

Western Riverside County - MSHCP Consistency Analysis

Galway Downs Project Site

Unincorporated Riverside County, California

FINAL REPORT



HANS 2039, Amendment JPR 10-12-27-01

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1. EXECUTIVE SUMMARY

The 241.60-acre Galway Downs onsite (Onsite) and 4.10-acre offsite (Offsite), project site (Project Site, 245.70-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 (2.16-acres of permanent and 0.46-acre of temporary) which extend into Criteria Cells 7134 and 7185 (Amendment Area). The following report was prepared for use during the Amended JPR and analysis of consistency with the MSHCP reserve design and guidelines.

Criteria Cell 7134 – Permanent impacts to 1.07-acre within Criteria Area 7134 would not conflict with reserve assembly due to the fact that all impacts would occur within the existing right-of-way (MSHCP Covered Roads Layer) and existing developed areas.

Criteria Cell 7185 – Permanent impacts to 1.09-acre within Criteria Area 7185 would not conflict with reserve assembly due to the fact that all impacts would occur within the existing right-of-way (MSHCP Covered Roads Layer) and existing developed areas. A total of 0.46-acre of temporary impacts within Criteria Area 7185 and Proposed Constrained Linkage 24 would occur as a result of constructing the EMWD sewer connection. The construction of the EMWD sewer connection will result in temporary impacts to 0.17-acre of developed/disturbed and 0.29-acre of active livestock feed yards (non-native grassland) within the Amendment Area. 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 will occur within the proposed temporary impact area.

The Amendment Area is not located within an MSHCP Survey area for amphibians, or mammals (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2.

The Amendment Area 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 Amendment Area. 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 Amendment Area 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.

The Amendment Area is not located within a predetermined Survey Area for MSHCP narrow endemic plant species (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.1.3

The Amendment Area is not located within a predetermined Survey Area for MSHCP criteria area plant species. The project is consistent with MSHCP Section 6.3.2.

No suitable habitat for the least Bell's vireo, southwestern willow flycatcher or western yellow-billed cuckoo was detected within or adjacent to the 2.62-acre Amendment Area; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.1.2.

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. No sign or indication of inundation was documented within the Amendment Area during a review of historic aerials. In summary, none of the conditions (i.e., no inundated depressions, hydric soils, historic inundation, etc.) were observed or documented within the Amendment Area impact area. The project is consistent with MSHCP Section 6.1.2.

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. Temporary impact areas will be recontoured to preexisting conditions following construction of the sewer connection and all staging will occur within the proposed temporary impact area.

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 action is located within Proposed Constrained Linkage 24 and all activities will be temporary and standard best management efforts implemented. The project is compliant with MSHCP Section 6.1.4.

2. INTRODUCTION

This document presents the results of a Western Riverside County MSHCP Consistency Analysis (Analysis) and habitat assessment conducted on March 17th, 2025 and focused surveys conducted during the spring of 2025 by Cadre Environmental. Specifically, the following report presents existing conditions, impact assessment and proposed best management practices to ensure compliance and consistency with MSHCP goals and objectives of the Reserve System.

2.1. Project Site & Amendment Area Description

The 241.60-acre onsite (Onsite) and 4.10-acre offsite (Offsite), (Project Site, 245.70-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.

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.

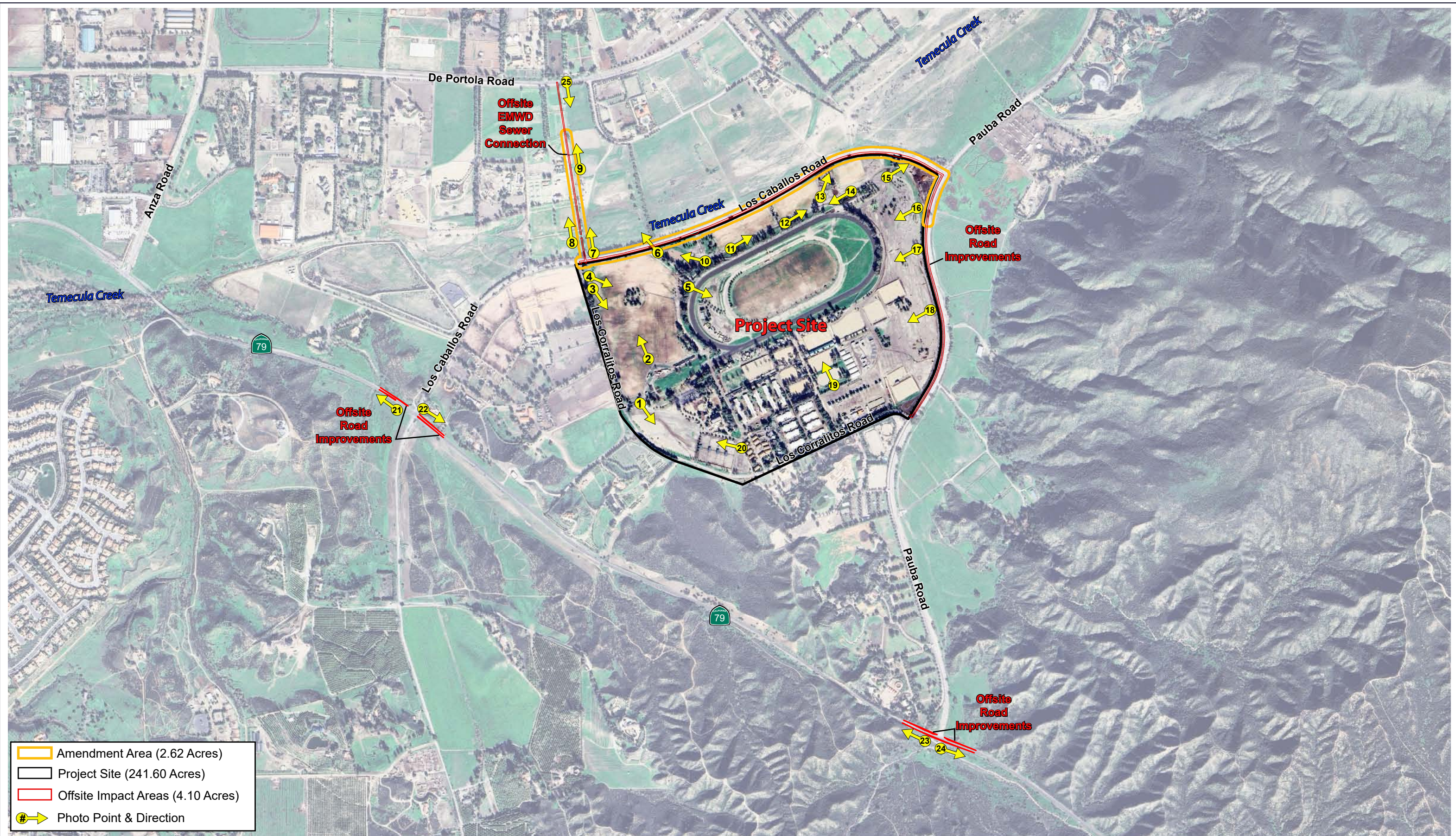
Exception No. 9 to Riverside County Noise Ordinance No. 847 is sought by the Project Applicant pursuant to Section 7.a.3 of Ordinance No. 847. Exception No. 9 would allow for sound amplifying equipment to operate on certain portions of the property between 8 a.m. and 10 p.m. without need to seek a separate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

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 16, *Current Project Site Photographs*, and outlined in Table 1, *Project Site Vegetation Community Acreages*.

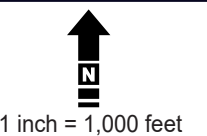
All staging of equipment and construction materials will be located within the proposed temporary impact footprint.

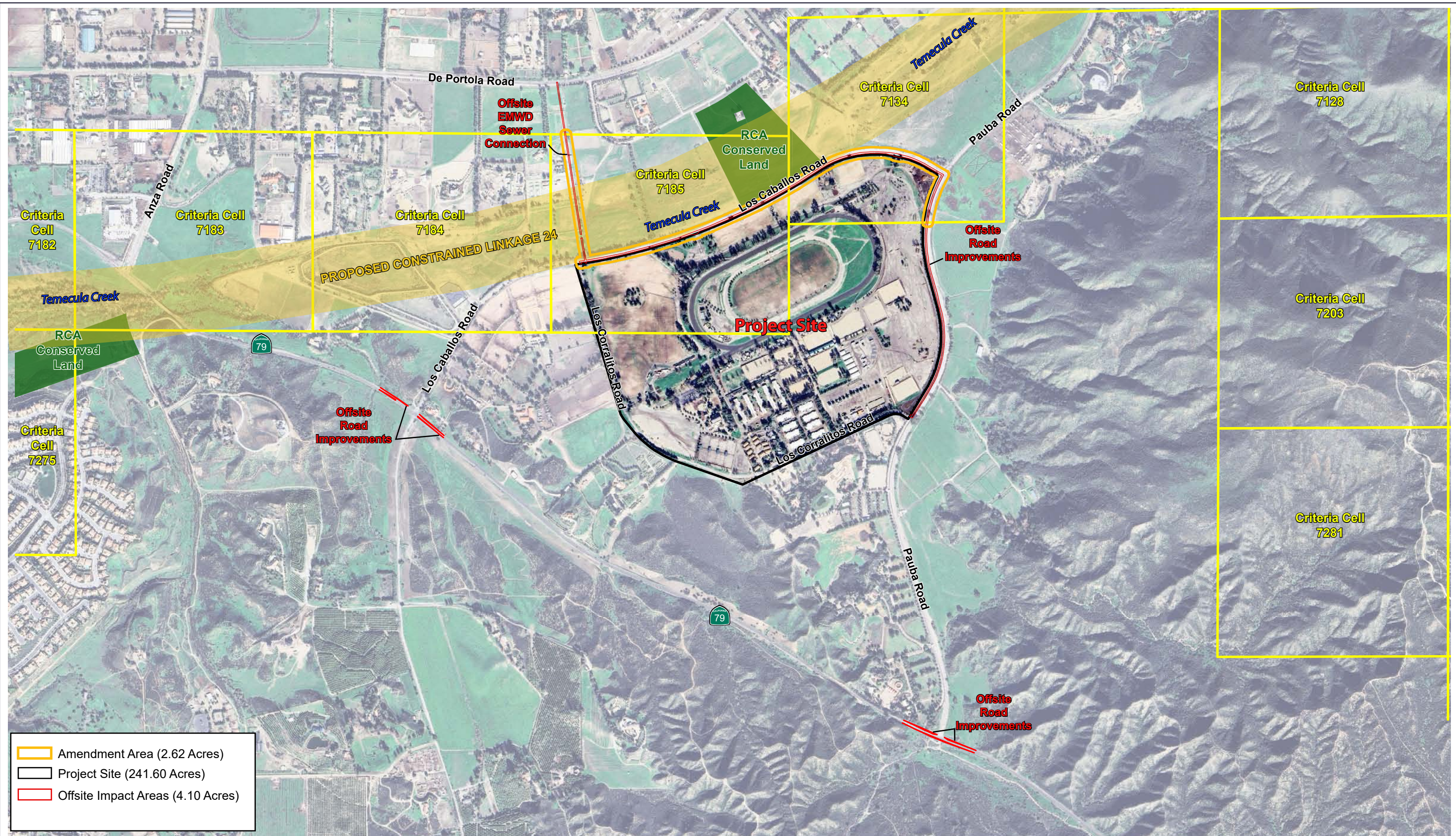


Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 1 - Project Site & Amendment Area Map

