. 1957, Ch. 456.) It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. (Amended by Stats. 1971, Ch. 1470.)”

Native Plant Protection Act

The Native Plant Protection Act (NPPA) enacted a process by which plants are listed as rare or endangered. The NPPA regulates collection, transport, and commerce in plants that are listed. The CESA follows the NPPA and covers both plants and wildlife determined to be threatened with extinction or endangered. Plants listed as rare under the NPPA are designated as threatened under the CESA. No plants listed under the CESA occur on the Project Site onsite or offsite impact areas.

Regional Water Quality Control Board

The RWQCB also has jurisdiction over waters deemed “isolated” or not subject to Section 404 jurisdiction under the Solid Waste Agency of Northern Cook County v. Corps decision. Dredging, filling, or excavation of isolated waters constitutes a discharge of waste to waters of the state and prospective dischargers are required to obtain authorization through an Order of Waste Discharge or waiver thereof from the RWQCB and comply with other requirements of Porter-Cologne Act.

Under Section 401 of the CWA, the local RWQCB must certify that actions receiving authorization under Section 404 of the CWA also meet state water quality standards. The RWQCB requires projects to avoid impacts to wetlands if feasible and requires that projects do not result in a net loss of wetland acreage or a net loss of wetland function and values. Compensatory mitigation for impacts to wetlands and/or waters of the state is required.

CDFW Streambed Alteration Agreement

Waters of the State are regulated by the California Department of Fish and Wildlife (CDFW) through Section 1600 et seq. of the California Fish and Game Code. Section 1600 et seq. requires notifying the CDFW prior to any project activity that might (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. If, after this notification, the CDFW determines that the activity may substantially adversely affect fish and wildlife resources, a Lake or Streambed Alteration Agreement

will need to be obtained. CDFW may then place conditions in the Section 1602 Streambed Alteration Agreement to avoid, minimize, and mitigate any potentially significant adverse impacts within CDFW jurisdictional limits.

The limits of Waters of the State are defined as the “body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation.” Therefore, the limits extend from the channel bed to the top of the bank, with the addition of the canopy of any riparian habitat associated with the watercourse.

ENVIRONMENTAL IMPACTS

The following sections include an analysis of the direct impacts, indirect impacts, and cumulative effects of the proposed action on sensitive biological resources. This analysis characterizes the project related activities that are anticipated to adversely impact the species, and when feasible, quantifies such impacts. Direct effects are defined as actions that may cause an immediate effect on the species or its habitat, including the effects of interrelated actions and interdependent actions. Indirect effects are caused by or result from the proposed actions, are later in time, and are reasonably certain to occur. Indirect effects may occur outside of the area directly affected by the proposed action.

Cumulative impacts refer to incremental, individual environmental effects of two or more projects when considered together. These impacts taken individually may be minor but may be collectively significant. Cumulative effects include future tribal, local, or private actions that are reasonably certain to occur in the proposal vicinity considered in this report. A cumulative impact to biological resources may occur if a project has the potential to collectively degrade the quality of the environment, substantially reduce the habitat of wildlife species or cause a population to drop below self-sustaining levels, thereby threatening to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal species.

THRESHOLD OF SIGNIFICANCE

The environmental impacts relative to biological resources are assessed using impact significance criteria which mirror the policy statement contained in the CEQA at Section 21001 (c) of the Public Resources Code. This section reflects that the legislature has established it to be the policy of the state to:

“Prevent the elimination of fish and wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities...”

The following definitions apply to the significance criteria for biological resources:

- “*Endangered*” means that the species is listed as endangered under state or federal law.
- “*Threatened*” means that the species is listed as threatened under state or federal law.

- “*Rare*” means that the species exists in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens.
- “*Region*” refers to the area within southern California that is within the range of the individual species.
- “*Sensitive habitat*” refers to habitat for plants and animals (1) which plays a special role in perpetuating species utilizing the habitat on the property, and (2) without which there would be substantial danger that the population of that species would drop below self-perpetuating levels.
- “*Substantial effect*” means significance loss or harm of a magnitude which, based on current scientific data and knowledge, (1) would cause a species or a native plant or animal community to drop below self-perpetuating levels on a statewide or regional basis or (2) would cause a species to become threatened or endangered.

Impacts to biological resources may result in a significant adverse impact if one or more of the following conditions would result from implementation of the proposed project.

- Have a substantial adverse effect, either directly or through habitat modification, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or Title 50, Code of Federal Regulations (Sections 17.11 or 17.12).
- Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, and meets the definition of Section 15380 (b), (c), or (d) of the CEQA Guidelines.
- 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 CDFW or USFWS.
- Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident migratory wildlife corridors, or impede the use of native nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state conservation plan.

Also, the determination of impacts has been made according to the federal definition of “*take*”. The federal FESA prohibits the “*taking*” of a member of an endangered or threatened wildlife species or removing, damaging, or destroying a listed plant species by any person (including private individuals and private or government entities). The FESA

defines “take” as “to harass, harm, pursue, hunt, shoot, would, kill, trap, capture or collect” an endangered or threatened species, or to attempt to engage in these activities. Specifically, the biological resources assessment report addresses the following CEQA Environmental Checklist items.

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modification, 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. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Native Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		X		

DIRECT IMPACTS

- a) *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 CDFW or USFWS?*

Sensitive Plants

The Project Site is not located within an MSHCP Narrow Endemic Plant Survey; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.1.3. No Impact.

