

Environmental Impact Report

SCH No. 2025010280

Galway Downs

Riverside County, California

Lead Agency:

Riverside County Planning Department

4080 Lemon Street, 12th Floor

Riverside, CA 92501

Draft Environmental Impact Report | June 25, 2026

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Lead Agency
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Lead Agency Discretionary Permits
Revision No. 1 to CUP 02303 (CUP 02303R1)
Change of Zone (CZ 22000010)
Exception No. 9 to Riverside County Noise Ordinance No. 847

Draft Environmental Impact Report | June 25, 2026

TABLE OF CONTENTS

Section Name and Number **Page No.**

S.0 **Executive Summary** **S-1**
S.1 Introduction S-1
S.2 Project Synopsis S-2
S.2.1 Location and Regional Setting *S-2*
S.2.2 Project Objectives *S-3*
S.2.3 Project Summary Description *S-4*
S.3 Areas of Controversy and Issues to be Resolved S-5
S.4 Project Alternatives S-5
S.4.1 No Project Alternative (NPA) *S-5*
S.4.2 No Construction Alternative (NCA) *S-6*
S.4.3 Residential Only Alternative (ROA) *S-6*
S.4.4 Specific Plan Alternative (SPA) *S-7*
S.5 EIR Process S-8
S.6 Summary of Impacts, Mitigation Measures and Conclusions S-9
S.6.1 Effects Found not to be Significant *S-9*
S.6.2 Impacts of the Proposed Project *S-10*

1.0 Introduction **1-1**
1.1 Purposes of CEQA and this Draft EIR 1-1
1.2 Project Background 1-2
1.3 Summary of the Project Evaluated by this EIR 1-2
1.4 CEQA Compliance Process 1-4
1.5 Legal Authority 1-5
1.6 EIR Scope, Format, and Content 1-6
1.6.1 EIR Scope *1-6*
1.6.2 Use of This EIR *1-15*
1.6.3 EIR Format and Content *1-16*
1.6.4 Incorporation by Reference *1-19*
1.7 Responsible and Trustee Agencies 1-20
1.8 Areas of Controversy 1-21
1.9 Issues to be Resolved by the Decision-Making Body 1-21

2.0 Environmental Setting/Baseline **2-1**
2.1 Regional Setting and Location 2-1
2.2 Local Setting and Location 2-1
2.3 Surrounding Land Uses 2-4
2.4 Baseline Conditions of the Project Site 2-4

TABLE OF CONTENTS

Section Name and Number **Page No.**

2.4.1 Existing Physical Site Conditions 2-4
2.4.2 Existing Operational Characteristics 2-14
2.4.3 Existing Public Facilities, Utilities, and Service Systems 2-17
2.5 Planning Context 2-19
2.5.1 SCAG Regional Transportation Plan/Sustainable Communities Strategy 2-20
2.5.2 South Coast Air Quality Management District Air Quality Management Plan 2-20
2.5.3 Western Riverside County Multiple Species Habitat Conservation Plan 2-21
2.5.4 County of Riverside General Plan and Southwest Area Plan 2-21
2.5.5 Temecula Valley Wine Country Community Plan 2-23
2.5.6 Zoning 2-23
2.5.7 Rare and Unique Environmental Resources 2-23

3.0 Project Description 3-1
3.1 Summary of the Proposed Project 3-1
3.2 Summary of Requested Approval Actions 3-2
3.3 Regional Setting 3-3
3.4 Project Location and Setting 3-3
3.5 Statement of Objectives 3-4
3.6 Project's Component Parts and Discretionary Approvals 3-5
3.6.1 Conditional Use Permit (CUP 02303R1) 3-5
3.6.2 Exception No. 9 to Riverside County Noise Ordinance No. 847 3-29
3.6.3 Change of Zone No. 22000010 (CZ 22000010) 3-31
3.7 Project's Technical Characteristics 3-37
3.7.1 Construction Characteristics 3-37
3.7.2 Operational Characteristics 3-39

4.0 Environmental Analysis 4.0-1
4.0.1 Summary of EIR Scope 4.0-1
4.0.2 Scope of Cumulative Effects Analysis 4.0-1
4.0.3 Identification of Impacts 4.0-6
4.1 Agriculture and Forestry Resources 4.1-1
4.1.1 Existing Conditions 4.1-1
4.1.2 Applicable Regulatory Requirements 4.1-4
4.1.3 Basis for Determining Significance 4.1-9
4.1.4 Methodology 4.1-10
4.1.5 Impact Analysis 4.1-11

TABLE OF CONTENTS

Section Name and Number **Page No.**

4.1.6 Cumulative Impact Analysis 4.1-23
4.1.7 Significance of Impacts Before Mitigation 4.1-25
4.1.8 Regulatory Requirements, Design Features, and Mitigation 4.1-26
4.1.9 References 4.1-27
4.2 Air Quality 4.2-1
4.2.1 Existing Conditions 4.2-1
4.2.2 Applicable Regulatory Requirements 4.2-11
4.2.3 Basis for Determining Significance 4.2-18
4.2.4 Methodology 4.2-18
4.2.5 Impact Analysis 4.2-32
4.2.6 Cumulative Impact Analysis 4.2-45
4.2.7 Significance of Impacts Before Mitigation 4.2-47
4.2.8 Regulatory Requirements, Design Features, and Mitigation 4.2-48
4.2.9 References 4.2-52
4.3 Biological Resources 4.3-1
4.3.1 Existing Conditions 4.3-1
4.3.2 Applicable Regulatory Requirements 4.3-8
4.3.3 Basis for Determining Significance 4.3-15
4.3.4 Methodology 4.3-16
4.3.5 Impact Analysis 4.3-21
4.3.6 Cumulative Impact Analysis 4.3-39
4.3.7 Significance of Impacts Before Mitigation 4.3-42
4.3.8 Regulatory Requirements, Design Features, and Mitigation 4.3-45
4.3.9 Significance of Impacts After Mitigation 4.3-47
4.3.10 References 4.3-47
4.4 Cultural Resources 4.4-1
4.4.1 Existing Conditions 4.4-1
4.4.2 Applicable Regulatory Requirements 4.4-8
4.4.3 Basis for Determining Significance 4.4-14
4.4.4 Methodology 4.4-15
4.4.5 Impact Analysis 4.4-18
4.4.6 Cumulative Impact Analysis 4.4-20
4.4.7 Significance of Impacts Before Mitigation 4.4-22
4.4.8 Regulatory Requirements, Design Features, and Mitigation 4.4-22
4.4.9 Significance of Impacts After Mitigation 4.4-25
4.4.10 References 4.4-26
4.5 Energy 4.5-1
4.5.1 Existing Conditions 4.5-1

TABLE OF CONTENTS

Section Name and Number **Page No.**

4.5.2 Applicable Regulatory Requirements *4.5-5*
4.5.3 Basis for Determining Significance *4.5-9*
4.5.4 Methodology *4.5-9*
4.5.5 Impact Analysis *4.5-14*
4.5.6 Cumulative Impact Analysis *4.5-27*
4.5.7 Significance of Impacts Before Mitigation *4.5-28*
4.5.8 Regulatory Requirements, Design Features, and Mitigation *4.5-28*
4.5.9 References *4.5-29*
4.6 Greenhouse Gas Emissions 4.6-1
4.6.1 Existing Conditions *4.6-1*
4.6.2 Applicable Regulatory Requirements *4.6-10*
4.6.3 Basis for Determining Significance *4.6-25*
4.6.4 Methodology *4.6-26*
4.6.5 Impact Analysis *4.6-30*
4.6.6 Cumulative Impact Analysis *4.6-37*
4.6.7 Significance of Impacts Before Mitigation *4.6-37*
4.6.8 Regulatory Requirements, Design Features, and Mitigation *4.6-38*
4.6.9 Significance of Impacts After Mitigation *4.6-41*
4.6.10 References *4.6-42*
4.7 Hydrology and Water Quality 4.7-1
4.7.1 Existing Conditions *4.7-1*
4.7.2 Applicable Regulatory Requirements *4.7-5*
4.7.3 Basis for Determining Significance *4.7-11*
4.7.4 Methodology *4.7-12*
4.7.5 Impact Analysis *4.7-15*
4.7.6 Cumulative Impact Analysis *4.7-22*
4.7.7 Significance of Impacts Before Mitigation *4.7-24*
4.7.8 Regulatory Requirements, Design Features, and Mitigation *4.7-26*
4.7.9 References *4.7-29*
4.8 Land Use and Planning 4.8-1
4.8.1 Existing Conditions *4.8-1*
4.8.2 Applicable Regulatory Requirements *4.8-10*
4.8.3 Basis for Determining Significance *4.8-17*
4.8.4 Methodology *4.8-18*
4.8.5 Impact Analysis *4.8-20*
4.8.6 Cumulative Impact Analysis *4.8-51*
4.8.7 Significance of Impacts Before Mitigation *4.8-51*
4.8.8 Regulatory Requirements, Design Features, and Mitigation *4.8-51*

TABLE OF CONTENTS

Section Name and Number **Page No.**

4.8.9 References 4.8-51
4.9 Noise 4.9-1
4.9.1 Noise Fundamentals 4.9-1
4.9.2 Existing Conditions 4.9-6
4.9.3 Applicable Regulatory Requirements 4.9-10
4.9.4 Basis for Determining Significance 4.9-19
4.9.5 Methodology 4.9-22
4.9.6 Impact Analysis 4.9-34
4.9.7 Cumulative Impact Analysis 4.9-43
4.9.8 Significance of Impacts Before Mitigation 4.9-45
4.9.9 Regulatory Requirements, Design Features, and Mitigation 4.9-46
4.9.10 References 4.9-48
4.10 Transportation 4.10-1
4.10.1 Existing Conditions 4.10-1
4.10.2 Applicable Regulatory Requirements 4.10-3
4.10.3 Basis for Determining Significance 4.10-7
4.10.4 Methodology 4.10-8
4.10.5 Impact Analysis 4.10-12
4.10.6 Cumulative Impact Analysis 4.10-39
4.10.7 Significance of Impacts Before Mitigation 4.10-41
4.10.8 Regulatory Requirements, Design Features, and Mitigation 4.10-43
4.10.9 Significance Of Impacts After Mitigation 4.10-45
4.10.10 References 4.10-46
4.11 Tribal Cultural Resources 4.11-1
4.11.1 Existing Conditions 4.11-1
4.11.2 Applicable Regulatory Requirements 4.11-2
4.11.3 Basis for Determining Significance 4.11-4
4.11.4 Methodology 4.11-5
4.11.5 Impact Analysis 4.11-7
4.11.6 Cumulative Impact Analysis 4.11-9
4.11.7 Significance of Impacts Before Mitigation 4.11-10
4.11.8 Regulatory Requirements, Design Features, and Mitigation 4.11-10
4.11.9 Significance of Impacts After Mitigation 4.11-11
4.11.10 References 4.11-11
4.12 Utilities and Service Systems 4.12-1
4.12.1 Existing Conditions 4.12-1
4.12.2 Applicable Regulatory Requirements 4.12-10
4.12.3 Basis for Determining Significance 4.12-15

TABLE OF CONTENTS

Section Name and Number **Page No.**

4.12.4 Methodology 4.12-16
4.12.5 Impact Analysis 4.12-19
4.12.6 Cumulative Impact Analysis 4.12-28
4.12.7 Significance of Impacts Before Mitigation 4.12-30
4.12.8 Regulatory Requirements, Design Features, and Mitigation 4.12-32
4.12.9 References 4.12-35
4.13 Wildfire 4.13-1
4.13.1 Existing Conditions 4.13-1
4.13.2 Applicable Regulatory Requirements 4.13-3
4.13.3 Basis for Determining Significance 4.13-7
4.13.4 Methodology 4.13-8
4.13.5 Impact Analysis 4.13-10
4.13.6 Cumulative Impact Analysis 4.13-14
4.13.7 Significance of Impacts Before Mitigation 4.13-16
4.13.8 Regulatory Requirements, Design Features, and Mitigation 4.13-18
4.13.9 References 4.13-19

5.0 Other CEQA Considerations 5-1
5.1 Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project is Implemented 5-1
5.2 Significant Irreversible Environmental Impacts Which Would Be Involved in the Proposed Action Should It Be Implemented 5-1
5.3 Growth Inducing Impacts of the Proposed Project 5-2
5.4 Effects Found Not to be Significant During the Initial Study Process 5-3
5.4.1 Aesthetics 5-3
5.4.2 Geology and Soils 5-6
5.4.3 Hazards and Hazardous Materials 5-12
5.4.4 Land Use and Planning 5-15
5.4.5 Mineral Resources 5-15
5.4.6 Paleontological Resources 5-16
5.4.7 Population and Housing 5-17
5.4.8 Public Services 5-17
5.4.9 Recreation 5-22
5.5 References 5-23

6.0 Alternatives 6-1
6.1 Alternatives Under Consideration 6-2
6.1.1 No Project Alternative (NPA) 6-3

TABLE OF CONTENTS

Section Name and Number **Page No.**

6.1.2 No Construction Alternative (NCA) 6-3
6.1.3 Residential Only Alternative (ROA) 6-4
6.1.4 Specific Plan Alternative (SPA) 6-5
6.2 Alternatives considered and Rejected 6-6
6.2.1 Alternative Sites 6-6
6.3 Alternatives Analysis 6-7
6.3.1 No Project Alternative (NPA) 6-8
6.3.2 No Construction Alternative (NCA) 6-14
6.3.3 Residential Only Alternative (ROA) 6-22
6.3.4 Specific Plan Alternative (SPA) 6-30
6.3.5 Environmentally Superior Alternative 6-39

7.0 References 7-1
7.1 Persons Contributing to EIR Preparation 7-1
7.1.1 Lead Agency 7-1
7.1.2 T&B Planning, Inc. 7-1
7.2 Documents Appended to this EIR 7-1
7.3 Documents and Websites Consulted 7-2
7.4 Persons Consulted/Written or Verbal Communication 7-12

EIR Technical Appendices (bound separately)

Appendix A.	Notice of Preparation (NOP), Initial Study, and NOP Comments
Appendix B1.	Air Quality Impact Analysis (AQIA)
Appendix B2.	Construction Health Risk Assessment (HRA)
Appendix C1.	Biological Resources Technical Report
Appendix C2.	Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis
Appendix D.	Cultural Resources Technical Report
Appendix E.	Energy Analysis (EA)
Appendix F.	Greenhouse Gas Analysis
Appendix G.	Water Quality Management Plan (WQMP)
Appendix H.	Noise Impact Analysis (NIA)
Appendix I.	Level-of-Service Based Traffic Analysis Report
Appendix J.	Vehicle Miles Traveled (VMT) Screening Evaluation
Appendix K.	Analysis of Applicability of Wine Country Community Plan Program EIR Mitigation Measures

LIST OF FIGURES

Figure Number and Title **Page No.**

Figure 2-1 Regional Map 2-2
Figure 2-2 Vicinity Map 2-3
Figure 2-3 Surrounding Land Uses and Development 2-5
Figure 2-4 Aerial Photograph 2-6
Figure 2-5 Existing On-Site Structures 2-9
Figure 2-6 USGS Topographic Map 2-10
Figure 2-7 Existing General Plan Land Use Designations 2-22
Figure 2-8 Existing Zoning Classification 2-24
Figure 3-1 Land Use Allocation Plan 3-7
Figure 3-2 CUP 02303R1 Site Plan 3-9
Figure 3-3 Proposed Floor Plans and Elevations 3-11
Figure 3-4 Parking Lot Tree Shading Plan 3-13
Figure 3-5 Interior Driveways 3-15
Figure 3-6 Multiple Events Parking Exhibit 3-16
Figure 3-7 All Potential Temporary Parking Exhibit 3-17
Figure 3-8 Permanent Lighting Plan 3-19
Figure 3-9 Temporary Lighting Plan – Multiple Events Parking 3-20
Figure 3-10 Temporary Lighting Plan – All Potential Temporary Parking 3-21
Figure 3-11 Interim On-Site Sewer Plan 3-24
Figure 3-12 Conceptual On-Site Sewer Plan 3-25
Figure 3-13 Conceptual Off-Site Sewer Plan 3-26
Figure 3-14 Proposed Water Quality Improvements 3-27
Figure 3-15 Existing and Proposed Sound Amplification Locations 3-30
Figure 3-16 Exception No. 9 to Riverside County Ordinance No. 847 3-32
Figure 3-17 Limits of Disturbance 3-38
Figure 4.0-1 Cumulative Development Location Map 4.0-4
Figure 4.1-1 FMMP Farmland Map 4.1-5
Figure 4.2-1 Receptor Locations 4.2-26
Figure 4.3-1 Vegetation Communities Map 4.3-2
Figure 4.3-2 Jurisdictional Resources Map 4.3-7
Figure 4.3-3 MSHCP Relationship Map 4.3-23
Figure 4.3-4 MSHCP Section 6.1.2 Jurisdictional Resources Impact Map 4.3-26
Figure 4.3-5 Vegetation Communities Impact Map 4.3-27
Figure 4.3-6 Jurisdictional Resources Impact Map 4.3-38
Figure 4.6-1 Summary of Projected Global Warming Impact, 2070-2099 (as Compared with 1961-1990) 4.6-6
Figure 4.7-1 San Diego Region Hydrologic Units, Areas, and Subareas 4.7-2
Figure 4.7-2 FEMA FIRM No. 06065C3310G 4.7-4

LIST OF FIGURES

Figure Number and Title **Page No.**

Figure 4.9-1 Noise Level Increase Perception 4.9-5
Figure 4.9-2 Typical Levels of Ground-Borne Vibration 4.9-7
Figure 4.9-3 Noise Measurement Locations 4.9-8
Figure 4.9-4 Land Use Compatibility for Community Noise Exposure 4.9-17
Figure 4.9-5 Receiver Locations 4.9-26
Figure 4.9-6 Operational Noise Source Locations 4.9-31
Figure 4.9-7 Construction Noise Source Locations 4.9-36
Figure 4.13-1 Wildfire Susceptibility 4.13-2

LIST OF TABLES

Table Number and Title		Page No.
Table S-1	Summary of Environmental Impacts, Mitigation Measures, and Conclusions	S-11
Table 1-1	Summary of NOP and Scoping Meeting Comments	1-6
Table 1-2	Location of CEQA Required Topics	1-18
Table 2-1	Summary of Existing On-Site Structures	2-8
Table 3-1	Matrix of Project Approvals/Permits	3-4
Table 3-2	Summary of Structures and Uses to be Newly Permitted	3-10
Table 3-3	Construction Duration Assumptions	3-39
Table 3-4	Construction Equipment Assumptions	3-39
Table 4.0-1	Cumulative Projects List	4.0-5
Table 4.2-1	Ambient Air Quality Standards	4.2-9
Table 4.2-2	Attainment Status of Criteria Pollutants in the SCAB	4.2-11
Table 4.2-3	Project Area Air Quality Monitoring Summary 2022-2024	4.2-12
Table 4.2-4	Project Construction Trip Assumptions	4.2-22
Table 4.2-5	Regional Emissions Significance Thresholds	4.2-23
Table 4.2-6	Construction- and Operational-Related Localized Thresholds of Significance	4.2-24
Table 4.2-7	AERMOD Model Parameters	4.2-29
Table 4.2-8	Exposure Assumptions for Individual Cancer Risk (Construction Activity)	4.2-31
Table 4.2-9	Construction Emissions Summary	4.2-36
Table 4.2-10	Summary of Peak Operational Emissions	4.2-38
Table 4.2-11	Construction Localized Significance Summary	4.2-40
Table 4.2-12	Localized Significance Summary for Peak Operations	4.2-40
Table 4.3-1	Existing Vegetation Communities	4.3-1
Table 4.3-2	Project Impacts to Vegetation Communities	4.3-37
Table 4.5-1	Total Electricity System Power (California 2024)	4.5-2
Table 4.5-2	SCE 2023 Power Content Mix	4.5-4
Table 4.5-3	Construction Power Cost	4.5-15
Table 4.5-4	Construction Electricity Usage	4.5-15
Table 4.5-5	Construction Equipment Fuel Consumption Estimate	4.5-16
Table 4.5-6	Construction Trips and VMT	4.5-17
Table 4.5-7	Construction Worker Fuel Consumption Estimates	4.5-18
Table 4.5-8	Construction Vendor/Hauling Fuel Consumption Estimates	4.5-19
Table 4.5-9	Total Project-Generated Traffic-Related Annual Fuel Consumption	4.5-21
Table 4.5-10	Project Annual Operational Energy Demand Increase Summary	4.5-22
Table 4.5-11	Project and Countywide Energy Consumption	4.5-23
Table 4.6-1	GWP and Atmospheric Lifetime of Select GHGs	4.6-6

LIST OF TABLES

Table Number and Title		Page No.
Table 4.6-2	Top GHG Producing Countries and the European Union	4.6-7
Table 4.6-3	Amortized Annual Construction Emissions	4.6-31
Table 4.6-4	Project Annual GHG Emissions	4.6-34
Table 4.6-5	Project Compliance with 2022 Scoping Plan Actions and Strategies	4.6-36
Table 4.7-1	Identification of Receiving Waters	4.7-3
Table 4.8-1	Project Consistency with SWAP and Temecula Valley Wine Country Community Plan Policies	4.8-22
Table 4.8-2	Analysis of Consistency with Connect SoCal Goals	4.8-38
Table 4.9-1	Typical Noise Levels	4.9-1
Table 4.9-2	Ambient Noise Level Measurements	4.9-10
Table 4.9-3	Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment	4.9-11
Table 4.9-4	Noise Significance Criteria Summary	4.9-23
Table 4.9-5	Construction Reference Noise Levels	4.9-29
Table 4.9-6	Vibration Source Levels for Construction Equipment	4.9-29
Table 4.9-7	Reference Operational Noise Level Measurements	4.9-30
Table 4.9-8	On-Site Construction Equipment Noise Level Summary	4.9-37
Table 4.9-9	On-Site Construction Noise Level Compliance	4.9-38
Table 4.9-10	On-Site Daytime Construction Noise Increases	4.9-38
Table 4.9-11	Daytime Project Operational Noise Levels	4.9-40
Table 4.9-12	Nighttime Project Operational Noise Levels	4.9-40
Table 4.9-13	Operational Noise Level Compliance	4.9-41
Table 4.9-14	Daytime Project Operational Noise Level Increases	4.9-42
Table 4.9-15	Nighttime Project Operational Noise Level Increases	4.9-42
Table 4.9-16	On-Site Construction Vibration Levels	4.9-44
Table 4.10-1	Average Baseline Trip Length	4.10-2
Table 4.10-2	Baseline Conditions VMT	4.10-2
Table 4.10-3	Project Consistency with Riverside County General Plan Circulation Element Policies	4.10-13
Table 4.10-4	Proposed Project VMT	4.10-35
Table 4.12-1	RCWD Retail Water Supplies Utilized – Fiscal Year 2020	4.12-3
Table 4.12-2	RCWD Actual Water Demands – 2020	4.12-4
Table 4.12-3	RCWD Water Supply Estimates – Average/Normal Year (AF)	4.12-4
Table 4.12-4	RCWD Water Supply Estimates – Single-Dry Year (AF)	4.12-4
Table 4.12-5	RCWD Water Supply Estimates – Multiple-Dry Years (AF)	4.12-5
Table 4.12-6	Projected Water Use 2020 to 2045 by Standard Water Use Types – Normal Year (AF)	4.12-6

LIST OF TABLES

Table Number and Title **Page No.**

Table 4.12-7 Projected Water Use 2020 to 2045 by Standard Water Use Types – Dry Years (AF) 4.12-7
Table 6-1 Alternatives to the Proposed Project – Comparison of Environmental Impacts 6.3-40

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
§	Section
A-1	Light Agriculture
A-1-10	Light Agriculture, Minimum 10-acre Lot Size
A-2	Heavy Agriculture
AB	Assembly Bill
ABAU	Adjusted Business As Usual
A/C	Air conditioning
ACM	Alternative Calculation Method
A-D	Agriculture-Dairy
ADA	Americans with Disabilities Act
AERMOD	American Meteorological Society/EPA Regulatory Model
AF	Acre-Feet
AFY	acre-feet/year
AG	Agriculture
AHI	Area of Historic Interest
AIA	Airport Influence Area
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commissions
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
ANSI	American National Standards Institute
A-P	Light Agriculture with Poultry
APN	Assessor's Parcel Number
APS	alternative planning strategy
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
BACM	best available control measures
BAU	business as usual
BMP	Best Management Practice
BTU	British Thermal Unit
C&D	Construction and Demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer Aided Noise Abatement

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
CalFire	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CalGEM	California Geological Energy Management Division
CalGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPP	Community Air Protection Program
CAPCOA	California Air Pollution Control Officers Association
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CBSC	California Building Standards Code
CCAA	California Clean Air Act
CCAAQS	California Ambient Air Quality Standards
CCR	California Code of Regulations
CCRUS	Carbon Capture, Removal, Utilization, and Storage
CCUS	carbon capture, utilization, or storage
CD	Consistency Determination
CDC	California Department of Conservation
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CDR	carbon dioxide removal
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CF_4	tetrafluoromethane
CFC	chlorofluorocarbon
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CGC	California Government Code
C_2F_6	hexafluoroethane
CH_4	methane
CH_2FCF	difluoroethane
CHF_3	fluoroform
CH2FCF	tetrafluoroethane
C_2H_6	ethane

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
CHP	California Highway Patrol
CHPO	County Historic Preservation Officer
CIWMB	California Integrated Waste Management Board
CIWMP	Countywide Integrated Waste Management Plan
CLCA	California Land Conservation Act
CMP	Congestion Management Program
CMUTCD	California Manual on Uniform Traffic Control Devices
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2 e	CO2 equivalent
COG	Council of Governments
COHb	carboxyhemoglobin
COP	Conference of the Parties
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CRIT	Colorado River Indian Tribes
CRNA	California Natural Resources Agency
CSA	County Service Area
CTC	California Transportation Commission
CTC	County Transportation Commissions
CTR	California Toxics Rules
CUP	Conditional Use Permit
C/V	Citrus/Vineyard
CVAG	Coachella Valley Association of Governments
CWA	Clean Water Act
CWC	California Water Code
CZ	Change of Zone
D	Urban and Built-Up Land
dB	Decibel
dBA	A-weighted Decibel
DEH	Department of Environmental Health
DIF	Development Impact Fee
DIVCA	Digital Infrastructure and Video Competition Act

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
DOE	Department of Energy
DOE	Determination of Eligibility
DWR	Department of Water Resources
EA	Energy Analysis
EIA	Energy Information Administration
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMD	Emergency Management Department
EMFAC	Emission Factor Model
EMWD	Eastern Municipal Water District
EO	Executive Order
EPA	Environmental Protection Agency
EPS	emissions performance standard
ERO	Electric Reliability Organization
ESA	Endangered Species Act
EV	Electric Vehicle
EVMWD	Elsinore Valley Municipal Water District
F	Fahrenheit
FAA	Federal Aviation Administration
FAR	firm access rights
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIMA	Federal Insurance and Mitigation Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
G	Grazing Land
GBN	Ground-Based Noise
GBV	Ground-Based Vibration

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
GCC	Global Climate Change
Gg	gigagram
GHG	greenhouse gas
GHGA	Greenhouse Gas Emissions Assessment
GIS	Geographic Information Systems
GPA	General Plan Amendment
GPCD	gallons capita per day
gpd	gallons per day
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GT&S	Gas Transmission and Storage
GWh	gigawatt hour
GWP	Global Warming Potential
HA	Hydraulic Area
HANS	Habitat Acquisition and Negotiation Strategy
HAP	hazardous air pollutant
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
HFHSZ	High Fire Hazard Severity Zone
HI	Hazard Index
HP	horse-power
hp-hr-gal	horsepower hour per gallon
HSA	Hydrologic Subarea
HSC	Health and Safety Code
HU	Hydrologic Unit
IA	Implementing Agreement
LCA	life-cycle analysis
ICAO	International Civil Aviation Organization
IEPR	Integrative Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent Service Operator
ISO	Independent System Operator
ISTEA	Intermodal Surface Transportation Efficiency Act
ITIP	Interregional Transportation Improvement Plan
ITP	incidental take permits

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
JPR	Joint Project Review
kBTU/year	kilo British Thermal Units per year
kWh	kilowatt hours
LADWP	Los Angeles Department of Water and Power
LBNL	Lawrence Berkeley National Laboratory
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard
LDA	Light-Duty-Auto vehicles
LDT	Light-Duty-Trucks
Leq	equivalent continuous sound pressure level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
Lmax	maximum noise level
LOS	Level of Service
LRA	Local Responsibility Area
LSA	Lake and Streambed Alteration
LST	Localized Significance Threshold
LTF	Local Transportation Fund
LTO	Licensed Timber Operators
LULUCF	Land-Use, Land-Use Change and Forestry
Lw	reference sound power level
MBTA	Migratory Bird Treaty Act
MDAQMD	Mojave Desert Air Quality Management District
MDAB	Mojave Desert Air Basin
MG	million gallons
MGD	Million Gallons per Day
MHDT	Medium Heavy-Duty Trucks
MICR	maximum individual cancer risk
MM	mitigation measure
MMcfd	million cubic feet per day
MMRP	Mitigation, Monitoring, and Reporting Program

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
MMT	million metric tons
MMTCO_2e/yr	million metric tons of CO_2e per year
MPH	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resources Zone
MSHCP	Multiple Species Habitat Conservation Plan
MTCO2e	metric tons of CO2e
MW	megawatt
MWDSC	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NDC	nationally determined contributions
NCCP	Natural Community Conservation Planning
NDA	No Development Alternative
NEPSSA	Narrow Endemic Plant Species Survey Area
NESHAP	National Emissions Standards for Hazardous Air Pollutant
NERC	North American Electric Reliability Corporation
NF_3	Nitrogen Trifluoride
NFIP	National Flood Insurance Program
NHL	National Historic Landmark
NIA	Noise Impact Analysis
NIOSH	National Institute for Occupational Safety and Health
N_2	Nitrogen
NMFS	National Marine Fisheries Service
NOP	Notice of Preparation
NO	nitric oxide
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
N_2O	Nitrous Oxide
NPA	No Project (Existing General Plan) Alternative
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NPS	Non-Point Source
NPS	National Park Service
NRHP	National Register of Historic Places
NTR	National Toxics Rule