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site





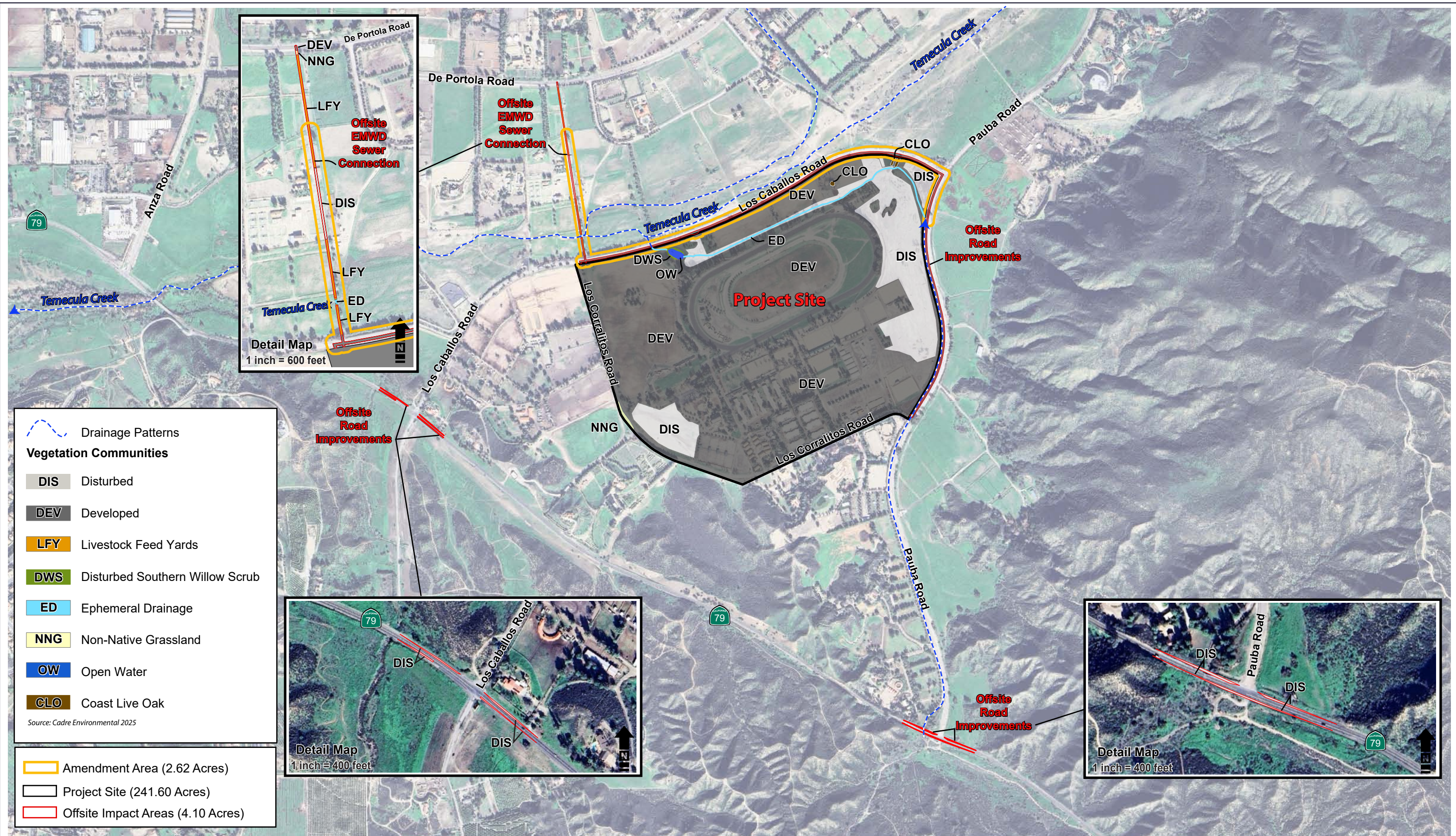
Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Figure 2 - MSHCP Relationship Map

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site



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 3 - Vegetation Communities Map

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site

CADRE
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

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 5 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 6 - Current Project Site Photographs

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site





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

Figure 7 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 8 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 9 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 10 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 11 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





PHOTOGRAPH 17 - Westward view of equestrian facilities.



PHOTOGRAPH 18 - Northwest view of equestrian facilities.

Refer to Figure 1 for Photographic Key - Project Site Map

Figure 12 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 13 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





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

Figure 14 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





PHOTOGRAPH 23 - Northwest view of offsite impact area from the intersection of SR79 and Pauba Road.



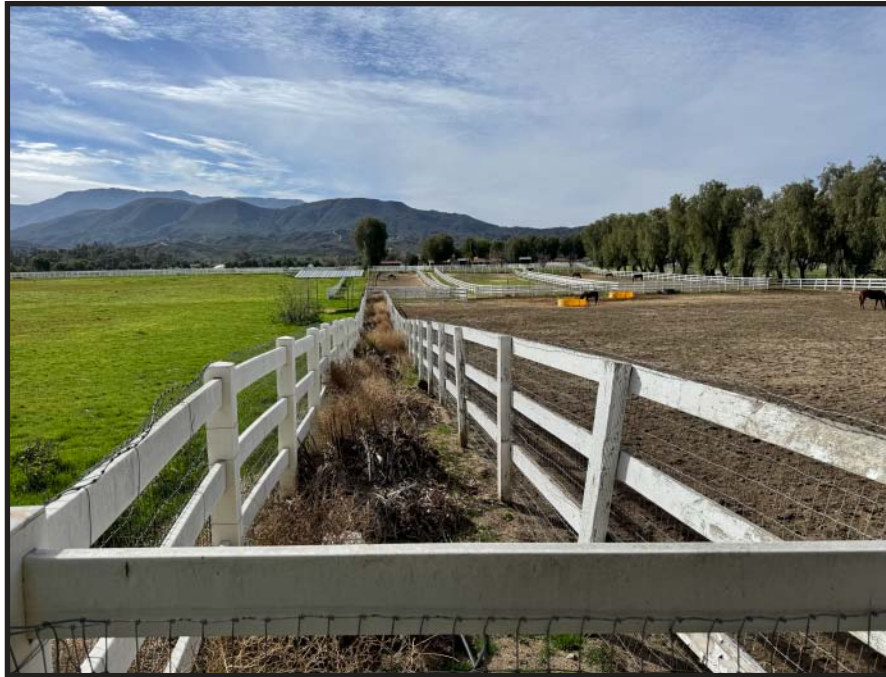
PHOTOGRAPH 24 - Southeast view of offsite impact area from the intersection of SR79 and Pauba Road.

Refer to Figure 1 for Photographic Key - Project Site Map

Figure 15 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*





PHOTOGRAPH 25 - Southward view of EMWD proposed sewer alignment extending south of De Portola Road.

Refer to Figure 1 for Photographic Key - Project Site Map

Figure 16 - Current Project Site Photographs

*MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site*



Table 1.
Project Site Vegetation Community Acreages

Vegetation Community	Onsite (ac)	Offsite (ac)	Project Site Total (ac)
Developed	205.48	3.12	208.60
Disturbed	34.89	0.48	35.85
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	0.30
Coast Live Oak	0.18	--	0.18
Disturbed Southern Willow Scrub	0.13	--	0.13
	241.60	4.10	245.70

Source: Cadre Environmental 2025.

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 (2.16-acres of permanent and 0.46-acre of temporary) which extend into Criteria Cells 7134 and 7185 (Amendment Area). The following report was prepared for use during the Amended JPR and analysis of consistency with the MSHCP reserve design and guidelines.

A total of 1.07-acre of the Amendment Area is located within Criteria Cell 7134 and 1.55-acre within Criteria Cell 7185 (2.62-acres total), as noted in Table 2, Amendment Area *Vegetation Community Acreage*. A total of 2.62-acres of vegetation communities and disturbed areas will be directly impacted as a result of project implementation. Specifically, a total of 1.07-acre of permanent impacts within Criteria Cell 7134 and 1.09-acre within Criteria Cell 7185 (2.16-acre total), all developed areas would occur as a result of project implementation, as outlined in Table 2, *Amendment Area Vegetation Community and Criteria Cell Impacts*. A total of 0.46-acre of non-native grassland/livestock feed yards and disturbed habitat would be temporarily impacted as a result of the construction of the EMWD sewer connection, as outlined in Table 3, *Amendment Area Vegetation Community and Criteria Cell Impacts*.

Table 2.
Amendment Area Vegetation Community Acreage

Vegetation Type	Offsite Criteria Cell 7134	Offsite Criteria Cell 7185	Total Amendment Area Acres
Developed	1.07	1.09	2.16
Non-Native Grassland/Livestock Feed Yards	--	0.29	0.29
Disturbed	--	0.17	0.17
TOTALS	1.07	1.55	2.62

Source: Cadre Environmental 2025

Table 3.
Amendment Area Vegetation Community and Criteria Cell Impacts

Vegetation Type	Offsite Criteria Cell 7134	Offsite Criteria Cell 7185	Total Amendment Area Acres	Offsite PERM IMPACT Criteria Cell 7134	Offsite PERM IMPACT Criteria Cell 7185	Offsite TEMP IMPACT Criteria Cell 7185
Developed	1.07	1.09	2.16	1.07	1.09	--
Non-Native Grassland	--	0.29	0.29	--	--	0.29
Disturbed	--	0.17	0.17	--	--	0.17
TOTALS	1.07	1.55	2.62	1.07	1.09	0.46