The Project Site is not located within an MSHCP criteria area Species Survey Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2. No Impact.

No state or federally listed threatened, endangered, or special-status plants not covered under the MSHCP were documented or expected to occur onsite based on a lack of suitable habitat, as outlined in Table 2, *Sensitive Plant Species with Potential to Occur within Project Site*. No Impact.

Sensitive Wildlife

Suitable habitat was documented onsite for one (1) special-status invertebrate species not covered under the MSHCP including Crotch's bumble. Suitable scattered foraging habitat for the Crotch's bumble bee is present with the Project Site and nesting habitat onsite where debris piles were documented. Burrows representing suitable nesting resources were also documented within this region of the Project Site. The Crotch's bumble bee was not documented onsite following focused surveys conducted during the spring of 2025 (Huffman Environmental 2025). Although focused surveys did not result in the detection of Crotch's bumble bee, based on the presence of suitable habitat, the following measure will be implemented to ensure protection of the species if the property is occupied subsequent to the surveys, (**BIO-CM3** Crotch's Bumble Bee Preconstruction Survey). Less than Significant Impact.

An inundated detention basin (open water) captures flows from a well-defined unvegetated ephemeral drainage extending in a western direction through the northern region of the Project Site. This feature represents low quality habitat for vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and western spadefoot (*Spea hammondi*). No direct impacts to the open basin are proposed. No Impact.

The Project Site is not located within an MSHCP Amphibian Species Survey Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2. No Impact.

The Project Site occurs partially within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented within the property including foraging habitat documented within the northern region of the Project Site. Based on the presence of suitable habitat, focused MSHCP burrowing owl surveys were conducted during the spring of 2025. No burrowing owl or characteristic sign such as white-wash, feathers, tracks, or pellets were detected within or immediately adjacent to the Project Site during the 2025 survey efforts. At a minimum, an MSHCP 30-day preconstruction survey will be required immediately prior to the initiation of construction to ensure protection for this species and compliance with the

conservation goals as outlined in the MSHCP. If burrowing owls are detected onsite during the burrowing owl 30-day preconstruction survey, a burrowing owl relocation plan will be developed for the passive/active translocation of individuals as directed by the County of Riverside EPD and MSHCP wildlife agencies. Following completion of the burrowing owl 30-day preconstruction survey and compliance with MSHCP species guidelines, if detected, the project will be consistent with MSHCP Section 6.3.2. (**BIO-CM4** MSHCP Burrowing Owl 30-Day Preconstruction Surveys). Less than Significant Impact.

No suitable habitat for the least Bell's vireo, southwestern willow flycatcher or western yellow-billed cuckoo was detected within or adjacent to the Project Site; therefore, no surveys are required (RCA GIS Data Downloads 2025). The 0.13-acre of disturbed southern willow scrub does not represent suitable habitat for the species. The northern region of the open water basin is bordered by disturbed southern willow scrub, dominated by scattered arroyo willow saplings. The project is consistent with MSHCP Section 6.1.2. No Impact

A total of ten (10) sensitive species have potential to occur or were observed within the Project Site including grasshopper sparrow, Cooper's hawk, sharp-shinned hawk, northern harrier, white-tailed kite, California horned lark, Stephens' kangaroo rat, bobcat, mountain lion, and San Diego black-tailed jackrabbit. As previously stated, the MSHCP has determined that these sensitive species potentially occurring within Project Site have been adequately covered (MSHCP Table 2-2 Species Considered for Conservation Under the MSHCP Since 1999, 2004). Sensitive species that can be excluded from occurring onsite or known to occur within the region with potential to occur onsite are presented in Table 3, *Sensitive Wildlife Species with Potential to Occur within Project Site*. Potential impacts to MSHCP covered species will be mitigated following implementation of **BIO-CM1** MSHCP Local Development Mitigation Fee, **BIO-CM4** MSHCP Burrowing Owl 30-Day Preconstruction Surveys, and compliance with **BIO-CM5** Nesting Bird Preconstruction Surveys. Less than Significant Impact with Mitigation.

The Project Site is not located within an MSHCP Mammal Species Survey Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2. No Impact.

The Project Site possess vegetation expected to provide habitat for nesting migratory birds and raptors protected under the federal MBTA and CDFG Codes. Measures for potential direct/indirect impacts to common and sensitive bird and raptor species will require compliance with the MBTA and CDFG Code Section 3503. Construction outside the nesting season (between September 1st and January 31st) does not require preconstruction nesting bird surveys. However, if construction is proposed between February 1st and August 31st, a qualified biologist will conduct a preconstruction nesting bird survey(s) no more than three (3) days prior to initiation of vegetation removal or grading to document the presence or absence of nesting birds within or directly adjacent to the Project Site. Loss of an active nest would be considered a potentially significant impact. Impacts to potential nesting bird habitat would be reduced to less than significant with the implementation of Conservation Measure **BIO-CM5**: Nesting Bird Preconstruction Surveys. Less than Significant.

- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?*

The northern region of the open water basin is bordered by a small 0.13-acre patch of disturbed southern willow scrub dominated by scattered arroyo willow saplings. The disturbed southern willow scrub will not be directly impacted as a result of the proposed project activities. No sensitive natural community vegetation will be impacted as a result of the project activities. No Impact.