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
NVIA	Noise and Vibration Impact Assessment
O_2	oxygen
O_3	Ozone
OAL	Office of Administrative Law
OIH	Office of Industrial Hygiene
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Act
P	Prime Farmland
PA	Production/Attraction
Pb	lead
PFC	perfluorocarbon
PG&E	Pacific Gas & Electric
PM	Particulate Matter
PM_{10}	respirable particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	fine particulate matter with a diameter of 2.5 microns or less
PML	Park Model Lodging
PMRV	Park Model RVs
ppb	parts per billion
pph	persons per household
Ppm	parts per million
ppt	parts per trillion
PPV	Peak Particle Velocity
PRC	Public Resources Code
PV	photovoltaic
R-A	Residential - Agricultural
R-A-10	Residential Agriculture, 10-acre minimum lot size
RCA	Regional Conservation Authority
RCDWR	Riverside County Department of Waste Resources
RCFD	Riverside County Fire Department
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCHCA	Riverside County Habitat Conservation Agency
RCNM	Roadway Construction Noise Model
RCPLS	Riverside County Public Library System
RCSD	Riverside County Sheriff's Department

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
RCTC	Riverside County Transportation Commission
RCWD	Rancho California Water District
RPF	Registered Professional Forester
RHNA	Regional Housing Needs Assessment
RIVTAM	Riverside Transportation Analysis Model
RMS	Root mean Square
ROG	Reactive Organic Gas
ROW	Right-of-Way
RPA	Reduced Project Alternative
RPS	Renewables Portfolio Standard
RR	Rural Residential
RSHA	Regional System of Highways and Arterials
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RTPA	Regional Transportation Planning Agency
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
S	Farmland of Statewide Importance
s.f.	square feet
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAQMD AQMP	South Coast Air Quality Management District Air Quality Management Plan
SCE	State Candidate Endangered
SCE	Southern California Edison
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDG&E	San Diego Gas & Electric
SDSU	San Diego State University
SDWA	Safe Drinking Water Act

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
SEIR	Subsequent Environmental Impact Report
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SHA	Safe Harbor Agreement
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SKR HCP	Stephens' kangaroo rat Habitat Conservation Plan
SLF	Sacred Lands File
SLPS	Short-Lived Climate Pollutant Strategy
SO_2	sulfur dioxide
SO_4	sulfates
SOC	Statement of Overriding Considerations
SoCalGas	Southern California Gas
SOV	single occupant vehicle
SR	State Route
SRA	Source Receptor Area
SRA	State Responsibility Area
SRRRA	Santa Rosa Regional Resources Authority
SRWRF	Santa Rosa Water Reclamation Facility
STA	State Transit Assistance
STIP	Statewide Transportation Improvement Program
SWAP	Southwest Area Plan
SWFP	Solid Waste Facility Permit
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TA	Traffic Analysis
TAC	toxic air contaminant
TCP	traditional cultural property
TCR	Tribal Cultural Resource
TDA	Transportation Development Act
TEA-21	Transportation Equity Act for the 21st Century
THP	Timber Harvesting Plan
TIP	Transportation Improvement Plan
TOD	transit-oriented developments
tpd	tons per day

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
TPW	tons per week
TPY	tons per year
TUA	Traditional Use Area
TUMF	Transportation Uniform Mitigation Fee
TVGA	Temecula Valley Groundwater Basin
TVRWRF	Temecula Valley Regional Water Reclamation Facility
TVUSD	Temecula Valley Unified School District
TVWCCP	Temecula Valley Wine Country Community Plan
TVWCPA	Temecula Valley Wine Country Policy Area
U	Unique Farmland
UNFCCC	United Nations Framework Convention on Climate Change
U.S.	United States
USDOT	United Stated Department of Transportation
U.S. EPA	United States Environmental Protection Agency
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UWIG	Urban/Wildlands Interface Guidelines
UWMP	Urban Water Management Plan
VdB	decibel notation
VDC	Valle De Los Caballos
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VWRPD	Valley Wide Recreation and Park District
WC	Wine Country Zones
WC-E	Wine Country - Equestrian
WDR	Waste Discharge Requirement
WMI	Watershed Management Initiative
WMIE	Waste Management of the Inland Empire
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRI	World Resources Institute

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
WRP	Waste Recycling Plan
WRRA	Waste Reuse and Recycling Act
WSA	Water Supply Assessment
WUI	Wildland-Urban Interface
X	Other Land
ZE/NZE	zero- and near-zero-emission
ZEV	zero-emission vehicle
µg/m3	Microgram per Cubic Meter

S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000, et seq. requires that before a public agency decides to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This Draft Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2025010280, was prepared in accordance with CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which consists of applications for a Conditional Use Permit Revision (CUP 02303R1), Change of Zone (CZ 22000010), and issuance of Exception No. 9 to Riverside County Ordinance No. 847, which collectively are referred to herein as the "Project" or "proposed Project." This EIR does not recommend approval or denial of the proposed Project; rather, this EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, the County of Riverside will consider certifying the Final EIR and adopting required findings and a statement of overriding considerations.

This Executive Summary complies with CEQA Guidelines Section 15123, "Summary." This EIR includes a description of the proposed Project and evaluates the physical environmental effects that could result from Project implementation. The County of Riverside prepared an environmental Initial Study and determined that the scope of this EIR should cover 13 subject areas. The scope includes all of the subject areas listed in the Initial Study and Notice of Preparation (NOP) for this EIR and in consideration of Appendix G to the CEQA Guidelines and public comments received by the County in response to this EIR's NOP and during a publicly-noticed Scoping Meeting, which occurred on February 10, 2025. The NOP, and written comments received by the County in response to the NOP, are attached to this EIR as *Technical Appendix A*. In consideration of the Initial Study and public comment on the NOP, the 13 environmental subject areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

1. Agriculture and Forestry Resources
2. Air Quality
3. Biological Resources
4. Cultural Resources
5. Energy
6. Greenhouse Gas Emissions
7. Hydrology and Water Quality
8. Land Use and Planning
9. Noise
10. Transportation
11. Tribal Cultural Resources
12. Utilities and Service Systems
13. Wildfire

Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR: 1) describes the applicability of the environmental baseline, which consists of the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (January 14, 2025), and the operational baseline derived from the Galway Downs facility's actual 2023 operating conditions, adopted pursuant to the County's exercise of discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439, as described in EIR Section 2.0, *Environmental Baseline*; 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project's significant environmental impacts and the mitigation measures imposed by the County of Riverside on the Project to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Summary of Environmental Impacts, Mitigation Measures, and Conclusions*. The County of Riverside applies mitigation measures that it determines: 1) are feasible and practical for project applicants to implement; 2) are feasible and practical for the County of Riverside to monitor and enforce; 3) are legal for the County to impose; 4) have an essential nexus to the Project's impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

This EIR also discusses alternatives to the proposed Project. Alternatives are described that would attain most of the Project's objectives while avoiding or substantially lessening the proposed Project's significant adverse environmental effects. A full discussion of Project alternatives is found in Section 6.0, *Alternatives*.

S.2 PROJECT SYNOPSIS

S.2.1 Location and Regional Setting

The Project site comprises two parcels totaling approximately 241.6 acres, situated in the southwestern portion of unincorporated Riverside County. Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

The 241.6-acre Project site that is the subject of this EIR is located within the Southwest Area Plan (SWAP) portion of unincorporated Riverside County and within the Temecula Valley Wine Country Policy Area. The Project site is situated approximately 0.3-mile east of State Route 79 (SR-79) and approximately 6 miles east of Interstate 15 (I-15). More specifically, the Project site comprises two parcels, Assessor's Parcel Numbers (APNs) 927-160-001 and 927-160-002, located at the street address of 38801 Los Corralitos Road, Temecula, CA 92592. The Project site is bounded to the west and south by Los Corralitos Road; to the east by Pauba Road; and to the north by Los Caballos Road. The nature of the Project site and the surrounding area is characterized primarily by equestrian and winery uses, along with rural residential uses and open space.

Under existing conditions, the Project site consists of an existing events center that features a variety of recreational-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; recreational vehicle (RV) park with club house; grooms quarters; office space; clock tower house, and storage spaces. Refer to Section 2.0, *Environmental Baseline*, for a more detailed description of the existing conditions of the Project site and surrounding areas.

S.2.2 Project Objectives

The underlying purposes of the proposed Project are threefold: (1) to ensure the long-term viability of Galway Downs as a premier equestrian facility in the Temecula Valley Wine Country; (2) to attract and host equestrian events at higher level of competition; and (3) to authorize a complementary mix of other uses to generate operational revenue necessary to sustain and reinvest in the facility's primary equestrian mission. The proposed Project reflects the Project Applicant's determination that the continued vitality of Galway Downs as a working equestrian center depends on a diversified event programming model in which non-equestrian uses support the facility's equestrian character and equestrian operations.

The following objectives are intended to achieve these underlying purposes:

A. To make physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.

B. To make operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.

C. To align past and current uses that occur at Galway Downs under Riverside County Ordinance No. 348 and the Temecula Wine Country Community Plan.

D. To provide expanded opportunities for equestrian-related overnight accommodations.

E. To allow multi-sports field activities as secondary uses, primarily on weekends and holiday weekends, to help ensure the facility remains financially viable to enable the facility to continue hosting equestrian-oriented uses.

F. To eliminate reliance on septic systems for sewage disposal.

G. To reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source.

H. To establish procedures and protocols for the management of special occasion traffic generated by Galway Downs.

I. To clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone.

J. To establish Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Parks, and Multi-Use Sport Field land uses as new conditionally permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.

S.2.3 Project Summary Description

Galway Downs is an existing events facility that first opened in the 1960's and has a current street address of 38801 Los Corralitos Road. It operates under four (4) 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 (hereafter "proposed Project" or "Project"). The primary use of the site would continue to be equestrian related. The proposed Project would generally allow the Project Applicant to: (1) make physical and operational modifications on the property to attract higher level of competition for equestrian events that can be hosted on the site; (2) permit a portion of the site to host non-equestrian sports events (primarily on weekends and holiday 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.

New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed CUP 02303R1 include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure that is proposed to be placed over an existing arena to support rooftop solar panels (hereafter called "metal solar structure"), and additional area for equestrian recreational vehicle (RV) park use. Existing structures that would continue to be operated in connection with the Project include an existing 1,513-square-foot (s.f.) barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future; the design of these areas would be subject to future discretionary approval of Plot Plans by Riverside County. Notwithstanding, the environmental effects associated with the future construction and operation of the 36 park model lodging units and 18 additional employee modular housing units are evaluated throughout this EIR based on reasonably foreseeable conceptual designs that include the following characteristics: (1) Scale: The Park Model Lodging area would not exceed 36 units within the 5.50-acre Zone 3 area identified on Figure 3-1 and the employee housing area would not exceed 18 units within the 2.76-acre Zone 4 area identified on Figure 3-1; and (2) Ground Disturbance: Grading within Zone 3 and Zone 4 would be limited to that necessary to prepare level pads for each unit and associated access and utility infrastructure; substantial alteration of existing topography or drainage patterns would not occur.

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 that is audible beyond 200 feet from the source.

CZ 22000010 is sought by the Project Applicant to amend Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348 (herein "Ordinance No. 348") to allow for operational enhancements at the site, which specifically would add definitions for three uses; modify the list of conditionally permitted uses within the "Wine Country – Equestrian (WC-E)" zone; 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; and add new development standards for Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks. The approvals requested from Riverside County to implement the Project consist of the following:

1. Approval of a Conditional Use Permit Revision (CUP 02303R1);
2. Approval 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's application materials, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to State CEQA Guidelines Section 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. All other discretionary and administrative approvals that would be required of the County of Riverside or other government agencies also are within the scope of the Project analyzed in this EIR.

S.3 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Substantive issues raised in response to the NOP and related to environmental topics are summarized in Table 1-1. Based on comments received during the NOP review period, a number of concerns were expressed regarding the Project's potential impacts to agricultural resources, biological resources, hydrology/water quality, land use/planning, noise, transportation, and wildfire.

S.4 PROJECT ALTERNATIVES

S.4.1 No Project Alternative (NPA)

The No Project Alternative (NPA) assumes that the Project Applicant's applications for proposed CUP 02303R1, CZ 22000010, and Exception No. 9 to Riverside County Noise Ordinance No. 847 are not approved by Riverside County. In such a case, future activities at Galway Downs would consist of equestrian-oriented land uses that are currently allowed under existing permits, including CUP 02303 which places no capacity limit on equestrian activities. The temporarily-permitted sports events that occur on the property under existing conditions, including events such as soccer and lacrosse, would cease to operate. Additionally, there would be no special occasion zone under the NPA. Galway Downs would continue to host events such

as weddings, remembrances, and award ceremonies, but these activities would be restricted to the existing Carriage House where they currently occur. In addition, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented under the NPA. Also, all activities involving exterior sound amplification would require issuance of separate permits providing exceptions to the provisions of Ordinance No. 847 instead of having a blanket exception as proposed by the Project's Exception No. 9. Furthermore, no changes would be made to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification and Galway Downs would continue to be regulated by the adopted version of Ordinance No. 348. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative under which Galway Downs would continue operate under existing CUP 2303 and other existing permits.

S.4.2 No Construction Alternative (NCA)

The No Construction Alternative (NCA) assumes that no construction requiring a new or modified entitlement permits would occur at Galway Downs, and would eliminate potential environmental effects associated with ground-disturbing construction activities. First, Galway Downs would continue operating on a holding tank sewer system and the construction of a new sewer line connecting to the newly installed EMWD sewer main in De Portola Road would not occur. In addition, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented and there would be no physical improvements associated with establishment of a special occasion zone and temporary parking areas. The NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for sports events and would allow for use of sound amplification equipment. However, it should be noted that under the NCA, Ordinance No. 348 would not be revised to include establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348, as Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Park uses would not be accommodated under the NCA. CUP 02303R1 would be modified to omit physical construction aspects of the Project. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative under which no physical alteration of the Galway Downs property would occur as a result of entitlement permit or permit modification.

S.4.3 Residential Only Alternative (ROA)

Under existing conditions, the 241.6 acres of the Galway Downs property is designated by the Riverside County General Plan and Southwest Area Plan (SWAP) for "Rural – Rural Residential (R-RR)" land uses, which normally would allow for development of residential uses on minimum five-acre lot sizes. However, the Project also is subject to the Temecula Valley Wine Country Community Plan (TVWCCP), which has been incorporated into the SWAP. Pursuant to SWAP and TVWCCP Policy SWAP 1.5, residential densities within the "Wine Country – Equestrian" (WC-E) District (which includes the Project site) are restricted to 10-acre

minimum lot sizes. Accordingly, the Residential Only Alternative (ROA) assumes that the Galway Downs site would be subdivided and developed with up to 24 single-family homes on minimum 10-acre lot sizes. As part of implementation of the ROA, all of the existing structures and facilities on site would be demolished and/or removed from the Project site, and the 241.6-acre property would be developed entirely with single-family residential homes. Under the ROA, equestrian uses only would be permitted as an ancillary use to the residential units, and equestrian-related events, such as competitive events, would not be allowed. Implementation of the ROA would require approval of a TTM to subdivide the 241.6-acre site to establish legal lots to accommodate residential development on site. As part of the TTM, the ROA would be required to construct the off-site sewer connection between the Project site and the planned sewer line within De Portola Road. This alternative was selected to allow Riverside County to consider development of the Project site with an alternative permitted use based on the site's existing R RR General Plan land use designation and the TVWCCP restriction on residential lot sizes, and to enable consideration of an alternative that would further reduce the Project's less-than-significant impacts to air quality and due to GHG emissions.

S.4.4 Specific Plan Alternative (SPA)

The Specific Plan Alternative (SPA) considers development of the Project site with residential uses while still maintaining some equestrian-related components. Under the SPA, a Specific Plan would be proposed to address future development within the 241.6-acre property. Under the SPA, the northern +/- 137.9 acres of the existing Galway Downs facility, inclusive of the existing race track, special events zone, and most of the existing northern parking areas, would continue to be used for equestrian-related events, including but not limited to, English Style such as Dressage, Hunter/Jumper, Eventing, Peruvian, etc., or multiple disciplines of Western styles such as Reining, Barrel Racing, Roping, etc. No other sports events (e.g., soccer, lacrosse, etc.) would be allowed within the northern portion of the site that would be reserved for equestrian uses. As part of the SPA, the southern +/- 98.7 acres of the Project site would be developed with up to 98 single-family residential dwelling units on minimum one-acre lot sizes, which would be designed to meet the requirements of the Wine Country's "Clustered Subdivision Development Standards" pursuant to Section 14.93.B of Riverside County Ordinance No. 348. In addition, approximately 5.0 acres within the northern portions of the site would be reserved for vineyard uses, as required by Section 14.93.B.5 of Riverside County Ordinance No. 348 for Wine Country Clustered Subdivisions. In total, the SPA would allow for equestrian-related uses on approximately 137.9 acres, vineyard uses on approximately 5.0 acres, and up to 98 clustered single-family homes on approximately 98.7 acres. Implementation of the SPA would require the following discretionary approvals from Riverside County:

1. A Foundation General Plan Amendment, as described by Chapter 11 of the Riverside County General Plan, in order to change the existing General Plan Foundation Component and General Plan land use designation applied to the southern 98.7 acres of the site from "Rural – Rural Residential (R-RR)" to "Rural Community – Very Low Density Residential (RC-VLDR)";
2. A General Plan Amendment to revise Figure 4B of the SWAP and TVWCCP to redesignate the southern +/- 98.7 acres of the site from the "Wine Country – Equestrian District (WC-ED)" to the "Wine Country – Residential District (WC-RD)", with no changes to the northern 142.9 acre of the site that would remain designated within the WC-ED;

3. A Change of Zone to change the existing zoning classification of the 241.6-acre property from "Wine Country – Equestrian (WC-E)" to "Specific Plan (SP) Zone," which would apply zoning regulations, permitted uses, and development standards for the northern 142.9 acres (i.e., the 137.9-acre equestrian area and the 5.0-acre vineyard area) similar to those provided in Section 14.96 of Riverside County Ordinance No. 348 for the WC-E zone, and would apply zoning regulations, permitted uses, and development standards for the southern +/- 98.7 acres similar to those provided in Section 14.98 of Riverside County Ordinance No. 348 for the "Wine Country – Residential (WC-R)" zone;
4. A Conditional Use Permit (CUP) as required by Section 14.98.B of Riverside County Ordinance No. 348 for Wine Country Clustered Subdivisions; and
5. A Tentative Tract Map (TTM) to subdivide the southern +/- 98.7 acres of the Project site to establish up to 98 single-family lots on minimum one-acre lot sizes.

In addition, it is anticipated that Exception No. 9 to Riverside County Noise Ordinance No. 847 also would be proposed under the SPA. This alternative was selected to allow for consideration of an alternative that would increase the available housing supply within unincorporated Riverside County generally and within the Wine Country area specifically, thereby assisting the County in meeting its Regional Housing Needs Assessment (RHNA) allocations for the "Above Moderate" income category.

S.5 EIR PROCESS

CEQA (Public Resources Code, Sections 21000- 21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project's anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report (EIR) must be prepared. The scope of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.

Pursuant to State CEQA Guidelines Section 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must

consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by, or under the direction, of the Lead Agency, which for the proposed Project is the County of Riverside. The County of Riverside is the Lead Agency because it is public agency that has the primary responsibility for approving or carrying out the Project. Further, Responsible and Trustee Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the County of Riverside.

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with related technical appendices and reference sources, represent the complete record of the EIR. Throughout this document, the terms Final EIR and Draft EIR may be used interchangeably since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

In accordance with State CEQA Guidelines Section 15087, this Draft EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Section 152049(a)). Responses to written comments received during the public review period will be included in the Final EIR. During the decision-making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by Riverside County decision-makers. If the Final EIR is certified and the Project approved, Riverside County and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the Final EIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

S.6 SUMMARY OF IMPACTS, MITIGATION MEASURES AND CONCLUSIONS

S.6.1 Effects Found not to be Significant

CEQA Guidelines Section 15128 requires that an EIR "...contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." Based on the Project's Initial Study (*Technical Appendix A*), it was determined that the Project would result in no impact or less than significant impacts under the following environmental subject areas: Aesthetics, Geology and Soils, Hazards and Hazardous Materials, Mineral Resources, Paleontological Resources, Population and Housing, Public Services, and Recreation. Refer to Subsection 5.4, *Effects Found not to be Significant During the Initial Study Process*, for more information pertaining to these environmental topics.

S.6.2 Impacts of the Proposed Project

Table S-1, *Summary of Environmental Impacts, Mitigation Measures, and Conclusions*, provides a summary of the proposed Project's environmental impacts, as required by CEQA Guidelines Section 15123(a). Also presented are the mitigation measures recommended by Riverside County to avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable impacts due to GHG emissions and Vehicle Miles Traveled (VMT) that cannot be mitigated to below a level of significance, while all remaining impacts of the Project were determined to be less than significant or would be reduced to less-than-significant levels with the implementation of mitigation measures.

Table S-1 Summary of Environmental Impacts, Mitigation Measures, and Conclusions

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
4.1 Agriculture and Forestry Resources					
Threshold a.: The entire 241.6-acre Project site is classified by the Farmland Mapping and Monitoring Program (FMMP)as "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands." "Farmland" is defined in Section II (a) of Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and by Riverside County to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands" are not considered "Farmland" as that term is defined by CEQA, the County, or the California Department of Conservation (CDC), meaning that the Project would not convert "Prime Farmland," "Unique Farmland," "Farmland of Statewide Importance," or any other "Farmland" as shown on the maps prepared pursuant to the FMMP of the California Resources Agency to non-agricultural use. Thus, based on the FMMP mapping, the Project would not result in the conversion of "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance" (Farmland) to a non-agricultural use. No impact would occur.	No Impact	Impacts would be less than significant; thus, no mitigation measures are required.	N/A	N/A	N/A
Threshold b.: The Project site is zoned Wine Country – Equestrian (WC-E), which is not an agricultural zoning classification pursuant to Ordinance No. 625. The Project would be fully consistent with the WC-E zone because it would not displace or conflict with equestrian activity. To	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
the contrary, its primary purpose is to attract higher level of competition for equestrian events and formalize uses already occurring under the established operational baseline, with all non-equestrian uses remaining subordinate to the site's equestrian character as reflected in the 75% permanent equine lands requirement of CZ 22000010. The Project site is not subject to any Williamson Act Contract or agricultural preserve. The nearest contracted land is separated from the Project site by Pauba Road, and no Project improvements would affect operations within the Agricultural Preserve. The off-site sewer line would be installed entirely below grade on a parcel that is neither actively farmed nor Williamson Act-encumbered, leaving no permanent above-ground infrastructure. Mandatory compliance with Ordinance No. 625 would further ensure that Project activities would not indirectly contribute to conversion of off-site farmland. Impacts would be less than significant. Threshold c.: Under existing conditions, the only property that comprises “agriculturally-zoned property” pursuant to Ordinance No. 625 is land to the southeast of the Project site that is zoned for “Light Agriculture, 10-acre minimum lot sizes (A-1-10)” land uses. Although the Project site occurs adjacent to agriculturally-zoned property located to the southeast of the Project site, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement,	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Based on mandatory compliance with Ordinance No. 625, impacts would be less than significant. Threshold d.: The proposed Project would not result in any change in the existing environment that, due to its location or nature, could result in the conversion of nearby Farmland – including lands classified as "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland" – to non-agricultural use. As established in Environmental Impact Report (EIR) Sections 2.0 and 3.0, the Project would continue to operate consistent with the 2023 environmental baseline and would not introduce operational activities beyond those already occurring at the Galway Downs facility. The Project would not physically disturb any off-site parcel currently being used for agricultural purposes; Project-related construction and operational noise levels would remain below the County of Riverside's adopted thresholds of significance at all nearby sensitive receivers, including the equestrian-oriented properties surrounding the Project site; Project-related lighting would be designed, shielded, and directed in compliance with Riverside County Ordinance No. 915 such that no light spillover would reach adjacent agricultural, equestrian-oriented, or winery properties; and the Project would be	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
subject to the right-to-farm protections of Riverside County Ordinance No. 625, which insulate established agricultural operations from nuisance-based land use pressure. Accordingly, the Project would not indirectly affect the continued agricultural use of any surrounding Farmland or other agriculturally designated parcel, and indirect impacts of the Project on surrounding agricultural lands would be less than significant. Thresholds e., f., and g.: There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur.	No Impact				
4.2 Air Quality					
Threshold a.: The Project's regional and localized construction- and operational-source emissions would not exceed applicable regional significance thresholds or LSTs. Additionally, the Project is consistent with the site's existing General Plan land use designation, and the analyses of Thresholds b. and c. demonstrate that the Project's construction and long-term operational activities would not exceed any of the South Coast Air Quality Management District (SCAQMD) Regional Thresholds or Localized Significance Thresholds (LSTs). As such, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant. Threshold b.: As indicated in EIR Tables 4.2-9 and	Less-than-Significant Impact Less-than-	Although Project impacts due to air quality emissions would be less than significant and mitigation measures are not required, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's air quality emissions during construction activities. **WCCP PEIR MM AQ-10**: The County shall require implementing projects to comply with the following Mitigation Measures for Construction Equipment and Vehicles Exhaust Emissions: • The County shall require implementing projects to select construction equipment to be used on site based on low emission	Project Applicant & Construction Contractors	County Planning Department or designee, SCAQMD	Pre-construction (notes on plans) and during construction activities

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
4.2-10, Project construction- and operational-related regional emissions would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants. As such, Project regional construction- and operational-related emissions would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant.	Significant Impact	factors (equipment which releases little atmospheric pollutants) and high energy efficiency (equipment which requires less energy to do the same work). Examples of low emission and high energy efficiency equipment include use of EPA Tier 2 (or better) emission compliant construction equipment and use of alternative fueled construction equipment (natural gas) as deemed appropriate by the County during application review (see GHG-1 for criteria).			
Threshold c.: As indicated in EIR Tables 4.2-11 and 4.2-12, Project-related construction and operational emissions would not exceed the SCAQMD LSTs for any criteria pollutant. Additionally, Project-related traffic at nearby intersections would not cause or contribute to a carbon monoxide (CO) "hot spot," as background CO concentrations are low and mobile-source emissions would not change relative to existing conditions. Furthermore, construction activities associated with the proposed Project would not expose nearby sensitive receptors, including the Maximally Exposed Individual Receptor (MEIR), Maximally Exposed Individual Worker (MEIW), and Maximally Exposed Individual School Child (MEISC), to cancer or non-cancer health risks due to diesel particulate matter (DPM) emissions exceeding the thresholds of significance of 10 in one million and 1.0, respectively; therefore, based on SCAQMD guidance, the Project's localized DPM-related health risk impacts during construction would be less than significant. Additionally, under long-term operating conditions,	Less-than-Significant Impact	• The County shall require implementing projects to include a statement on grading plans that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications. • The County shall require implementing projects to utilize electric- or diesel-powered equipment, in lieu of gasoline-powered engines, as deemed appropriate by the County during application review (see GHG-1 for criteria).. • The County shall require implementing projects to include a statement on grading plans that work crews will shut off equipment when not in use. During smog season (May through October), the overall length of the construction period will be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time. • The County shall require implementing projects to time construction activities so as to not interfere with peak hour traffic and			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
the proposed Project would not have the potential to expose sensitive receptors to substantial pollutant concentrations, and significant cancer or non-cancer health risk impacts would not occur. Therefore, the Project would not expose sensitive receptors, which are located within one mile of the Project site, to substantial pollutant concentrations, and impacts would be less than significant. Threshold d.: The proposed Project would entail a continuation of activities at an existing equestrian-related events facility and would not introduce new odor-generating uses or expand current operations. The Project site is located within a rural area characterized by surrounding agricultural and equestrian land uses that are not considered sensitive to agricultural-related odors, as such odors are typical and expected in this setting. Existing equestrian activities already generate intermittent odors associated with horse stalls and manure management. However, these conditions would not increase under the Project. Current best management practices would continue, including the use of absorbent shavings in stalls, daily and in some cases twice-daily cleaning, and removal of manure and soiled bedding within 24 hours by a third-party hauler, with no long-term on-site storage of byproducts. Additionally, potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse)	Less-than-Significant Impact	minimize obstruction of through traffic lanes adjacent to the site; if deemed necessary by the County to maintain acceptable levels of service and safety, a flag person shall be retained to maintain safety adjacent to existing roadways. • The County shall require implementing projects to use EPA-rated engines of Tier 3 or better, or prevailing ARB construction fleet specifications (see GHG-1 for criteria). • As soon as electric utilities are available at construction sites, the County shall require implementing projects to supply the construction site with electricity from the local utility and all equipment that can be electrically operated shall use the electric utility rather than portable generators, where reasonable and feasible (see GHG-1 for criteria). . • The County shall require implementing projects to retain on site dust generated by the development activities, and keep dust to a minimum by following the dust control measures listed below: a) During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease. b) During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
associated with the proposed Project's long-term operational uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed Project would be less than significant and no mitigation is required.		site. At a minimum, this would require watering at least three times per day which include wetting down such areas in the late morning, mid-day after work is completed for the day, and whenever wind exceeds 15 miles per hour. Soil stabilizers may also be used instead of watering as deemed appropriate by the County during application review, to comply with County and SCAQMD nuisance and dust regulations. c) Immediately after clearing, grading, earthmoving, or excavation is completed, the entire area of disturbed soil shall be treated until the area is paved or otherwise developed so that dust generation will not occur. d) Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. e) Trucks transporting soil, sand, cut or fill materials, and/or construction debris to or from the site shall be tarped/covered from the point of origin. **WCCP PEIR MM AQ-11**: Where applicable, the County shall require implementing projects to apply Conservation Management Practices for Confined Animal Facilities: 1. Manure Handling a. Cover manure prior to removing material offsite; and b. Spread the manure before 11:00 AM and	Project Applicant	County Planning Department or designee	Concurrent with discretionary application review and post construction