Source: Cadre Environmental 2025

2.2. Covered Roads

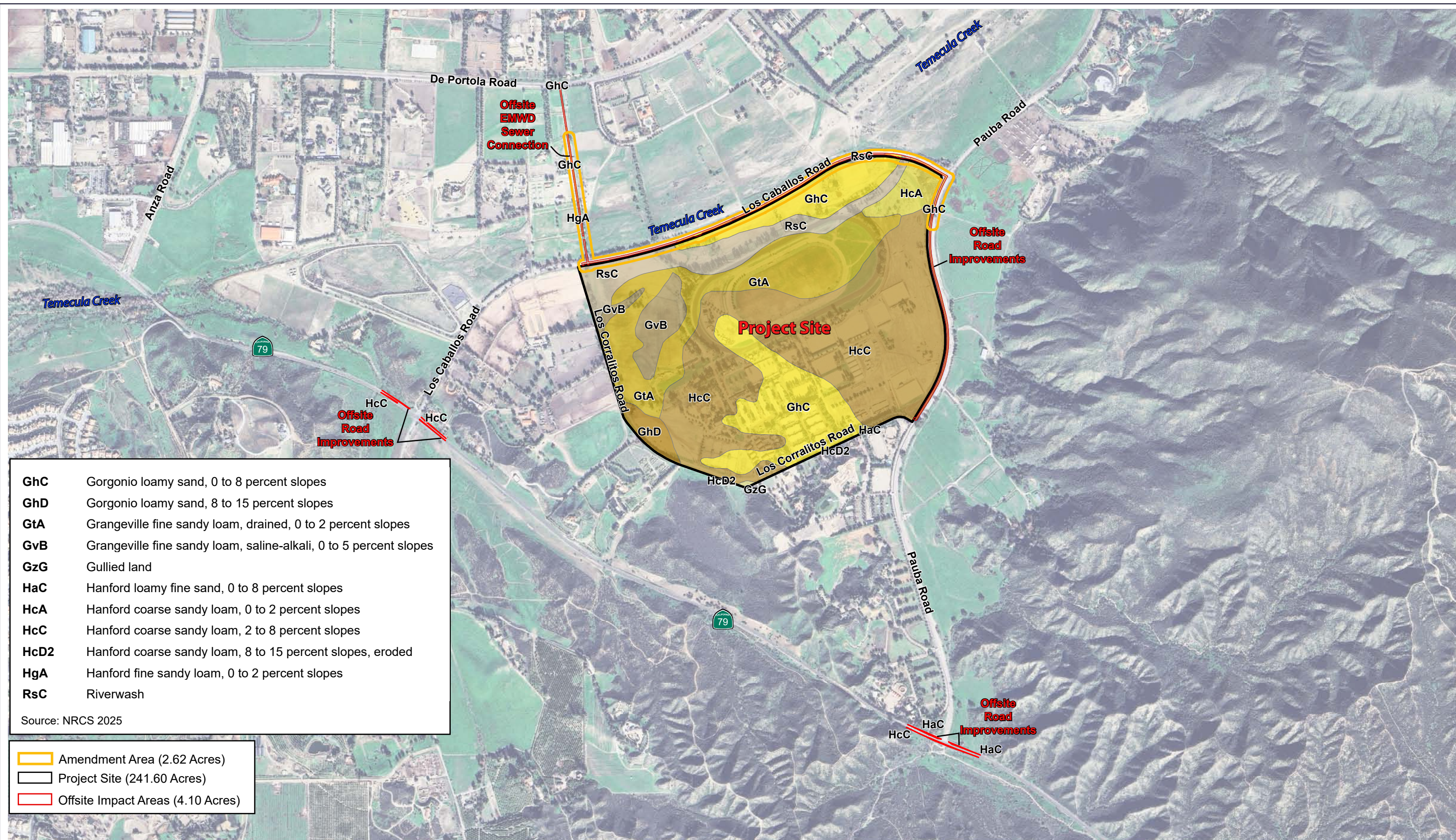
The proposed project proposes 2.16-acres of road improvements to the developed regions of Los Caballos Road and Pauba Road within the Amendment Area. All impacts will occur within the Covered Roads layer including 100-foot width for Los Caballos Road and 110-foot wide Pauba Road. No road improvements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

2.3. Covered Public Access Activities

The proposed project does not include covered public access activities including but not limited to construction or improvements to trails or other public access facilities.

2.4. General Setting

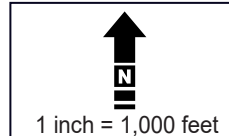
The 2.62-acre Amendment Area is characterized as the developed reaches of Los Caballos Road and Pauba Road and non-native grassland/livestock feed yards, as outlined in Table 1, *Vegetation Community Acreages*, and as shown in Figure 3, *Vegetation Communities Map* and Figures 7, 8 and 16, *Current Project Site Photographs*. The Soil Survey of Western Riverside Area has the following soils mapped within the boundary of the property, as shown in Figure 17, *Soils Association Map*:



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

Figure 17 - Soils Association Map

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site



- GhC - Gorgonio loamy 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
- HgA - Hanford fine sandy loam, 0 to 2 percent slopes
- RsC - Riverwash

The soils documented onsite are characterized as well drained (drainage class).

3. RESERVE ASSEMBLY ANALYSIS

The proposed Amendment Area 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

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.

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 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 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 will 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.

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 7165, 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 a 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 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 the 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 lighting 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.

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, as outlined in Table 4, *Potential Planning Species Assessment*.

Table 4.
Potential Planning Species Assessment

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
MSHCP Planning Species Southwest Plan Area Subunit 2, Temecula Creek & Pechanga Creek		
REPTILES		
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.
BIRDS		
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.
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 (<i>Scientific Name</i>) 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 Amendment Area.
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 Amendment Area.
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 Amendment Area.
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 Amendment Area.
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 Amendment Area.
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	<u>No Potential</u> . No suitable riparian scrub, forest or woodland habitat was documented within or adjacent to the Amendment Area.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
	valley foothill and montane riparian habitats below 2,700 meters (9,000 feet) for breeding within its range (MSHCP 2004).	
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 Amendment Area.
MAMMALS		
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.
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.
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 SSC – State Species of Special Concern CWL – California Watch List SPF – State Fully Protected		

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 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 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 will occur within the proposed temporary impact 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. The proposed project would not conflict with the conservation goals for these species as discussed in Section 5, PROTECTION OF SPECIES ASSOCIATED WITH RIPARIAN/RIVERINE AREAS AND VERNAL POOLS (SECTION 6.1.2), Section 6, PROTECTION OF NARROW ENDEMIC PLANT SPECIES (SECTION 6.1.3) and Section 7, ADDITIONAL SURVEY NEEDS AND PROCEDURES (SECTION 6.3.2) in the following report.

3.1. Public Quasi-Public Lands in Reserve Assembly Analysis

3.1.1. Public Quasi-Public Lands in Reserve Assembly Analysis

The Amendment Area is not located within Public Quasi-Public (PQP) lands as shown in Figure 2, *Project Site*, and Figure 3, *MSHCP Relationship Map*.

3.1.2. Project Impacts to Public Quasi-Public Lands

The Amendment Area is not located within Public Quasi-Public (PQP) lands as shown in Figure 2, *Project Site*, and Figure 3, *MSHCP Relationship Map*.

4. VEGETATION MAPPING

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 16, *Current Project Site Photographs*, and outlined in Table 1, *Project Site Vegetation Community Acreages*.

A total of 1.07-acre of the Amendment Area is located within Criteria Cell 7134 and 1.55-acre within Criteria Cell 7185 (2.62-acres total), as noted in Table 2, Amendment Area *Vegetation Community Acreage*. A total of 2.62-acres of vegetation communities and disturbed areas will be directly impacted as a result of project implementation.

Specifically, a total of 1.07-acre of permanent impacts within Criteria Cell 7134 and 1.09-acre within Criteria Cell 7185 (2.16-acre total), all developed areas would occur as a result of project implementation, as outlined in Table 2, *Amendment Area Vegetation Community and Criteria Cell Impacts*. A total of 0.46-acre of non-native grassland/livestock feed yards and disturbed habitat would be temporarily impacted as a result of the construction of the EMWD sewer connection, as outlined in Table 3, *Amendment Area Vegetation Community and Criteria Cell Impacts*.

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*), prostate 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 EMWD sewer connection impact area 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 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 annus*), mulefat (*Baccharis salicifolia*), tocalote and non-native grasses.

5. PROTECTION OF SPECIES ASSOCIATED WITH RIPARIAN/RIVERINE AREAS AND VERNAL POOLS (SECTION 6.1.2)

5.1. Riparian/Riverine

5.1.1. Methods

An MSHCP Section 6.1.2 assessment was conducted by Cadre Environmental in March 2025. The delineation determined the boundaries or absence of potential Riparian/Riverine Areas and Vernal Pools defined in Section 6.1.2 of the Western Riverside County MSHCP.

5.1.2. Existing Conditions and Results

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:

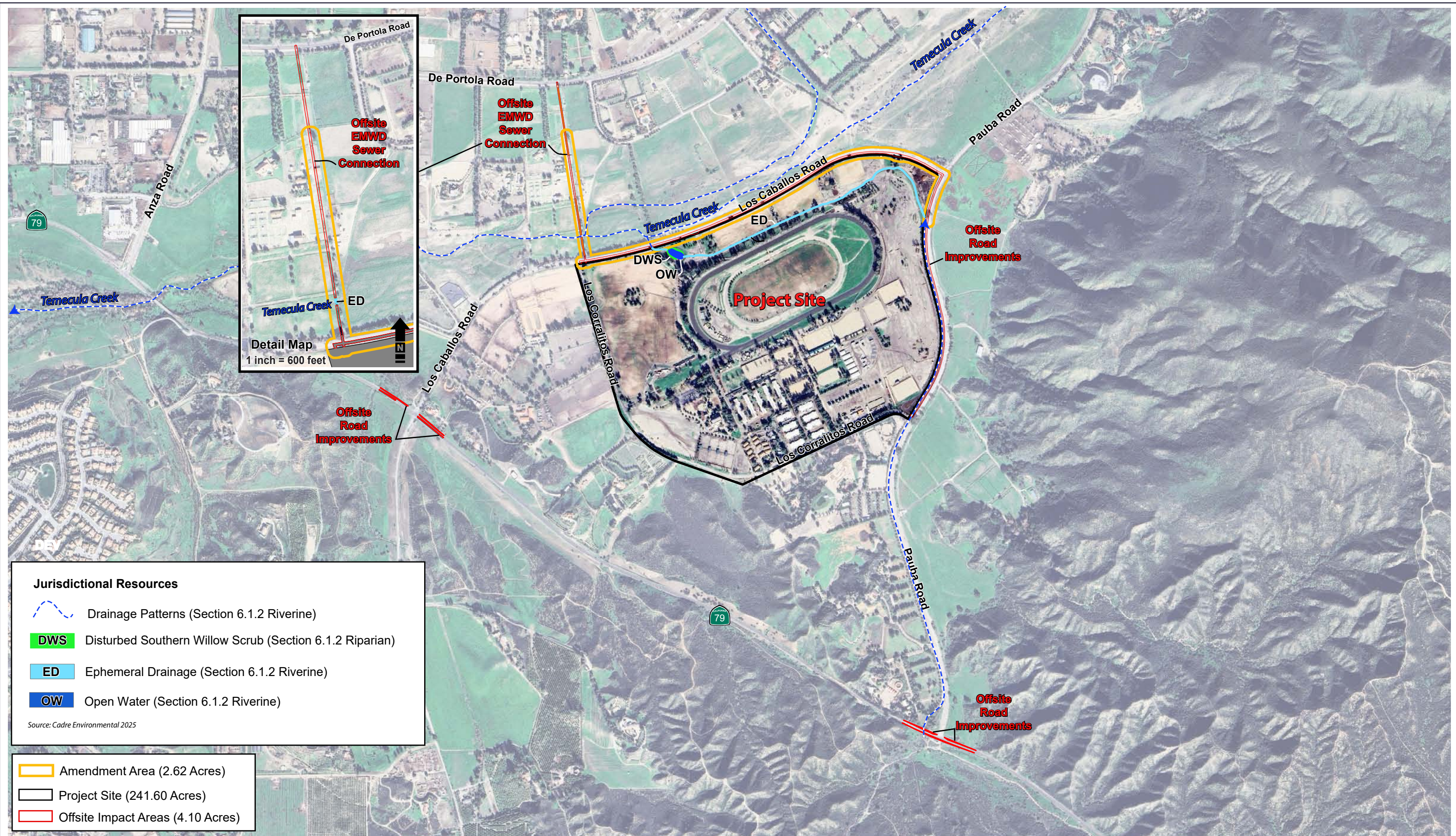
“...seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season.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

The offsite EMWD sewer connection Amendment Area will traverse but avoid direct impacts to a short reach of Temecula Creek (ephemeral drainage) which represents an MSHCP Section 6.1.2 riverine resource. Specifically, the Amendment Area was assessed for the presence or absence of any drainages, swales or sign of flow. No regulated features were documented within the Amendment Area impact area. Direct impacts to the active channel of Temecula Creek (0.01-acre) will be avoided by implementing Horizontal Directional Drilling (HDD). No MSHCP Section 6.1.2 riverine habitats are located within the Amendment Area impact area, as shown in Figure 18, *MSHCP Section 6.1.2 Jurisdictional Resources Map*. Following implementation of project specific avoidance measures presented in Section 5.1.4, no direct or indirect impacts are anticipated.