A total of 99.52-acres of primarily disturbed and developed vegetation communities will be directly and permanently impacted as a result of project implementation, as outlined Table 4, *Project Site Vegetation Community Impacts*, and illustrated on Figure 18, *Vegetation Communities Impact Map*. Compliance with the County of Riverside MSHCP Local Development Mitigation Fees (Condition of Approval) would ensure direct impacts to all vegetation communities will remain consistent with MSHCP guidelines, **BIO-CM1** MSHCP Local Development Mitigation Fee. The construction of the EMWD sewer connection will result in temporary impacts to 0.19-acre of developed/disturbed habitat and 0.49-acre of active livestock feed yards (non-native grassland). Temporary impact areas will be recontoured to preexisting conditions following construction of the sewer connection, and all staging would occur within the proposed temporary impact area. Less than significant.

Table 4.
Project Site Vegetation Community Impacts

Vegetation Community	Onsite (ac)	Offsite (ac)	Project Site Total (ac)	Onsite Impacts PERM (ac)	Offsite Impacts PERM (ac)	Offsite Impacts TEMP (ac)
Developed	205.48	4.23	209.71	83.84	4.21	0.02
Disturbed	34.89	0.54	35.43	11.10	0.37	0.17
Ephemeral Drainage	0.32	0.01	0.33	--	--	--
Open Water	0.31	--	0.31	--	--	--
Non-Native Grassland	0.29	0.49	0.78	--	--	0.49
Coast Live Oak	0.18	--	0.18	--	--	--
Disturbed Southern Willow Scrub	0.13	--	0.13	--	--	--
	241.60	5.27	246.87	94.94	4.58	0.68

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- c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The well-defined unvegetated ephemeral drainage (0.32-acre) which enters the northeast region of the Project Site (onsite) and drains in a western direction where it is captured in a detention basin (open water) represents a potential resource regulated by the USACE, RWQCB and CDFW, as shown in Figure 19, *Jurisdictional Resources Map Impact Map*. The detention basin overflows into a channel which exits the Project Site through a culvert

extending north under Los Caballos Road and drains into Temecula Creek. The onsite potential jurisdictional features will not be directly or indirectly impacted. No Impact.

The offsite EMWD sewer connection impact area also traverses a short reach of Temecula Creek (0.01-acre, ephemeral drainage) which represents a potential resource regulated by the USACE, RWQCB and CDFW. The active channel of Temecula Creek (0.01-acre) will be avoided by implementing directional drilling. No Impact. To ensure no direct or indirect impacts occur to Section 6.1.2 riverine resources (Temecula Creek), the following avoidance measures will be implemented and included as conditions of approval.

- Contractor shall submit a boring plan, frac-out prevention and cleanup plan, and a containment and cleanup plan, as applicable. Specifically, A boring plan shall, at a minimum, include: 1) a sketch of the construction site, including equipment staging areas, approximate location of drill entry and exit points and the approximate location of access roads in relation to the surrounding area; 2) proposed depth of bore and statement of streambed condition (subsurface strata and percent of gravel and cobble) that support the depth of the bore; 3) approximate length of bore (50-foot increments); 4) type and size of boring equipment to be used (categorized as mini, mid or maxi); 5) estimated time to complete bore; and 6) list of lubricants and HDD additives to be used. A frac-out prevention plan shall, at a minimum, include: 1) name(s) and phone numbers of biological monitor(s), third-party monitors, and crew supervisor(s); 2) site-specific resources of concern (if applicable, include factors such as possible presence of sensitive species/resources); 3) specific qualifications for monitors; and 4) monitoring protocols (include biological monitoring and frac-out monitoring). A containment and clean-up plan shall, at a minimum include: 1) staging location of vacuum trucks and equipment, equipment list, and necessary hose lengths at each location. The contractor shall ensure that the necessary emergency response equipment and materials, as outlined in the contaminant and cleanup plan are readily available at the entry and exit pits or off-site location during drilling operations.
- A biological monitor experienced in delineating Section 6.1.2 riverine resources must be present during all phases of project related impacts associated with the EMWD sewer construction activities including but not limited to installation of sediment control measures. The biological monitor will initially assess the proposed EMWD sewer alignment prior to the initiation of construction to designate avoidance areas and monitor the installation of exclusionary silt fencing between the impact and avoidance area. A biological monitor shall be present during all HDD activities and have the authority to cease operations if any direct or indirect impacts to a jurisdictional resource may occur as a result of the proposed action.
- Tailboard meetings will be held before work each day to discuss site management, compliance with avoidance measures, and safety along with other topics. The biological monitor will be present during tailboard meetings at locations where HDD and jack-and-bore activities are being performed.

- All project related impacts including but not limited to access, trenching, stockpiling, parking, and staging will occur within the designated temporary impact areas and outside of designated avoidance areas. No crossing of Temecula Creek (designated avoidance area) will be permitted.
- Prior to initiation of construction all sediment and erosion control measures outlined in the boring plan, frac-out prevention and cleanup plan, and a containment and cleanup plan will be installed by the contractor. Specifically, Best Management Practices (BMPs) including sediment control measures will be implemented to ensure no indirect impacts to Section 6.1.2 riverine resources occur as a result of the proposed action including but not limited to the use of erosion control blankets, soils stabilizers and siltation fencing. Silt fencing must be erected around all holes, trenches or work areas until project completion.
- Spill kits and cleanup materials will be available on site prior to any construction activities.
- The biological monitor or contractor will notify the appropriate agencies immediately upon discovery of any inadvertent release to a Section 6.1.2 riverine resource including County of Riverside EPD, California Department of Fish and Wildlife, Regional Water Quality Control Board and United States Army Corps of Engineers, as applicable.
- Temporary impact areas will be recontoured to preexisting conditions following construction of the sewer connection and all staging would occur within the proposed temporary impact area.