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		when wind conditions are less than 25 miles per hour; and c. Utilize coning and drying manure management by removing manure at laying hen houses at least twice per year and maintain a base of no less than 6 inches of dry manure after clean out; or in lieu of complying with conservation management practice (1c) comply with conservation management practice (1d). d. Utilize frequent manure removal by removing the manure from laying hen houses at least every seven days and immediately thin bed dry the material. 2. Feedstock Handling a. Utilize a sock or boot on the feed truck auger when filling feed storage bins. 3. Disturbed Surfaces a. Maintain at least 70 percent vegetative cover on vacant portions of the facility; or b. Utilize conservation tillage practices to manage the amount, orientation and distribution of crop and other plant residues on the soil surface year-round, while growing crops (if applicable) in narrow slots or tilled strips; or c. Apply dust suppressants in sufficient concentrations and frequencies to maintain a stabilized surface. 4. Unpaved Roads a. Restrict access to private unpaved roads either through signage or physical access restrictions and control vehicular speeds to no more than 15 miles per hour through			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		worker notifications, signage, or any other necessary means; or b. Cover frequently traveled unpaved roads with low silt content material (i.e., asphalt, concrete, recycled road base, or gravel to a minimum depth of four inches); or c. Treat unpaved roads with water, mulch, chemical dust suppressants or other cover to maintain a stabilized surface 5. Equipment Parking Access a. Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; or b. Apply material with low silt content (i.e., asphalt, concrete, recycled road base, or gravel to a depth of four inches). **WCCP PEIR MM AQ-13**: Construction contractors supplying heavy duty diesel equipment, greater than 50 hp, will be encouraged to apply for AQMD SOON funds. Information including the AQMD website will be provided to each contractor which uses heavy duty diesel for onsite construction activities.	Project Applicant, construction contractors	County Planning Department or designee	Prior to issuance of any construction permits
4.3 Biological Resources					
Threshold a.: The proposed Project is not located within or adjacent to any Stephens' Kangaroo Rat (SKR) core reserve areas and is not subject to payment of SKR Habitat Conservation Plan (HCP) fees pursuant to Riverside County Ordinance No. 663; thus, the proposed Project has no potential to conflict with the SKR HCP. The proposed Project would not conflict with Multiple Species Habitat Conservation Plan (MSHCP) provisions relating to	Less-than-Significant Impact with Mitigation Incorporated	**MM 4.3-1** Prior to approval of the Project's proposed Conditional Use Permit No. CUP02303R1, the Project Applicant shall obtain an amendment to JPR 10-12-27-01 to expand the area covered by the JPR to include the 2.62 acres of additional Project-related off-site impacts within Assessor's Parcel Number (APN) 927-690-005 and within the impacted portions of Los Caballos Road and De Portola Road to address	Project Applicant	Riverside County Planning Department	Prior to the issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
vernal pools, sensitive fairy shrimp, narrow endemic plant species, or the urban/wildlands interface. In addition, the Project would not conflict with MSHCP Section 6.3.2 with respect to Criteria Area Plant Species Survey Area (CAPSSA) species, mammals, amphibians, or other species not considered adequately conserved. However, while the Project would not directly conflict with the MSHCP Reserve Assembly requirements, because the Project's previously-issued Joint Project Review (JPR) 10-12-27-01 did not account for the Project's off-site sewer impacts, a revision to the JPR is required; this is conservatively evaluated as a potentially significant impact. Implementation of Mitigation Measure MM 4.3-1 would ensure that the Project's previously-issued JPR 10-12-27-01 is updated to include the Project's off-site impacts associated with the construction of an off-site sewer line and the Project's driveway improvements along Los Caballos Road and De Portola Road, and would reduce the Project's potential indirect impact to the MSHCP Reserve Assembly requirements to below a level of significance. Additionally, although the Project has been designed to completely avoid on- and off-site riparian and riverine resources subject to regulation under MSHCP Section 6.1.2, the off-site portion of Temecula Creek that traverses the proposed off-site sewer alignment appears to shift over time, and there is a potential that the location identified on the Project's Conditional Use Permit (CUP) application materials may not match the precise location of the drainage at the time the sewer line would be installed. Accordingly, the		impacts associated with the off-site construction of the proposed sewer line between the northwest corner of the Project site and the future EMWD sewer main within De Portola Road, and to address the proposed reconfiguration of the Project's driveways along Los Caballos Road and De Portola Road. **MM 4.3-2** Prior to issuance of grading or construction permits that facilitate or authorize off-site construction of the sewer line between the northwest corner of the Project site and the EMWD sewer main within De Portola Road, the Project Applicant shall provide Riverside County with a Jurisdictional Delineation map and technical report prepared by a Qualified Biologist meeting the qualifications defined by the Western Riverside County MSHCP with demonstrated experience conducting jurisdictional delineations in accordance with the USACE Wetland Delineation Manual and applicable Regional Supplements. The Jurisdictional Delineation shall identify the jurisdictional limits of Temecula Creek within APN 927-690-005 under Section 404 of the Clean Water Act (USACE jurisdiction), Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act (RWQCB jurisdiction), and Fish and Game Code Section 1602 (CDFW jurisdiction), in relation to ground-disturbing activities associated with the sewer line installation. The plans included as part of the grading or construction permit application shall depict the limits of federal and state jurisdiction of Temecula Creek within APN 927-690-005, and	Project Applicant	Riverside County Planning Department	Prior to the issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
Project's potential to result in significant direct impacts to approximately 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek conservatively represents a significant impact due to a conflict with MSHCP Section 6.1.2. Implementation of Mitigation Measure MM 4.3-2 would ensure that a future jurisdictional delineation is conducted within the off-site sewer alignment, would require adjustments to grading associated with the off-site sewer alignment as needed to completely avoid the 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek, and would require recontouring of the off-site areas subject to sewer line construction to their pre-existing conditions. In addition, while no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. If present, the Project could result in impacts to the burrowing owl in conflict with MSHCP Section 6.3.2, representing a potentially significant impact. Implementation of Mitigation Measure MM 4.3-3 would ensure that pre-construction surveys for the burrowing owl are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and that a burrowing owl management plan is prepared and implemented in order to address the relocation of owls from the Project site, passively and/or actively. Implementation of the required mitigation would ensure Project consistency with MSHCP Section 6.3.2 and would reduce the Project's		shall require directional drilling (e.g., jack and bore) beneath all mapped jurisdictional areas such that there would be no surface impact to the drainage feature within those jurisdictional limits. The grading and construction plans associated with the off-site sewer construction shall further require that all temporary impact areas be recontoured to pre-existing conditions following completion of sewer line construction. Prior to commencement of sewer line installation, the Project Applicant shall provide Riverside County with pre-construction photographs of the creek alignment and proposed bore location documenting existing conditions. Prior to final grading and sewer line installation inspection, the Project Applicant shall provide Riverside County with post-construction photographs of the drainage and sewer alignment demonstrating that the drainage feature has been completely avoided and left in its existing condition and that all non-jurisdictional areas subject to disturbance during off-site sewer line construction have been recontoured to pre-existing grades. **MM 4.3-3** In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days prior to commencement of any ground-disturbing activities at the Project site, as discussed below.	Project Applicant	Riverside County Planning Department, CDFW, RCA	Prior to the issuance of grading permits or other permits authorizing ground disturbance or discing

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
potentially significant impacts to less-than-significant levels. Thresholds b. and c.: The Project would result in no impacts to State- or federally-listed threatened or endangered plant species or to any other special-status plants or species of local concern. Additionally, the Crotch's bumble bee was not documented onsite following focused surveys conducted during the spring of 2025. As such, the proposed Project would not result in any impacts to the Crotch's bumble bee. The Project also has been designed to avoid impacts to the existing inundated detention basin located on site, which is the only feature on site that potentially could serve as habitat for sensitive fairy shrimp species. Thus, the Project would not result in any impacts to sensitive fairy shrimp species. Although no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site, representing a potentially significant impact and a potential conflict with MSHCP Section 6.3.2. Implementation of Mitigation Measure MM 4.3-3 would ensure that pre-construction surveys for the burrowing owl are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and that a burrowing owl management plan is prepared and implemented in order to address the relocation of owls from the Project site, passively and/or actively. Implementation of the required mitigation would	Less-than-Significant Impact with Mitigation Incorporated	• Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the RCA and Wildlife Agencies (i.e., CDFW and/or USFWS). • Burrowing Owl Management Plan: In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on site, a burrowing owl management plan shall be prepared and implemented in coordination with the Western Riverside County Regional Conservation Authority (RCA) and CDFW that shall detail the relocation of owls from the Project site, passively and/or actively. If additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented. A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
ensure Project consistency with MSHCP Section 6.3.2. With implementation of the required mitigation, Project impacts to the burrowing owl would be reduced to below a level of significance.		required, shall be provided to the Riverside County Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and ground-disturbing activities.			
Threshold d:. The onsite regions of the Project site including offsite road improvements are not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor. In addition, all offsite impacts associated with the proposed Eastern Municipal Water District (EMWD) sewer connection would be temporary. Temporary impact areas within upland habitats would be recontoured to preexisting conditions following construction of the sewer connection and all staging will occur within the proposed temporary impact area. Accordingly, the proposed Project's off-site sewer connection would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.	Less-than-Significant Impact				
Threshold e.: A total of 99.52 acres of primarily disturbed and developed vegetation communities conservatively would be directly and permanently impacted as a result of project implementation. The proposed Project has been designed to completely avoid disturbed southern willow scrub within the on-site areas, as no grading or improvements are proposed as part of the Project within this 0.13-acre patch of disturbed southern	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
willow scrub. No other vegetation associated with sensitive natural communities occur within the Project's impact areas. Accordingly, the Project would not result in any impacts to sensitive vegetation communities, and no impact would occur. Therefore, the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service, and impacts would be less than significant.					
Threshold f.: The proposed Project has been designed to completely avoid the existing unvegetated ephemeral drainage located in the northern portion of the Project site. In addition, a note has been added to the plans included as part of CUP 2303R1 to require directional drilling (e.g., jack and bore technique) beneath the existing 0.01-acre portion of Temecula Creek, such that there would be no surface impacts to this existing drainage. However, based on a review of aerial photographs, it appears that the precise location of the off-site portions of Temecula Creek has shifted over time. As a precise timeline for when the new EMWD sewer main within De Portola Road will be completed is not currently available, there is a potential that the location identified on the Project's plans where the directional drilling is required may not exactly match the precise location of the drainage at the time the sewer line needs to be constructed. Accordingly, a subsequent jurisdictional delineation would be	Less-than-Significant Impact with Mitigation Incorporated				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
required prior to installation of the off-site sewer line beneath Temecula Creek. Therefore, there is a potential that construction of the sewer line could result in significant direct impacts to the approximately 0.01-acre ephemeral drainage within Temecula Creek, resulting in a potentially significant impact. Implementation of Mitigation Measure MM 4.3-2 would ensure that a future jurisdictional delineation is conducted within the off-site sewer alignment, and further requires adjustments to the off-site sewer alignment as needed to completely avoid the 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek. Implementation of the required mitigation would ensure that Project impacts associated with the off-site sewer line construction would completely avoid all areas containing riparian resources, and would reduce Project impacts to below a level of significance.					
Threshold g: Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a. in EIR Subsection 4.3, the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines, Riverside County Ordinance No. 449, and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). Although the Project site contains approximately 0.18-acre of Coast Live Oak habitat and contains several mature regulated coast live oak trees within the northeastern portion of the Project site, the Project has been designed to fully avoid these oak trees. In addition, the Project	No Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
would not result in the removal of any existing trees either on site or within the Project's off-site improvement areas, and as such the Project has no potential to conflict with Riverside County Ordinance Nos. 559 (Regulating the Removal of Trees) or 449 (Regulating Encroachments in County Highways). Thus, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines, and no impact would occur. Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,313 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Accordingly, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.					
4.4 Cultural Resources					
Thresholds a. and b: Although no significant historical resources, as defined by the California Register of Historical Resources (CRHR) and CEQA, were identified as part of the Project's Cultural Resources Study (CRS) within the Project's physical disturbance area, there is a potential for previously-undiscovered historical resources to occur beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources on site or within	Less-than-Significant Impact with Mitigation	**MM 4.4-1 (015 – Planning-CUL)**: Unanticipated Resources. The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the	Project Applicant, Project Archaeologist, Construction Contractors	Riverside County Planning Department, Tribal Monitor	In the event that unanticipated cultural resources are encountered

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
the off-site improvement areas would be significant on both a direct and cumulatively-considerable basis prior to mitigation. Implementation of Mitigation Measures MM 4.4-1 through MM 4.4-3 would ensure that any historical resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated, including if necessary curation of the historical artifact(s) at the Western Science Center in Hemet or as directed by the County Archaeologist. Implementation of the required mitigation would ensure that any potential impacts to subsurface historical sites or resources would be reduced to less-than-significant levels. <u>Thresholds c. and d:</u> The Project would not impact any known archaeological sites and would not cause a substantial adverse change in the significance of any known archaeological resources pursuant to California Code of Regulation, Section 15064.5. However, given the past impacts to the property, coupled with the Project site's proximity to natural sources of water and the presence of cultural resources within the Project vicinity, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur in the on- or off-site impact areas of the proposed Project would be significant prior to mitigation. Implementation of Mitigation Measures	Less-than-Significant Impact with Mitigation	cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. * A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources. ** If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary. **MM 4.4-2 (060 – Planning-CUL)**: Native American Monitor. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all	Project Applicant, Project Archaeologist, Construction Contractors	Riverside County Planning Department, Tribal Monitor	Prior to the issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
MM 4.4-1 through MM 4.4-3 would ensure that any archaeological sites or resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance. Thresholds e.: The Project site does not contain a cemetery and no known cemeteries are located within the immediate Project site vicinity. Although the Project Applicant would be required to comply with the applicable provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 et. seq., the Project's potential impacts to buried human remains would be significant on a direct and cumulatively-considerable basis prior to mitigation. In the event that human remains are discovered during construction activities, Mitigation Measure MM 4.4-4 would require the Project Applicant to comply with the applicable provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 et. seq. Mandatory compliance with Mitigation Measure MM 4.4-4, State law, and applicable regulatory requirements would reduce the Project's potential impacts to buried human remains to less-than-significant levels.	Less-than-Significant Impact with Mitigation	initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure. **MM 4.4-3 (070 – Planning-CUL)**: Artifact Disposition. Prior to Grading Permit Final Inspection. In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources, (with the exception of sacred items, burial goods, and Human Remains) and provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods. Historic Resources - All historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such	Landowner(s), Project Archaeologist	Riverside County Planning Department	Prior to Grading Permit Final Inspection

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. Pre-contact resources - A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s). This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloguing, analysis and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in the Phase IV Report. The details of any disposition of artifacts shall be documented in the Phase IV report. **MM 4.4-4 Human Remains**: In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097 et. seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the	Project Applicant, Construction Contractors, Project Archaeologist	County Coroner	In the event that human remains are encountered

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		treatment and disposition has been made. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.			
4.5 Energy					
Threshold a.: Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be	Less-than-Significant Impact	Impacts would be less than significant; thus, no mitigation measures are required.			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
accommodated within the context of available resources and energy delivery systems. The Project would, therefore, not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation. Threshold b.: Energy consumed by the Project's operation is calculated to be comparable to or less than energy consumed by other uses of similar scale and intensity that are constructed and operating in California, as the Project would be subject to current regulatory requirements, such as the 2025 version of Title 24, which was not in effect when most existing residential developments were constructed. Based on the analysis presented in EIR Subsection 4.5, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.	Less-than-Significant Impact				
4.6 Greenhouse Gas Emissions					
Threshold a: Construction and long-term operation of the Project would result in approximately 13,210.05Million Metric Ton of Carbon Dioxide Equivalent per Year ($MTCO_2e$/yr), reflecting the incremental difference between the Project's total emissions and the emissions already occurring under baseline conditions.	Significant and Unavoidable Cumulatively-Considerable Impact	For the reasons discussed in detail in EIR subsection 4.6.7, feasible mitigation measures are not available to address the Project's cumulatively-considerable impacts due to the annual emissions of 13,210.05 $MTCO_2e$/yr, which primarily would result from Project-generated traffic.			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
Because the Project's Greenhouse Gas (GHG) emissions of approximately 13,210.05 $MTCO_2e/yr$ would exceed the County's Climate Action Plan (CAP) Update screening threshold of 3,000 $MTCO_2e/yr$, the Project's impacts due to GHG emissions would represent a significant impact. The screening tables and associated point system identified in Appendix D to the Riverside County CAP Update are structured around standardized residential and commercial development categories and the GHG-reducing features applicable to those uses. The Project's combination of uses, operational characteristics, and site-specific conditions does not correspond to the residential or commercial development types contemplated by the Riverside County CAP Update's screening tables. Thus, compliance with the CAP Update's screening tables was determined to be infeasible for the proposed Project. Mitigation measures beyond CAP Update compliance were considered to address the Project's significant impacts due to GHG emissions, including on-site solar energy generation, operational efficiency measures, Transportation Demand Management (TDM) measures, and limited weekend event frequency. However, these measures were determined to comprise Project design features and compliance with existing State regulations, or otherwise would be infeasible as they would conflict with the Project's primary objectives. The Project's primary source of GHG emissions would be associated with vehicular trips to and from the Project site, and neither the Project Applicant nor Riverside		The following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's GHG emissions during construction activities. **WCCP PEIR MM GHG-1**: All implementing projects shall use the following mitigation measures to reduce impacts from construction activities as related to construction equipment and vehicle exhaust emissions: • The County shall require implementing projects to use low-emission and high energy efficiency construction equipment on site. Examples of low-emission and high energy efficiency equipment include use of EPA Tier 2 (or better) emission compliant construction equipment and use of alternative-fuel construction equipment (natural gas), if available. • The County shall require implementing projects to include a statement on grading plans that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications. • The County shall require implementing project to utilize electric- or diesel-powered equipment, in lieu of gasoline-powered engines, where feasible. • The County shall require implementing projects to include a statement on grading	Project Applicant, Construction Contractors	Riverside County Planning Department or designee	Prior to discretionary project approval or issuance of a grading permit for ministerial projects

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
county have the authority to regulate tail pipe emissions, which instead are regulated at the State and federal levels. Accordingly, because mitigation measures are not available to reduce the Project's GHG emissions to below the CAP Update screening threshold of 3,000 $MTCO_2e$/yr or to reduce the Project's GHG emissions by the requisite 25% efficiency-based reduction pursuant to the CAP Update, Project impacts due to GHG emissions would represent a significant and unavoidable cumulatively-considerable impact of the proposed Project for which mitigation measures are not available. <u>Thresholds b.:</u> The Project would be consistent with or otherwise would not conflict with the California Air Resources Board (CARB) 2022 Scoping Plan. However, because the Project would result in 13,210.05 $MTCO_2e$/yr of GHG emissions and would exceed the CAP screening threshold of 3,000 $MTCO_2e$/yr, the Project would have the potential to conflict with the CAP in the absence of mitigation measures. Mitigation measures to reduce the Project's GHG emissions have been determined to be infeasible. Although the CAP Update includes screening tables to address significant impacts due to GHG emissions, these measures were designed to address residential and commercial developments and are not applicable to the proposed Project. Furthermore, mitigation measures are not available to reduce the Project's GHG emissions to below the CAP Update screening threshold of 3,000 $MTCO_2e$/yr or to reduce the Project's GHG emissions by the	Significant and Unavoidable Direct and Cumulatively-Considerable Impact	plans that work crews shall shut off equipment when not in use. During smog season (May through October), the overall length of the construction period shall be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time. • The County shall require implementing projects to time construction activities so as to not interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flag person shall be retained to maintain safety adjacent to existing roadways. • The County shall require implementing projects to use EPA-rated engines of Tier 3 or better for construction equipment. • As soon as electric utilities are available at construction sites, the County shall require implementing projects to supply the construction site with electricity from the local utility and all equipment that can be electrically operated shall use the electric utility rather than portable generators.			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
requisite 25% efficiency-based reduction pursuant to the CAP Update. Therefore, Project impacts due to a conflict with the Riverside County CAP Update would represent a significant and unavoidable impact of the proposed Project on both a direct and cumulatively-considerable basis. Furthermore, because the County's CAP is intended to address the County's obligations pursuant to Assembly Bill (AB) 32 and Senate Bill (SB) 32, the Project's significant and unavoidable impacts due to a conflict with the County's CAP also represents a significant and unavoidable impact due to potential conflicts with AB 32 and SB 32.					
4.7 Hydrology and Water Quality					
Thresholds a., b., and i.: Under the proposed Project all runoff that is generated on site would continue to be conveyed to downstream areas where Project-related runoff would infiltrate into the groundwater table, and would continue to contribute flows to the Temecula Valley Groundwater Basin (TVGB). Accordingly, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the San Diego Region Basin Plan and potential impacts to groundwater quality, would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would continue to be	Less-than-Significant Impact	Impacts would be less than significant; thus, no mitigation measures are required.	N/A	N/A	N/A

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
appropriately treated by the existing retention basin on site, while runoff generated by the proposed driveway improvements would be routed to self-treatment areas for retention and water quality purposes prior to ultimate discharge from the site. Thus, the Project would not adversely affect surface or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or waste discharge requirements (WDRs) or otherwise substantially degrade surface or ground water quality; would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; and would not conflict with the San Diego Region Basin Plan or result in adverse groundwater quality impacts. Impacts would be less than significant. <u>Thresholds c. and f.:</u> Similar to existing conditions, with implementation of the proposed Project all runoff generated on site would continue to be appropriately treated by the existing retention basin on site, while runoff generated by the proposed driveway improvements would be routed to self-treatment areas for retention and water quality purposes prior to ultimate discharge from the site. Thus, the Project would not adversely affect surface or groundwater quality. Additionally, the existing retention basin and proposed driveway self-treatment areas have been designed to treat the Project's pollutants of concern, including nutrients, metals, toxicity, bacteria/pathogens, pesticides/herbicides, and total dissolved solids, thereby ensuring that the Project does not provide substantial additional sources of polluted runoff.	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
Impacts would be less than significant. Threshold d.: With mandatory adherence to the Stormwater Pollution Prevention Plan (SWPPP) requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance. Under long-term conditions, implementation of the proposed Project would result in the introduction of impervious surfaces associated with the driveway access points and the new proposed structures. Thus, with development of the site as proposed, the Project site's potential to result in erosion would be slightly reduced. Furthermore, runoff from the Project site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin, which is designed to retain water and reduce sediments in site runoff per the requirements of the Riverside County Flood Control and Water Conservation District (RCFCWCD) Hydraulic Design Manual. Additionally, because the vast majority of runoff generated on the Project site would be conveyed to the on-site retention basin and ultimately to Temecula Creek and would be allowed to infiltrate into the groundwater table, the Project has no potential to result in an increase in runoff from the Project site that could cause or contribute to erosion hazards downstream. Therefore, long-term impacts due to erosion on and off site would be	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
less than significant with implementation of the proposed Project. Thresholds e. and g.: Although the Project would result in new impervious surfaces on site encompassing approximately 78,489 square feet (s.f.) (1.8 acres), the site's existing retention basin in the northwest portion of the Project site is sufficiently sized per the requirements of the RCFCWCD's Hydraulic Design Manual to accommodate the slight increase in runoff due to the addition of 1.8 acres of impervious surfaces. Any runoff that exceeds the capacity of the existing retention basin would be conveyed northerly via a culvert beneath Los Caballos Road to an existing swale, with flows ultimately being conveyed to Temecula Creek located north of the Project site. Additionally, the increase in impervious surfaces associated with the proposed driveway improvements would be attenuated by self-retaining areas improved to include an amended soil configuration. As such, there are no components of the proposed Project that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and impacts would be less than significant. Additionally, although the northern portions of the Project site are subject to flood hazards under existing conditions, the only improvements proposed as part of the Project within the areas subject to the existing floodplain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
6,046 s.f. (0.14-acre) of additional pavement. This addition of impervious surface would not substantially affect any flood flows in the area, as the driveway has been designed to include self-retaining areas that would attenuate any increase in flows. Accordingly, the proposed Project would not impede or redirect flood flows, and impacts would be less than significant. Threshold h.: Although the northern portions of the Project site are subject to inundation during heavy rain events, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would not materially affect the mapped floodplain, and would not result in the release of any pollutants due to Project site inundation. Accordingly, impacts due to inundation from flood hazards would be less than significant. Similarly, although the northern portions of the Project site are subject to inundation in the event of a failure of the dam at Vail Lake, which is considered to have a "high" susceptibility to failure, no portions of the Project site subject to inundation due to dam failure would include any new uses that would be associated with the storage or use of pollutants, and as such Project impacts due to the release of pollutants due to site inundation would be less than significant. Additionally, the Project site is located approximately 28 miles from the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis, and no impact	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
would occur.					
4.8 Land Use and Planning					
Threshold a: Aside from Project-related impacts due to a conflict with the Riverside County CAP (which is separately addressed under the discussion of Greenhouse Gas Emissions in EIR Subsection 4.6), the Project would not conflict with the General Plan, Southwest Area Plan (SWAP), Temecula Valley Wine Country Community Plan (TVWCCP), Connect SoCal, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.	Less-than-Significant Impact	Impacts would be less than significant; thus, no mitigation measures are required.	N/A	N/A	N/A
4.9 Noise					
Thresholds a. and b.: The Project site is located approximately 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL). Noise levels below 75 dBA CNEL are considered "Conditionally Acceptable" for outdoor spectator sports uses, "Normally Acceptable" for residential uses (i.e., employee housing), and "Normally Acceptable" for lodging uses. Accordingly, the Project would have no potential to expose people residing or working in the Project area to excessive public airport-related noise levels. The nearest private airstrip to the Project site is Ernst Field, located approximately 10.6 miles northeast of the Project site; however, due to distance and the limited nature of airstrip operations at Ernst Field, the Project site is not subject to airstrip-related noise levels from Ernst Field. In addition, the Project does not include any airport- or airstrip-related	No Impact	Although Project impacts due to noise would be less than significant and mitigation measures are not required, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's potential impacts due to noise. **WCCP PEIR MM NOI-2**: Implementing project proponents shall submit a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. These measures may include the following: • A sign posted on-site pertaining the permitted construction days and hours and complaint procedures and who to notify in the event of a problem. The sign shall also include a listing of both the County and construction	Project Applicant, Construction Contractors	Riverside County Planning Department	Prior to/during construction activities

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
components, and there are no components of the proposed Project with the potential to result in an increase in local airport operations. Accordingly, the proposed Project would not expose people residing or working in the Project area to excessive noise levels associated with public airports or private airstrips, and no impact would occur. Threshold c.: On-site Project-related construction activities would expose nearby sensitive receptors to noise levels ranging from 55.4 to 67.6 dBA Equivalent continuous (average) sound level (Leq), which would not exceed the identified threshold of significance of 80 dBA Leq. 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. Additionally, construction-related noise affecting the nearest sensitive receptors would not exceed 76 dBA Leq, which is below the identified threshold of significance of 80 dBA Leq. Therefore, noise impacts due to daytime Project construction noise would be less than significant. 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; thus,	Less-than-Significant Impact	contractor's telephone numbers (during regular construction hours and off-hours); and • A pre-construction meeting may be held with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. **WCCP PEIR MM NOI-5**: All implementing projects involving a special occasion facility shall be reviewed by the Riverside County Office of Industrial Hygiene and include at least the following conditions: • All special event venders (e.g. DJs, musical bands, etc.) shall be notified regarding noise conditions of approval . • Outdoor special events and associated audio equipment, sound amplifying equipment, and/or performance of live music shall be limited to the hours of 8:00 a.m. to 10:00 p.m. Monday through Sunday. • Noise levels shall be kept below levels prescribed in the County's General Plan Noise Element and County noise Ordinances No. 847 by using a decibel-measuring device to measure music sound levels when amplified music is used. • Clean-up activities associated with special events shall terminate no later than midnight. • Outdoor speakers for all scheduled events shall be oriented toward the center of the	Project Applicant	County Planning Department; County Office of Industrial Hygiene	Prior to Special Occasion Facility approval

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
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. In addition, 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. Impacts would be less than significant. Threshold d.: At distances ranging from 211 to 1,532 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.00 to 0.01 Peak Particle Velocity (PPV) in inches per second (in/sec). Based on the maximum acceptable continuous vibration threshold of 0.3 in/sec PPV, typical construction-related vibration from the Project would remain below building damage thresholds at all receiver locations. Therefore, the Project-related vibration impacts would be less than significant during construction activities at the Project site.	Less-than-Significant Impact	property and away from adjoining land uses. • Padding/carpeting shall be installed under music speakers for early absorption of music. **WCCP PEIR MM NOI-6**: All implementing projects involving a special occasion facility shall include at least the following conditions to ensure proper enforcement of the County Ordinances and project conditions: • After issuance of two Code Violation Notices for excessive noise, noise measurements shall be performed by the Office of Industrial Hygiene for every event at the property line, to determine if the Noise Ordinance and project conditions are being followed during the special events. • If violations of the Noise Ordinance or project conditions are found, the County shall reconsider allowed hours of operation, number of guests, amount of special events per year, or approval of the specific facility. • The proponents shall be required to pay fees assessed per the Department's hourly rate pursuant to Ordinance No. 671.	Project Applicant	County Office of Industrial Hygiene	During operations
4.10 Transportation					
Threshold a.: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Specifically, there are no components of the Project that would conflict with Connect SoCal, the Riverside County Congestion Management Plan (CMP), or the	Less-than-Significant Impact	**MM 4.10-1** Prior to the issuance of grading permits or improvement plans affecting the intersection of Los Caballos Road at State Route 79 (SR-79), prior to issuance of grading permits or improvement plans affecting the intersection of Anza Road at SR-79, and prior to issuance of grading permits or improvements plans to accommodate	Project Applicant	Riverside County Transportation Department, Riverside County Building & Safety Department	Prior to issuance of grading permits or improvement plans affecting the intersection of Los Caballos