No MSHCP Section 6.1.2 riparian habitats are located within the Amendment Area impact area, as shown in Figure 19, *Vegetation Communities Impact Map*. Specifically, all existing vegetation communities were mapped onto a recent aerial photograph. No riparian scrub, woodland or forest habitat is present within the Amendment Area impact area including but not limited to mulefat scrub, southern willow scrub, or southern cottonwood willow riparian. No direct impact.

5.1.3. Impacts

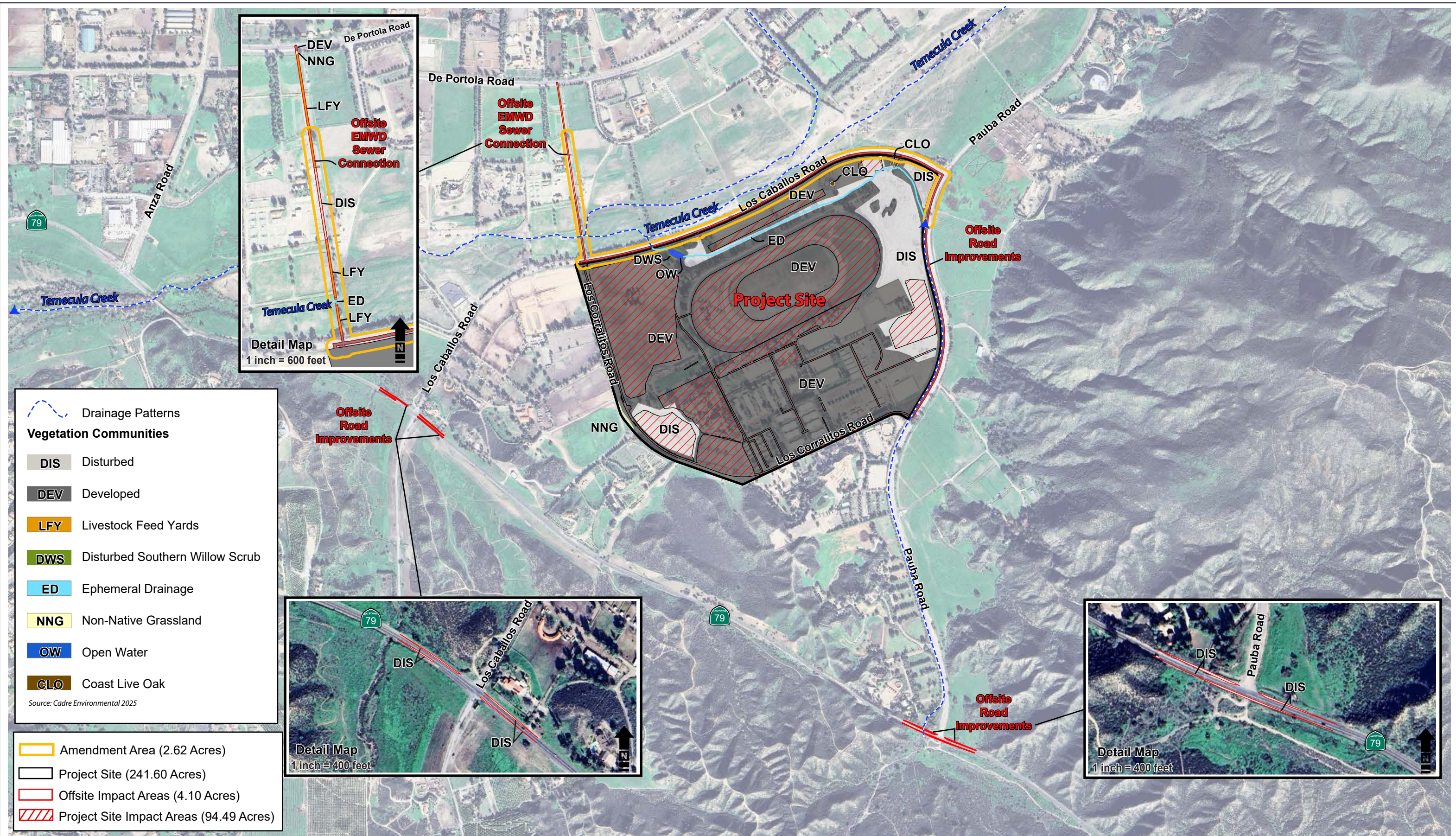
No MSHCP Section 6.1.2 riverine or riparian habitats are located within the Amendment Area impact area, as shown in Figure 20, *Vegetation Communities Impact Map*. Following implementation of project specific avoidance measures presented in Section 5.1.4, no direct or indirect impacts are anticipated.



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

Figure 18 - MSHCP Section 6.1.2 Jurisdictional Resources Map

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site



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

Figure 19 - Vegetation Communities Impact Map

MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
Galway Downs Project Site

CADRE
Environmental

1 inch = 1,000 feet

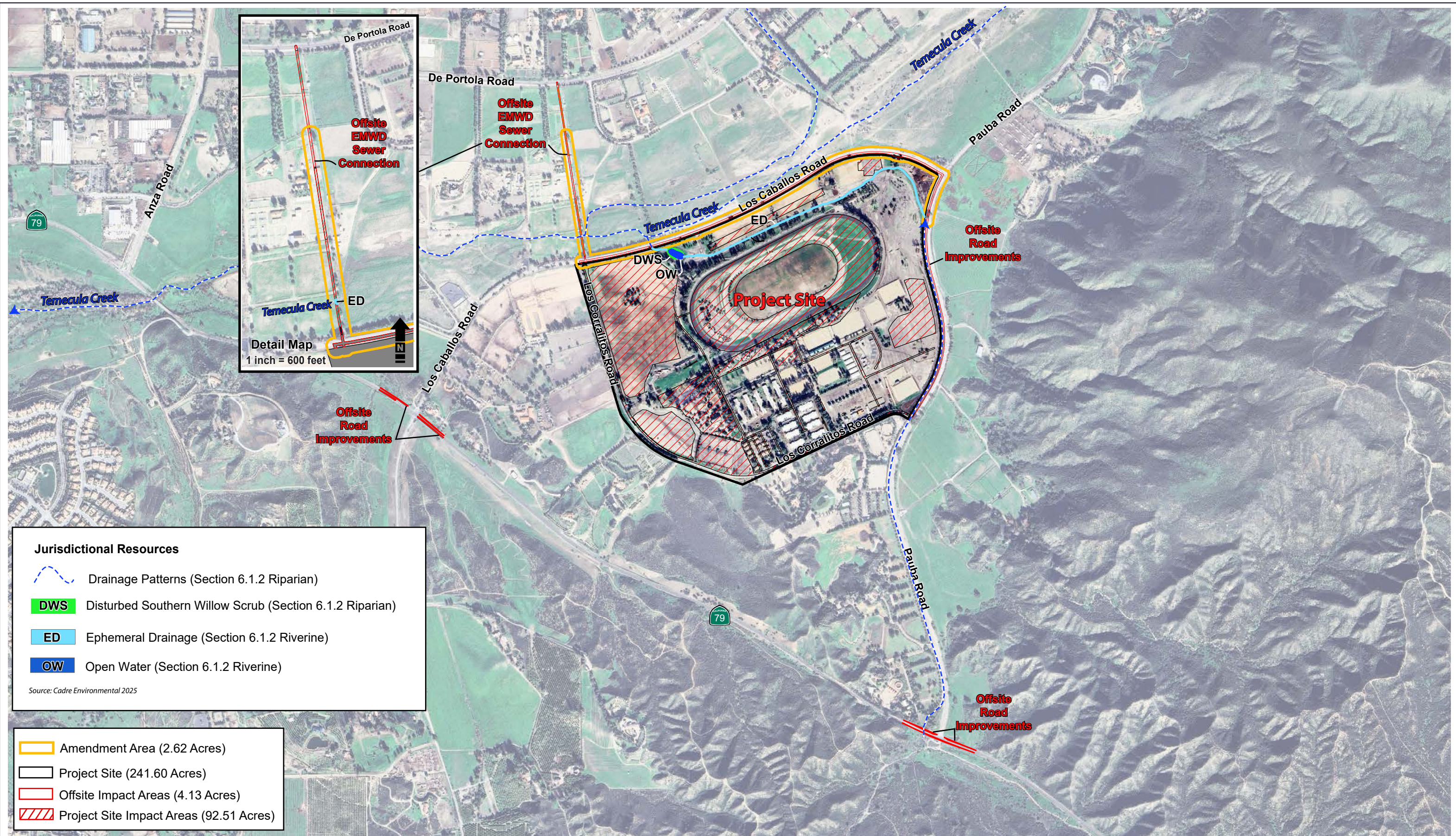


Figure 20 - MSHCP Section 6.1.2 Jurisdictional Resources Impact Map
 MSHCP Consistency Analysis - HANS 2039, Amendment JPR 10-12-27-01
 Galway Downs Project Site

5.1.4. Mitigation

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 will occur within the proposed temporary impact area.

5.2. Vernal Pools

5.2.1. Methods

The Amendment Area was assessed on March 17th, 2025 to determine the presence/absence and extent of MSHCP vernal pool resources in accordance with the RCIP definition (Section 6.1.2, Volume I, Final MSHCP). The assessment included a review of historic aerials and soils maps within and immediately adjacent to the Amendment Area.

5.2.2. Existing Conditions and Results

No evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded within the Amendment Area. Vernal pools are depressions in areas where a hard-underground layer prevents rainwater from draining downward into the subsoils. When rain fills the pools in the winter and spring, the water collects and remains in the depressions. In the springtime, the water gradually evaporates away, until the pools became completely dry in the summer and fall. Vernal pools tend to have an impermeable layer that results in ponded water. The soil texture (the amount of sand, silt, and clay particles) typically contains higher amounts of fine silts and clays with lower percolation rates. Pools that retain water for a sufficient length of time will develop hydric cells. Hydric cells form when the soil is saturated from flooding for extended periods of time and anaerobic conditions (lacking oxygen or air) develop.

Consistent with conditions documented during the site assessment and as previously stated, the Amendment Area is characterized as Gorgonio loamy sand, Hanford coarse sandy loam, Hanford fine sandy loam, and Riverwash, all types possessing well drained substrates (drainage class). No indication of clay substrates or inundated conditions were documented within the Amendment Area.

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, seasonal depressions and road ruts can easily be seen. No sign or indication of inundation was documented within the Amendment Area during a review of historic aerials.

In summary, none of the conditions (i.e., no inundated depressions including road ruts, hydric soils, historic inundation, etc.) were observed or documented within the Amendment Area. No features are present that would support fairy shrimp. No standing water or other sign of areas that pond water was recorded.

5.2.3. Impacts

No Impact.

5.2.4. Mitigation

No Mitigation Proposed.

5.3. Fairy Shrimp

5.3.1. Methods

The Amendment Area was assessed on March 17th, 2025 to determine the presence/absence and extent of vernal pool (fairy shrimp habitat). The assessment included a review of historic aerials and soils maps within and immediately adjacent to the Amendment Area.

5.3.2. Existing Conditions and Results

No evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded within the Amendment Area. Vernal pools are depressions in areas where a hard-underground layer prevents rainwater from draining downward into the subsoils. When rain fills the pools in the winter and spring, the water collects and remains in the depressions. In the springtime, the water gradually evaporates away, until the pools became completely dry in the summer and fall. Vernal pools tend to have an impermeable layer that results in ponded water. The soil texture (the amount of sand, silt, and clay particles) typically contains higher amounts of fine silts and clays with lower percolation rates. Pools that retain water for a sufficient length of time will develop hydric cells. Hydric cells form when the soil is saturated from flooding for extended periods of time and anaerobic conditions (lacking oxygen or air) develop.