The project will comply with all applicable water quality regulations, including complying with a NPDES regulations and MS4 permit requirements. The MS4 permit places pollution prevention requirements on planned developments, construction sites, commercial and industrial businesses, municipal facilities and activities, and residential communities. Both of these permits include the treatment of all surface runoff from paved and developed areas, the implementation of applicable BMPs during construction activities and the installation and proper maintenance of structural BMPs to ensure adequate long-term treatment of water before entering into any stream course or municipal system.

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?

The onsite regions of the Project Site, including offsite road improvements are not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor. As previously stated, the Project Site is an existing equestrian and events facility located at 38801 Los Corralitos Road within the SWAP General Plan portion of unincorporated western Riverside County. The existing facility encompasses approximately 241.60 acres, and consists of a multi-faceted events facility that operates as a traditional equestrian facility the majority of the time but also hosts a variety of other activities on the weekends. The Project Site is heavily impacted, with vegetation communities documented onsite including developed (equestrian and events center) and disturbed

habitat, as shown in Figure 3, *Vegetation Communities Map*, Figures 4 to 15, *Current Project Site Photographs*, and outlined in Table 1, *Project Site Vegetation Community Acreages*.

The offsite proposed EMWD sewer connection is located within and bisects Proposed Constrained Linkage 24, which contributes to local and regional wildlife movement. As stated by the MSHCP:

“Proposed Linkage 24 is comprised of the portion of Temecula Creek east of Redhawk Parkway and west of Pauba Road. This Linkage provides Habitat for wetland species and a connection to Core Areas in Wilson Valley. The Linkage is constrained by existing roadways and planned community Development. Planning Species for which Habitat is provided for within this Linkage include bobcat, mountain lion, Stephens' kangaroo rat, Aguanga kangaroo rat, western pond turtle, yellow warbler, southwestern willow flycatcher, arroyo chub, loggerhead shrike, tree swallow, white-tailed kite, Cooper's hawk and least Bell's vireo. In addition to maintenance of habitat quality, maintenance of existing floodplain processes along Temecula Creek is important for these species. While specific studies of movement along this Linkage have not been conducted, it likely provides for movement of common mammals such as bobcat.”
(MSHCP 2004)

All offsite impacts within the EMWD sewer connection will be temporary. In addition, the active channel of Temecula Creek (0.01-acre) will be avoided by implementing directional drilling. Temporary impact areas will be recontoured to preexisting conditions following construction of the sewer connection and all staging would occur within the proposed temporary impact area. Following implementation of applicable UWIG guidelines described below during construction, potential temporary impacts would be Less than Significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No regulated oak species will be impacted and the proposed project would not conflict with any County of Riverside protected tree ordinance or oak tree management guidelines. To ensure compliance with County of Riverside protected tree ordinance or oak tree management guidelines and following avoidance measures will be implemented and included as conditions of approval. No Impact.

- A certified arborist shall delineate a protected zone of existing coast live oaks adjacent to the proposed impact area and the results submitted to the County of Riverside EPD for review and approval.
- No construction activities, staging or placement of structures shall occur within the protected zone of any existing oak tree.
- Landscaping, trenching or irrigation systems shall not be installed within the existing protected zone of any oak tree, unless recommended by a certified arborist.