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
Riverside County General Plan Circulation Element. Accordingly, the Project has no potential to result in impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. <u>Threshold b.:</u> The Vehicle Miles Traveled (VMT) significance threshold is any net increase in VMT above baseline conditions. The proposed Project is estimated to generate approximately 32,857,946 net new annual VMT above the established 2023 environmental baseline under the conservative assumption that a peak event occurs every weekend of the year. Because the Project's net new VMT represents an increase in VMT above baseline conditions, and the Project's direct VMT impact and contribution to cumulative VMT is therefore significant. For the reasons discussed in further detail in EIR subsection 4.10, no feasible mitigation measures are available to reduce the Project's VMT impact to a less-than-significant level. Specifically, TDM measures were determined to be impractical and even if such measures were determined to be feasible, available TDM strategies could achieve only a 3 to 12 percent reduction in total Project VMT. Additionally, limiting event frequency or scale would reduce VMT but is not feasible mitigation because it would be fundamentally inconsistent with the basic objectives of the proposed Project. Accordingly, the Project's VMT impact is significant and unavoidable on both a project-specific and cumulatively-considerable basis.	Significant and Unavoidable Direct and Cumulatively-Considerable Impact	acceleration lanes and deceleration lanes at the Project's access driveways, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CA MUTCD). The traffic control plan shall also require advance coordination with RCFD and the CHP regarding construction schedules and lane closure timing; establishment and signing of emergency vehicle access during construction; requirements that flaggers give immediate right-of-way to emergency vehicles at all times; and restrictions on simultaneous lane closures at multiple locations along the SR-79 corridor. A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors. In addition, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's air quality emissions during construction activities. **WCCP PEIR MM TR-4**: All future transportation related improvements in the Project area shall be consistent with the County ordinances (i.e. Ordinance No. 348, 460, 461, 499, 512, 585 etc.) and the Project (i.e., revised SWAP Figure 7 – Circulation Network, development standards of	Project Applicant, Construction Contractors	Riverside County Transportation Department	Road at State Route 79 (SR-79) or affecting the intersection of Anza Road at SR-79, and prior to issuance of grading permits or improvements plans to accommodate acceleration lanes and deceleration lanes at the Project's access driveways Prior to implementing project approval; Prior to construction of Project area

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		the implementing zones, Temecula Valley Wine Country Design Guidelines, etc.). All implementing project designs, including site access points, turning lanes, etc. shall be reviewed by the County Transportation Department staff to determine that proposals are consistent with appropriate design standards.			transportation improvements
Threshold c.: The only roadway improvements proposed as part of the Project include the installation of a traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at State Route 79 (SR-79), the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project access driveways. The Riverside County Transportation Department (RCTD) has reviewed the Project's proposed roadway improvements plans, and has determined that the design of the improvements would not substantially increase hazards due to a geometric design feature; on the contrary, the installation of a new traffic signal and the acceleration and deceleration lanes generally would serve to improve traffic safety in the local area. In addition, the equestrian and sports event uses that would be accommodated by the proposed Project are fully consistent and compatible with surrounding land uses in the area. Accordingly, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment), and impacts would be less than significant.	Less-than-Significant Impact				
Threshold d.: Roadway pavement wear and maintenance demand attributable to Project traffic would not exceed those already generated by existing operations. Furthermore, the Project's proposed roadway improvements would improve	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
traffic operations at the facility's primary access points and reduce the potential for traffic-related wear on the adjacent public roadway network. The Project Applicant would continue to pay property taxes funding the ongoing maintenance of public roadways serving the Project, and private driveways serving Galway Downs would be maintained by the Galway Downs facility at the Applicant's expense. For these reasons, the proposed Project would not result in an increase in the need for new or altered roadway maintenance in the local area beyond what already occurs under existing conditions such that significant environmental effects would occur, and impacts would therefore be less than significant. <u>Threshold e.:</u> The Project would include the installation of a traffic signal and left-turn lane at the intersection of Los Caballos Road at SR-79, the implementation of overlap phasing for the southbound right-turn lane and to increase the cycle length to 120 second at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project access driveways. As such, the Project has the potential to adversely impact circulation in the local area during the construction of proposed frontage improvements and during proposed improvements at the intersections of Los Caballos Road at SR-79 and Anza Road at SR-79, representing a potentially significant impact. Mitigation Measure MM 4.10-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to	Less than Significant with Mitigation Incorporated				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
issuance of grading permits or improvement plans associated with the installation of a traffic signal and eastbound left-turn lane at the Los Caballos Road at SR-79 intersection, during the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and during the construction of acceleration and deceleration lanes at the Project's access driveways. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels. Threshold f.: Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during the installation of a traffic signal and left-turn lane at the intersection of Los Caballos Road at SR-79, during the implementation of overlap phasing for the southbound right-turn lane and to increase the cycle length to 120 seconds at the intersection of Anza Road at SR-79, and during the installation of acceleration and deceleration lanes at the Project access driveways, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact. Mitigation Measure MM 4.10-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of	Less than Significant with Mitigation Incorporated				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
grading permits or improvement plans associated with the installation of a traffic signal and eastbound left-turn lane at the Los Caballos Road at SR-79 intersection, the overlap phasing improvements at Anza Road at SR-79, and the acceleration and deceleration lanes at the Project access driveways. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect emergency access or access to nearby uses during the Project's construction phase. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels. Threshold g.: All bike lanes planned in the local area already are in place, and no construction or expansion of bike systems or bike lanes are proposed as part of the Project. Accordingly, no impact would occur.	No Impact				
4.11 Tribal Cultural Resources					
Threshold a.: The Project has the potential to result in significant impacts to previously-undiscovered Tribal Cultural Resources, including human remains, and could result in significant impacts to previously-identified Tribal Cultural Resources within the Project site in the absence of protective measures. Mitigation Measures MM 4.11-1 through MM 4.11-4 shall apply (which also are included as Mitigation Measures MM 4.4-1 through MM 4.4-4 in EIR Subsection 4.4, *Cultural Resources*), and have been drafted to include all of the mitigation requirements requested during the Project's Tribal Consultation process. Implementation of the	Less-than-Significant Impact with Mitigation Incorporated	**MM 4.11-1 (015 – Planning-CUL)**: Unanticipated Resources. The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project	Project Applicant, Project Archaeologist, Construction Contractors	Riverside County Planning Department, Tribal Monitor	In the event that unanticipated cultural resources are encountered

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
required mitigation would ensure appropriate treatment of any Tribal Cultural Resources that may be identified during Project-related ground-disturbing activities, including human remains. Implementation of the required mitigation would reduce Project impacts to Tribal Cultural Resources to below a level of significance.		archaeologist**, the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. * A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources. ** If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary. **MM 4.11-2 (060 – Planning-CUL)**: Native American Monitor. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including	Project Applicant, Project Archaeologist, Construction Contractors	Riverside County Planning Department, Tribal Monitor	Prior to the issuance of grading permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure. **MM 4.11-3 (070 – Planning-CUL)**: Artifact Disposition. Prior to Grading Permit Final Inspection. In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources, (with the exception of sacred items, burial goods, and Human Remains) and provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods. Historic Resources - All historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western	Landowner(s), Project Archaeologist	Riverside County Planning Department	Prior to Grading Permit Final Inspection

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. Pre-contact resources - A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s). This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloguing, analysis and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in the Phase IV Report. The details of any disposition of artifacts shall be documented in the Phase IV report. **MM 4.11-4 Human Remains**: In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097 et. seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. The County Coroner shall determine that no	Project Applicant, Construction Contractors, Project Archaeologist	County Coroner	In the event that human remains are encountered

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
		investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.			
4.12 Utilities and Service Systems					
Threshold a.: Although the Project would require construction of new or expanded water, wastewater conveyance, and stormwater drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings	Less-than-Significant Impact	Although Project impacts to utilities and service systems would be less than significant and mitigation measures are not required, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply			

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
(e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been identified to reduce the Project's impacts to the extent feasible. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant.		to the proposed Project to further reduce the Project's potential impacts to utilities and service systems. **WCCP PEIR MM PSU WATER-3**: All implementing projects shall be required to use graywater advanced water conservation pursuant to the intent of Riverside County Policy OS 2.5 through implementation of at least the following best management practices: • Irrigation systems shall be designed, maintained, and managed to meet or exceed an irrigation system efficiency of 80%. • The capacity of the irrigation system shall not exceed peak system capacity to meet crop-specific water requirements, water meter capacity, and backflow preventer device capacity. • Irrigation systems shall be designed to prevent runoff, overspray, and low-head drainage. • Irrigation systems shall be designed to ensure the dynamic pressure at each emission device is within the manufacturers recommended pressure range for optimum performance. • Irrigation systems shall be designed to include a device(s), which provides site-specific soil moisture and/or evapotranspiration data that can be used to schedule irrigation events effectively. • Care shall be taken to design irrigation systems so that irrigation blocks are	Project Applicant	Riverside County Planning Department or designee	Prior to discretionary project approval or issuance of a grading permit for ministerial projects, and during construction
Threshold b.: The Rancho California Water District (RCWD) 2020 Urban Water Management Plan (UWMP) demonstrates that RCWD would have sufficient water supplies to meet existing and projected demands without shortage under normal, single-dry-year, and multiple-dry-year conditions through 2045. The Project's anticipated incremental increase in potable water demand of 18.0 Acre-Feet per Year (AFY) is negligible relative to RCWD's projected excess supply capacity and would be fully accommodated without requiring new or expanded water supply infrastructure or affecting RCWD's ability to serve other users within its service area. Impacts due to water supply would be less than significant.	Less-than-Significant Impact				
Threshold c.: The Project's proposed sewer improvements consist of a new off-site sewer line connecting the northwestern corner of the Project site to the EMWD sewer main within De Portola Road, installed entirely below grade through	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
Assessor's Parcel Number (APN) 927-690-005 using standard trenching and directional drilling (jack and bore) techniques beneath an ephemeral drainage feature. Construction of the sewer line would generate temporary impacts that have been evaluated under the appropriate subject headings in this EIR and reduced to less-than-significant levels through the implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2. Upon completion of construction, all temporarily disturbed areas would be recontoured to pre-existing grades and the sewer line would leave no permanent above-ground infrastructure within the off-site parcel. Long-term operation of the sewer line would convey wastewater generated at the Galway Downs facility to the Temecula Valley Regional Water Reclamation Facility (TVRWRF) for treatment, eliminating the need for interim septic system reliance and reducing the risk of on-site wastewater-related water quality impacts. The sewer line has been designed solely to serve the Galway Downs facility and would not extend wastewater service capacity to other properties in a manner that removes barriers to their development. Accordingly, there are no environmental effects associated with the Project's sewer improvements that have not been fully evaluated and addressed in this EIR. With implementation of the identified mitigation measures, Project impacts due to sewer improvements would be less than significant. Threshold d.: The Project's worst-case demand for wastewater treatment of 145,590 gallons per day	Less-than-Significant	contained within areas of uniform soil texture and solar orientation. • Irrigation shall be scheduled to apply water at or below crop-specific water requirements. • Crops with different water needs shall be irrigated separately. **WCCP PEIR MM PSU SEWER 2**: All implementing projects shall make a fair share contribution toward proposed sewer improvements, as set forth in the phasing and financing plan being developed by EMWD. In addition, all implementing projects shall be responsible for extending sewer lines from available trunk lines as a condition of approval for the project, and/or otherwise ensuring adequate wastewater service consistent with County, Rancho California Water District and Regional Water Quality Control Board requirements, as deemed appropriate by the County during application review, in order to meet water quality standards and comply with applicable policies and regulations adopted by the County, Rancho California Water District and the Regional Water Quality Control Board. Every future project in the Project area have special sewer conditions as established by the County pursuant to the "Temecula Valley Wine Country (TVWC) Draft Conditions of Approval" adopted by the Board on February 14, 2012. **WCCP PEIR MM PSU WASTE-1**: All implementing project proponents shall make every effort feasible to recycle, reuse, and/or reduce the amount of construction and demolition materials	Project Applicant Project Applicant	Riverside County Planning Department or designee; EMWD Riverside County Department of Waste Resources (DWR)	Prior to issuance of occupancy permits Prior to issuance of building or occupancy permits

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
(gpd) would represent only 1.6% of the TVRWRF's current excess capacity of 9 MGD (145,590 gpd ÷ 9,000,000 gpd x 100 = 1.62%). In addition, the Project's demand for wastewater treatment would represent only 1.0% of the TVRWRF's planned excess capacity of 14 million gallons per day (MGD) (145,590 gpd ÷ 14,000,000 gpd x 100 = 1.04%). Accordingly, the Project would not result in a determination by the EMWD that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and impacts would therefore be less than significant.	Impact	(i.e., concrete, asphalt, wood, etc.) generated by implementing projects of the Project that would otherwise be taken to a landfill. This diversion of waste must exceed a 50 percent reduction by weight. The project shall complete the Riverside County Waste Management Department Construction and Demolition Waste Diversion Program Form B or and Form C process as evidence to ensure compliance. Form B (Recycling Plan) must be submitted and approved by the Riverside County Waste Management Department and provided to the Department of Building and Safety prior to the issuance of building permits. Form C (Reporting Form) must be approved by the Riverside County Waste Management Department and submitted to the Department of Building and Safety prior to the issuance of certificate of occupancy/final inspection.			
<u>Threshold e.:</u> The Project's 0.7 tons per day (tpd) of solid waste would represent approximately 0.01% of the excess daily capacity at El Sobrante Landfill, approximately 0.02% of the excess daily capacity at the Lamb Canyon Landfill, and approximately 0.03% of the excess daily capacity at the Badlands Landfill. Because the Project would generate a relatively small amount of solid waste per day, as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. Therefore, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.	Less-than-Significant Impact	**WCCP PEIR MM PSU WASTE-2**: All implementing project proponents shall dispose of any hazardous wastes, including paint, used during construction and grading at a licensed facility in accordance with local, state, and federal guidelines. **WCCP PEIR MM PSU WASTE-4**: Prior to issuance of Building Permits for any commercial or agricultural facilities, clearance from the Riverside County Waste Management Department is needed to verify compliance with California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires the local jurisdiction to require	Project Applicant, Construction Contractors Project Applicant	Riverside County DWR Riverside County DWR	During construction Prior to issuance of building permits for any commercial or agricultural facilities

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
Threshold f.: The proposed Project would be regulated by the Riverside County Department of Waste Resources (RCDWR) and would be required to comply with all applicable federal, State, and local solid waste management and reduction statutes and regulations, including AB 939 (50% diversion mandate), AB 341 (mandatory commercial recycling), AB 1826 (mandatory commercial organics recycling), SB 1383 (short-lived climate pollutants and organic waste diversion), and the Riverside County Integrated Waste Management Plan (CIWMP). Mandatory compliance with these requirements, together with the Project Applicant's obligation to work with a County-franchised hauler to implement recycling, organics diversion, and waste reduction programs consistent with the CIWMP and SB 1383, would ensure that the Project does not conflict with applicable solid waste management and reduction requirements. Impacts would be less than significant. Threshold g.: Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.	Less-than-Significant Impact Less-than-Significant Impact	adequate areas for collecting and loading recyclable materials.			
4.13 Wildfire					
Threshold a.: The Project site and surrounding areas are not identified as evacuation routes, and the Project has no potential to conflict with the Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). The proposed Project would be required to comply with all applicable	Less-than-Significant Impact	Impacts would be less than significant; therefore, mitigation measures are not required.	N/A	N/A	N/A

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
provisions of County policies and ordinances related to public safety. During construction and at Project build-out, adequate emergency access for emergency vehicles would be required to be maintained along streets that abut the Project site including along Los Caballos Road, Los Corralitos Road, and Pauba Road. The proposed Project would be subject to on-going implementation of the Event Site & Event Management Plan (EMP), which includes specific provisions related to fire protection and emergency medical services. As identified by the EMP, in the event of a wildfire requiring evacuation in the local area, three areas have been identified as Evacuation/Refuge (E/R) areas where guests can be moved to for safety. These E/R area locations may change due to the dynamics of the emergency including, but not limited to, the type of threat, location of threat, and current and predicted weather. For a regional emergency, the EMP requires managers at Galway Downs to follow CalFire/Riverside County Fire Department's (RCFD) lead on evacuation and, to minimize offsite traffic, consider sheltering in place until direction is given. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant. Threshold b. and e.: Although the proposed Project is located within areas classified as having a "high" to "very high" susceptibility to wildfire hazards, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. Furthermore, the Project site and surrounding areas do not contain any steep slopes that could exacerbate wildfire hazards. Although the Project area is subject to high winds, particularly during Santa Ana wind events, there are no components of the proposed Project that would result in increased wildland fire hazards in the local area beyond what occurs under existing conditions. Furthermore, all of the new structures on site are proposed in the interior portions of the Project site and are not located at the edges of the Project site that could be affected by wildfires originating in off-site locations. Accordingly, the proposed Project would not exacerbate wildfire risks, would not expose Project occupants to a substantial increase in pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant. Threshold c.: Although the Project site is located within an area that is considered susceptible to wildfire-related hazards, under existing conditions the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. Because the entirety of the Project site already is subject to	Less-than-Significant Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
vegetation removal under existing conditions, any vegetation removal under the proposed Project would not result in any new or more severe impacts due to ongoing fuel management activities at the Project site. In addition, the proposed Project would not require any new or modified infrastructure to address wildfire hazards, as the on-going removal of flammable vegetation largely precludes the potential for wildfire hazards on the Project site. There are no components of the proposed Project that would require new or expanded infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment beyond what already occurs under existing conditions. Accordingly, Project impacts would be less than significant. Threshold d.: Although the Project site is located within an area that is considered susceptible to wildfire-related hazards, the Project site and surrounding areas primarily exhibit relatively level topography and there are no major slopes in the immediate Project area. Although lands to the southwest of the Project site are susceptible to landslides, there is no evidence that any landslides have occurred in association with these steep slopes, including during fire events associated with the 1993 Vail Fire and the 2004 Eagle Fire, both of which burned all or portions of these slopes (CalFire, 2025; Google Earth, 2025). Thus, the Project would not be subject to fire-induced landslide hazards. Additionally, although the	No Impact				

Summary of Impacts	Significance Determination	Mitigation Measures (MM)	Responsible Parties	Monitoring Parties	Implementation Stage
northern portions of the Project site are located within a Federal Emergency Management Agency (FEMA)-mapped floodplain, no existing or proposed structures are proposed within the portions of the site subject to inundation from floods (FEMA, 2008). Thus, the portions of the Project site that include existing or proposed permanent structures would not be subject to inundation as a result of fire hazards. In addition, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. There are no components of the proposed Project that would have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and no impact would occur.					

1.0 INTRODUCTION

This Draft Environmental Impact Report ("Draft EIR" or "EIR") is an informational document that represents the independent judgment of Riverside County, acting as the Lead Agency pursuant to the California Environmental Quality Act ("CEQA"), and evaluates the physical environmental effects that could result from the entitlement actions described herein that are proposed for the existing Galway Downs event facility. In summary, the primary use of the Galway Downs site would continue to be equestrian related. The proposed entitlement actions generally would allow the Project Applicant to: (1) make physical and operational modifications on the property to attract higher level of competition for equestrian events that can be hosted on the site; (2) permit a portion of the site to host non-equestrian sporting events (primarily on weekends and holiday weekends); and (3) designate areas of the site where exterior sound amplification can occur between 8 a.m. and 10 p.m., without needing to seek a separate approval for every amplification event. The requested entitlement actions include a revision to existing Conditional Use Permit (CUP) No. 02303 (CUP 02303R1); proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 (herein "Ordinance No. 847"); and Change of Zone No. 22000010 (CZ 22000010) to amend Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348 (herein "Ordinance No. 348") to allow for operational enhancements at the site. All physical and operational changes proposed (hereinafter the "Project") are evaluated herein.

When the term "Project" is used in this EIR with the initial letter capitalized, the term shall mean all aspects of the planning, construction, and operation of the changes proposed for Galway Downs and evaluated herein as the "Project," including all related discretionary and administrative approvals and permits required for its implementation. When the terms "Project Applicant" or "Applicant" are used with the initial letters capitalized, the terms shall mean SFT Realty Galway Downs, LLC, which is the entity that submitted applications for the Project as proposed and as evaluated in this EIR.

1.1 PURPOSES OF CEQA AND THIS DRAFT EIR

This Draft EIR has been prepared in compliance with CEQA, as amended, and the California Code of Regulations, Title 14, Section 15000 *et seq.* ("State CEQA Guidelines"), as amended. As stated by State CEQA Guidelines Section 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential significant environmental effects of proposed development activities involving discretionary government approvals (including the approval of private development projects);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

- Disclose to the public the reasons why the governmental agency approved the project in the manner the agency chose (if the project involves significant environmental effects).

Following a preliminary review of the Project's application materials and the preparation of an environmental Initial Study, the County concluded that the Project and its associated implementation actions have the potential to result in significant environmental effects; as such, the County proceeded with preparation of this EIR pursuant to State CEQA Guidelines Section 15060(d). The County determined that a Project EIR, as described in State CEQA Guidelines Section 15161, would be required.

Pursuant to State CEQA Guidelines Section 15161, this Project EIR shall "... focus primarily on the changes in the environment that would result from the development project," and "...examine all phases of the project including planning, construction, and operation." Also, pursuant to State CEQA Guidelines Section 15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project, (2) identify possible ways to minimize or avoid those significant effects, and (3) to describe a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

1.2 PROJECT BACKGROUND

The Galway Downs facility originally opened in 1968 as the Rancho California Track and Training Center, a multipurpose event center for equestrian-related activities. By 1976, the majority of the property was cleared and prepared for the facility's operations, and extensive improvements were made to include a recreational vehicle (RV) park, kitchen, restaurant, hay barn, and check-in gate. In 1980, the facility was purchased by a new owner, at which point the facility was renamed as "Galway Downs." The new owner installed a 5/8-mile racetrack inside the larger track, along with additional barns and infrastructure. Over subsequent decades, the previous owners of the facility experienced challenges in keeping the facility operating, and several unsuccessful attempts were made to develop the property with residential uses.

In 2010, the Galway Downs facility was purchased by Ken and Tina Smith, who continue to own and manage the facility to this day. Galway Downs includes a variety of existing recreational- and event-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with club house; grooms quarters; office space; a clock tower house; and storage spaces. The existing facility operates under four approved CUPs, including CUP 001127, CUP 00966, CUP 01615, and CUP 02303.

1.3 SUMMARY OF THE PROJECT EVALUATED BY THIS EIR

Galway Downs is an existing events facility that first opened in the 1960s and has a current street address of 38801 Los Corralitos Road. The site is located within the Southwest Area Plan (SWAP) portion of unincorporated Riverside County and specifically within the Temecula Valley Wine Country Policy Area. The existing facility encompasses approximately 241.6 acres and operates as a traditional equestrian facility the majority of the time but also hosts a variety of other activities primarily on weekends and holiday weekends.

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

New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed CUP 02303R1 include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure that is proposed to be placed over an existing arena to support rooftop solar panels (hereafter called "metal solar structure"), and additional area for equestrian RV park use. Existing structures that would be permitted with the Project include an existing 1,513-square-foot (s.f.) barn/storage building, an existing 624-s.f. storage building, an existing 1,560-s.f. polo field metal storage building, and an existing 360-s.f. manufactured storage structure. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future; the design of these areas would be subject to future County review and approvals.

Exception No. 9 to 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 sound amplifying equipment to periodically operate on certain portions of the property during scheduled events between 8 a.m. and 10 p.m. without need to seek a separate permission for every event that includes sound amplification that is audible more than 200 feet from the source.

CZ 22000010 is sought by the Project Applicant to amend Article XIVd (Wine Country Zones [WC]) of Ordinance No. 348 to allow for operational enhancements at the site, which would specifically add definitions for three uses; modify the list of conditionally permitted uses within the "Wine Country – Equestrian (WC-E)" zone; 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; and add new development standards for Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks. The approvals requested from Riverside County to implement the Project consist of the following:

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

The Project's application materials, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to State CEQA Guidelines Section 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. All other discretionary and ministerial approvals that would be required of the County of Riverside or other government agencies are also within the scope of the Project analyzed in this EIR.

1.4 CEQA Compliance Process

CEQA (Public Resources Code, Sections 21000-21177) requires that all public agencies within the State of California having land use approval authority over project activities that have the potential to affect the quality of the environment shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project's anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an EIR must be prepared. The "scope" of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.

Pursuant to State CEQA Guidelines Section 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by or under the direction of the Lead Agency, which for the proposed Project is the County of Riverside. The County of Riverside is the public agency that has the primary responsibility for approving or carrying out the Project. Further, Responsible and Trustee Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the County of Riverside.

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both the Draft and Final EIR together comprise the EIR; the Final EIR includes the Draft EIR, comments received, a list of commenters, and responses to significant environmental points raised as required by CEQA Guidelines Section 15132, along with any related technical appendices and reference sources. Throughout this document, the terms Final

EIR or Draft EIR may be used interchangeably since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided in the volume made available for the CEQA-required 45-day public review period.

In accordance with State CEQA Guidelines Section 15087, this Draft EIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Sections 15087, 15204(a)). Responses to written comments received during the public review period will be included in the Final EIR. During the decision making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by Riverside County decision-makers. If the Final EIR is certified and the Project approved, Riverside County and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the Final EIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

1.5 LEGAL AUTHORITY

This EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resources Code Section 21000 *et seq*.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 *et seq*.).

Pursuant to Public Resources Code Section 21067 and State CEQA Guidelines Article 4 and Section 15367, Riverside County is the Lead Agency under whose authority this EIR has been prepared. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action to approve the Project, the County has the obligation to: (1) ensure that this EIR has been completed in accordance with CEQA; (2) review and consider information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects the County's independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090 through 15093).

Pursuant to State CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the County will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;

- Deny approval of the Project in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project could cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that: (1) there is no feasible way to lessen or avoid the significant effect; and (2) expected benefits from the Project will outweigh the significant environmental impacts of the Project.

This EIR fulfills the CEQA environmental review requirements for proposed CUP 02303R1, Exception No. 9 to Ordinance No. 847, and CZ 22000010, and all other governmental discretionary and administrative actions related to the Project.

1.6 EIR Scope, Format, and Content

1.6.1 EIR Scope

The County filed a Notice of Preparation (NOP) with the California Governor's Land Use and Climate Innovation (LCI) State Clearinghouse to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP was filed with the State Clearinghouse and distributed to Responsible Agencies, Trustee Agencies, and other interested parties on January 14, 2025, for a 30-day public review period. The NOP was distributed for public review to solicit responses that would help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

In addition, a publicly noticed EIR Scoping Meeting was held on February 10, 2025. The EIR Scoping Meeting provided public agencies, interested parties, and members of the general public an additional opportunity to learn about the Project, the CEQA review process, and how to submit comments on the scope and range of environmental concerns to be addressed in this EIR.

The NOP, public review distribution list, and written comments received by the County during the NOP public review period are provided in *Technical Appendix A* to this EIR. Substantive issues raised in response to the NOP and during the Scoping Meeting are summarized below in Table 1-1, *Summary of NOP and Scoping Meeting Comments*. The purpose of this table is to present a summary of the key environmental topics that were expressed by public agencies, interested parties, and members of the general public to be of primary interest. All comments received in response to the NOP and during the EIR Scoping Meeting are addressed in this EIR.