Consistent with conditions documented during the site assessment and as previously stated, the Amendment Area is characterized as Gorgonio loamy sand, Hanford coarse sandy loam, Hanford fine sandy loam, and Riverwash, all types possessing well drained substrates (drainage class). No indication of clay substrates or inundated conditions were documented within the Amendment Area.

A review of historic aerals was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. Historic aerals taken in 2011 and 2023 represent an ideal baseline during which know (previously documented) inundated vernal pools, seasonal depressions and road ruts can easily be seen. No sign or indication of inundation was documented within the Amendment Area during a review of historic aerals.

In summary, none of the conditions (i.e., no inundated depressions including road ruts, hydric soils, historic inundation, etc.) were observed on documented within the Amendment Area. No features are present that would support fairy shrimp. No standing water or other sign of areas that pond water was recorded.

5.3.3. Impacts

No Impact.

5.3.4. Mitigation

No Mitigation Proposed.

5.4. Riparian Birds

5.4.1. Methods

The Amendment Area was assessed on March 17th, 2025 during which time all vegetation communities were mapped. 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.

5.4.2. Existing Conditions and Results

No MSHCP Section 6.1.2, riparian scrub, forest or woodland habitats are located within or adjacent to the Amendment Area. Therefore, no suitable habitat for the following three (3) MSHCP Section 6.1.2 species was documented within the Amendment Area including least Bell’s vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and western yellow-billed cuckoo (*Coccyzus americanus*). No additional surveys required.

5.4.3. Impacts

No Direct Impact.

5.4.4. Mitigation

No Mitigation Proposed.

5.5. Other Section 6.1.2 Species

6. PROTECTION OF NARROW ENDEMIC PLANT SPECIES (SECTION 6.1.3)

The Amendment Area does not occur within a predetermined Survey Area for MSHCP narrow endemic plant species; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.1.3.

6.1. Methods

The Amendment Area does not occur within a predetermined Survey Area for MSHCP narrow endemic plant species including (RCA GIS Data Downloads 2025).

6.2. Existing Conditions and Results

The Amendment Area does not occur within a predetermined Survey Area for MSHCP narrow endemic plant species including (RCA GIS Data Downloads 2025).

6.3. Impacts

No Direct Impact.

6.4. Mitigation

No Mitigation Proposed.

7. ADDITIONAL SURVEY NEEDS AND PROCEDURES (SECTION 6.3.2)

7.1. Criteria Area Plant Species

The Amendment Area does not occur within a predetermined Survey Area for MSHCP criteria area plant species; therefore, no surveys are required (RCA GIS Data Downloads 2025). The project is consistent with MSHCP Section 6.3.2.

7.2. Amphibians

7.2.1. Methods

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

7.2.2. Existing Conditions and Results

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

7.2.3. Impacts

No Impact.

7.2.4. Mitigation

No Mitigation Proposed.

7.3. Burrowing Owl

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 Amendment Area occurs partially within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented adjacent to the property including foraging habitat. Therefore, focused surveys were conducted by Cadre Environmental during the spring of 2025.

7.3.1. Methods

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 Amendment Area. 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 Amendment Area, 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 Amendment Area 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 Amendment Area 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 Amendment Area. 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.

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 Amendment Area 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 Amendment Area on March 23rd, April 13th, May 15th and 31st, 2025 from one hour before sunrise to two hours after sunrise. 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.

**Table 5.
Burrowing Owl Survey Schedule**

Survey	Dates (Conditions) 2025 Start – End Times	Results
1	March 23th 53°F to 58°F, winds 2-6 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Amendment Area.
2	April 13th 57°F to 60°F, winds 0-4 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Amendment Area.
3	May 15th 55°F to 64°F, winds 4-10 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Amendment Area.
4	May 31st 62°F to 74°F, winds 2-8 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Amendment Area.

7.3.2. Existing Conditions and Results

The Amendment Area occurs almost completely within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented adjacent to the property including foraging habitat documented throughout the Amendment Area. Therefore, focused surveys were conducted by Cadre Environmental during the spring and spring of 2025. No burrowing owls were detected within or adjacent to the Amendment Area. At a minimum, a 30-day preconstruction

survey will be conducted immediately prior to the initiation of construction to ensure protection for this species and compliance with the conservation goals as outlined in the MSHCP. The project is consistent with MSHCP Section 6.3.2.

7.3.3. Impacts

No Impact.

7.3.4. Mitigation

Regardless of the results of the focused surveys, if suitable habitat for burrowing owl is documented onsite, MSHCP guidelines require preconstruction surveys be conducted at least 30-days prior to initiation of construction to ensure compliance with prescribed conservation goals and objectives.

Due to the presence of potentially suitable habitat, a 30-day pre-construction survey for burrowing owls is required prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) 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 Amendment Area prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the Wildlife Agencies, and will need to coordinate further with RCA and the Wildlife Agencies, including 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 burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

Following submittal, review and approval of the 30-day burrowing owl preconstruction survey report by the County of Riverside EPD and compliance with all species-specific conservation goals, if detected within or adjacent to the Amendment Area, the project will be consistent with MSHCP Section 6.3.2.

7.4. Mammals

7.4.1. Methods

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

7.4.2. Existing Conditions and Results

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

7.4.3. Impacts

No Impact.

7.4.4. Mitigation

No Mitigation Proposed.

8. INFORMATION ON OTHER SPECIES

8.1. 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.

8.2. 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.

8.3. Species Not Adequately Covered

No suitable habitat for the twenty-eight (28) MSHCP species not adequately covered was detected within the Amendment Area, as presented in Table 6, *Species not Adequately Covered with Potential to Occur on Amendment Area*.

Table 6.
Species not Adequately Covered with Potential to Occur on Amendment Area

Species Name (Scientific Name) Status	Habitat Description	Comments
PLANTS		
Beautiful hulsea (<i>Hulsea vestita</i> ssp. <i>callicarpha</i>) CRPR 4.2	Perennial herb generally blooming from May to October within chaparral and lower montane coniferous forest in association with rocky or gravelly, granitic substrates (CNPS 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
California bedstraw (<i>Galium californicum</i> ssp. <i>primum</i>) CRPR 1B.2	Perennial herb generally blooming from May to July within chaparral and lower montane coniferous forest in association with granitic	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
	and sandy substrates (CNPS 2025).	
California muhly (<i>Muhlenbergia californica</i>) CRPR 4.3	Perennial rhizomatous herb generally blooming from June to September within chaparral, coastal scrub, lower montane coniferous forest, meadows and seeps in association with mesic, seeps and streambanks (CNPS 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Chickweed oxytheca (<i>Sidotheca caryophylloides</i>) CRPR 4.3	Annual herb generally blooming from July to October within lower montane coniferous forest in association with sandy substrates. CNPS 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Cleveland's bush monkeyflower (<i>Diplacus clevelandii</i>) CRPR 4.2	Perennial rhizomatous herb generally blooming from April to July in chaparral, cismontane woodland and lower montane coniferous forest in association with gabbroic, often disturbed areas, openings, rocky. (CNPS 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Cliff cinquefoil (<i>Potentilla rimicola</i>) CRPR 2B.3	Perennial herb generally blooming from July to September in subalpine coniferous forest, upper montane coniferous forest in association with granitic and rocky substrates. (CNPS 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Coulter's Matilija poppy (<i>Romneya coulteri</i>) CRPR 4.2	Perennial rhizomatous herb generally blooming from April to July in chaparral, coastal scrub, often in burned areas. (CNPS 2025).	<u>No Potential</u> . Perennial species not detected onsite.
Fish's milkwort (<i>Polygala cornuta</i> var. <i>fishiae</i>) CRPR 4.3	Perennial deciduous shrub generally blooming from May to August in chaparral, cismontane and riparian woodland. (CNPS 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
Graceful tarplant (<i>Holocarpha virgata</i> ssp. <i>elongata</i>) CRPR 4.2	Annual herb generally blooming from May to November in chaparral, cismontane woodland, coastal scrub and valley and foothill grassland. (CNPS 2025) " <i>Graceful tarplant is known from heavy clay soils around vernal pools and wet meadows (USFWS, unpublished data).</i> " (MSHCP 2004)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Lemon lily (<i>Lilium parryi</i>) CRPR 1B.2	Perennial bulbiferous herb generally blooming from July to August in lower montane coniferous forest, meadows and seeps, riparian forest and upper montane coniferous forest in association with mesic substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Mojave tarplant (<i>Deinandra mohavensis</i>) CRPR 1B.3	Annual herb generally blooming from June to October in chaparral, coastal scrub and riparian habitat in association with mesic substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Ocellated Humboldt lily (<i>Lilium humboldtii</i> ssp. <i>ocellatum</i>) CRPR 4.2	Perennial bulbiferous herb generally blooming from March to August in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest and riparian woodland in openings. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Parry's spine flower (<i>Chorizanthe parryi</i> var. <i>parryi</i>) CRPR 1B.1	Annual herb generally blooming from April to June in chaparral, cismontane woodland, coastal scrub, valley and foothill grassland in association with sandy or rocky openings. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
Peninsular spine flower (<i>Chorizanthe leptotheca</i>) CRPR 4.2	Annual herb generally blooming from May to August in chaparral, coastal scrub and lower montane coniferous forest in association with alluvial fan and granitic substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Plummer's mariposa lily (<i>Calochortus plummerae</i>) CRPR 4.2	Perennial bulbiferous herb generally blooming from May to July in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland in association with granitic and rocky substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Rainbow manzanita (<i>Arctostaphylos rainbowensis</i>) CRPR 1B.1	Perennial evergreen shrub generally blooming from December to March in chaparral habitat. (CNPS 2025)	<u>No Potential</u> – Not detected onsite.
Shaggy-haired alumroot (<i>Heuchera hirsutissima</i>) CRPR 1B.3	Perennial rhizomatous herb generally blooming from May to July in subalpine coniferous forest, upper montane coniferous forest in association with rocky and granitic substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Small-flowered microseris (<i>Microseris douglasii</i> var. <i>platycarpa</i>) CRPR 4.2	Annual herb generally blooming from March to May in cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools in association with clay substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Sticky-leaved dudleya (<i>Dudleya viscida</i>) CRPR 1B.2	Perennial herb generally blooming from May to June in coastal bluff scrub, chaparral, cismontane woodland, coastal scrub in association with rocky substrates. (CNPS 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.