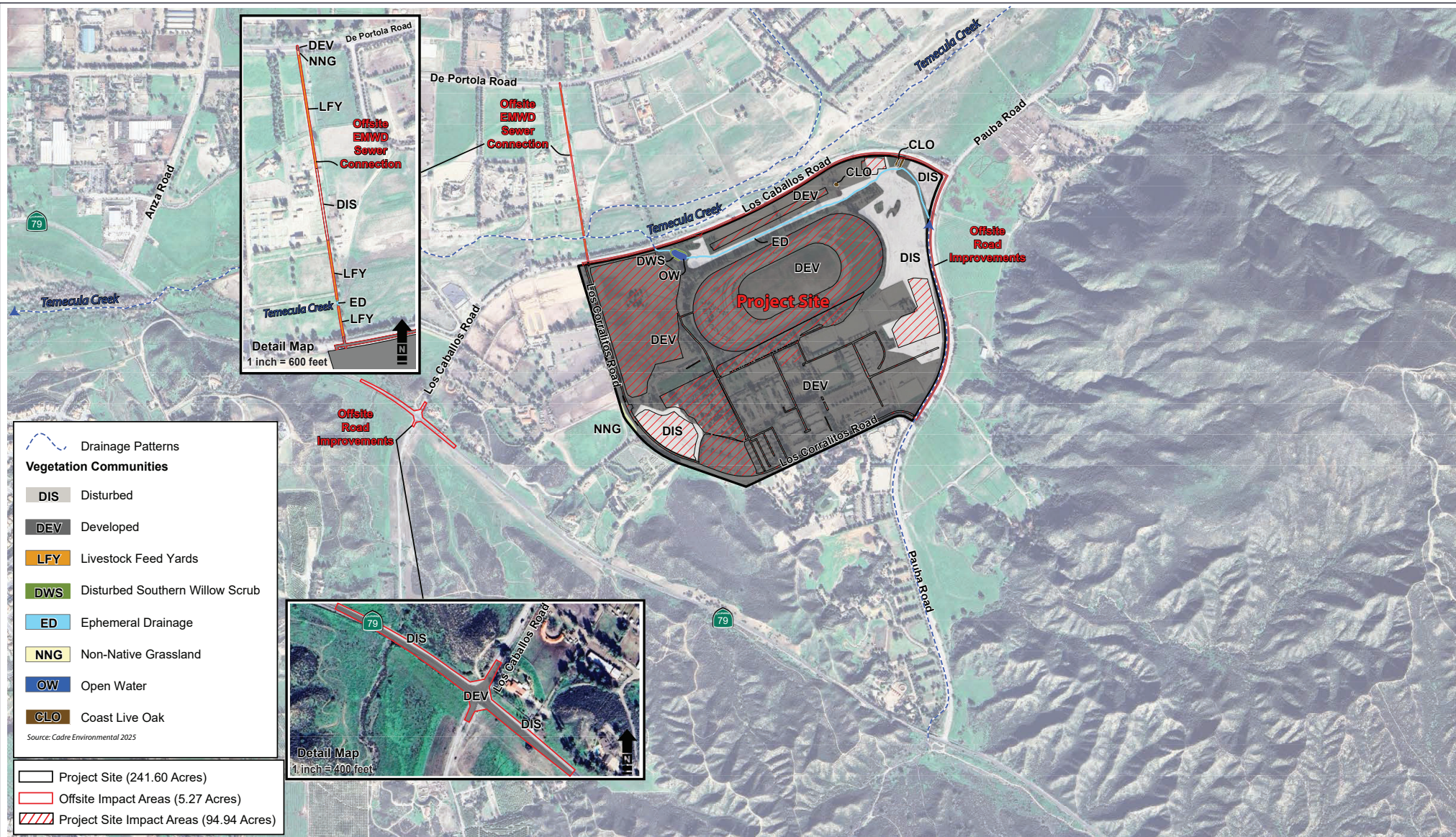


Figure 18 - Vegetation Communities Impact Map
 Biological Resources Technical Report
 Galway Downs Project Site