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
California Department of Transportation	1/27/25	• States that local residents are concerned over vehicle collisions at SR-79 and Los Caballos Road and SR-79 and Pauba Road.	Subsection 4.10, *Transportation*, and EIR Technical Appendices I

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
(Caltrans)		• Requests a Traffic Impact Analysis, Queuing Analysis, VMT Analysis, and Safety Analysis.	and J
Riverside County Department of Waste Resources (RCDWR)	1/17/25	• Recommends that the EIR consider quantitatively analyzing the Project's potential to exceed landfill capacity. • Informs of local landfill locations and disposal capacity (El Sobrante, Lamb Canyon, and Badlands Landfills). • Requests compliance with AB 75 (50% solid waste diversion requirement) and SB 1383 (organics waste reduction mandate). • Recommends measures to reduce waste impacts, including on-site recycling and composting programs, xeriscaping and drought-tolerant landscaping, submission of a Waste Recycling Plan (WRP) before construction.	Subsection 4.12, *Utilities and Service Systems*
Regional Conservation Authority	1/14/25	• Expresses concern regarding the proposed sewer connection that is planned to cross Proposed Constrained Linkage 24, a wildlife movement linkage. • States that the proposed sewer connection will require an amendment to JPR 10-12-27-01 because the off-site sewer line would traverse MSHCP Criteria Cell No. 7185, and the sewer line construction was not addressed as part of the original JPR 10-12-27-01.	Subsection 4.3, *Biological Resources*, and EIR *Technical Appendices C1* and *C2*
Barbara DiBernardo, Gypsy Fever Farms	2/10/25	• Expresses general support for the Galway Downs facility and the proposed Project. • States that proactive planning is needed to sustain equestrian properties and prevent their disappearance. • Mentions that Highway 79S experiences heavy traffic due to regional growth and tourism, not just Galway Downs activities, and notes traffic congestion in the area is likely caused, in part, by the abrupt reduction in the number of lanes from six lanes west of Horizon View Street to two lanes east of Horizon View Street.	Subsection 4.8, *Land Use and Planning*; Subsection 4.10, *Transportation*, and EIR Technical Appendix I

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
Cory Asmus, VP of Corporate Operations, Southwest Traders	2/10/25	• Generally supports Galway Downs and the changes proposed as part of the Project.	N/A
Craig Way, Broker, Seaway Properties Real Estate, Inc.	2/10/25	• Generally supports Galway Downs and the changes proposed as part of the Project.	N/A
Juanita Koth, President, Temecula Eq-Wine Riders	2/10/25	• Expresses support for Galway Downs and the proposed Project. • Mentions that Highway 79S experiences heavy traffic due to regional growth and tourism, not just Galway Downs activities, and notes traffic congestion in the area is likely caused, in part, by the abrupt reduction in the number of lanes from six lanes west of Horizon View Street to two lanes east of Horizon View Street.	Subsection 4.10, *Transportation*, and EIR *Technical Appendix I*
Pam Nelson, Sierra Club - Santa Margarita Group	2/09/25	• Generally opposes revisions to CUP 02303, change of zone, and the noise ordinance exemption. • Expresses concerns that the Project would result in impacts to MSHP Conservation Areas due to light, chaos, noise, sediment movement, and habitat degradation. • Gives opinion that the proposed noise exception is out of character for this portion of the Wine Country Plan, and highlights the importance of quietness for livestock, small wineries, and residents. • States that sewer and septic issues have the potential to contaminate both surface and groundwater. • Requests an evaluation of potential effects on traffic and traffic-related safety. • Gives opinion that the Project's hours, lighting, noise, and traffic are out of character for the area. • Expresses concern over the Project's potential to cause or contribute to wildfire	Subsection 4.3, *Biological Resources*; Subsection 4.4, *Cultural Resources*; Subsection 4.7, *Hydrology and Water Quality*; Subsection 4.8, *Land Use and Planning*; Subsection 4.9, *Noise*; Subsection 4.10, *Transportation*; Subsection 4.12, *Utilities and Service Systems*; Subsection 4.13, *Wildfire*; and EIR *Technical Appendices C1, C2, D, G,I, and J*

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		hazards. • Gives opinion that the Project would allow for too broad a range of uses. • Indicates concern over water supply and water quality. • Expresses concern over neighborhood character and potential effects on road infrastructure, crime, and accidents. • Requests an evaluation of potential impacts to cultural resources. • Gives opinion that the Project would not be consistent with policies included in the SWAP, including Policies SWAP 1.1 and SWAP 1.2.	
Rosalinda Orozco, Human Resources Manager, Southwest Traders	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Adam Adventures	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Ajay Sinha	2/10/25	• Opposes the rezoning associated with Change of Zone No. 22000010. • Expresses concern over potential noise impacts associated with the proposed Project and its effect on the existing character of the community.	Subsection 4.8, *Land Use and Planning*; Subsection 4.9, *Noise*; and EIR *Technical Appendix H*
Amanda Sutherlin	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Angel Gasca	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Beth Good	2/10/25	• Expresses support for Galway Downs and the proposed Project. • Mentions that Highway 79S experiences heavy traffic due to regional growth and tourism, not just Galway Downs activities, and notes traffic congestion in the area is likely caused, in part, by the abrupt reduction in the number of lanes from six lanes west of Horizon View Street to two	Subsection 4.10, *Transportation*, and EIR *Technical Appendix I*

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		lanes east of Horizon View Street.	
Blaine Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Brad Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Brianna Weeks	2/10/25	• Expresses support for youth sports and their positive impact on the community.	N/A
Brock Schermerhorn	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Cameron Halliday	2/10/25	• Expresses support for youth sports and their positive impact on the community.	N/A
Danyelle McKee	2/08/25	• Expresses concern over any proposed modifications to or reduction in size of the equestrian district, which would adversely affect community character. • Indicates concern over potential traffic congestion.	Subsection 4.8, *Land Use and Planning*; Subsection 4.10, *Transportation*, and EIR *Technical Appendix I*
David Casey	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Erin Kellerhouse	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Erin Nickerson	2/10/25	• Expresses support for Galway Downs and the proposed Project, highlighting the importance of sports activities for local area youth.	N/A
Greg Ion	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Jacquii Peters	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Jenny Sihanantharath	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Jenny Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Judy Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Karalee Ball	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Kathryn Randazzo	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Keegan Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
Kenny Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Lafe Ball	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Matthew Kelly	2/09/25	• Indicates general opposition to the proposed Project. • Expresses concern over the Project and its potential effects on community character. • Indicates concern over potential noise pollution and traffic congestion. • Indicates concerns over commercial uses and their effect on horse raising and boarding. • Indicates opposition to moving lands out of the wine country-equestrian district.	Subsection 4.8, *Land Use and Planning*; Subsection 4.9, *Noise*; Subsection 4.10, *Transportation*; and EIR *Technical Appendices H* and *I*
Mya Parcel	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Orianna Celis	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Robert Kellerhouse	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Ryan Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Stacie Lyons-Kelly	2/09/25	• Indicates general opposition to the proposed Project. • Expresses concern over the Project and its potential effects on community character. • Indicates concern over potential noise pollution and traffic congestion. • Indicates concerns over commercial uses and their effect on horse raising and boarding. • Indicates opposition to moving lands out of the wine country-equestrian district.	Subsection 4.1, *Agriculture and Forestry Resources*; Subsection 4.8, *Land Use and Planning*; Subsection 4.9, *Noise*; Subsection 4.10, *Transportation*; and EIR *Technical Appendices H* and *I*
Stacy Schermerhorn	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Tanis Earle	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Tina Smith	2/10/25	• Expresses support for Galway Downs and the proposed Project.	N/A
Tyler Kalisiak	2/10/25	• Expresses support for Galway Downs and	N/A

Table 1-1 Summary of NOP and Scoping Meeting Comments

Commenter	Date	Comments	Location in EIR Where Comment(s) Addressed
		the proposed Project.	
Comment Letters Received After Public Comment Period on the Project's NOP:			
Alison Rench	2/25/25	• Expresses concern over the Project's potential effects on infrastructure, including traffic-related infrastructure and requests appropriate mitigation. • Indicates concern over traffic safety.	Subsection 4.10, *Transportation*; and EIR *Technical Appendix I*
Chris Bogan	2/25/25	• Expresses concern over traffic congestion, including along local area highways. • Indicates concern over potential evacuation in the event of an emergency.	Subsection 4.10, *Transportation*; Subsection 4.13, *Wildfire*; and EIR *Technical Appendix I*
Dave Hamilton	2/26/25	• Expresses concern over traffic congestion.	Subsection 4.10, *Transportation*; and EIR *Technical Appendix I*
David Lawrence	2/21/25	• Expresses opposition to the proposed Project. • Indicates concern over local area traffic congestion.	Subsection 4.10, *Transportation*; and EIR *Technical Appendix I*
Gary Worobec	2/25/25	• Expresses opposition to the proposed Project. • Indicates concern over local area traffic congestion. • Requests an expansion to the County's notification radius for public notices.	Subsection 4.10, *Transportation*; and EIR *Technical Appendix I*
Kelly Jordan	2/25/25	• Expresses opposition to the proposed Project. • Indicates concern over local area traffic congestion.	Subsection 4.10, *Transportation*; and EIR *Technical Appendix I*

As more fully discussed in the Project's Initial Study (EIR *Technical Appendix A*), and based on the comment letters received during the public review period for the Project's NOP and comments received by the County during the February 10, 2025, Scoping Meeting, this EIR evaluates the Project's potential to cause adverse effects to the following environmental issue areas:

- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Wildfire

Subsequent to the 30-day public review period for the Project's NOP, the Project Applicant voluntarily made several changes to the scope of the proposed Project to address community concerns and to respond to County staff comments on the CUP 02303R1 application materials. These changes included the following:

- The Project Applicant agreed that daily traffic volumes generated by events at Galway Downs would not exceed maximum event attendance under existing baseline conditions, which is limited by the number of parking spaces that can be reasonably activated on the Galway Downs property at any one time. Specifically, the Project Description included in the Project's Initial Study (IS), which accompanied the NOP, indicated that the Project would result in an increase in vehicular traffic ranging from 3,214 one-way vehicular trips per day during "normal operations/non-holiday weekends" to 5,616 one-way vehicular trips per day during "peak operations/holiday weekends." However, based on discussions with the Project Applicant, it was determined that the number and intensity of events that occurred on the site in 2023 are reflective of the number and intensity of events that are anticipated under the proposed Project. Therefore, based on information from the Project Applicant as well as the capacity of parking spaces available on site during peak events, it was determined that there would be no net increase in maximum daily traffic generated by the Project as compared to existing baseline conditions.
- The Project Applicant agreed to install a traffic signal at the SR-79/Los Caballos Road intersection as part of CUP 02303R1.
- The Project Applicant agreed to implement traffic management by the California Highway Patrol (CHP) or other Caltrans approved traffic management at the SR-79/Los Caballos Road and SR-79/Pauba Road intersections for all events at Galway Downs anticipated to draw 3,500 or more one-way vehicle trips to manually direct traffic through both intersections.
- The Project Applicant withdrew its request to add Special Events as a permitted use. Events would be classified as only Equine (already permitted), Special Occasions (already permitted in limited scope), and Sports (currently occurring and proposed to be added under CUP 02303R1 as a permitted use).
- The Project Applicant withdrew its request for an amphitheater and seating and is instead proposing an awards/ceremony area with no fixed seating.
- The Project Applicant withdrew its request for temporary merchant and catering buildings, which are no longer proposed to be permitted via CUP 02303R1 and would instead be permitted separately, as the need arises, as temporary uses.
- The Applicant modified its request to add 11 manufactured Pony Homes and instead is proposing to designate an area for up to 36 future Wine Country Equestrian Park Model Lodging units south of the existing racetrack and to be provided by Galway Downs. The Project Applicant also agreed to subject the design of this area to subsequent discretionary County review and Plot Plan approval and to

prohibit visitors from placing RVs, trailers, tents, and all other forms of accommodations in this area. The analysis in this EIR is based on a reasonably foreseeable conceptual design for the Wine Country Equestrian Park Model Lodging units.

- The Project Applicant modified the location proposed for additional employee modular housing, from near Pauba Road in the southeast portion of the site to just west of the existing employee housing area in the southwest portion of the site along Los Corralitos Road. The Project Applicant also agreed to subject the design of this area to subsequent County discretionary review and Plot Plan permitting. The analysis in this EIR is based on a reasonably foreseeable conceptual design.
- The Project Applicant withdrew its request for campground uses and instead is proposing to add an Equestrian Recreational Vehicle Park for use only in association with events held on the establishment that are reserved for the exclusive use of participants for equestrian events. The area for this use is proposed adjacent to and west of the proposed employee housing area.

Also,

- The Public Notice issued by Riverside County to advertise the Project's February 10, 2025, Scoping Meeting implied that the Project Applicant was seeking to permit outdoor amplifying equipment during weekends (Friday through Sunday) from 8 a.m. to midnight. This was incorrect; the Project Applicant is seeking to permit the periodic use of sound amplifying equipment during events between 8 a.m. and 10 p.m., seven days a week, with no sound amplifying equipment proposed between the hours of 10 p.m. to 8 a.m., consistent with the timing restrictions established by Ordinance No. 847.

The changes described above, and in particular the Applicant's agreement that daily traffic volumes generated by events at Galway Downs would not exceed the maximum event size under existing baseline conditions, would reduce the Project's operational-related environmental effects. This limitation to daily traffic volumes will be assured in the Project entitlements. Due to the reduction in environmental effects compared to the effects contemplated by the environmental IS, the County determined that the EIR's NOP did not need to be recirculated for an additional 30-day public review period. Further, the revisions and reduction in the Project's scope were in part the result of feedback obtained during the Project's environmental review scoping process. CEQA expressly contemplates that scoping will lead to clarifications, refinements, or reductions to a project (State CEQA Guidelines Sections 15083, 15124). Adjustments made in response to NOP comments, particularly those that clarify the project or reduce impacts, are part of the ordinary EIR process and do not trigger any requirement to restart scoping or recirculate a NOP. CEQA's primary disclosure document is the Draft EIR, not the NOP. This Draft EIR clearly describes the revised Project, explains the evolution of the Project since NOP scoping, and analyzes the Project's environmental effects. This satisfies CEQA's informational and participatory mandates.

1.6.2 Use of This EIR

Riverside County will release the Draft EIR for a minimum 45-day public review period and make the Draft EIR and its supporting technical appendices available for review in electronic form on the County's website, located at https://planning.rctlma.org/. During the 45-day review period, comments on the content of the Draft EIR can be submitted to:

Riverside County – Planning Department
Attn: Russell Brady, Project Planner
P.O. Box 1409
Riverside, CA 92502-1409
Email: rbrady@rivco.org

Public comments should be focused "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Section 15204[a]).

Following the Draft EIR's 45-day public review period, the County will then respond in writing to all submitted comments pertaining to an environmental effect and publish a Final EIR. Before taking action to approve the Project, Riverside County (serving as the Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects the County's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090-15093).

Project-related decision-making hearings will be subject to noticed public hearings held before the Planning Commission and Board of Supervisors, which will include consideration of the information contained in the Final EIR and the associated administrative record. The roles and responsibilities of the Riverside County Planning Commission and Board of Supervisors for Project-related approvals are as follows.

- **Planning Commission:** The Planning Commission will make advisory recommendations to the Board of Supervisors whether proposed CUP 02303R1, CZ 22000010, and Exception No. 9 to Ordinance No. 847 should be approved, approved with changes, or not approved, and will recommend to the Board of Supervisors whether to certify the Final EIR with or without modifications.
- **Board of Supervisors:** The Board of Supervisors will decide whether to certify the Final EIR and whether to approve, approve with changes, or deny CUP 02303R1, CZ 22000010, and Exception No. 9 to Ordinance No. 847.

During the decision-making processes, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project's administrative record, will be considered by Riverside County. If the Final EIR is certified and CUP 02303R1, CZ 22000010, and Exception No. 9 to Ordinance No. 847 are approved, Riverside County and other public agencies with permitting authority over all or portions of the Project would be able to rely on the certified Final EIR as part of their permitting and approval processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits. County staff also would rely on the certified Final EIR to subsequently conduct discretionary and administrative-level reviews for implementing permits and approvals.

1.6.3 EIR Format and Content

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and State CEQA Guidelines (California Public Resources Code, Section 21000 *et seq.* and California Code of Regulations, Title 14, Division 6, Chapter 3). This EIR is organized in the following manner:

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the proposed Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions in a table that forms the basis of the EIR's Mitigation Monitoring and Reporting Program (MMRP).

- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the County of Riverside, serving as the Lead Agency for this EIR; a brief description of the Project; the purpose of this EIR; applications proposed by the Project Applicant that would require discretionary County approvals; permits and approvals required by other agencies; and an overview of the EIR format.

- **Section 2.0, Environmental Setting/Baseline**, describes the environmental conditions against which the proposed Project's potential environmental effects are measured, including an overview of the regional and local setting and descriptions of the Project site's physical conditions, operational conditions, and surrounding context. The physical baseline is defined as the physical condition of the Project site and surrounding area at the approximate time this EIR's NOP was released for public review on January 14, 2025, consistent with State CEQA Guidelines Section 15125(a). The operational baseline for evaluating the Project's incremental effects on traffic, air quality, greenhouse gas emissions, energy, noise, and related topics is defined based on the actual, documented operational conditions at the Galway Downs facility as captured in dataset of operational activity collected in 2023. This operational baseline has been adopted by the County of Riverside pursuant to its exercise of discretion under Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth. (2013) 57 Cal.4th 439, which authorizes a lead agency to define the environmental

baseline in a manner that most accurately reflects the project's actual incremental environmental effects. The legal framework for, and application of, the Neighbors for Smart Rail operational baseline is described in detail in Section 2.0 and is applied consistently throughout EIR Sections 4.1 through 4.13.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines Section 15123. This Section provides a detailed description of the Project, including its purpose and main objectives; a description of the land use allocation zones proposed as part of the Project; an overview of new structures and facilities that would be permitted as part of the Project; a description of proposed changes to event programming; a detailed description of parking plans for the facility; and information related to water, sewer, and drainage. In addition, the discretionary actions required of the County of Riverside and other government agencies to implement the Project are discussed.

- **Section 4.0, Environmental Analysis**, provides an analysis of the potential direct, indirect, and cumulatively considerable impacts that may occur from implementing the proposed Project. The topics analyzed in this section include the topics summarized above under EIR Subsection 1.6.1. A conclusion concerning significance is reached for each discussion, and mitigation measures are presented as warranted. The environmental changes identified in EIR Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. The State CEQA Guidelines also describe the terms "effects" and "impacts" as being synonymous (State CEQA Guidelines Section 15358).

  In the environmental analysis subsections of EIR Section 4.0, the existing baseline conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the proposed Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in State CEQA Guidelines Section 15355 as "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

  The analyses in EIR Section 4.0 are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in EIR Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance.

- **Section 5.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project.

- **Section 6.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. Although the Project would not result in any impacts that cannot be mitigated to less-than-significant levels, a reasonable range of alternatives is presented in EIR Section 6.0.

- **Section 7.0, References**, cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted during preparation of this EIR. EIR Section 7.0 also lists the persons who authored or participated in preparing this EIR

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.

Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Table of Contents	§ 15122	Table of Contents
Summary	§ 15123	Section S.0, *Summary*
Project Description	§ 15124	Section 3.0
Environmental Setting	§ 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	§ 15126	Section 4.0 and Subsections 4.1 through 4.13
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	§ 15126.2(c)	Section 4.0 and Subsection 5.1
Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented	§ 15126.2(d)	Subsection 5.2
Growth-Inducing Impacts of the Proposed Project	§ 15126.2(e)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	§ 15126.4	Section 4.0 and Table S-1
Consideration and Discussion of Alternatives to the Proposed Project	§ 15126.6	Section 6.0
Effects Not Found to be Significant	§ 15128	Subsection 5.4
Organizations and Persons Consulted and References	§ 15129	Section 7.0 and Technical Appendices
Discussion of Cumulative Impacts	§ 15130	Section 4.0

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Energy Conservation	§ 15126.2(b) & Appendix F	Subsection 4.5

1.6.4 Incorporation by Reference

State CEQA Guidelines Section 15147 states that the "information contained in an EIR shall include summarized…information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided." State CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document… [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this EIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502, during the County's regular business hours or can be requested in electronic form by contacting the County's Planning Department. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:

A. Notice of Preparation (NOP), Initial Study, and NOP Comments
B1. Air Quality Impact Analysis (AQIA)
B2. Construction Health Risk Assessment (HRA)
C1. Biological Resources Technical Report
C2. Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis
D. Cultural Resources Technical Report
E. Energy Analysis (EA)
F. Greenhouse Gas Analysis
G. Water Quality Management Plan (WQMP)
H. Noise Impact Analysis (NIA)
I. Level-of-Service Based Traffic Analysis Report
J. Vehicle Miles Traveled (VMT) Screening Evaluation
K. Analysis of Applicability of Wine Country Community Plan Program EIR Mitigation Measures

Other reference sources that are incorporated into this EIR by reference are listed in EIR Section 7.0, *References*, of this EIR. In most cases, documents or information posted on websites not included in the

EIR's Technical Appendices are cited by a link to the online location where the document/website can be viewed by the public, for convenience. All references relied upon by this EIR are included as part of Riverside County's administrative record pertaining to the proposed Project.

1.7 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resources Code (Section 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also State CEQA Guidelines Sections 15082 and 15086[a]). As defined by State CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A Trustee Agency is defined in State CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

Known Trustee Agencies are:

- The California Department of Fish and Wildlife (CDFW) and Riverside County Regional Conservation Authority (RCA) are identified as trustee agencies responsible for reviewing the Project's proposed Amendment to Joint Project Review (JPR) No. 10-12-27-01, which is proposed to be amended to include the Project's proposed off-site sewer connection between the northwest Project boundary and the new EMWD sewer main within De Portola Road, which would traverse Multiple Species Habitat Conservation Plan (MSHCP) Criteria Cell 7185 and would bisect Proposed Constrained Linkage 24.

Known Responsible Agencies are:

- Caltrans is identified as a responsible agency for approval of Project-related improvements to State Route 79.
- The San Diego RWQCB is identified as a responsible agency for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality. The RWQCB also is responsible for issuance of a Construction Activity General Construction Permit.
- Riverside County Flood Control and Water Conservation District (RCFCWCD) is identified as a responsible agency for approval of the Project's proposed drainage infrastructure.
- Rancho California Water District (RCWD) is identified as a responsible agency for approving the Project's proposed water connections and associated improvements.
- Eastern Municipal Water District (EMWD) is identified as a responsible agency for approving the Project's proposed connection to the new sewer main planned within De Portola Road.

1.8 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOP and related to environmental topics previously were summarized in Table 1-1. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in response to the NOP are addressed in this EIR. Based on comments received during the NOP review period, a number of concerns were expressed regarding the Project's potential impacts to the environment and the surrounding community, as summarized in Table 1-1. Issues of concern include potential impacts to agriculture, biological resources, hydrology/water quality, land use/planning, noise, transportation, and wildfire.

1.9 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The primary issues to be resolved by the decision-making body for the proposed Project involve the Project's significant and unavoidable impacts under the issue areas of Greenhouse Gas (GHG) Emissions and Transportation, as disclosed in EIR Subsections 4.2 and 4.10, respectively. Specifically, Project-related impacts due to GHGs would be significant and unavoidable due to a conflict with the Riverside County Climate Action Plan (CAP) and due to GHG emissions that would exceed the County's GHG screening threshold of 3,000 metric tons of carbon dioxide equivalents per year ($MTCO_2e/yr$). Project-related impacts to Transportation would be significant and unavoidable because the Project would generate substantially higher Vehicle Miles Traveled (VMT) compared to baseline conditions. The Riverside County Board of Supervisors will need to evaluate whether the mitigation measures identified by this EIR, if any, to reduce the Project's unavoidable impacts adequately reduce the Project's GHG and/or VMT impacts to the maximum feasible extent. In addition, and pursuant to State CEQA Guidelines Section 15126.6, the Riverside County Board of Supervisors also will decide whether to approve one of the Project alternatives evaluated in EIR Section 6.0 in lieu of the proposed Project if it is determined that one of the alternatives is feasible and its approval would serve to substantially reduce or avoid the Project's significant unavoidable environmental impacts due to GHG and/or VMT or if its approval would best serve the public interest. Finally, the Riverside County Board of Supervisors also retains full discretionary authority to decide whether to approve the Project's applications for CUP 02303R1, CZ 22000010, and Exception No. 9 to Ordinance No. 847, and will decide whether the Project's benefits outweigh the Project's adverse environmental effects due to GHGs and VMT in support of adopting a Statement of Overriding Consideration's pursuant to State CEQA Guidelines Section 15093.

2.0 ENVIRONMENTAL SETTING/BASELINE

This Section 2.0 is provided pursuant to State CEQA Guidelines Section 15125(a) and describes the environmental conditions in the vicinity of the Project site and its off-site improvement areas against which the proposed Project's potential environmental effects are measured. For physical environmental conditions (e.g., aesthetics, biological resources, cultural resources, hydrology and water quality, and related topics), the baseline reflects conditions as they existed at the approximate time the Notice of Preparation (NOP) for this EIR was published on January 14, 2025. For operational conditions (e.g., traffic volumes, noise levels, air quality emissions, and related topics), the baseline reflects the actual documented operations at the Galway Downs facility as of the NOP date, based on a 2023 operational dataset described in Subsection 2.4.2, *Existing Operational Characteristics*, below, consistent with the County's exercise of discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439. This Section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual environmental topic areas is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this EIR.

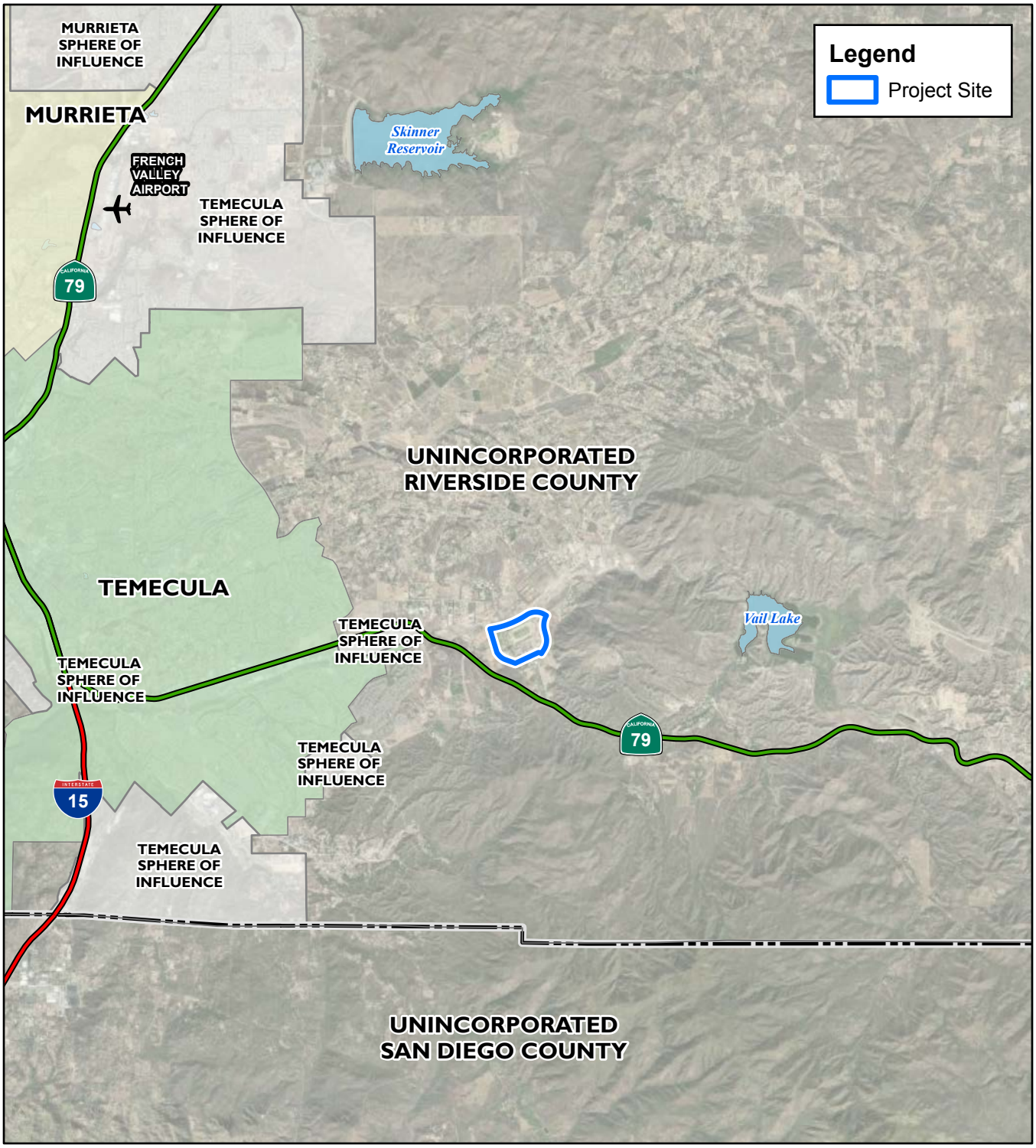
2.1 REGIONAL SETTING AND LOCATION

The 241.6-acre Project site is located within unincorporated western Riverside County, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County is bordered by San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximately 28,000-square-mile region comprising western San Bernardino County, western Riverside County, and the eastern portions of Los Angeles County. As of 2019, the Southern California Association of Governments (SCAG) estimated that unincorporated Riverside County had a population of 2,386,000. SCAG estimates that the population will increase to 2,992,000 by 2050 (SCAG, 2024, Table 3.1).

2.2 LOCAL SETTING AND LOCATION

The Project site is located within the western region of unincorporated Riverside County, California. As depicted on Figure 2-2, *Vicinity Map*, the Project site is within the Southwest Area Plan (SWAP) portion of unincorporated Riverside County and within the Temecula Valley Wine Country Policy Area (TVWCPA). The Project site is situated approximately 0.3-mile east of State Route 79 (SR-79) and approximately 6 miles east of Interstate 15 (I-15). More specifically, and as depicted on Figure 2-2, the Project site comprises 241.6 acres located south of Los Caballos Road, west of Pauba Road, and east and north of Los Corralitos Road at 38801 Los Corralitos Road. The Project site encompasses two parcels of land, Assessor's Parcel Numbers (APNs) 927-160-001 and 927-160-002.

Under existing conditions, the Project site consists of a multi-purpose events facility known as Galway Downs that operates primarily as a traditional equestrian facility but also hosts a variety of other activities

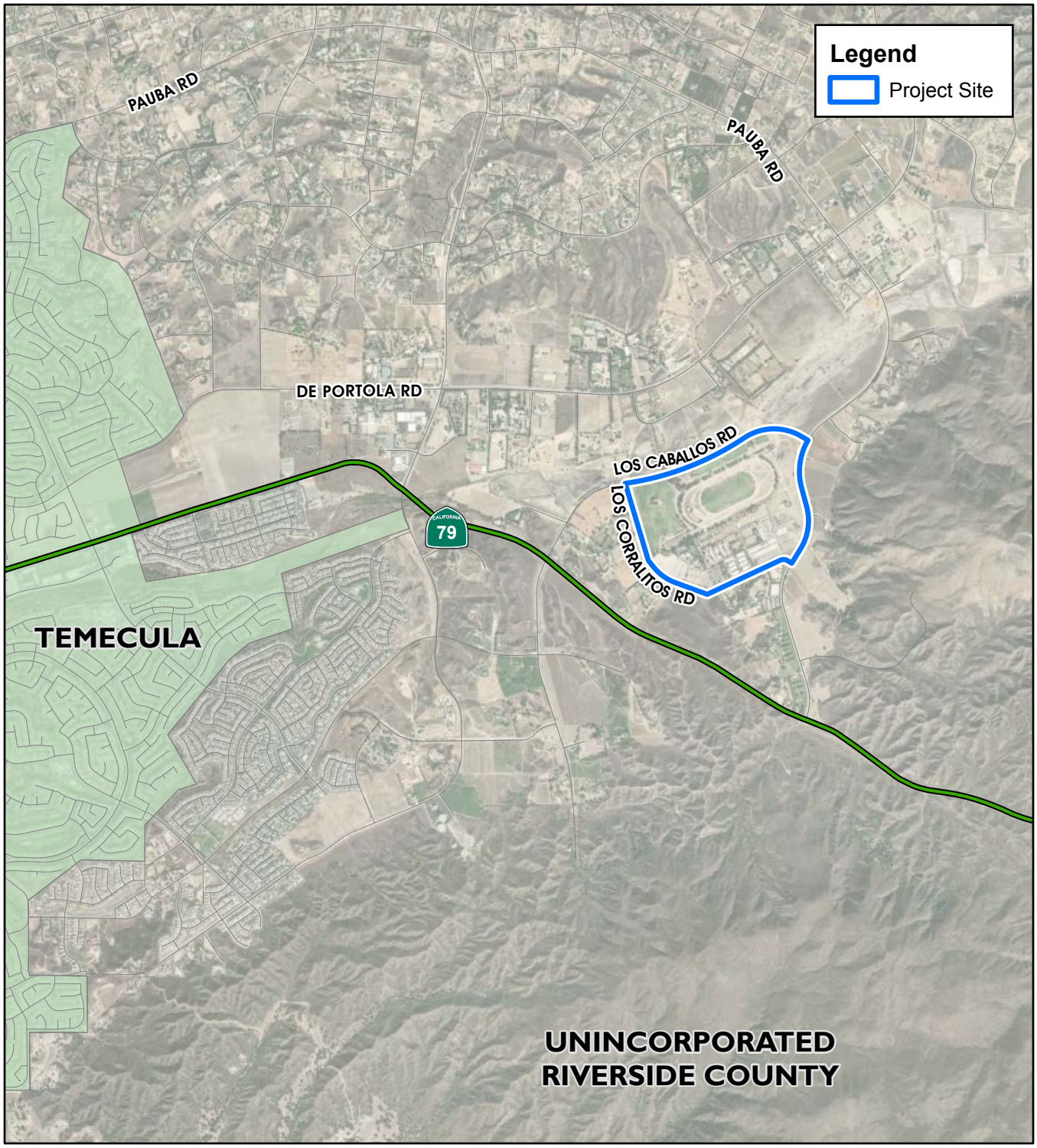


Source(s): ESRI, NearMap Imagery (August 2024), RCIT (2025)

Figure 2-1

0 0.75 1.5 3 Miles

Regional Map



Source(s): ESRI, NearMap Imagery (August 2024), RCIT (2025)

Figure 2-2

0 1,000 2,000 4,000 Feet

Vicinity Map

on the weekends and during three-day holiday weekends that include a Friday or a Monday. Galway Downs includes a variety of physical features including but not limited to a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; a recreational vehicle (RV) park with club house; grooms quarters; office space; a clock tower house; and storage spaces. The existing facility operates under four approved Conditional Use Permits (CUPs), including CUP 001127, CUP 00966, CUP 01615, and CUP 02303.