Species Name (Scientific Name) Status	Habitat Description	Comments
REPTILES		
San Bernardino mountain kingsnake (<i>Lampropeltis zonata parvirubra</i>)	A habitat generalist, found in diverse habitats including coniferous forest, oak-pine woodlands, riparian woodland, chaparral, manzanita, and coastal sage scrub. Wooded areas near a stream with rock outcrops, talus or rotting logs that are exposed to the sun are good places to find this snake. California Mountain Kingsnake is not found near the coast, instead preferring coniferous forests and woodlands above 3,000 feet. This species appears to prefer rocky areas, but also is found beneath logs and under bark. (Calheps 2025, SDNHM 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
San Diego mountain kingsnake (<i>Lampropeltis zonata pulchra</i>)	A habitat generalist, found in diverse habitats including coniferous forest, oak-pine woodlands, riparian woodland, chaparral, manzanita, and coastal sage scrub. Wooded areas near a stream with rock outcrops, talus or rotting logs that are exposed to the sun are good places to find this snake. This species appears to prefer rocky areas, but also is found beneath logs and under bark. (Calheps 2025, SDNHM 2025)	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
Southern rubber boa (<i>Charina umbratica</i>) ST	Grassland, mountain meadows, chaparral, woodland, along streamsides, deciduous	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the

Species Name (<i>Scientific Name</i>) Status	Habitat Description	Comments
	and coniferous forest in the San Bernardino and San Jacinto Mountains.	Amendment Area impact area.
Southern sagebrush lizard (<i>Sceloporus graciosus vandenburgianus</i>)	Lives in shrublands such as chaparral, manzanita and ceanothus, as well as open pine and Douglas Fir forests, mainly in the mountains. (CalHerps 2025) The distribution of the Southern Sagebrush Lizard extends in a series of disjunct, montane sky islands from Los Angeles County, southward to the Sierra San Pedro Martir in Baja California. It is commonly found above 5,000 feet in elevation, depending on latitude. These lizards enjoy open ground, with clear sunlight and dappled low vegetation. (SDNH 2025).	<u>No Potential</u> – based on a lack of suitable soils and vegetation within the Amendment Area impact area.
BIRDS		
California spotted owl (<i>Strix occidentalis occidentalis</i>) SSC	Primarily occurs in woodlands of oaks and coniferous forests.	<u>No Potential</u> – based on a lack of suitable vegetation within the Amendment Area impact area.
Grasshopper sparrow (<i>Ammodramus savannarum</i>) SSC	Occurs within native and non-native grasslands.	<u>No Potential</u> – based on a lack of suitable vegetation within the Amendment Area impact area.
Lincoln's sparrow (breeding) (<i>Melospiza lincolnii</i>)	Occurs in riparian scrub, riparian edges and mesic weedy areas.	<u>No Potential</u> – based on a lack of suitable vegetation within the Amendment Area impact area.
Williamson's sapsucker (<i>Sphyrapicus thyroideus</i>)	Resident in the San Jacinto Mountains in montane coniferous forest.	<u>No Potential</u> – based on a lack of suitable vegetation within the Amendment Area impact area.
MAMMALS		
San Bernardino flying squirrel (<i>Glaucomys sabrinus californicus</i>) SSC	San Bernardino flying squirrel occurs in a range of coniferous and deciduous forest, including riparian forests	<u>No Potential</u> – based on a lack of suitable vegetation within the Amendment Area impact area.

Species Name (Scientific Name) Status	Habitat Description	Comments
	in the San Gabriel, San Bernardino, and San Jacinto Mountains. The San Bernardino flying squirrel has been reported in mixed conifer forests of Jeffrey pine and white fir. Sumner (1927) reported the habitat as white fir and black oak (<i>Quercus kelloggii</i>) woodlands. (CDFG 1998)	
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 State (CDFW) Protection and Classification ST – State Threatened SSC – State Species of Special Concern		

9. GUIDELINES PERTAINING TO THE URBAN/WILDLANDS INTERFACE (Section 6.1.4)

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 an MSHCP Conservation Area. The proposed project does not include commercial, mixed uses and/or residential development. However, The Amendment Area is located within Proposed Constrained Linkage 24. Therefore, as addressed below all proposed Urban/Wildlands Interface Guidelines and Best Management Practices (BMP) will be implemented, as applicable.

- Conduct Pre-Construction Burrowing Owl Surveys, Refer to Section 7.3.2.
- Conduct Pre-Construction Nesting Bird Surveys, Refer to Section 10.
- Implement Best Management Practices, Section 10 of this report.
- Incorporate measures 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.

- 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.
- 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.
- 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.
- Consider the invasive, non-native plant species listed in Table 6-2 of the MSHCP in approving landscape plans to 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.
- 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.
- Manufactured slopes associated with the proposed site development shall not extend into the MSHCP Conservation Area.

Implementation of all Urban/Wildlands Interface guidelines will minimize adverse project indirect impacts and ensure consistency with MSHCP Section 6.1.4 guidelines.

10. CONSTRUCTION GUIDELINES (SECTION 7.5.3)

The following Construction Guidelines will be implemented for the proposed project to ensure compliance and consistency with MSHCP objectives and goals in addition to those listed in Section 5.1.4, as applicable.

1. Plans for water pollution and erosion control will be prepared for all Discretionary Projects involving the movement of earth in excess of 50 cubic yards. The plans

will describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, use of plant material for erosion control. Plans will be reviewed and approved by the County of Riverside and participating jurisdiction prior to construction.

2. Timing of construction activities will consider seasonal requirements for breeding birds and migratory non-resident species. Habitat clearing will be avoided during species active breeding season defined as March 1 to June 30.
3. Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized.
4. Short-term stream diversions will be accomplished by use of sand bags or other methods that will result in minimal instream impacts. Short-term diversions will consider effects on wildlife.
5. Silt fencing or other sediment trapping materials will be installed at the downstream end of construction activities to minimize the transport of sediments off-site.
6. Settling ponds where sediment is collected will be cleaned in a manner that prevents sediment from re-entering the stream or damaging/disturbing adjacent areas. Sediment from settling ponds will be removed to a location where sediment cannot re-enter the stream or surrounding drainage area. Care will be exercised during removal of silt fencing to minimize release of debris or sediment into streams.
7. No erodible materials will be deposited into water courses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks.
8. The footprint of disturbance will be minimized to the maximum extent Feasible. Access to sites will occur on pre-existing access routes to the greatest extent possible.
9. Equipment storage, fueling and staging areas will be sited on non-sensitive upland habitat types with minimal risk of direct discharge into riparian areas or other sensitive Habitat types.
10. The limits of disturbance, including the upstream, downstream and lateral extents, will be clearly defined and marked in the field. Monitoring personnel will review the limits of disturbance prior to initiation of construction activities.
11. During construction, the placement of equipment within the stream or on adjacent banks or adjacent upland habitats occupied by Covered Species that are outside of the project footprint will be avoided.
12. Exotic species removed during construction will be properly handled to prevent sprouting or regrowth.

13. Training of construction personnel will be provided.
14. Ongoing monitoring and reporting will occur for the duration of the construction activity to ensure implementation of best management practices.
15. When work is conducted during the fire season (as identified by the Riverside County Fire Department) adjacent to coastal sage scrub or chaparral vegetation, appropriate fire-fighting equipment (e.g., extinguishers, shovels, water tankers) shall be available on the site during all phases of project construction to help minimize the chance of human-caused wildfires. Shields, protective mats, and/or other fire preventative methods shall be used during grinding, welding, and other spark-inducing activities. Personnel trained in fire hazards, preventative actions, and responses to fires shall advise contractors regarding fire risk from all construction-related activities.
16. Active construction areas shall be watered regularly to control dust and minimize impacts to adjacent vegetation.
17. All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other toxic substances shall occur only in designated areas within the proposed grading limits of the project site. These designated areas shall be clearly marked and located in such a manner as to contain run-off.
18. Waste, dirt, rubble, or trash shall not be deposited in the Conservation Area or on native habitat.

11. BEST MANAGEMENT PRACTICES (MSHCP VOLUME I, APPENDIX C)

The following Best Management Practices will be implemented for the proposed project to ensure compliance and consistency with MSHCP objectives and goals in addition to those listed in Section 5.1.4, as applicable.

1. A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the FESA and the MSHCP, the need to adhere to the provisions of the FESA and the MSHCP, the penalties associated with violating the provisions of the FESA, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.
2. A qualified biologist shall be onsite prior to and during all initial ground and habitat disturbance activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities.
3. Water pollution and erosion control plans shall be developed and implemented in accordance with RWQCB requirements.

4. The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
5. The upstream and downstream limits of projects disturbance plus lateral limits of disturbance on either side of the drainages shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.
6. Projects should be designed to avoid the placement of equipment and personnel within stream channels or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern located outside of impact areas.
7. When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing of other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments offsite. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.
8. Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to the County of Riverside, USFWS, and CDFW, RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.
9. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
10. The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
11. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable.
12. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.

13. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
14. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
15. The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions including these BMPs.

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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."*

Author:  Date: April 29, 2026



INFORMATION SUMMARY

- A. Report Date: February 24th, 2026.
- B. Report Title: Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Focused Burrowing Owl Surveys for the 241.60-acre (4.10-acre offsite) Galway Downs Project Site (245.70-acres total), Unincorporated Western Riverside County, California.
- C. Case#: 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.
- D. APN#: Onsite: 927-160-001 and 927-160-002 - Offsite Portion of 927-160-041, 927-690-005 and Right-of-Ways.
- E. Project Location: 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 Attachment A, *Project Site Map*.
- F. Applicant: T&B Planning, Inc.
8690 Aero Drive, Suite 115 PMB 383
San Diego, CA 92123
Contact: Jerrica Harding (760) 484-6784
- G. MOU Principal: Cadre Environmental
701 Palomar Airport Road, Suite 300
Carlsbad, CA 92011
Contact: Ruben S. Ramirez, Jr. (949) 300-0212
- H. Date of Surveys: March 17th, 23rd, April 13th, May 15th and 31st, 2025.
- I. Summary: The 241.60-acre Galway Downs project site, 4.10-acre offsite (245.70-acre total) 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 Attachment B, *MSHCP Relationship Map* (Western Riverside County Regional Conservation Authority (RCA) Geographic Information System (GIS) Data Downloads 2025). The offsite proposed Eastern Municipal Water District (EMWD) sewer connection is located within and
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bisects Proposed Constrained Linkage 24. The project site 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 Attachment, C *Vegetation Communities Map*, and Attachments D to P, *Current Project Site Photographs*.

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 for 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 (*Athene cunicularia*). Suitable burrowing owl burrows and features potentially utilized for refugia and/or nesting were documented within and/or adjacent to the project site including foraging habitat documented throughout the northern region of the property. Therefore, focused surveys were conducted by Cadre Environmental during the spring of 2025 following MSHCP guidelines and 2012 California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation recommended survey procedures.

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.

SUBJECT

Western Riverside County Multiple Species Habitat Conservation Plan Focused Burrowing Owl Surveys for the 241.60-acre (4.10-acre offsite) Galway Downs Project Site (245.70-acres total), Unincorporated Western Riverside County, California.

This report presents the findings of focused Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) burrowing owl surveys conducted for the 241.60-acre (4.10-acre offsite) Galway Downs (245.70-acres total) ("Project Site") located within the unincorporated western region of Riverside County, California.

The Project Site 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 Attachment A, *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 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 Attachment B, *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.

This report incorporates the findings of a literature review, compilation of existing documentation, and focused surveys conducted on March 23rd, April 13th, May 15th and 31st, 2025. This documentation is consistent with accepted scientific and technical standards and the requirements of the MSHCP. When appropriate, general biological resources are described in summary form in an effort to provide the reader with adequate background information.

METHODS OF STUDY

APPROACH

Prior to visiting the Project Site, a review of all available and relevant data on the biological characteristics, sensitive habitats, and species potentially present on or adjacent to the Project Site was conducted. Additionally, aerial photography, and USGS topographic map data were examined. After reviewing the available information, Cadre Environmental conducted a physical site assessment/burrow and focused surveys.