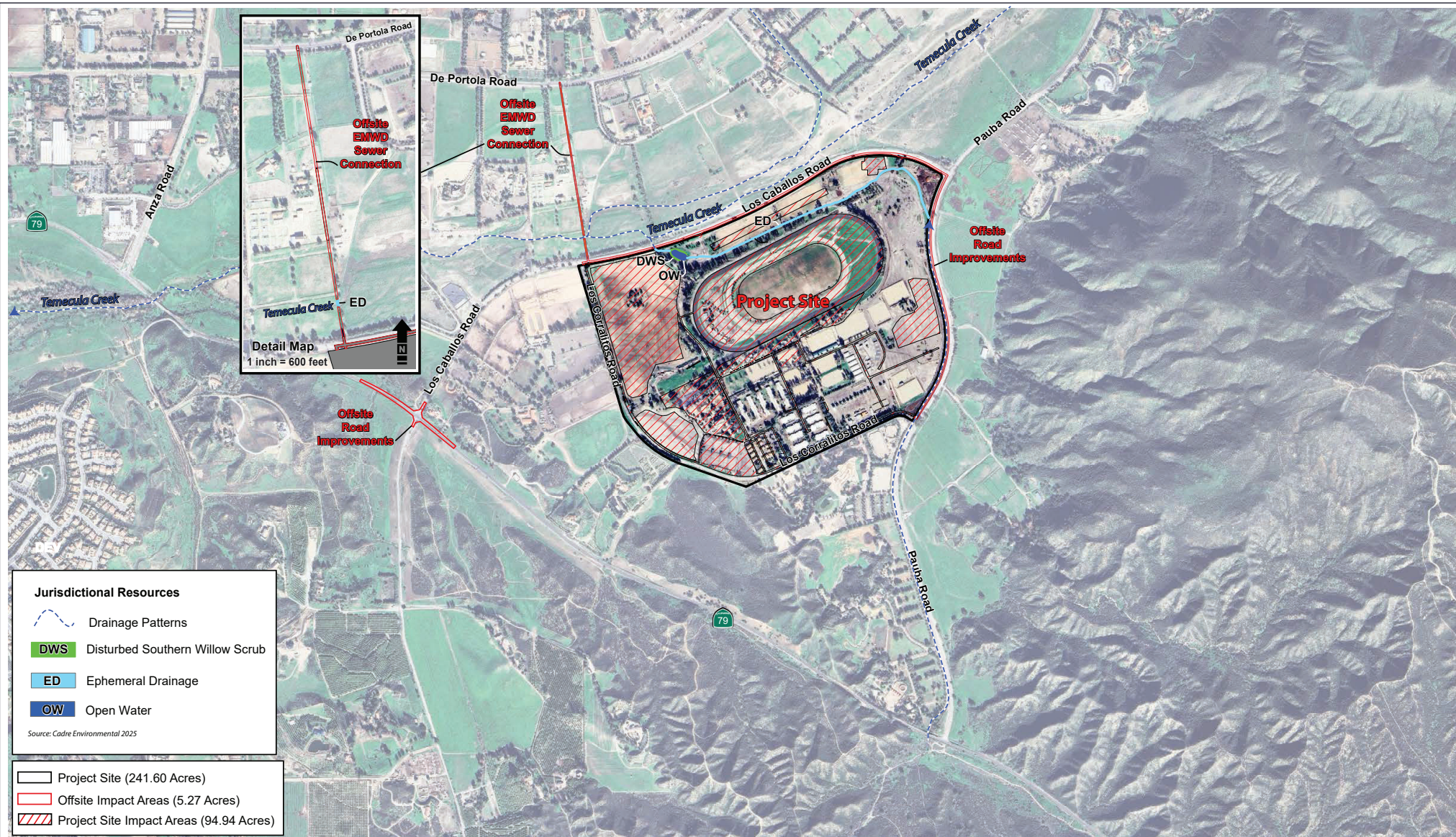


Figure 19 - Jurisdictional Resources Impact Map
 Biological Resources Technical Report
 Galway Downs Project Site

- f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Native Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The Project Site is located within the Western Riverside County MSHCP Southwest Plan Area, partially within Subunit 2 – Temecula Creek & Pechanga Creek. The Project Site is located partially within MSHCP Criteria Cells 7134 and 7185, as shown in Figure 2, *MSHCP Relationship Map* (RCA GIS Data Downloads 2025). The offsite proposed EMWD sewer connection is located within and bisects Proposed Constrained Linkage 24. The entire onsite region of the Project Site completed the MSHCP HANS 2039 and JPR (JPR 10-12-27-01) process and a consistency determination was issued on January 6th, 2011 with no onsite conservation required (RCA 2011). An amendment to the JPR will be processed for the additional 2.62-acres of offsite impacts which extend into Criteria Cells 7134 and 7185.

As documented in the previous section (REGIONAL AND REGULATORY SETTING, LOCAL/MSHCP CONSISTENCY ANALYSIS, implementation of the proposed project will be consistent with all provisions, guidelines and objectives of the MSHCP following implementation of Biological Conservation Measures (**BIO-CM1** through **BIO-CM5**).

INDIRECT IMPACTS

The MSHCP Urban/Wildlands Interface Guidelines (UWIG) presented in MSHCP Section 6.1.4 are intended to address indirect effects associated with locating commercial, mixed uses, and residential developments in proximity to an MSHCP Conservation Area. The Project Site and off-site improvement areas encompass portions of MSHCP Criteria Cells 7134 and 7185, indicating that conserved lands may be established both north and northeast of the Project Site within the off-site portions of Cells 7134 and 7185. Therefore, the Project is subject to MSHCP Section 6.1.4, which addresses potential indirect impacts associated with water quality/hydrology, toxics, lighting, noise, invasive species, and barriers. Each is discussed below.

Water Quality/Hydrology

The Project would be required to comply with all applicable water quality regulations, including obtaining and complying with those conditions established in Waste Discharge Requirements and the National Pollutant Discharge Elimination System (NPDES) permit. Both of these permits include the treatment of all surface runoff from paved and developed areas, the implementation of applicable BMPs during construction activities and the installation and proper maintenance of structural BMPs to ensure adequate long-term treatment of water before entering into any stream course. For the proposed Project, runoff generated on the portions of the Project site proposed for improvement with reconfigured driveways would sheet flow to one of four self-retaining areas that currently exist on site, which implement Low Impact Development (LID) principles. No significant impacts are anticipated, and the Project would be consistent with MSHCP Section 6.1.4 provisions related to water quality and hydrology.

Toxics

Runoff generated on the portions of the Project site proposed for improvement with reconfigured driveways would sheet flow to one of four self-retaining areas that currently exist on site, which implement Low Impact Development (LID) principles in order to prevent the release of toxins, chemicals, petroleum products, exotic plant material, or other elements that could degrade or harm downstream biological or aquatic resources. Toxic sources associated with the Project would be limited to those commonly associated with the facility, such as nutrients, metals, toxicity, bacteria/pathogens, pesticide/herbicides, and total dissolved solids. The Project's existing self-retaining areas already consist of self-treatment areas as required to meet Waste Discharge Requirements and as required by the NPDES permit system, which would reduce or prevent the level of toxins introduced into downstream areas associated with the proposed Project.

Lighting

Construction activities associated with the Project would be minor and would occur during daylight hours in conformance with the provisions of Section 2 of Riverside County Ordinance No. 847 (Regulating Noise); thus, no lighting is anticipated in association with Project construction activities. Under long-term operating conditions, future improvements on site would be subject to compliance with Riverside County Ordinance No. 915 (Regulating Outdoor Lighting). In particular, Section 5 of Riverside County Ordinance No. 915 requires that "[a]ll outdoor luminaires in shall [sic] be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way." In conformance with the provisions of Riverside County Ordinance No. 915 (Regulating Outdoor Lighting), proposed CUP 2303R1 includes a lighting plan and photometric plans to identify new proposed sources of lighting and to identify illumination levels associated with Project lighting. The photometric plan, included as Sheet E0.2 of CUP 2303R1, shows that all existing and proposed lighting elements on site, inclusive of both temporary and permanent lighting, would not directly generate any lighting along public roadway rights-of-way or any adjacent off-site parcels. As such, under long-term conditions the Project would not conflict with the lighting provisions of MSHCP Section 6.1.4.