2.3 SURROUNDING LAND USES

Land uses in the immediate vicinity of the Project site are illustrated on Figure 2-3, *Surrounding Land Uses and Development*, and described below.

- North: To the north of the Project site is Los Caballos Road, beyond which is vacant, undeveloped land as well as rural residential and agriculture-oriented uses, including equestrian-oriented uses and stabling of horses.
- East: To the east of the Project site is Pauba Road, beyond which is a winery and vacant, undeveloped land.
- South: To the south of the Project site is Los Corralitos Road, beyond which are rural residential homes, Temeku Equine (a business providing veterinary care for horses and livestock), and Sweet Oaks Ranch (a farmstay), beyond which are undeveloped lands/open space and SR-79.
- West: West of the Project site is Los Corralitos Road, beyond which is Kingsway Farm along with rural residential uses, agricultural uses (including equestrian-oriented uses and stabling of horses), and vacant undeveloped land.

2.4 BASELINE CONDITIONS OF THE PROJECT SITE

2.4.1 Existing Physical Site Conditions

Pursuant to State CEQA Guidelines Section 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this EIR was released for public review on January 14, 2025. The following subsections provide a description of the Project site's physical environmental condition and operational conditions ("existing conditions") as of that approximate date.

The site's physical conditions and surrounding areas are shown on Figure 2-4, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.



Source(s): ESRI, NearMap Imagery (August 2024)

Figure 2-3

Surrounding Land Use and Development



Source(s): ESRI, NearMap Imagery (August 2024)

Figure 2-4

0 225 450 900 Feet

Aerial Photograph

B. Existing Structures and Features

As shown on Figure 2-4, Galway Downs includes a variety of existing recreational- and event-related physical features including but not limited to a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; a recreational vehicle (RV) park with club house; grooms quarters; office space; a clock tower house; and storage spaces. Table 2-1, *Summary of Existing On-Site Structures*, provides a summary of each of the existing structures on the Project site, while Figure 2-5, *Existing On-Site Structures*, depicts the location of each of the structures identified in Table 2-1. All on-site structures are permitted or conditionally permitted, with exception of one restroom structure, the grand pavilion tent, and several storage buildings, which are currently unpermitted under the site's existing permits (i.e., CUP 001127, CUP 00966, CUP 01615, and CUP 02303) and are being separately permitted or proposed to be permitted via the proposed Project.

C. Site Topography

Figure 2-6, *USGS Topographic Map*, depicts the topography of the 241.6-acre Project site. As shown, the topography of the Project site slopes gently in a south-to-north orientation, with elevations ranging from approximately 1,313 feet above mean sea level (amsl) at the southern portion of the Project site to approximately 1,196 feet amsl along the north portion of the site.

D. Air Quality and Climate

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, San Jacinto Mountains to the north and east; and San Diego County to the south. The SCAB is within the jurisdiction of the SCAQMD, the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. As documented in the Project's Air Quality Impact Analysis ("AQIA"; *Technical Appendix B1* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year. (UXR, 2026a, pp. 7-8)

E. Agriculture and Forestry Resources

Land uses surrounding the Project site include properties used for agricultural-related activities, including wineries and equestrian-oriented land uses. As more fully discussed in EIR Subsection 4.1, *Agriculture and Forestry Resources*, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) identifies "Important Farmland" to include lands mapped as "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." According to the FMMP maps, the Project site contains

Table 2-1 Summary of Existing On-Site Structures

#	Use	Occupancy	s.f.	Height	Const. Type
1	Existing Barn / Restaurant	A-2	9,923 s.f.	31'-4"	V-B
2	Existing Retail / Restaurant Dining	A-2	1,917 s.f.	21'-8"	V-B
3	Existing Grooms Quarters	R-2	1,338 s.f.	14'-8"	V-B
4	Existing Office	B	500 s.f.	15'-4"	V-B
5	Existing Stables	U	14,000 s.f.	13'	V-B
6	Existing Stables	U	14,000 s.f.	13'	V-B
7	Existing Stables	U	14,000 s.f.	13'	V-B
8	Existing Stables	U	14,000 s.f.	13'	V-B
9	Existing Stables	U	14,000 s.f.	13'	V-B
10	Existing Ranch House	R-2	2,000 s.f.	13'-6"	Manufactured
11	Existing Ranch House	R-2	2,000 s.f.	13'-6"	Manufactured
12	Existing Ranch House	R-2	2,000 s.f.	13'-6"	Manufactured
13	Existing Ranch House	R-2	2,000 s.f.	13'-6"	Manufactured
14	Existing Ranch House "Space 17"	R-2	1,835 s.f.	13'-6"	Manufactured
15	Existing Ranch House "Space 16"	R-2	1,835 s.f.	13'-6"	Manufactured
16	Existing Ranch House "Space 15"	R-2	1,860 s.f.	13'-6"	Manufactured
17	Existing Ranch House "Space 14"	R-2	1,835 s.f.	13'-6"	Manufactured
18	Existing Ranch House "Space 13"	R-2	1,860 s.f.	13'-6"	Manufactured
19	Existing Ranch House "Space 12"	R-2	1,872 s.f.	13'-6"	Manufactured
20	Existing Ranch House "Space 11"	R-2	1,835 s.f.	13'-6"	Manufactured
21	Existing Ranch House "Space 10"	R-2	768 s.f.	13'-6"	Manufactured
22	Existing Ranch House " Space 9"	R-2	1,860 s.f.	13'-6"	Manufactured
23	Existing Clubhouse	B	1,765 s.f.	13'-6"	V-B
24	Existing Mobile Home "Space 8"	R-2	1,248 s.f.	13'-6"	Manufactured
25	Existing Mobile Home "Space 7"	R-2	1,860 s.f.	13'-6"	Manufactured
26	Existing Mobile Home "Space 6"	R-2	1,200 s.f.	13'-6"	Manufactured
27	Existing Mobile Home "Space 5"	R-2	1,860 s.f.	13'-6"	Manufactured
28	Existing Mobile Home "Space 4"	R-2	1,860 s.f.	13'-6"	Manufactured
29	Existing Mobile Home "Space 3"	R-2	1,860 s.f.	13'-6"	Manufactured
30	Existing Mobile Home "Space 2"	R-2	1,872 s.f.	13'-6"	Manufactured
31	Existing Mobile Home "Space 1"	R-2	1,872 s.f.	13'-6"	Manufactured
32	Existing Stables	U	10,500 s.f.	14'	V-B
33	Existing Stables	U	10,500 s.f.	14'	V-B
34	Existing Stables	U	10,500 s.f.	14'	V-B
35	Existing Stables	U	10,500 s.f.	14'	V-B
36	Existing Stables	U	10,500 s.f.	14'	V-B
37	Existing Stables	U	10,500 s.f.	14'	V-B
38	Existing Stables	U	10,500 s.f.	14'	V-B
39	Existing Stables	U	10,500 s.f.	14'	V-B
40	Existing Storage	U	1,130 s.f.	20'	II-B
41	Existing Storage	U	1,140 s.f.	20'	II-B
42	Existing RK Barn - Storage	U	1,009 s.f.	22'	V-B
43	Existing Storage	U	624 s.f.	10'	II-B
44	Existing Pavilion	A	10,847 s.f.	22'	II
45	Existing Clock Tower House	R-3	2,400 s.f.		V-B
46	Existing Polo Field Storage	U	1,560 s.f.	14'-6"	Manufactured
47	Existing Storage	U	360 s.f.	10'	Manufactured
48	Grand Pavillion Tent	A	7,500 s.f.	21’	Manufactured
49	Office Trailer	U	600 s.f.	10’	Manufactured
50	Shipping Container #1	U	400 s.f.	9’6”	Steel container
51	Pod container	U	120 s.f.	9’6”	Steel container
52	Shipping container #2	U	400 s.f.	9’6”	Steel container
53	Existing Ranch House	R-2	1,860 s.f.		Manufactured
54	Existing Ranch House	R-2	1,860 s.f.		Manufactured



BUILDING DATA

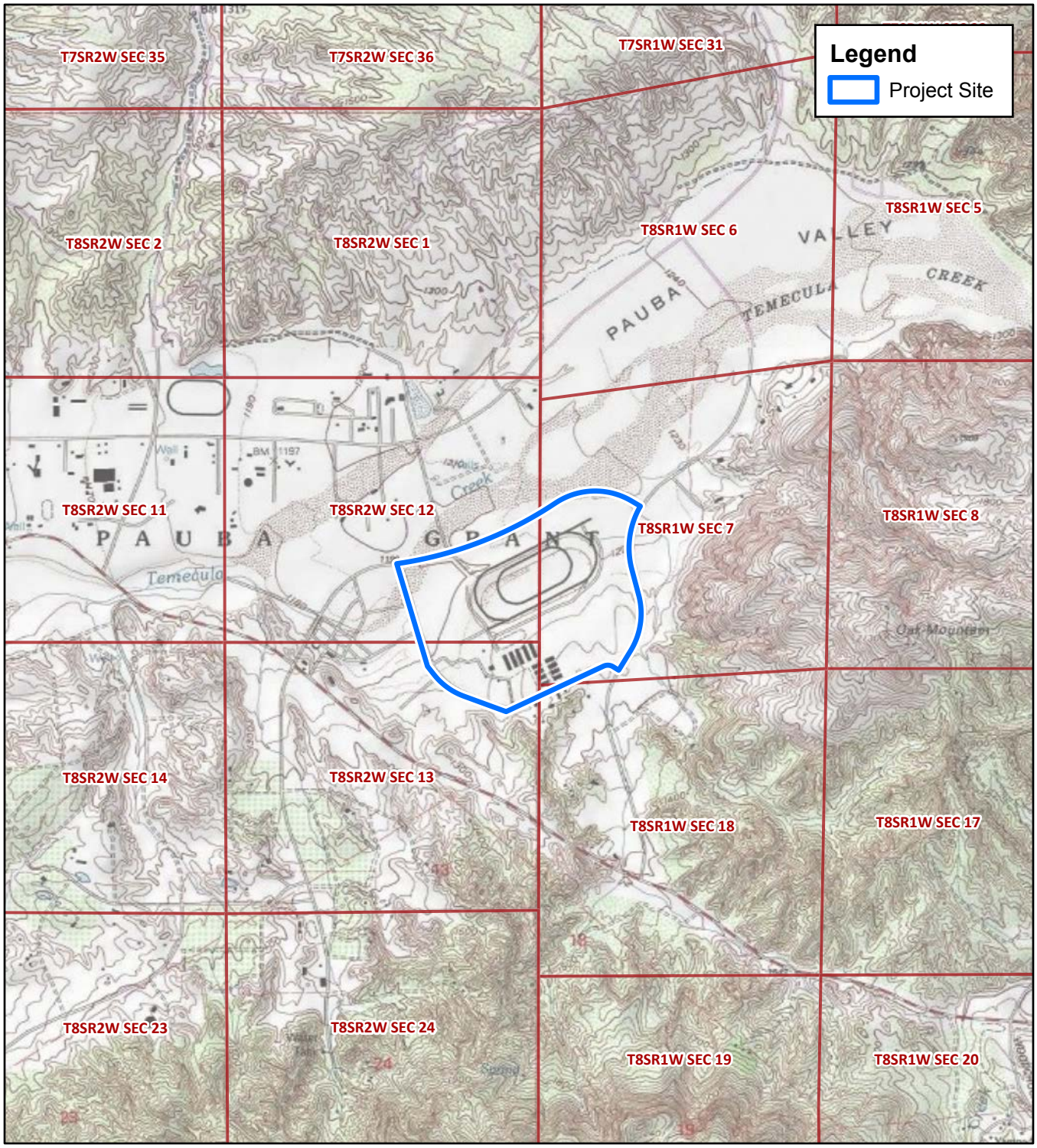
#	USE	OCCUPANCY	S.F.	HEIGHT	CONST. TYPE
1	EXISTING BARN / RESTAURANT	A-2	9,923 S.F.	31'-4"	V-B
2	EXISTING RETAIL / RESTAURANT DINING	A-2	1,917 S.F.	21'-8"	V-B
3	EXISTING GROOMS QUARTERS	R-2	1,338 S.F.	14'-8"	V-B
4	EXISTING OFFICE	B	500 S.F.	15'-4"	V-B
5	EXISTING STABLES	U	14,000 S.F.	13'	V-B
6	EXISTING STABLES	U	14,000 S.F.	13'	V-B
7	EXISTING STABLES	U	14,000 S.F.	13'	V-B
8	EXISTING STABLES	U	14,000 S.F.	13'	V-B
9	EXISTING STABLES	U	14,000 S.F.	13'	V-B
10	EXISTING RANCH HOUSE	R-2	2,000 S.F.	13'-6"	MANUFACTURED
11	EXISTING RANCH HOUSE	R-2	2,000 S.F.	13'-6"	MANUFACTURED
12	EXISTING RANCH HOUSE	R-2	2,000 S.F.	13'-6"	MANUFACTURED
13	EXISTING RANCH HOUSE	R-2	2,000 S.F.	13'-6"	MANUFACTURED
14	EXISTING RANCH HOUSE "SPACE 17"	R-2	1,835 S.F.	13'-6"	MANUFACTURED
15	EXISTING RANCH HOUSE "SPACE 16"	R-2	1,835 S.F.	13'-6"	MANUFACTURED
16	EXISTING RANCH HOUSE "SPACE 15"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
17	EXISTING RANCH HOUSE "SPACE 14"	R-2	1,835 S.F.	13'-6"	MANUFACTURED
18	EXISTING RANCH HOUSE "SPACE 13"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
19	EXISTING RANCH HOUSE "SPACE 12"	R-2	1,872 S.F.	13'-6"	MANUFACTURED
20	EXISTING RANCH HOUSE "SPACE 11"	R-2	1,835 S.F.	13'-6"	MANUFACTURED
21	EXISTING RANCH HOUSE "SPACE 10"	R-2	768 S.F.	13'-6"	MANUFACTURED
22	EXISTING RANCH HOUSE " SPACE 9"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
23	EXISTING CLUBHOUSE	B	1,765 S.F.	13'-6"	V-B
24	EXISTING MOBILE HOME "SPACE 8"	R-2	1,248 S.F.	13'-6"	MANUFACTURED
25	EXISTING MOBILE HOME "SPACE 7"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
26	EXISTING MOBILE HOME "SPACE 6"	R-2	1,200 S.F.	13'-6"	MANUFACTURED
27	EXISTING MOBILE HOME "SPACE 5"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
28	EXISTING MOBILE HOME "SPACE 4"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
29	EXISTING MOBILE HOME "SPACE 3"	R-2	1,860 S.F.	13'-6"	MANUFACTURED
30	EXISTING MOBILE HOME "SPACE 2"	R-2	1,872 S.F.	13'-6"	MANUFACTURED
31	EXISTING MOBILE HOME "SPACE 1"	R-2	1,872 S.F.	13'-6"	MANUFACTURED
32	EXISTING STABLES	U	10,500 S.F.	14'	V-B
33	EXISTING STABLES	U	10,500 S.F.	14'	V-B
34	EXISTING STABLES	U	10,500 S.F.	14'	V-B
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39	EXISTING STABLES	U	10,500 S.F.	14'	V-B
40	EXISTING STORAGE	U	1,130 S.F.	20'	II-B
41	EXISTING STORAGE	U	1,140 S.F.	20'	II-B
42	EXISTING RK BARN - STORAGE	U	1,009 S.F.	22'	II-B
43	EXISTING STORAGE	U	624 S.F.	10'	V-B
44	EXISTING PAVILION	A-3	10,847 S.F.	22'	II-B
45	EXISTING CLOCK TOWER HOUSE	R-3	2,400 S.F.	±22'	V-B
46	EXISTING POLO FIELD STORAGE	U	1,560 S.F.	14'-6"	MANUFACTURED
47	EXISTING STORAGE	U	360 S.F.	10'	MANUFACTURED
48	GRAND PAVILION TENT	A-3	7,500 S.F.	21'	MANUFACTURED
49	OFFICE TRAILER	U	600 S.F.	10'	MANUFACTURED
50	SHIPPING CONTAINER #1	U	400 S.F.	9'-6"	STEEL CONTAINER
51	POD CONTAINER	U	120 S.F.	9'-6"	STEEL CONTAINER
52	SHIPPING CONTAINER #2	U	400 S.F.	9'-6"	STEEL CONTAINER
53	EXISTING RANCH HOUSE	R-2	1,860 S.F.	13'-6"	MANUFACTURED
54	EXISTING RANCH HOUSE	R-2	1,860 S.F.	13'-6"	MANUFACTURED

Source(s): Kolbrien (03-03-2026)

Figure 2-5

Not to Scale

Existing On-Site Structures



Source(s): ESRI, USGS (2013), RCIT (2025)

Figure 2-6

0 750 1,500 3,000 Feet

USGS Topographical Map

land classified as "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Land," none of which meet the definition of "Farmland" as outlined by CEQA, the County, or the CDC (CDC, 2021).

F. Biological Resources

The Project site largely consists of developed and disturbed habitat types, along with minor areas of ephemeral drainage, a detention basin, non-native grassland/livestock feed yards, coast live oak, and disturbed southern willow scrub. The dominant vegetation community across the majority (205.48 acres) of the Project site is characterized as developed, which includes equestrian and event center facilities where the vegetation is primarily ornamental including but not limited to turf. Disturbed areas comprise 34.89 acres of the Project site and include areas devoid of vegetation including event center parking areas and select equestrian facilities. A well-defined unvegetated ephemeral drainage comprising approximately 0.32-acre enters the northeast region of the Project site and drains in a western direction where it is captured in a detention basin. The detention basin into which the drainage flows is designed to hold water and encompasses approximately 0.31-acre. The northern portion of the detention basin is bordered by approximately 0.13-acre of disturbed southern willow scrub and dominated by scattered arroyo willow (*Salix lasiolepis*) saplings, Eucalyptus, annual sunflower (*Helianthus annus*), mulefat (*Baccharis salicifolia*), tocalote, and nonnative grasses. Approximately 0.29-acre of the Project site consists of non-native grassland/feed yards, which are generally devoid of vegetation with some areas of non-native grasses and reestablishing ruderal species. A few mature coast live oak trees (*Quercus agrifolia*) are located in the northeast region of the Project site on approximately 0.18-acre. (Cadre, 2026a, pp. 10, 26-28)

Regarding plant species, no State- or federally-listed threatened, endangered, or special-status plants not covered under the Western Riverside County MSHCP were documented on the site or are expected to occur on the site. Regarding wildlife, there is bird nesting habitat present in the existing trees and the Project site occurs within the predetermined survey area for the western burrowing owl. Focused surveys for burrowing owl were conducted on the site in 2025 and no owls or signs of owl presence were detected. (Cadre, 2026a, pp. 33, 40)

G. Cultural and Tribal Cultural Resources

BFSA Environmental Services (herein "BFSA") conducted an archaeological records search, a field survey, and a review of the Sacred Lands File (SLF) from the Native American Heritage Commission (NAHC) to identify any potential cultural or tribal cultural resources that may exist on the Project site or within the Project's off-site improvement areas. The results of the analysis determined that 12 resources are recorded within one mile of the Project, one of which is located on the Project site (P-33-013281). Site P-33-013281 is a prehistoric lithic scatter recorded by Compass Rose Archaeological Inc. (Compass Rose) in 2004. However, this prehistoric lithic scatter could not be relocated during the current survey conducted by BFSA in March 2025. Of the remaining 11 resources, three are prehistoric and eight are historic. The prehistoric resources consist of one village site, one bedrock milling feature and petroglyph site, and one bedrock milling feature with an associated lithic scatter. The historic resources include six isolates, one trash scatter, and the Dorland Ranch. (BFSA, 2026, pp. 4.0-1 and 4.0-2.)

H. Historical Resources

Based on a review of historic aerial images and topographic maps conducted by BFSA, the Project site was previously utilized for agriculture before transitioning into an equestrian training center in the late 1960s. By 1946, SR-79 had been constructed in its current location, adjacent to the linear alignments of the Project near the intersections of present-day SR-79 and Pauba Road, and SR-79 and Los Caballos Road. Between 1946 and 1967, the entire Galway Downs event facility consisted of cultivated fields. (BFSA, 2026, p. 4.0-2)

In 1968, the Galway Downs site became the Rancho California Track and Training Center, a multipurpose event center for equestrian-related activities. By 1976, the majority of the site was cleared and prepared for the facility's operations. Additionally, a dirt racetrack and several structures were constructed, many of which remain on the site. Subsequent aerial photographs demonstrate the continued development of the site for the expansion of the events facility for equestrian-related activities in the following decades, which includes the construction of additional structures, the grading of dirt roads, and the planting of numerous trees throughout the Project site. (BFSA, 2026, p. 4.0-2)

At present, the Galway Downs site continues to function as an events facility. Of the structures built between 1967 and 1976, two buildings located in the southwest portion of the site are within the Project's physical disturbance area. The buildings are situated northwest and southeast of a building primarily used for weddings, approximately 800 feet southwest of the racetrack. A third structure was also built between 1967 and 1976 in the location of the current wedding venue; however, historic aerial images demonstrate that the original structure was replaced by the wedding venue between 2014 and 2016. (BFSA, 2026, p. 4.0-2)

I. Geology

The Project site is located within the Peninsular Ranges, a prominent physiographic province forming much of southwestern California. This region is characterized by relatively steep, elongated northwest trending mountain ranges and valleys. More specifically, the Project site is situated within the Perris Block, an eroded mass of Cretaceous and older crystalline bedrock. The Perris Block, approximately 20 miles by 50 miles in extent, is bounded by the San Jacinto Fault Zone to the northeast, the Elsinore Fault Zone to the southwest, the Cucamonga Fault Zone to the northwest, and the Temecula Basin to the southeast. The southeast boundary of the Perris block is poorly defined. The Perris Block has had a complex tectonic history, apparently experiencing relative vertical land movements of several thousand feet in response to movement along the Elsinore and San Jacinto Fault Zones. Sedimentary and volcanic deposits locally mantle the crystalline bedrock. Alluvial and colluvial deposits fill the valley areas. Geologic deposits underlying the Project site include Quaternary alluvium within the low-lying drainage areas of the site and Cretaceous-age granitic bedrock exposed on the hillsides and underlying the alluvium.

According to mapping information available from Riverside County GIS, the extreme southeastern portion of the Galway Downs site (approximately 1.7 acres) occur within a Riverside County Fault Zone with several existing faults located southeast of the Project site, including the Agua Tibia Mountain Fault; however, no existing structures occur within this portion of the Project site. In addition, Riverside County GIS shows that the northern portions of the Project site having a "Very High" susceptibility to liquefaction hazards, while the

southern portions of the site are identified as having a "Low" to "Moderate" susceptibility to liquefaction hazards. In addition, the Project site is considered "Susceptible" to subsidence hazards. (RCIT, n.d.)

J. Hydrology

According to mapping information available from the San Diego RWQCB, the Project site occurs within the Pauba Hydrologic Subarea (HSA) of the Pechanga Hydraulic Area (HA) of the Santa Margarita Hydrologic Unit (HU). The HU largely is drainage by the Santa Margarita River, Murrieta Creek, and Temecula Creek. The major surface water storage areas are Vail Lake and O'Neill Lake. Annual precipitation ranges from less than 12 inches near the coast to more than 45 inches inland near Palomar Mountain. The only coastal lagoon of the HU is the Santa Margarita Lagoon, which lies within the Camp Pendleton Marine Base. The Santa Margarita HU is composed of the following nine HAs: the Ysidora, Deluz, Murrieta, Auld, Pechanga, Wilson, Cave Rocks, Aguanga, and Oak Grove HAs. (RWQCB, 2021, p. 1-8)

Under existing conditions, runoff on the Project site is conveyed by a natural drainage system that primarily directs stormwater runoff through a combination of sheet flow, earthen channels, and culverts. Runoff generated within the southeastern portion of the Project site drains to an existing culvert beneath Pauba Road, where it is conveyed to an improved storm drain channel that runs along the east side of Pauba Road, and ultimately is conveyed beneath a separate culvert where flows are conveyed into the Temecula Creek located to the north of the Project site. Flows from most of the remainder of the site sheet flow towards Los Corralitos Road and northerly towards an existing on-site retention basin located just northwest of the existing race track. In addition, a well-defined ephemeral drainage enters the northeast region of the Project site and drains in a western direction towards the on-site retention basin. Flows within this retention basin partially infiltrate into the groundwater table. During peak rain events, runoff from the retention basin is conveyed northerly by an existing culvert located beneath Los Caballos Road, where it discharges into an existing drainage swale and ultimately is conveyed to Temecula Creek.

In addition, the northern portions of the Project site, generally encompassing the areas north of the existing racetrack, are located within a Federal Emergency Management Agency (FEMA) mapped floodplain (RCIT, n.d.).

K. Noise

Ambient noise levels in the Project area are dominated by transportation-related noise associated with vehicles traveling on nearby surface streets. This includes traffic along nearby segments of Los Caballos Road, Pauba Road, and SR-79. Noise is also generated by operational activities in the area, which are primarily equestrian- and winery-related. Within the Project area, and based on noise measurements conducted by Urban Crossroads, Inc., ambient noise levels range from approximately 51.4 dBA CNEL to 62.9 dBA CNEL. (UXR, 2026e, p. 29 and Table 5-1)

L. Transportation

Galway Downs has fluctuating operations on weekdays, weekends, and seasonally. Travel to and from the site is primarily accomplished by vehicle with the primary regional access route being SR-79. Vehicles

accessing the site include passenger vehicles, vendor vehicles, recreational vehicles, horse trailers, and occasional tractor trailers. On weekdays with no scheduled events, vehicle entries range from 60 to 129 per day. When large events occur on weekends, the highest vehicle entry count on record in a single day was 5,757.

Under existing conditions, the Galway Downs facility is surrounded by Los Caballos Road to the north, Pauba Road to the east, and Los Corralitos Road to the south and west. Anza Road occurs approximately 0.8 mile to the west of the Project site. SR-79 occurs approximately 0.25-mile southwest of the Project site and is accessible in the Project area via Los Caballos Road and Pauba Road.

The Riverside County General Plan Circulation Element and SWAP classify the ultimate configurations of planned roads. SR-79 east of I-15 to the west of Pauba Road is planned as an "Expressway," which is a six- or eight-lane divided roadway (typically divided by a raised median or painted two-way turn-lane) with a 184-foot or 220-foot right-of-way (ROW) and a 134-foot curb-to-curb measurement. Anza Road is classified as a "Major Roadway," which is a four-lane roadway and may include a painted median, and typically has a 118-foot ROW and a 76-foot curb-to-curb measurement. De Portola Road and Pauba Road (south of De Portola Road) are classified as "Mountain Arterials," which are two-lane or four lane roadways that do not include a painted median that typically have a 110-foot ROW and a 64-foot curb-to-curb measurement. Los Caballos Road and Pauba Road (north of De Portola Road) are classified as "Collector Streets," which are two-lane roadways that do not include a painted median and that typically have a 74-foot ROW and a 40-foot curb-to-curb measurement. (UXR, 2025, p. 27)

The Project area currently is served by Riverside Transit Agency (RTA), a public transit agency serving various jurisdictions within Riverside County. Based on a review of the existing transit routes within the vicinity of the proposed Project, there are no transit routes that currently serve the Project site. Transit service is reviewed and updated by RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (UXR, 2025, p. 31)

The SWAP trails and bike paths are shown in Exhibit 3-4 of the Project's Traffic Analysis ("TA"; *Technical Appendix I*). As shown in Exhibit 3-4 of the Project's TA, there are planned Wine Country Roadside and Regional Open Space trails surrounding the Project site. In addition, along SR-79 between Anza Road and Pauba Road there is a planned Class II bike path. Regional Open Space trails also are identified along Anza Road, Pauba Road, and De Portola Road, while Wine Country Roadside trails are identified along Los Caballos Road and Los Corralitos Road. Existing pedestrian facilities within the study area are shown in Exhibit 3-5 of the Project's TA. Field observations and traffic counts conducted in August 2025 during a non-event weekend indicate minimal pedestrian and bicycle activity within the study area. (UXR, 2025, p. 31)

2.4.2 Existing Operational Characteristics

While the physical environmental baseline for this EIR is established as of the date of the NOP (January 14, 2025), consistent with State CEQA Guidelines Section 15125(a), the operational baseline for evaluating the

Project's incremental effects on traffic, air quality, greenhouse gas emissions, energy, noise, and related topics is defined based on the actual, documented operational conditions at the Galway Downs facility as of the NOP date.

Under CEQA, lead agencies retain discretion to define the environmental baseline in a manner that most accurately captures a project's actual incremental environmental effects. The California Supreme Court addressed this discretion in *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439, holding that a lead agency may define the baseline using conditions other than those existing at the NOP date where doing so would more accurately reflect the project's actual environmental effects and would better inform decision makers and the public. (Id. at pp. 454–455.) The Court emphasized that the choice of baseline is a discretionary judgment subject to the substantial evidence standard, and that the lead agency must provide a reasoned explanation for its choice. (Id. at pp. 454–456.)

Although *Neighbors for Smart Rail* addressed the use of projected future conditions as a baseline, its underlying principle applies equally to situations where a project site has a documented history of recurring operational activities that are occurring as of the NOP date but are not fully reflected in existing entitlements. In such circumstances, a lead agency may, consistent with *Neighbors for Smart Rail*, define the operational baseline to include those actual conditions rather than limiting the baseline to only the activities formally permitted under existing approvals. Defining the baseline to exclude documented actual operations would result in an artificially inflated assessment of the Project's incremental impacts and would misrepresent the true environmental effect of the Project, which is the precise outcome the *Neighbors for Smart Rail* framework is designed to prevent.