As required by the MSHCP, and during the initial property assessment process, the Project Site's APNs were searched using the RCA GIS database to determine if additional surveys for wildlife not adequately covered by the MSHCP may be required. The Project Site is located partially within a predetermined Survey Area for the burrowing owl.

Plant Community/Habitat Classification and Mapping

Plant communities were preliminarily mapped with the aid of an aerial photograph using the MSHCP uncollapsed vegetation communities' classification system. When a vegetation community could not be accurately characterized using this classification system, an updated community classification code was developed to more accurately represent onsite habitat types.

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).

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 hours 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 (74-acres) in the Project Site were surveyed, as shown in Attachment Q, *Burrowing Owl Survey Area Map*.

Table 1.
Burrowing Owl Survey Schedule

Survey	Dates (Conditions) 2025 Start – End Times	Results
1	March 23th 53°F to 58°F, winds 2-6 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Project Site.
2	April 13th 57°F to 60°F, winds 0-4 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Project Site.
3	May 15th 55°F to 64°F, winds 4-10 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Project Site.
4	May 31st 62°F to 74°F, winds 2-8 mph, no rain 6:30am – 9:00am	No burrowing owls or characteristic sign detected within or adjacent to the Project Site.

EXISTING CONDITIONS

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 Attachment C, *Vegetation Communities Map*, Attachments D to P, *Current Project Site Photographs*, and outlined in Table 2, *Project Site Vegetation Community Acreages*.

Table 2.
Project Site Vegetation Community Acreages

Vegetation Community	Onsite (ac)	Offsite (ac)	Project Site Total (ac)
Developed	205.48	3.12	208.60
Disturbed	34.89	0.48	35.85
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	0.30
Coast Live Oak	0.18	--	0.18
Disturbed Southern Willow Scrub	0.13	--	0.13
	241.60	4.10	245.70

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 EMWD sewer connection impact area 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 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 scattered 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 annus*), mulefat (*Baccharis salicifolia*), tocalote and non-native grasses.

SOILS

The Soil Survey of Western Riverside Area has classified the Project Site as follows (U.S. Department of Agriculture, 2025):

- 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

RESULTS

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 MSHCP focused survey efforts.

Due to the presence of potentially suitable habitat, a 30-day pre-construction survey for burrowing owls is required prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) 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 Riverside County Environmental Programs Division (EPD), Wildlife Agencies, and will need to coordinate further with Wildlife Agencies, including 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 burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

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 (*Psaltirparus minimus*), American crow (*Corvus brachyrhynchos*), yellow rumped warbler (*Setophaga coronata*), warbling vireo (*Vireo gilvus*), western meadowlark (*Sturnella neglecta*), house finch (*Haemorrhous 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.

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ATTACHMENTS

Attachment A - Project Site Map

Attachment B – MSHCP Relationship Map

Attachment C - Vegetation Communities Map

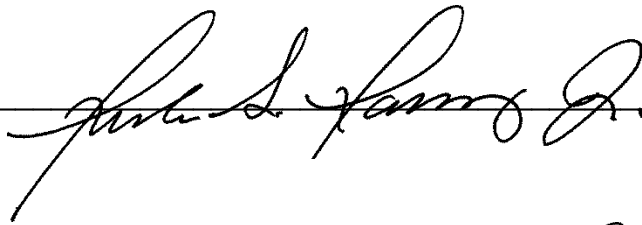
Attachment D to P - Current Project Site Photographs

Attachment Q - Burrowing Owl Survey Area Map

Certification

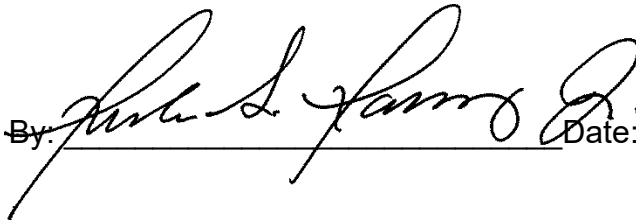
"I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief."

Author: _____

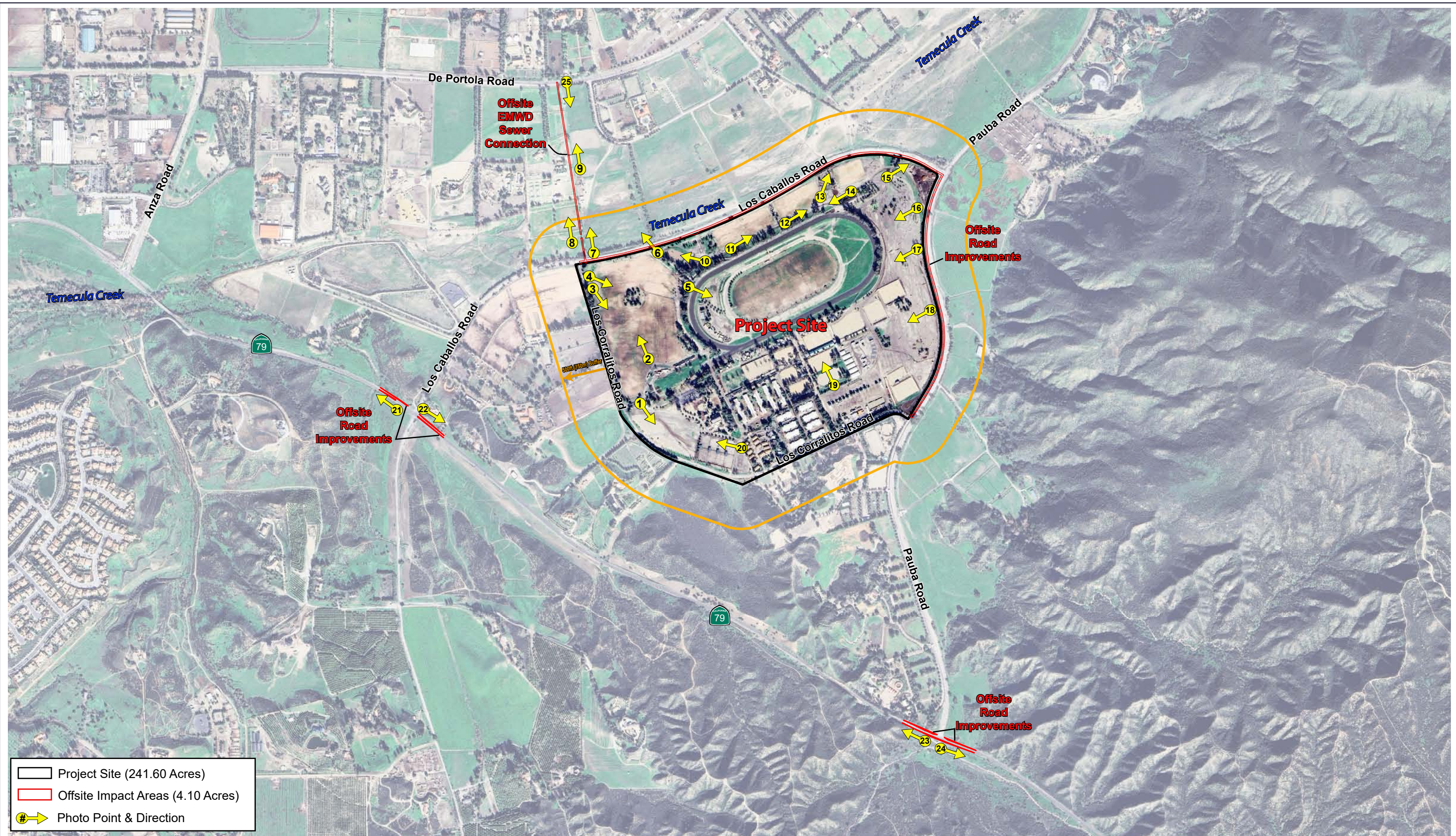


Date: February 24th, 2026

Fieldwork Performed By: _____



Date: February 24th, 2026



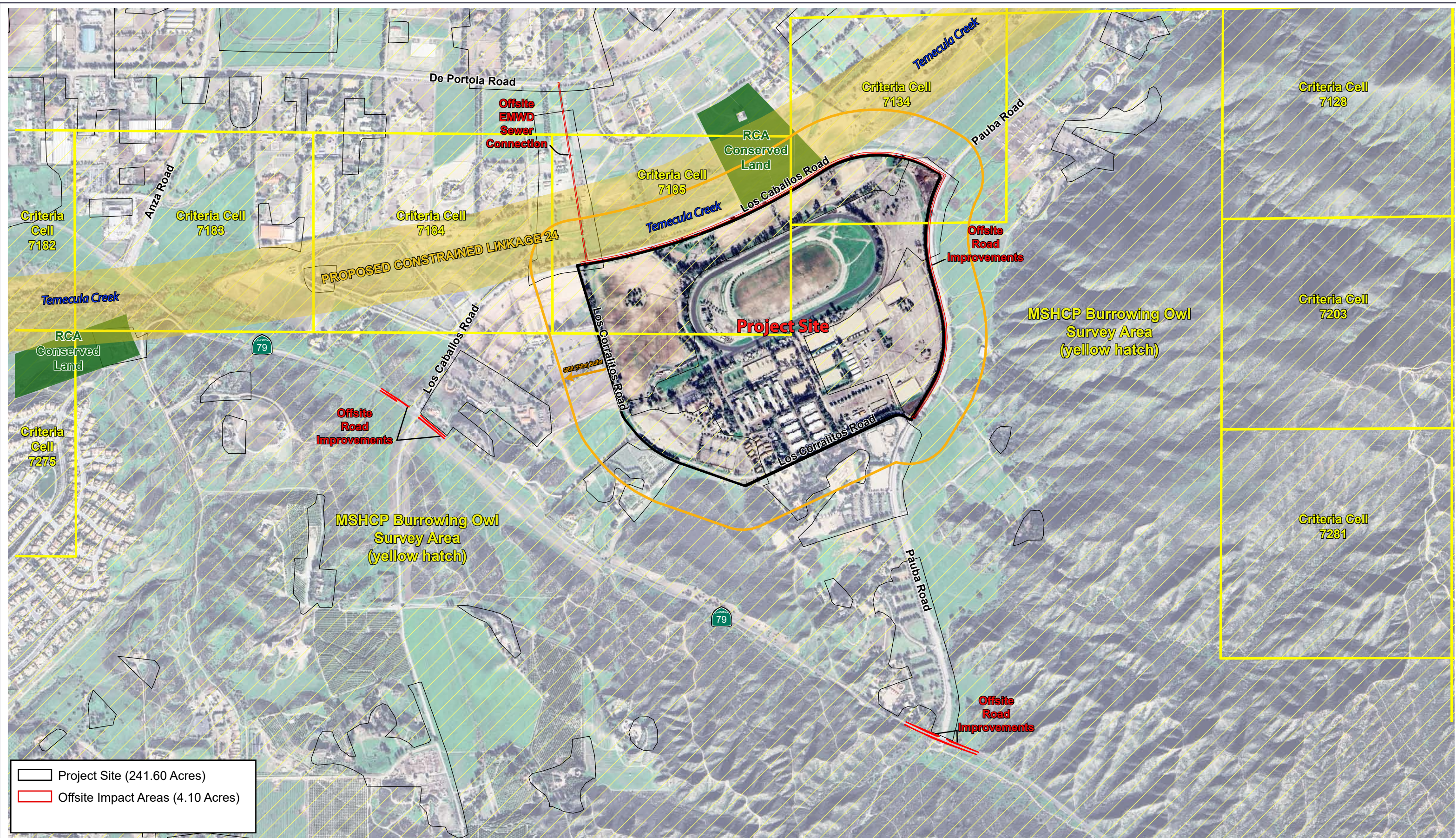
Project Site APNs: 927-160-001 and 927-160-002 - Offsite Partial APN 927-690-005 and Right-of-Ways