Noise

Noise has the potential to adversely affect sensitive wildlife species within the MSHCP Conservation Area. Proposed noise generating land uses affecting the MSHCP Conservation Area are required to incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards (i.e., 65 dBA CNEL).

Project-related construction activities would expose nearby sensitive receptors to noise levels ranging from 55.4 to 67.6 dBA Leq, which would not exceed the identified threshold of significance of 80 dBA Leq at the nearest noise-sensitive receiver locations, including locations within nearby MSHCP Criteria Cells. In addition, the Project would contribute

to construction noise increases ranging from 1.2 to 13.2 dBA Leq during the daytime hours at the nearest receiver locations, which is below the 20 dBA Leq noise level increase significance threshold for Project construction activities. Therefore, noise impacts due to daytime Project construction noise would be less than significant at the nearest lands subject to conservation under the MSHCP. Under long-term operational conditions, the daytime hourly noise levels at the off-site receiver locations are expected to range from 42.4 to 49.3 dBA Leq while the nighttime hourly noise levels at the existing off-site receiver locations are expected to range from 29.9 to 39.8 dBA Leq, which would not exceed the daytime threshold of significance of 55.0 dBA Leq or the nighttime threshold of significance of 45.0 dBA Leq at the nearest sensitive receptors, including nearby lands that may be conserved pursuant to the MSHCP; thus, operational noise impacts would be less than significant. In addition, Project-related noise increases at the nearest sensitive receptors would range from 0.1 to 2.5 dBA Leq during the daytime and from 0.1 to 0.3 dBA Leq during the nighttime, which would not exceed the identified threshold of significance for noise increases of 5.0 dBA Leq. Furthermore, the Project would not result in an increase in the amount of traffic generated by the facility as compared to existing conditions, and therefore the Project would have no potential to result in significant impacts due to traffic-related noise. Accordingly, the Project would not conflict with the noise provisions of the MSHCP Section 6.1.4 during either construction or long-term operations.

Invasive Species

MSHCP Section 6.1.4 requires that landscape plans for the residential, commercial, and mixed development avoid the use of invasive species for the portions of the development areas adjacent to open space areas west of the Project Site. Invasive plants that should be avoided are included in Table 6-2 of the MSHCP, Plants That Should Be Avoided Adjacent to the MSHCP Conservation Area. The proposed Project only would require new landscaping within the existing parking lot within the Special Occasions Zone located west of the existing office. Landscaping within this parking lot is required to provide adequate shading pursuant to Section 18.12 of Riverside County Ordinance No. 348. Specifically, as part of the Project a total of four new coast live oak (*Quercus agrifolia*) trees are proposed within the central portion of the parking area. Coast live oak is not included on the MSHCP prohibited plant list. Accordingly, the proposed Project would not conflict with the invasive species provisions of MSHCP Section 6.1.4.

Barriers

Barriers are intended to reduce or minimize unauthorized public access and associated impacts to protected resources. The only new walls or fencing proposed as part of the Project consists of a proposed perimeter fence around the award ceremony area proposed along the west side of the inner horse racetrack. This proposed fence would occur interior to the Project, and would have no effect on wildlife or wildlife movement as this portion of the Project site already is constrained by existing site improvements, including the outer horse racing track. Accordingly, the Project would not conflict with the MSHCP Section 6.1.4 provisions related to barriers, and no impact would occur.

Following implementation of all UWIG guidelines listed above, the project is compliant with MSHCP Section 6.1.4.

CUMULATIVE IMPACTS

The permanent impacts of the project would not result in cumulative impacts (State CEQA Guidelines Section 15355) to environmental resources within the region of the Project Site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects. The Project Site is located completely within the County of Riverside, MSHCP permittees. As stated in the County of Riverside Transportation and Land Management Agency:

"Implementation of the MSHCP and Covered Projects will not result in a cumulative adverse effect, either directly or through habitat modifications, on any of the Covered Species, including the 31 species that are currently listed as threatened or endangered and the one species that is currently proposed for listing. Implementation of the MSHCP will benefit the Covered Species by preserving their habitat in order to address their life cycle needs. Thus, based on the features of the Plan itself, impacts to Covered Species are mitigated below a level of significance." (County of Riverside Transportation and Land Management Agency 2003)

Although the project conservatively would result in the permanent loss of 94.94-acres onsite and 4.58-acres offsite (total 99.52-acres) of primarily disturbed, developed and non-native grassland habitats, as referenced above, the MSHCP was developed to address the comprehensive regional planning effort and anticipated growth in the County of Riverside.

As stated in the County of Riverside Transportation and Land Management Agency:

"The Plan will not cause adverse cumulative effects related to the reduction of sensitive vegetation communities within the Plan Area; rather, the Plan is designed to preserve sufficient acreage of the sensitive vegetation communities present in western Riverside County. Similarly, the Plan will not cause adverse cumulative effects related to interference with the movement of any native resident or migratory fish or wildlife species or obstruction of genetic flow for the identified Planning Species. Part of the purpose and goals of the MSHCP is to use regional planning efforts to assemble a reserve that will preserve contiguous blocks of habitat in large enough areas to ensure that the reserve will allow movement of species and flow of genetic information.