The Galway Downs facility originally opened in 1968 as the Rancho California Track and Training Center, a multipurpose event center for equestrian-related activities. By 1976, the majority of the property was cleared and prepared for the facility's operations, and extensive improvements were made to include a recreational vehicle (RV) park, kitchen, restaurant, hay barn, and check-in gate. In 1980, the facility was purchased by a new owner, at which point the facility was renamed as "Galway Downs." The new owner installed a 5/8-mile racetrack inside the larger track, along with the installation of additional barns and infrastructure. In 2010, the Galway Downs facility was purchased by Ken and Tina Smith, who continue to own and manage the facility. Galway Downs includes a variety of existing recreational- and event-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with club house; grooms quarters; office space; a clock tower house; and storage spaces. The Galway Downs facility employs approximately 35 full-time facility and operations positions, 27 part-time facility positions, and an additional approximately 105 part-time events positions (Millay, 2025). The existing facility operates under four approved CUPs, including CUP 001127, CUP 00966, CUP 01615, and CUP 02303.

Galway Downs has fluctuating operations on weekdays, weekends, and seasonally. Consistent with the *Neighbors for Smart Rail* framework described above, the operational baseline for this EIR is based on actual facility operations and represents a reasonable characterization of typical and peak conditions as of the NOP date. Specifically, baseline conditions for the number of visitors and frequency of events are derived

from a full year of operational data for 2023, provided by the Galway Downs operations team (Millay, 2025). This 2023 dataset includes a list of the scheduled event types and the number of vehicles parked or estimated to be parked at the facility on each day of the year. Based on a review of recent operations and information provided by the Galway Downs operations team, the facility's operations in 2024 and 2025 were substantially the same as those observed in 2023, confirming that the 2023 dataset accurately characterizes conditions as of the NOP date.

The environmental baseline for operating conditions is based on actual facility operations and represents a reasonable characterization of typical and peak conditions. Operational activity volumes widely vary from day to day and are summarized as follows:

- **Weekday – No Events:** On weekdays with no scheduled events, vehicle entries range from 60 to 129. In 2023, there were 209 weekdays with no scheduled events (80.4% of all weekdays). Activities that typically occur on the site on these days include equestrian care, property maintenance, and small gatherings (e.g., business meetings, vendor demonstrations, etc.).

- **Weekday – Events**: On weekdays with scheduled events, inclusive of weekdays that fall on a holiday, vehicle entries range from 208 to 2,229. In 2023, there were 51 weekdays with events (19.6% of all weekdays). Activities that typically occur on the site on these days include equine events, occasional sporting events, and small to mid-sized gatherings (e.g., business meetings, vendor demonstrations, weddings), sometimes with multiple events simultaneously occurring.

- **Weekend – No Events:** On weekend days with no scheduled events, vehicle entries range from 60 to 129. In 2023, there were 14 weekend days with no scheduled events (13.3% of all weekend days). Activities that typically occur on the site on these days include equestrian care, property maintenance, and small gatherings (e.g., business meetings, vendor demonstrations, etc.).

- **Weekend – Typical Events:** On weekend days with scheduled events, vehicle entries range from 229 to 2,272. In 2023, there were 61 weekend days with scheduled events (58.1% of all weekend days). Activities that typically occur on the site on these days include equine events, sports events, and small to mid-sized gatherings (e.g., business meetings, vendor demonstrations, weddings, etc.), sometimes with multiple events simultaneously occurring.

- **Weekend – Peak Events:** On some weekend days, large events ("peak operations") occur, with vehicle entries ranging from 2,318 to 5,757. In 2023, there were 30 weekend or holiday weekend days with peak operations (28.6% of all weekend days). Activities that typically occur on the site on these days include equine events, sports events, and small to large-sized gatherings (e.g., business meetings, vendor demonstrations, weddings, etc.), often with multiple events simultaneously occurring.

The 2023 operational dataset described above constitutes the operational baseline against which the Project's incremental environmental effects are measured throughout this EIR. The County of Riverside has

exercised its discretion under *Neighbors for Smart Rail* to adopt this operational baseline for the following reasons.

First, the 2023 dataset comprehensively captures the full range of activities actually occurring at the Galway Downs facility as of the NOP date, including equestrian events, sports events, and special occasion events, and provides an accurate and complete characterization of the facility's environmental footprint. Second, the Project's primary purpose is to formalize, permit, and provide appropriate regulatory oversight for the uses already occurring under actual operating conditions. The Project does not propose to introduce fundamentally new uses into the environment beyond those already captured in the 2023 operational dataset. Accordingly, defining the operational baseline to reflect actual conditions is consistent with CEQA's mandate to evaluate a project's true incremental effects. Third, the 2023 peak operational conditions, which included up to 5,757 one-way vehicular trips on peak days, represent the upper bound of operational activity at the facility under baseline conditions. Proposed CUP 02303R1 would constrain peak operations to a maximum of 4,639 parking spaces, which is less than the 2023 peak. The use of the 2023 operational data as the baseline is therefore conservative because it captures the maximum operational daily footprint of existing conditions, and the Project would be constrained to operate below that maximum. This conservatism provides additional support for the County's exercise of discretion to adopt the 2023 operational dataset as the baseline.

Cross-references to this operational baseline framework appear throughout EIR Subsections 4.1 through 4.13 wherever a threshold analysis relies on the finding that the Project would not increase maximum daily operational activities, including traffic volumes, beyond those already occurring under the established 2023 environmental baseline.

2.4.3 Existing Public Facilities, Utilities, and Service Systems

A. Public Facilities

Fire prevention and protection services for the Project site and surrounding area are provided by the Riverside County Fire Department (RCFD). The nearest fire stations to the Project site are RCFD Station 95 (Roripaugh Ranch), located approximately 4.9 miles northwest of the Project site, and RCFD Fire Station 96 (Glen Oaks) located 5.0 miles northeast of the Project site. (Riverside County, 2024b, Figure 6; RCIT, n.d.)

Police protection services for the Project site are provided by the Riverside County Sheriff's Department (RCSD). The nearest RCSD station is the Southwest Station, located at 30755-A Auld Road, Murrieta, CA 92563, approximately 7.9 miles northwest of the Project site (Google Earth, 2025)

The Project site is located within the Temecula Valley Unified School District (TVUSD). The nearest existing school facilities to the Project site are Crowne Hill Elementary (located approximately 2.4 miles northwest of the site), Tony Tobin Elementary School (located approximately 2.1 miles southwest of the site), Vail Lake Middle School (located 2.3 miles west of the site), and Rancho Vista High School (located 3.8 miles west of the site). As of the 2023/2024 school year, the TVUSD had a total enrollment of 28,094 students for grades

K-12 (TVUSD, 2023). Of the 28,094 enrolled students, 8.2% of students were in kindergarten, 34.1% were in elementary school, 23.4% were in middle school, and 34.3% were in high school (DOE, n.d.).

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The nearest library servicing the proposed Project site is Ronald H. Roberts Temecula Public Library, located at 30600 Pauba Road, or approximately 7.2 miles northwest of the Project site (Google Earth, 2025).

B. Utilities and Service Systems

1. Water Service

The Project site is located in the service area of the Rancho California Water District (RCWD). The RCWD is an independent Special District which provides water and recycled water service to the Temecula/Rancho California community. The RCWD's service area encompasses an approximate 154.7-square-mile area that includes the City of Temecula, portions of the City of Murietta, as well as unincorporated areas within southwest Riverside County. The RCWD currently obtains its water supplies from the following primary water sources: 1) local groundwater from the Temecula Valley Groundwater Basin; 2) imported State Water Project (SWP) and Colorado River water from the Metropolitan Water District of Southern California (MWDSC) via the Eastern Municipal Water District (EMWD) and Western Municipal Water District (WMWD); and 3) recycled water from both RCWD and EMWD. (RCWD, 2021, pp. 1-6 through 1-9)

In addition to the potable water system, RCWD operates 6 recycled water pump stations and 3 active recycled groundwater production wells and maintains 4 recycled water storage reservoirs with a combined capacity of 7.5 million gallons (MG). The RCWD owns 5 recycled water storage ponds with a total of 1,495 acre-feet per year (AFY) of storage, including the Cole Creek Storage Pond. The recycled water system includes 58.9 miles of water pipelines that convey recycled water for irrigation. The recycled water supply is from tertiary facilities at the Santa Rosa Water Reclamation Facility (SRWRF) and the seasonal storage ponds constructed adjacent to the reclamation facility. Recycled water is also received from the Temecula Valley Regional Water Reclamation Facility (TVRWRF) under agreement with EMWD. (RCWD, 2021, p. 1-9)

Under existing conditions, a series of potable water lines, irrigation water lines, and fire water lines are installed on site to provide water service to the existing uses on site, which connect to existing water lines installed within Los Corralitos Road, Los Caballos Road, and/or Pauba Road.

2. Sewer Service

Under existing conditions, wastewater generated at the Project site is conveyed to existing septic holding tanks. Sanitary sewer lines currently traverse the Project site, with sewer flows from the majority of the site being conveyed to the northwest portion of the site where there are six 12-foot-wide, 30-foot-long, and 12-foot-deep holding tanks. The tanks collect the wastewater that is routinely pumped by a septic service company and disposed of at a permitted off-site location.

Ultimately, sewer service in the Project area is planned to be served by the EMWD, which is planning to construct a modernized sewer system in the Temecula Valley Wine Country Region as part of Phase II of the

Wine Country sewer system improvements. In 2015, EMWD completed the first phase of a sewer system in Northern Wine Country. The EMWD's Northern Wine Country Phase II project will install 14,000 linear feet of sewer lines along Rancho California Road, Glen Oaks Road, Warren Road, and East Benton Road, along with 23,200 linear feet of sewer line along De Anza Road and De Portola Road as part of the Southern Wine Country sewer improvement project.

Following completion of the Phase II project, EMWD would be responsible for treating wastewater generated in the local area. Wastewater facilities owned and operated by EMWD include 52 miles of gravity mains, 2 lift stations, and 2.5 miles of force mains. This flow is conveyed to a collection system that is owned and operated by the Santa Rosa Regional Resources Authority (SRRRA). The SRRRA is a Joint Powers Authority with three member agencies: the RCWD, Elsinore Valley Municipal Water District (EVMWD), and WMWD. The SRRRA also provides treatment at the SRWRF, a 5 million gallon per day (MGD) sequencing batch reactor treatment facility with conventional advanced wastewater treatment.

3. Solid Waste Services

The Riverside County Department of Waste Resources (RCDWR) is responsible for the efficient and effective landfill disposal of non-hazardous county waste within the County, and operates five active landfills in addition to holding a contract agreement to dispose of waste at the private El Sobrante Landfill (Riverside County, 2015a, pp. 4.17-36). Solid waste generated in the Project area is disposed of at either the El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill. Currently, Badlands Landfill has a maximum capacity of 82,300,000 tons, a remaining capacity of 7,800,000 tons, and a daily capacity of 5,000 tons (CalRecycle, n.d.1). El Sobrante has a maximum capacity of 6,003,343 tons, a remaining capacity of 3,271,203 tons, and a daily capacity of 400 tons (CalRecycle, n.d.2). Lamb Canyon Landfill has a maximum capacity of 39,681,513 tons, a remaining capacity of 19,242,950 tons, and a daily capacity of 5,000 tons (CalRecycle, n.d.3)

4. Other Services

The Project site is also located in the service territories of Southern California Edison (electricity). The Project site also is located within the regional service area for Southern California Gas Company (natural gas), although natural gas is not available in the Project area under existing conditions. (CEC, 2020a; CEC, 2020b).

2.5 PLANNING CONTEXT

State CEQA Guidelines Section 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation and recognize potential inconsistencies. Plans that are applicable to the Project evaluated in this EIR and related to use of the land are summarized below. Additional information is provided about these plans and other applicable regional plans in the corresponding subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG is a regional agency established pursuant to California Government Code Section 6500 et seq., also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. In April 2024, SCAG's Regional Council approved and adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal). Connect SoCal is the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project. Connect SoCal embodies a collective vision for the region's future, prepared with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses, and stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Connect SoCal plans for a large number of transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and replacement bridges. These future investments were included in county plans developed by the six CTCs and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The goals of Connect SoCal are to: (1) build and maintain an integrated multimodal transportation network; (2) develop, connect, and sustain communities that are livable and thriving; (3) create a healthy region for the people of today and tomorrow; and (4) support a sustainable, efficient, and productive regional economic environment that provides opportunities for all residents. (SCAG, 2024)

2.5.2 South Coast Air Quality Management District Air Quality Management Plan

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the South Coast Air Basin (SCAB). In response, and in conformance with California Health and Safety Code Section 40702 et seq. and the California Clean Air Act, the South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly to more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. In December 2022, SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS)[1], a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act (CAA) requirements. The 2022 AQMP is based on assumptions provided by the Emission Factor Model (EMFAC) developed by the California Air Resources Board (CARB) for motor vehicle information and assumptions provided by SCAG for demographics. The air quality levels projected

[1] Although SCAG has since adopted the 2024-2050 RTP/SCS, the 2022 AQMP relied on information from the 2020-2045 RTP/SCS, which was the current version of the RTP/SCS at the time the 2022 AQMP was adopted.

in the 2022 AQMP assume that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its 2020 RTP/SCS. The 2022 AQMP also assumes that such development projects will implement strategies to reduce air pollutant emissions generated during the construction and operational phases of development. (SCAQMD, 2022)

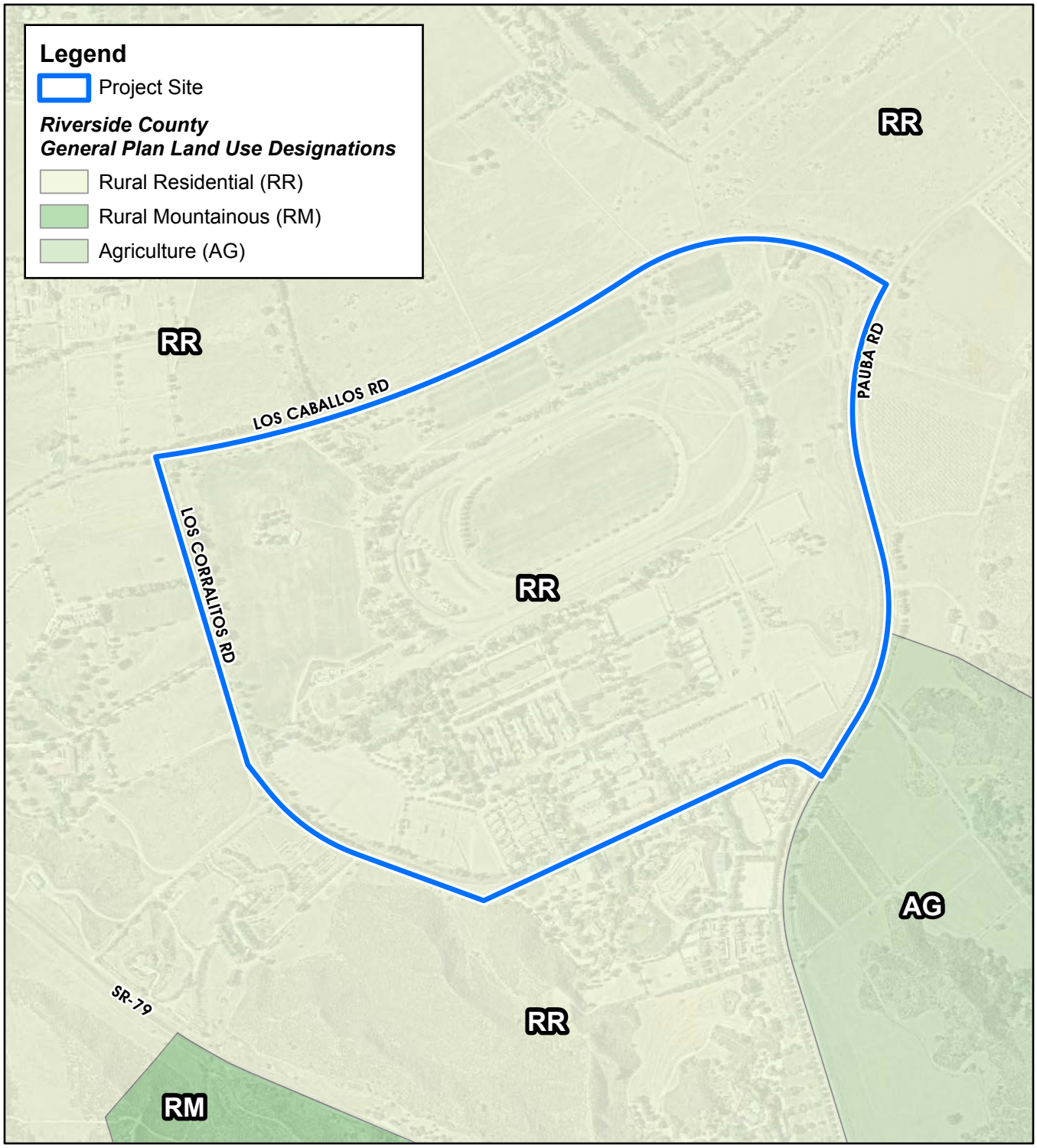
2.5.3 Western Riverside County Multiple Species Habitat Conservation Plan

The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted. As shown on EIR Figure 4.3-3, *MSHCP Relationship Map*, within EIR Subsection 4.3, *Biological Resources*, the northern portions of the Project site occur within MSHCP Criteria Cells 7134 and 7185, which are independent cells not located within any Cell Groups. According to the MSHCP, conservation within Criteria Cell 7134 is intended to include 5 to 15 percent of the Cell focusing on the southeastern portion of the Cell, while conservation within Criteria Cell 7185 is intended to include 20 to 30 percent of the Cell focusing on the southern portion of the Cell (Riverside County, 2003, Table 3-16). While northern portions of the site occur within Criteria Cells 7134 and 7185, a Joint Project Review (JPR) was approved by the County and Wildlife Agencies in 2011, which did not require any on-site conservation. An updated JPR is being processed in association with the proposed Project, and is expected to be approved prior to public hearings for the proposed Project.

In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements. The Project site is not located within an MSHCP Survey area for amphibians or mammals, although the Project site occurs within an MSHCP burrowing owl survey area. The Project site is not located within a narrow endemic plant species survey area or a criteria species survey area and is also not located within a Delhi Sands Flower-loving Fly survey area (RCA, n.d.). Refer to EIR Subsection 4.3, *Biological Resources*, for a more detailed description of applicable MSHCP requirements and an evaluation of the Project's consistency with the MSHCP.

2.5.4 County of Riverside General Plan and Southwest Area Plan

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the SWAP portion of the Riverside County General Plan. As depicted on Figure 2-7, *Existing General Plan Land Use Designations*, the County's General Plan and SWAP designate the Project site as "Rural Residential (RR)," which allows for single-family residences with a minimum lot size of 5 acres, and allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and



Source(s): ESRI, NearMap Imagery (August 2024), RCIT (2025)

Figure 2-7

Existing General Plan Land Use Designations

associated uses and governmental uses. The Project site also falls within the TVWCPA – Equestrian District and is subject to compliance with the Temecula Valley Wine Country Community Plan (TVWCCP), as discussed below. (RCIT, n.d.; Riverside County, 2021b)

2.5.5 Temecula Valley Wine Country Community Plan

The TVWCCP was adopted in March 2014 and applies to lands adjacent to the City of Temecula, City of Murrieta, and several unincorporated communities, including the Project site and surrounding areas. The TVWCCP includes policies specific to the 11 Policy Areas identified by the SWAP. The TVWCCP includes policies applicable to all land uses within the SWAP TVWCPA, along with policies specific to lands located within the Equestrian District portion of the TVWCPA. As stated by the TVWCCP, the intent of the Equestrian District is to protect and promote equestrian uses within the TVWCPA to "…make this a unique Wine Country in the nation." Additional details regarding the TVWCCP and the Project's consistency with the TVWCCP are provided in EIR Subsection 4.8, *Land Use and Planning*. (Riverside County, 2014)

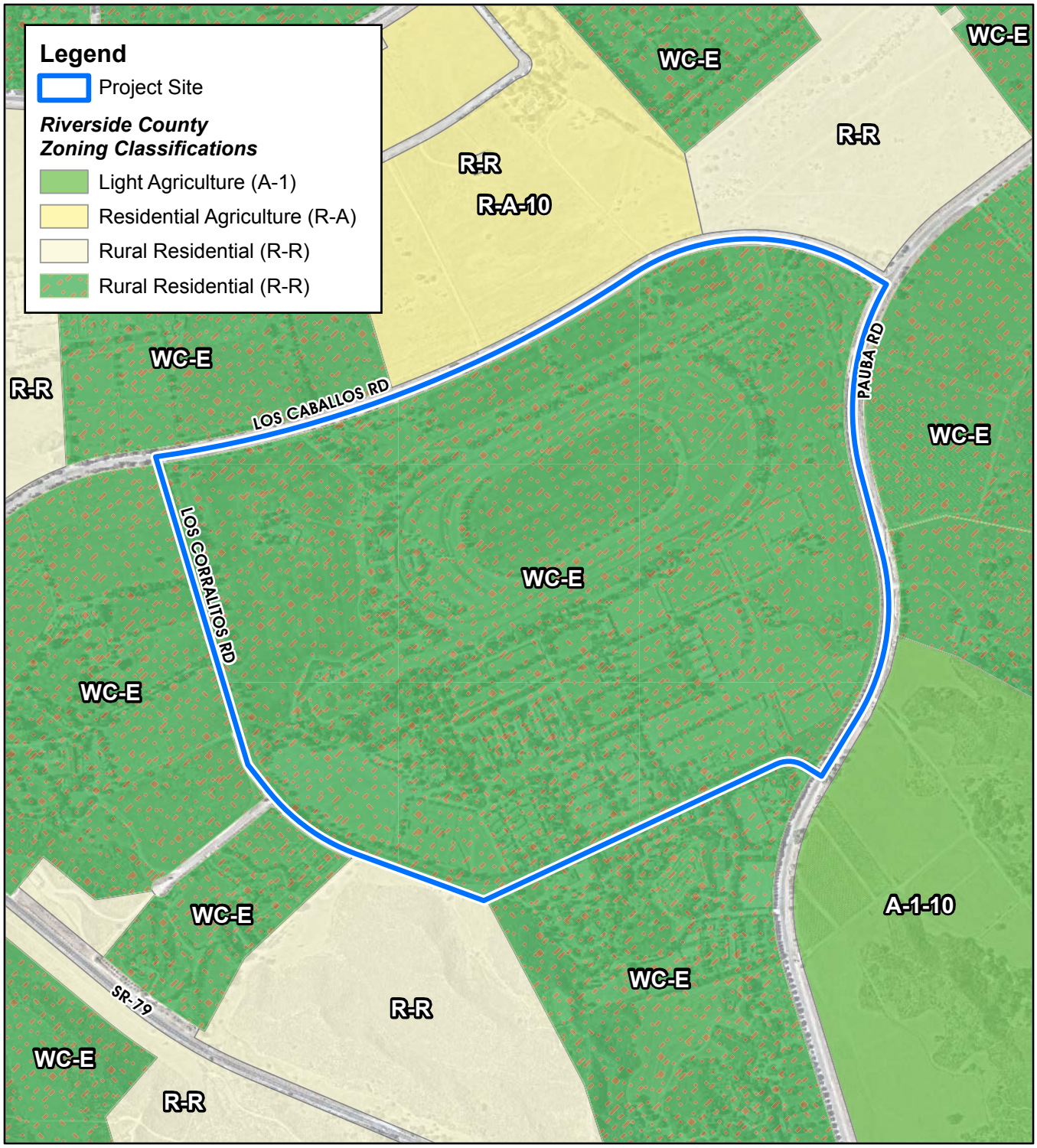
2.5.6 Zoning

The Riverside County Zoning Ordinance is intended to implement the Riverside County General Plan's land use plan. As shown on Figure 2-8, *Existing Zoning Classification*, under existing conditions, the Project site is zoned "Wine Country – Equestrian (WC-E)." The WC-E zone allows for equestrian facilities, limited agricultural uses, cottage industry uses, retail uses, Class I and II wineries, and Class II equestrian establishments, and also conditionally permits employee housing. (RCIT, n.d.; Riverside County, 2023a)

2.5.7 Rare and Unique Environmental Resources

As required by State CEQA Guidelines Section 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The principal discretionary actions required of Riverside County to implement the Project are described in detail in EIR Section 3.0, *Project Description*, and are listed in Table 3-2, *Matrix of Project Approvals/Permits*. Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in EIR Section 4.0, *Environmental Analysis*, the Project site does not contain any rare or unique environmental resources due in part to the past and on-going physical disturbances at the site.

The Galway Downs facility in and of itself is a large equestrian center with unique characteristics, although such characteristics are not considered environmentally sensitive because they are not related to aesthetics, biological resources, historical resources, or other uncommon or exceptional environmental resource at a regional or statewide scale.



Source(s): ESRI, NearMap Imagery (August 2024), RCIT (2025)

Figure 2-8

Existing Zoning Classification

3.0 PROJECT DESCRIPTION

This Section 3.0 provides all of the information required of an EIR Project Description by California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") Section 15124, including a description of the Project's precise location and boundaries; a statement of the Project's objectives; a description of the Project's technical, economic, and environmental characteristics; and a description of the intended uses of this EIR, including a list of the government agencies that are expected to use this EIR in their decision-making processes; a list of the permits and approvals required to implement the Project; and a list of related environmental review and consultation requirements.

3.1 SUMMARY OF THE PROPOSED PROJECT

Galway Downs is an existing events facility that first opened in the 1960s and has a current street address of 38801 Los Corralitos Road. The site is located within the Southwest Area Plan (SWAP) portion of unincorporated Riverside County and specifically within the Temecula Valley Wine Country Policy Area (TVWCPA). The existing facility encompasses approximately 241.6 acres and operates as a traditional equestrian facility most of the time but also hosts a variety of other activities, primarily on weekends and holiday weekends. Galway Downs includes a variety of physical features, including but not limited to a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; a recreational vehicle (RV) park with clubhouse; grooms' quarters; office space; a clock tower house; and storage spaces. The existing facility operates under four 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 (hereafter "proposed Project" or "Project"). The primary use of the site would continue to be equestrian-related. The proposed Project would generally allow the Project Applicant to: (1) make physical and operational modifications on the property to attract higher level of competition for equestrian events that can be hosted on the site; (2) permit a portion of the site to host non-equestrian sports events (primarily on weekends and holiday 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.

New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed CUP 02303R1 include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure that is proposed to be placed over an existing arena to support rooftop solar panels (hereafter called "metal solar structure"), and additional area for equestrian recreational vehicle (RV) park use. Existing structures that would continue to be operated in connection with the Project include an existing 1,513-square-foot (s.f.) barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future; the design of these areas would

be subject to future discretionary approval of Plot Plans by Riverside County. Notwithstanding, the environmental effects associated with the future construction and operation of the 36 park model lodging units and 18 additional employee modular housing units are evaluated throughout this EIR based on reasonably foreseeable conceptual designs that include the following characteristics: (1) Scale: The Park Model Lodging area would not exceed 36 units within the 5.50-acre Zone 3 area identified on Figure 3-1 and the employee housing area would not exceed 18 units within the 2.76-acre Zone 4 area identified on Figure 3-1; and (2) Ground Disturbance: Grading within Zone 3 and Zone 4 would be limited to that necessary to prepare level pads for each unit and associated access and utility infrastructure; substantial alteration of existing topography or drainage patterns would not occur.

Exception No. 9 to Riverside County Noise Ordinance No. 847 (herein "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 periodically operate during events 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 that is audible beyond 200 feet from the source.

CZ 22000010 is sought by the Project Applicant to amend Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348 (herein "Ordinance No. 348") to allow for operational enhancements at the site, which specifically would add definitions for three uses; modify the list of conditionally permitted uses within the "Wine Country – Equestrian (WC-E)" zone; 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; and add new development standards for Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks. The approvals requested from Riverside County to implement the Project consist of the following:

1. Approval of a Conditional Use Permit Revision (CUP 02303R1);
2. Approval 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's application materials, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to State CEQA Guidelines Section 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. All other discretionary and ministerial approvals that would be required of the County of Riverside or other government agencies are also within the scope of the Project analyzed in this EIR.

3.2 SUMMARY OF REQUESTED APPROVAL ACTIONS

The County of Riverside has primary approval responsibility for the proposed Project. As such, the County of Riverside serves as the Lead Agency for this EIR pursuant to State CEQA Guidelines Section 15050. The role of the Lead Agency was previously described in Section 1.0 of this EIR. As part of the Project's approval process, the County's Planning Commission will hold a public hearing to consider the Final EIR and

proposed CUP 02303R1, Exception No. 9 to Ordinance No. 847, and CZ 22000010. The Planning Commission will make advisory recommendations to the Riverside County Board of Supervisors on whether to approve, approve with changes, or not approve CUP 02303R1, Exception No. 9 to Ordinance No. 847, and CZ 22000010. A public hearing will then be held before the Board of Supervisors, which will consider the information contained in the Project's Draft EIR, Final EIR, and the associated Administrative Record in its decision-making processes. The Board of Supervisors will certify or decline to certify the Final EIR, and will approve, approve with changes, or deny approval of proposed CUP 02303R1, Exception No. 9 to Ordinance No. 847, and CZ 22000010.

Should these actions be approved, additional discretionary and ministerial actions by the County and other agencies would be required to implement the Project. Table 3-1, *Matrix of Project Approvals/Permits,* lists the authorities and agencies that are expected to use this EIR and provides a summary of subsequent actions associated with the Project. This EIR covers all federal, State, and local government and quasi-governmental approvals which may be needed to construct and operate the Project, whether they are explicitly listed in Table 3-1 or elsewhere in this EIR (State CEQA Guidelines Section 15124[d]).