Attachment A - Project Site Map

MSHCP Focused Burrowing Owl Surveys
Galway Downs Project Site



1 inch = 1,000 feet



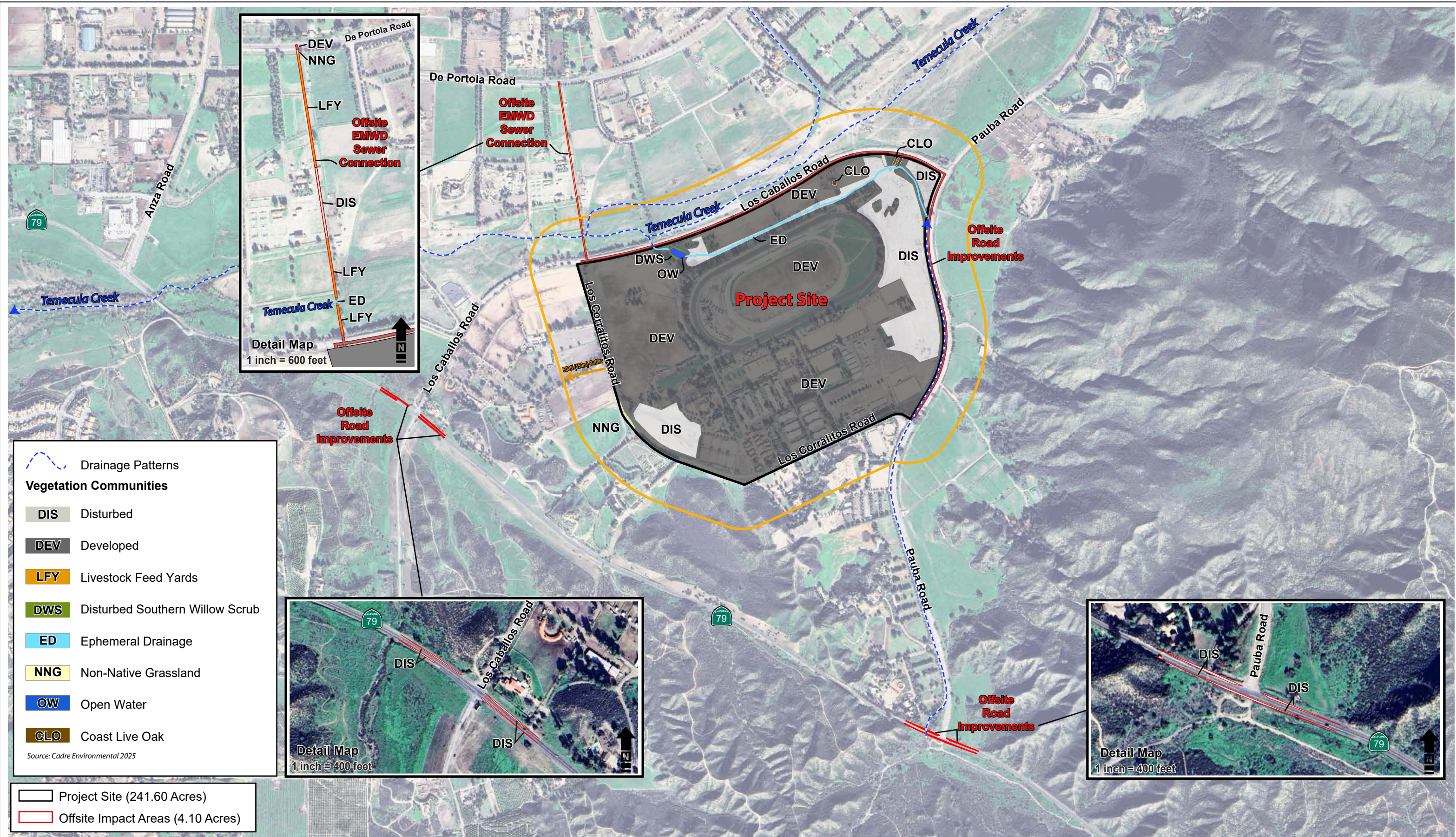
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Attachment B - MSHCP Relationship Map

MSHCP Focused Burrowing Owl Surveys
Galway Downs Project Site



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

Attachment C - Vegetation Communities Map

MSHCP Focused Burrowing Owl Surveys
Galway Downs Project Site

CADRE
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 Attachment A for Photographic Key - Project Site Map



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 Attachment A 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 Attachment A 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 Attachment A 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 Attachment A 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 Attachment A 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 Attachment A 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 Attachment A for Photographic Key - Project Site Map



PHOTOGRAPH 17 - Westward view of equestrian facilities.



PHOTOGRAPH 18 - Northwest view of equestrian facilities.

Refer to Attachment A 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 Attachment A 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 Attachment A for Photographic Key - Project Site Map

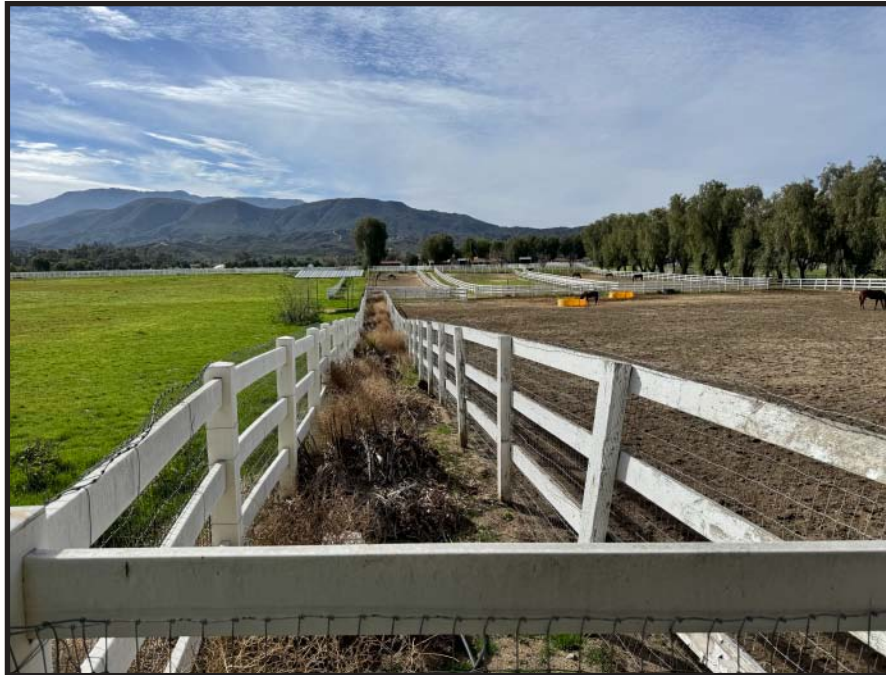


PHOTOGRAPH 23 - Northwest view of offsite impact area from the intersection of SR79 and Pauba Road.



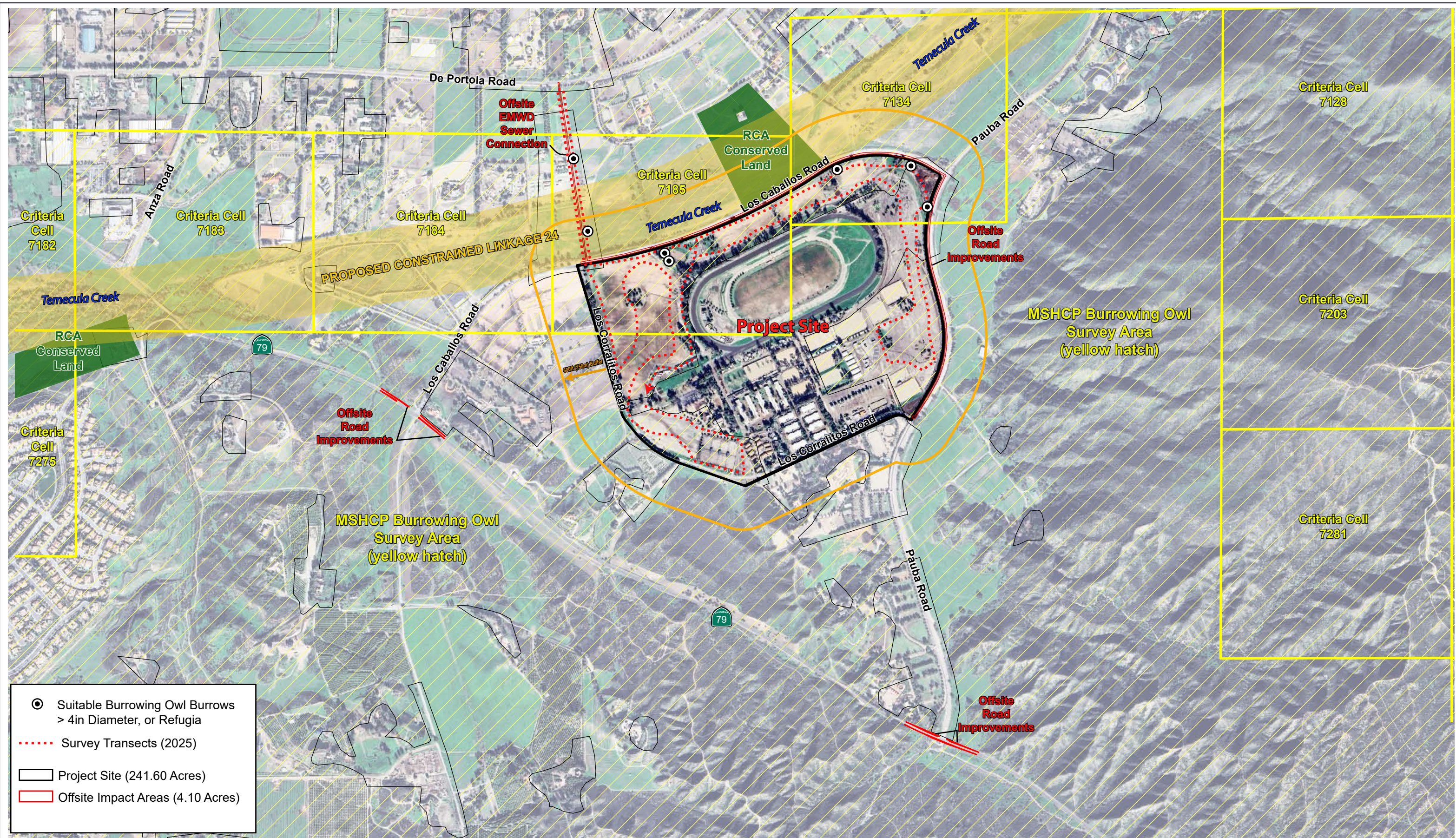
PHOTOGRAPH 24 - Southeast view of offsite impact area from the intersection of SR79 and Pauba Road.

Refer to Attachment A for Photographic Key - Project Site Map



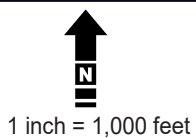
PHOTOGRAPH 25 - Southward view of EMWD proposed sewer alignment extending south of De Portola Road.

Refer to Attachment A for Photographic Key - Project Site Map



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

Attachment Q - Burrowing Owl Survey Area Map
 MSHCP Focused Burrowing Owl Surveys
 Galway Downs Project Site



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