The MSHCP will not cause adverse cumulative impacts by conflicting with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan or other approved local, regional, or State habitat conservation plan either within or outside of the Plan area. Rather, the MSHCP has been written specifically to complement existing HCPs, such as the Stephens' kangaroo rat long-term HCP." (County of Riverside Transportation and Land Management Agency 2003)

The proposed project has been designed and conservation measures will be implemented to remain in compliance with all MSHCP conservation goals and guidelines and therefore will not result in an adverse cumulative impact. No Impact.

CONSERVATION MEASURES

The following biological conservation and mitigation measures address those adverse impacts determined to be potentially significant or are relevant to the protection of biological resources to the extent practicable as part of ensuring compliance and consistency with all MSHCP conservation goals and CEQA guidelines.

BIO-CM1 MSHCP Local Development Mitigation Fee

The project applicant shall pay MSHCP Local Development Mitigation fees as established by the RCA and implemented by the County of Riverside. Five categories of the fee are defined, include and are effect till June 30th, 2026: Residential, density less than 8.0 dwelling units per acre \$4,486 per dwelling unit; Residential, density between 8.1 and 14.0 dwelling units per acre \$1.870 per dwelling unit; Residential, density greater than 14.1 dwelling units per acre \$827 per dwelling unit; Commercial \$20,191 per acre; and Industrial \$20,191 per acre. Annual updated MSHCP fees are available at [Permits and Fees | Western Riverside County Regional Conservation Authority](#).

BIO-CM2 SKR Fee Area

A total of 0.69-acre of the offsite temporary impact area including the proposed EMWD sewer line extension occurs within the SKR Fee Area outlined in the Riverside County SKR HCP. The project applicant shall pay the fees pursuant to County Ordinance 663.10 for the SKR HCP Fee Assessment Area as established and implemented by the County of Riverside

BIO-CM3 Crotch's Bumble Bee Preconstruction Survey

Although focused surveys did not result in the detection of Crotch's bumble bee, based on the presence of suitable habitat, the following preconstruction survey has been included as a conservation measure. This conservation and avoidance measure shall only be required if Crotch's bumble bee remains as a candidate state endangered species or is listed as a state endangered species at the time of project construction. If Crotch's bumble bee is delisted, this measure shall not be required. Due to the presence of suitable habitat for Crotch's bumble within the Project Site, the following measures shall be implemented to reduce potential impacts to this species:

Pre-construction Survey: To the extent feasible, construction activities (i.e., demolition, earthwork, clearing, and grubbing) shall occur outside of the Crotch's bee flight season (February 1st through October 31st). If construction activities must occur during the flight season, a qualified biologist shall conduct a pre-construction survey for Crotch's bumble bee queens, gynes, and colonies. The survey shall be conducted no more than 14 days prior to construction during optimal weather conditions (e.g., warm, sunny days between 65- and 90-degrees Fahrenheit). If the pre-construction survey is negative, no further assessment shall be required, and construction activities shall be allowed to proceed

without any further requirements. If Crotch's bumble bee is detected during the pre-construction survey, the measures below shall be implemented.

CESA Compliance: Prior to issuance of a grading permit, it shall be demonstrated that CESA-required consultation with CDFW regarding the project's effects to Crotch's bumble bee has occurred, and, if take of Crotch's bumble bee is expected, that CDFW has authorized such take through an incidental take permit, as applicable.

BIO-CM4 MSHCP Burrowing Owl 30-Day Preconstruction Surveys

A 30-day pre-construction survey for burrowing owls is required prior to initial ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, grading, tree removal, site watering, equipment staging) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the Project Site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the County of Riverside EPD and the Wildlife Agencies regarding the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

Following completion of the burrowing owl 30-day preconstruction survey in compliance with MSHCP conservation goals for the target species, the project will be consistent with MSHCP Section 6.3.2.

BIO-CM5 Nesting Bird Preconstruction Surveys

Regulatory requirement for potential direct/indirect impacts to nesting common and sensitive bird species will require compliance with the MBTA and CDFG Code Section 3503, 3503.5, and 3513. Construction outside the nesting season (between September 1st and January 31st) do not require pre-removal nesting bird surveys. If construction is proposed between February 1st and August 31st, a qualified biologist will conduct a preconstruction nesting bird and raptor survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds within or directly adjacent to the Project Site.

The survey(s) will focus on identifying any bird nests that would be directly or indirectly affected by construction activities. If active nests are documented, species-specific measures will be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest will be postponed until the young birds have fledged. The perimeter of the nest setback zone will be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, will be submitted to the County of Riverside EPD for review and approval prior to initiation of grading in the nest-setback zone.

The qualified biologist will serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final monitoring report of the findings, prepared by a qualified biologist, will be submitted to the County of Riverside EPD documenting compliance with the MBTA and CDFG Code. Any nest permanently vacated for the season would not warrant protection pursuant to the MBTA and CDFG Code.

Implementation of Mitigation and Conservation Measures **BIO-CM1** through **BIO-CM5**, would reduce all potential significant unavoidable impacts on biological resources below a level of significance and ensure compliance with MSHCP conservation requirements.

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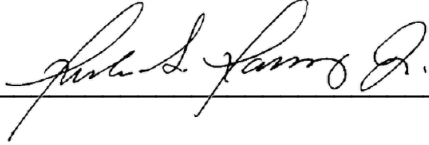
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Certification *"I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge."*

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