3.3 REGIONAL SETTING

The 241.6-acre Project site comprises two parcels that are located in the southwestern portion of unincorporated Riverside County. Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

3.4 PROJECT LOCATION AND SETTING

The 241.6-acre Project site that is the subject of this EIR is located within the SWAP portion of unincorporated Riverside County and within the TVWCPA. The Project site is situated approximately 0.3-mile east of State Route 79 (SR-79) and approximately 6 miles east of Interstate 15 (I-15). More specifically, the Project site comprises two parcels of land, Assessor's Parcel Numbers (APNs) 927-160-001 and 927-160-002, located at the street address of 38801 Los Corralitos Road, Temecula, CA 92592. The Project site is bounded to the west and south by Los Corralitos Road; to the east by Pauba Road; and to the north by Los Caballos Road. The Project site and the surrounding area are characterized primarily by equestrian and winery uses, along with rural residential uses and open space.

Under baseline conditions, the Project site consists of an existing events center that features a variety of recreational-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with clubhouse; grooms' quarters; office space; a clock tower house; and storage spaces. Refer to EIR Section 2.0, *Environmental Setting/Baseline*, for a complete description of the baseline conditions of the Project site and surrounding areas.

Table 3-1 Matrix of Project Approvals/Permits

Agency	Approvals and Decisions
County of Riverside	**Proposed Discretionary Approvals**
Planning Commission	• Provide recommendations to the Board of Supervisors whether to approve, approve with changes, or not approve CUP 02303R1, Exception No. 9 to Riverside County Ordinance No. 847, and CZ 22000010.
Board of Supervisors	• Approve, approve with changes, or not approve CUP 02303R1, Exception No. 9 to Riverside County Ordinance No. 847, and CZ 22000010. • Certify or decline to certify the Final EIR and adopt associated CEQA Findings.
County of Riverside	**Subsequent Approvals**
Planning Director or Planning Commission	• Approve Plot Plan for up to 36 equestrian park model lodging units. • Approve Plot Plan for up to 18 new employee modular housing units.
Riverside County Subsequent Implementing Approvals: Planning Department and/or Building and Safety Department	• Issue grading permits. • Issue building permits. • Issue certificates of occupancy. • Approve road improvement plans. • Issue encroachment permits. • Approve traffic control plans.
Other Agencies	**Subsequent Approvals and Permits**
Santa Ana Regional Water Quality Control Board (RWQCB)	• Issue a Construction Activity General Construction Permit. • Confirm Compliance with National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements.
California Department of Transportation (Caltrans)	• Issue encroachment permits for Project-related improvements on Highway 79.
Riverside County Flood Control and Water Conservation District (RCFCWCD)	• Approve drainage infrastructure and improvements.
Rancho California Water District (RCWD)	• Approve water connections and improvements.
Eastern Municipal Water District (EMWD)	• Approve sewer line connections to the future sewer main planned within De Portola Road.

3.5 STATEMENT OF OBJECTIVES

The underlying purposes of the proposed Project are to allow Galway Downs to continue operating primarily as an equestrian facility, to attract higher level of competition for equestrian events that can be hosted on the property, and to allow for other types of events including sports to help the operator cover its obligations to the equestrian uses.

The following objectives are intended to achieve these underlying purposes:

A. To make physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.

B. To make operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.

C. To align past and current uses that occur at Galway Downs under Riverside County Ordinance No. 348 and the Temecula Wine Country Community Plan.

D. To provide expanded opportunities for equestrian-related overnight accommodations.

E. To allow multi-sports field activities as secondary uses, primarily on weekends and holiday weekends, to help ensure the facility remains financially viable to enable the facility to continue hosting equestrian-oriented uses.

F. To eliminate reliance on septic systems for sewage disposal.

G. To reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source.

H. To establish procedures and protocols for the management of special occasion traffic generated by Galway Downs.

I. To clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone.

J. To establish Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Parks, and Multi-Use Sport Field land uses as new conditionally permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.

3.6 PROJECT'S COMPONENT PARTS AND DISCRETIONARY APPROVALS

The Project evaluated in this EIR involves applications for Revision No. 1 to CUP No. 02303 (CUP 02303R1), Exception No. 9 to Ordinance No. 847, and a Change of Zone (CZ 22000010) to amend Article XIVd (Wine Country Zones [WC]) of Ordinance No. 348. The principal discretionary actions required of Riverside County to implement the Project are described in detail on the following pages. Additional discretionary and ministerial actions that would be necessary to implement the Project previously were listed in Table 3-1. A full set of Project application materials is on file with the County of Riverside Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501.

3.6.1 Conditional Use Permit (CUP 02303R1)

CUP 02303R1 is proposed to allow for the construction or installation of new buildings and facilities at Galway Downs, to permit several structures previously installed on the site, and to accommodate an expanded range of conditionally-permitted uses allowed pursuant to proposed CZ 22000010 (refer to

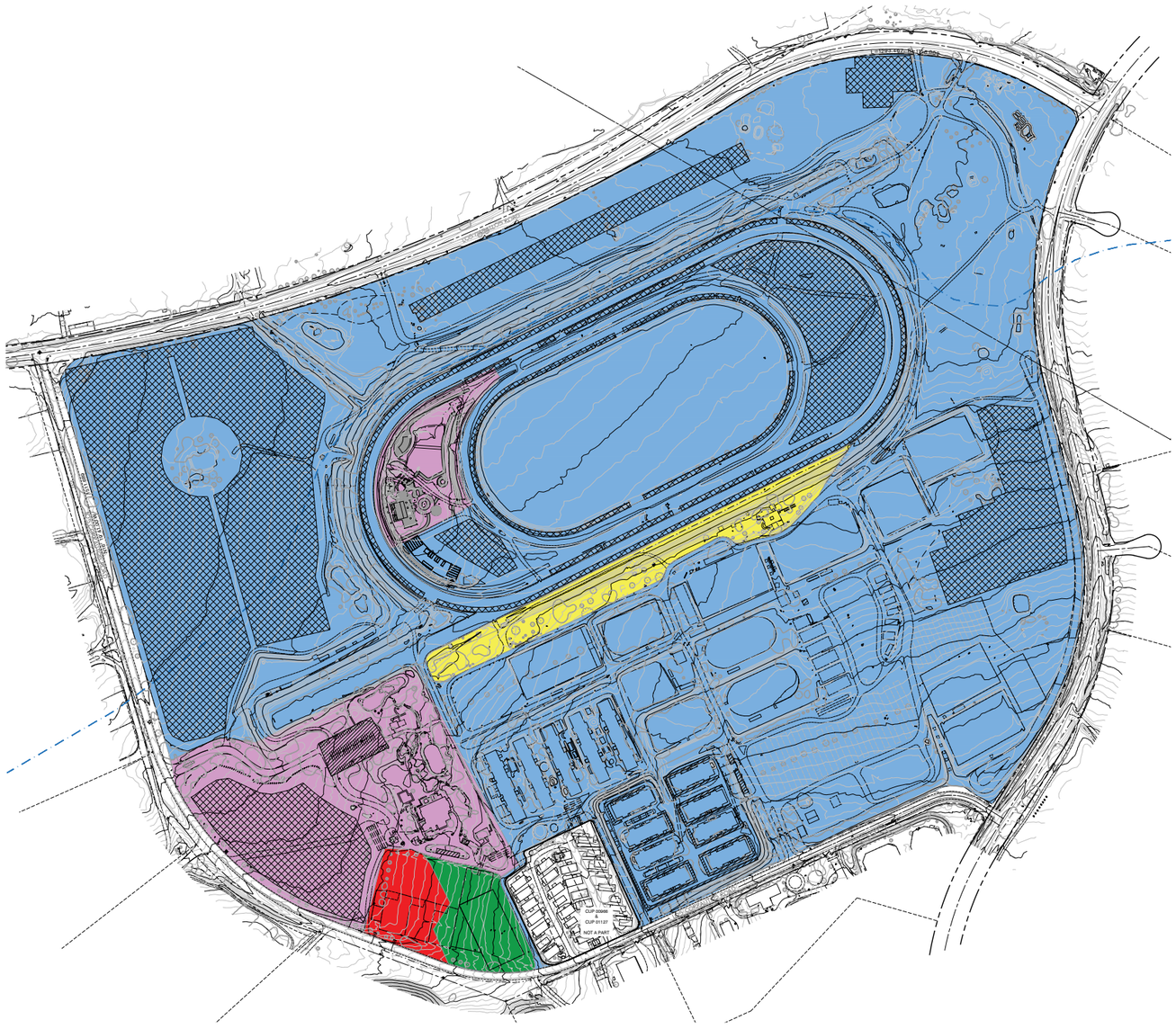
Subsection 3.6.3 for a complete description of proposed CZ 22000010). A description of key components of CUP 02303R1 is provided below.

A. Land Use Allocation Zones – Special Occasion Programming

For purposes of proposed CUP 02303R1, the Galway Downs property has been separated into five distinct Land Use Allocation Zones along with allocated parking areas for temporary and permanent parking, as shown on Figure 3-1, *Land Use Allocation Plan*. These zones are described below:

- Zone 1: Equine Zone: Zone 1 encompasses approximately 200.99 acres concentrated in the eastern, southern, and northwestern portions of the property. These areas are exclusively or primarily designed and used for equine activities, equine events, and associated parking. Galway Downs programs a portion of the Equine Zone for other activities such as non-equine sporting events in the grassy area in the center of the racetrack and in the northern and northwestern portion of the site, primarily on weekends and holiday weekends. Approval to use these portions of the Equine Zone as multi-use sports fields is proposed as part of CUP 02303R1.
- Zone 2: Special Occasion Zone: Zone 2 covers approximately 20.92 acres in the southwest corner of the property and west of the racetrack. The design of Zone 2 accommodate special occasions such as weddings, remembrances, awards ceremonies, entertainment and hospitality activity/events, other similar occasions, and associated parking. These uses are currently permitted and physical improvements to this area are proposed as part of CUP 02303R1.
- Zone 3: Wine Country Equestrian Park Model Lodging Zone: Zone 3 is a 5.50-acre area allocated to Equestrian Park Model Lodging units, positioned south of the racetrack where the existing clock tower house is located, and is anticipated to accommodate up to 36 Equestrian Park Model Lodging units. Other forms of overnight accommodations, such as RVs, trailers, or tents brought to the establishment by visitors, would be prohibited. Implementation of the Equestrian Park Model Lodging units would require separate discretionary approval of a Plot Plan from Riverside County that is not proposed at this time, although the reasonably foreseeable environmental effects associated with constructing and operating the Equestrian Park Model Lodging units are considered a part of the Project evaluated herein.
- Zone 4: Employee Housing Zone: Zone 4 is 2.76 acres dedicated to future employee housing and is anticipated to accommodate 18 housing units positioned in the southwestern portion of the site. Implementation of the employee housing design would require separate discretionary approval of a Plot Plan from Riverside County that is not proposed at this time, although the reasonably foreseeable environmental effects associated with constructing and operating the housing are considered a part of the Project evaluated herein.

  Zone 5: Equestrian Recreational Vehicle Park: Zone 5 is 2.24 acres and is allocated for use as an equestrian recreational vehicle park. This area would be designated for temporary use by vehicles, RVs, or trailers, such as overnight or short-term occupancy in association with events held on the establishment that are reserved for the exclusive use of participants for equestrian events.



LEGEND

- ZONE 1: EQUINE ZONE (200.99 ACRES - 86.48%)
- ZONE 2: SPECIAL OCCASION ZONE (20.92 ACRES - 8.99%)
- ZONE 3: WINE COUNTY EQUESTRIAN PARK MODEL LODGING (5.50 ACRES - 2.37%)
- ZONE 4: EMPLOYEE HOUSING (2.76 ACRES - 1.19%)
- ZONE 5: EQUESTRIAN RECREATIONAL VEHICLE PARK (2.24 ACRES - 0.97%)
- CUP 00966 & CUP 01127 - NOT A PART (4.08 ACRES)
- ALLOCATED TEMPORARY PARKING (7822 PARKING SPACES - 46.29 ACRES)

** PLEASE NOTE THAT NOT ALL THE PARKING AREAS SHOWN ON THIS PLAN ARE INTENDED FOR CONTINUOUS USE. REFER TO THE PROGRAMMING OVERVIEW FOR DETAILED USAGE GUIDELINES.

- ALLOCATED PERMANENT PARKING ON A DAILY BASIS (283 PARKING SPACES - 1.62 ACRES)

Source(s): Kolbrien (03-20-2026)

Figure 3-1

Not to Scale

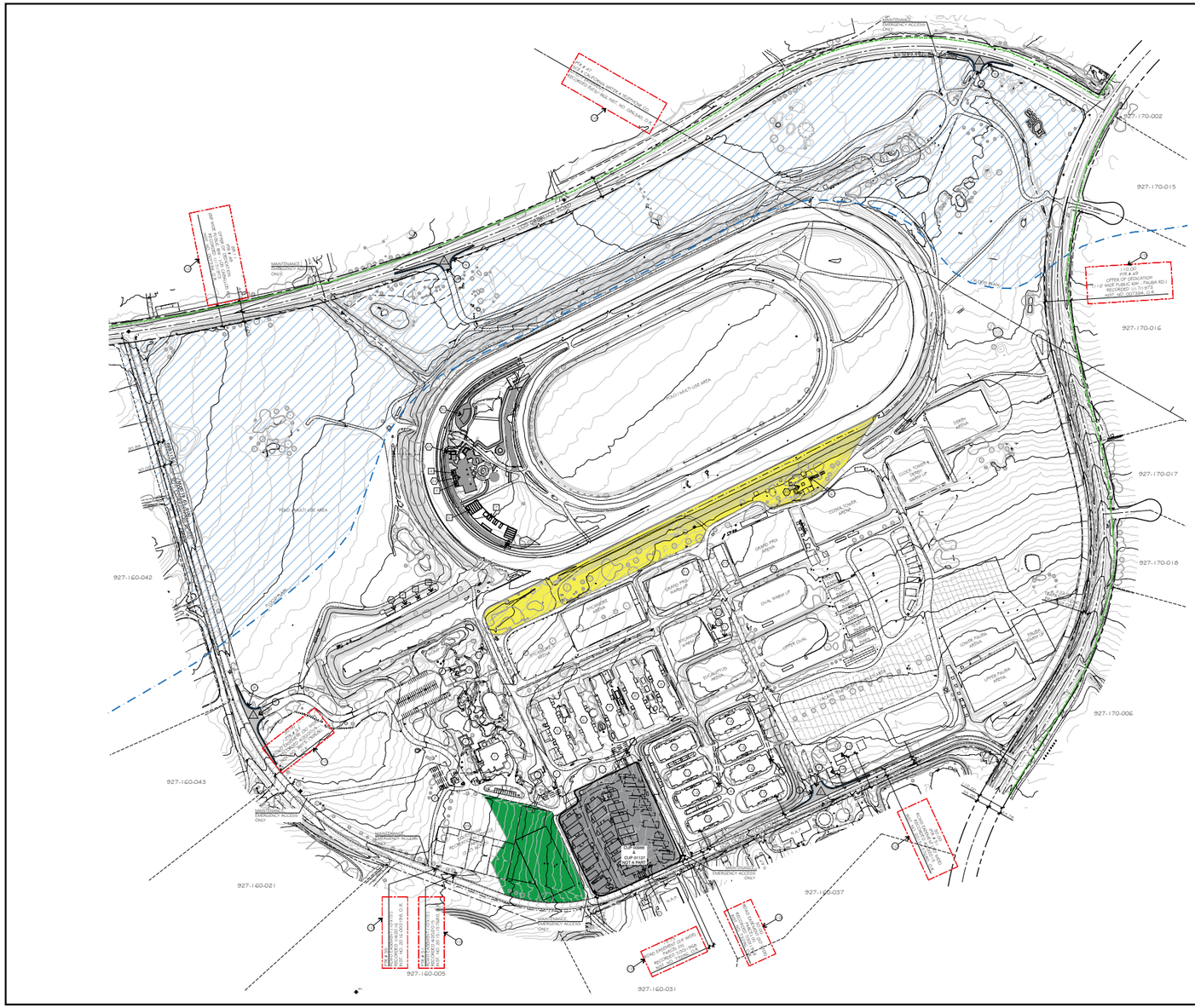
Land Use Allocation Plan

- Parking: One permanent parking area is located at Galway Downs, which is 1.62 acres, positioned in the Special Occasion Zone, and designed to accommodate 283 parking spaces. As part of event programming, temporary parking areas are activated throughout the Galway Downs site depending on the event type, anticipated parking needs, and where on the property the event is scheduled to occur. The Galway Downs property can accommodate up to 8,105 temporary parking spaces, although all of those spaces would not be used at the same time. Parking during multiple simultaneous events on the site would be accommodated at various locations on the property and is anticipated to include up to a total of approximately 4,639 activated parking spaces (as shown on Figure 3-9; refer to the discussion of proposed parking presented herein in subsection 3.6.1.D.3).

B. Proposed New Structures and Facilities

CUP 02303R1 seeks to revise approved CUP 02303 to allow for the construction or installation of several new structures and to permit structures previously installed on site without appropriate permits. Figure 3-2, *CUP 02303R1 Site Plan*, shows the CUP 02303R1 site plan, which depicts the locations of all existing facilities and structures on site as well as the proposed new structures and facilities. Table 3-2, *Summary of Structures and Uses to be Newly Permitted,* provides a summary of all new structures and facilities that would be constructed or installed on the site, along with a summary of those facilities previously installed without appropriate permits or that are being separately permitted or proposed to be permitted by CUP 02303R1. As shown, 8,745 square feet (s.f.) of new structures would be constructed on the site and 48,307 s.f. of existing structures (inclusive of the metal solar structure) would be permitted as part of the Project, in addition to an equestrian RV park, and the addition of an awards/ceremony area. No permanent roofed structures would be built in the equestrian RV park area or in the awards/ceremony area, and the RV park area would be reserved for the exclusive use of participants during equestrian events held on the property. Walls, fencing, shade trellises, and other landscape design features are expected. An Equestrian Park Model Lodging area and employee housing area also are proposed, although details of the Equestrian Park Model Lodging area and employee housing area would be determined in the future in conjunction with future discretionary Plot Plan applications for those areas; notwithstanding, the analysis in this EIR accounts for the future development of up to 36 Equestrian Park Model Lodging units and 18 employee housing units on site. Future Plot Plans are expected to remain within the scope of the Project analyzed in this EIR.

Although not necessarily required, proposed CUP 02303R1 includes conceptual floor plans and elevations for the Equestrian Park Model Lodging units that have been provided for disclosure purposes and to assist with future site planning efforts, but ultimately these buildings would be subject to review and approval by the Riverside County Building & Safety Department, which may result in minor modifications to the design of these structures. Figure 3-3, *Proposed Floor Plans and Elevations*, depicts the proposed restroom building that would be constructed in the western interior portion of the horse racetrack for the proposed Equestrian Park Model Lodging units. As shown, the restroom would include approximately 645 s.f. of building area, would measure up to approximately 13 feet 6 inches in height, and would be divided into separate spaces for men and women. The proposed restroom building would consist of a manufactured



BUILDING DATA

#	USE	PERMIT #	OCCUPANCY	S.F.	HEIGHT	CONST. TYPE
1	EXISTING BARN / RESTAURANT	BNR140021	A-2	9,923 S.F.	31'-4"	V-B
2	EXISTING RETAIL / RESTAURANT DINING	BZ1937963 BZ1937965	A-2	1,917 S.F.	21'-8"	V-B
3	EXISTING GROOMS QUARTERS	BZ1544281 BZ154901	R-2	1,338 S.F.	14'-8"	V-B
4	EXISTING OFFICE	BNR140020	B	500 S.F.	15'-4"	V-B
5	EXISTING STABLES	BZ154683	U	14,000 S.F.	13'	V-B
6	EXISTING STABLES	BZ164363	U	14,000 S.F.	13'	V-B
7	EXISTING STABLES	BZ164416	U	14,000 S.F.	13'	V-B
8	EXISTING STABLES	BZ164417	U	14,000 S.F.	13'	V-B
9	EXISTING STABLES	BZ170746	U	14,000 S.F.	13'	V-B
10	EXISTING STABLES	BZ424561, BZ421116	U	10,500 S.F.	14'	V-B
11	EXISTING STABLES	BZ424562, BZ421117	U	10,500 S.F.	14'	V-B
12	EXISTING STABLES	BZ424563, BZ421118	U	10,500 S.F.	14'	V-B
13	EXISTING STABLES	BZ424564, BZ421119	U	10,500 S.F.	14'	V-B
14	EXISTING STABLES	BZ424565, BZ421120	U	10,500 S.F.	14'	V-B
15	EXISTING STABLES	BZ424566, BZ421121	U	10,500 S.F.	14'	V-B
16	EXISTING STABLES	BZ424567, BZ421122	U	10,500 S.F.	14'	V-B
17	EXISTING STABLES	BZ424568	U	10,500 S.F.	14'	V-B
18	EXISTING STORAGE	BFE140059	U	1,130 S.F.	20'	II-B
19	EXISTING STORAGE	BFE140060	U	1,140 S.F.	20'	II-B
20	EXISTING RK BARN - STORAGE	CWP PERMIT PROCESS - IN PROGRESS	U	1,513 S.F.	22'	V-B
21	EXISTING STORAGE	CWP (PLANNED)	U	624 S.F.	10'	MANUFACTURED
22	EXISTING PAVILION	BNR2300091	A-2	13,322 S.F.	22'	V
23	EXISTING CLOCK TOWER HOUSE	378749	R-3	2,400 S.F.	±22'	V-B
24	EXISTING POLO FIELD STORAGE	CWP PERMIT PROCESS - IN PROGRESS	U	1,560 S.F.	14'-6"	II-B
25	PROPOSED RESTROOM BUILDING	PROPOSED	U	645 S.F.	13'-6"	MANUFACTURED
26	EXISTING STORAGE	CWP (PLANNED)	U	360 S.F.	10'	MANUFACTURED
27	GRAND PAVILION TENT	CWP (PLANNED)		7,500 S.F.	21'	MANUFACTURED
28	OFFICE TRAILER	CWP (PLANNED)		600 S.F.	10'	MANUFACTURED
29	PROPOSED EQUESTRIAN RECREATIONAL VEHICLE PARK	REFER TO SHEET C-7 FOR MORE INFORMATION, CALCULATIONS AND DEVELOPMENT STANDARDS.				
30	PROPOSED AWARD - CEREMONY AREA	PROPOSED	-	-	-	-
31	PROPOSED METAL SOLAR STRUCTURE	PERMIT IN PROCESS	U / A-4	44,250 S.F.	±28'-1"	II
WINE COUNTY EQUESTRIAN PARK MODEL LODGING		AREA #2: WINE COUNTY EQUESTRIAN PARK MODEL LODGING INCLUSIVE OF CLOCK TOWER HOUSE AND RV TRAILERS (PM RV) WITH SKIRTING REFER TO SHEET C-9.2 FOR MORE DETAILS DEFERRED TO LATER PERMITTING. REFER TO SHEET C-7.1 FOR CONCEPTUAL SITE PLAN ONLY.				
PROP. EMPLOYEE MODULAR HOUSING		AREA #4: EMPLOYEE HOUSING (TOTAL OF 18) REFER TO SHEET C-9.2 FOR MORE DETAILS DEFERRED TO LATER PERMITTING.				

STORAGE CONTAINER BUILDING DATA

#	USE	CONTAINER DIMENSION	HEIGHT	CONST. TYPE
1	MOBILE STORAGE TRAILER	(40' X 10') - 400 S.F.	9'-6"	STEEL CONTAINER
2	STORAGE CONTAINER #1	(12' X 10') - 120 S.F.	9'-6"	STEEL CONTAINER
3	STORAGE CONTAINER #2	(40' X 10') - 400 S.F.	9'-6"	STEEL CONTAINER
4	PROPOSED REFRIGERATOR CONTAINER REFER TO SHEET C-7 FOR MORE DETAILS	(20' X 10') - 200 S.F.	9'-6"	STEEL CONTAINER
5	PROPOSED DRY STORAGE CONTAINER	(20' X 10') - 200 S.F.	9'-6"	STEEL CONTAINER
6	(#12) PROPOSED METAL SHIPPING CONTAINER - PROPOSED STORAGE AREA	(40' X 10') - 400 S.F.	9'-6"	STEEL CONTAINER
7	(#5) PROPOSED METAL SHIPPING CONTAINER - PROPOSED STORAGE AREA	(20' X 10') - 200 S.F.	9'-6"	STEEL CONTAINER

EXISTING MAIN ACCESS

1. EXISTING MAIN ACCESS - LOS CORRALITOS ROAD
2. EXISTING MAIN ACCESS - LOS CORRALITOS ROAD
3. EXISTING MAIN ACCESS - LOS CABALLOS ROAD
4. EXISTING MAIN ACCESS - LOS CABALLOS ROAD

** REFER TO GRADING PACKAGE, ENTRY DESIGN AND WQMP EXHIBITS ATTACHED TO THIS PACKAGE FOR DRIVEWAY IMPROVEMENTS PROPOSED.

LOCATION OF EXISTING TRAILS

PERMANENT PARKING ANALYSIS

TOTAL OF PARKING SPACES PROVIDED:	87 PARKING SPACES
TOTAL OF ADA PARKING SPACES PROVIDED (18' X 9'):	4 PARKING SPACES SEE SHEET C-2.6 FOR MORE DETAILS
TOTAL OF EV PARKING SPACES PROPOSED - PER RIVERSIDE COUNTY ORD. 348:	9 PARKING SPACES
TOTAL OF REGULAR PARKING SPACES PROVIDED:	74 PARKING SPACES

HAZARDOUS MATERIALS NOTES:

THE PROJECT SITE IS NOT KNOWN TO CONTAIN HAZARDOUS MATERIALS OR HAZARDOUS WASTE BASED ON AVAILABLE RECORDS AND SITE OBSERVATIONS.
NO HAZARDOUS MATERIALS STORAGE, USE, OR DISPOSAL AREAS EXIST ON THE PROPERTY.

EXISTING OWTS ON SITE

1. EXISTING 6,000 GALLON SEPTIC SYSTEM #1 LOTS 1 THROUGH 12 W. (5) 80' LEACH LINES AND AREA FOR 100% EXPANSION - FOR DESTRUCTION UPON SEWER PROJECT APPROVAL
2. EXISTING 3,000 GALLON SEPTIC SYSTEM #2 LOTS 13 THROUGH 25 W. (3) 70' # (2) 100' LEACH LINES AND AREA FOR 100% EXPANSION - FOR DESTRUCTION UPON SEWER PROJECT APPROVAL
3. EXISTING 5,000 GALLON SEPTIC SYSTEM #3 W. (5) 100' LEACH LINES AND AREA FOR 100% EXPANSION FOR DESTRUCTION UPON SEWER PROJECT APPROVAL.
4. EXISTING 1,500 GALLON SEPTIC SYSTEM #4 BARN (2) 100' LEACH LINES AND AREA FOR 100% EXPANSION FOR DESTRUCTION UPON SEWER PROJECT APPROVAL.
5. EXISTING 1,500 GALLON SEPTIC SYSTEM #5 BARN (2) 100' LEACH LINES AND AREA FOR 100% EXPANSION FOR DESTRUCTION UPON SEWER PROJECT APPROVAL.
6. EXISTING 1,500 GALLON SEPTIC SYSTEM #6 CLOCK TOWER HOUSE (4) 100' LEACH LINES AND AREA FOR 100% EXPANSION - FOR DESTRUCTION UPON SEWER PROJECT APPROVAL.
7. EXISTING 1,000 GALLON SEPTIC SYSTEM #7 RETAIL OFFICE BUILDING (2) 100' LEACH LINES AND AREA FOR 100% EXPANSION - FOR DESTRUCTION UPON SEWER PROJECT APPROVAL.

** PLEASE NOTE EXISTING OWTS ON SITE FOR DESTRUCTION UPON SEWER PROJECT APPROVAL.

PROPOSED DRIVEWAY IMPROVEMENTS

8. PROPOSED ACCELERATION & DECELERATION AC PAVEMENT LANE PER STANDARD NO. 803, ORDINANCE 461 SEE DETAIL FOR DRAINAGE SPECIFICATIONS. SEE SHEET C-6 FOR TYPICAL DETAILS AND GRADING EXHIBITS - SHEET #2.
9. WATER QUALITY FEATURES, SEE C-6 FOR AMENDED SOIL TYPICAL DETAIL AND WQMP EXHIBITS ATTACHED TO THIS PACKAGE.

EASEMENT

10. LOCATION OF EXISTING EASEMENT

Source(s): Kolbrien (03-20-2026)

Figure 3-2

Not to Scale

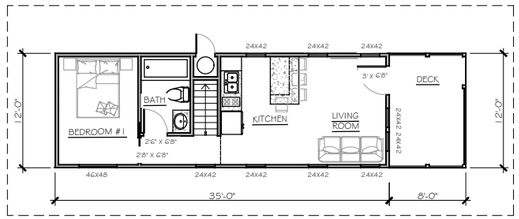
CUP 02303R1 Site Plan

Table 3-2 Summary of Structures and Uses to be Newly Permitted

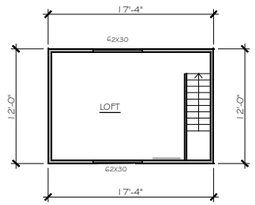
ID	Proposed Facility	Size (s.f.)	Height (ft.)	Construction Type	Location
20*	Existing RK Barn – Storage	1,513	22’	Metal	Central portion of site, within the Sycamore Warm Up area.
21	Existing Storage	624	10’	Manufactured	Central portion of site, within the Sycamore Warm Up area.
24*	Existing Polo Field Storage	1,560	14’-6”	Metal	Western portion of racetrack.
25	Proposed Restroom Building	645	13’-6”	Manufactured	Western portion of racetrack.
26	Existing Storage	360	10’	Manufactured	Central portion of site, within the Sycamore Warm Up area.
27	Grand Pavilion Tent	7,500	21’	Manufactured	Central portion of site, on the west side of the Grand Prix Arena
28	Office Trailer	600	10’	Manufactured	Western portion of site, southwest of the racetrack.
29	Equestrian Recreational Vehicle Park	N/A	N/A	N/A	Southwest portion of site along Los Corralitos Road.
30	Awards - Ceremony Area	N/A	N/A	N/A	Western portion of racetrack.
31*	Metal Solar Canopy Structure	44,250	28’-1”	Metal Solar Canopy Structure	Central portion of site, within the Grand Prix Arena
N/A	Equestrian Park Model Lodging Area			Manufactured (expected)	South of the racetrack.
N/A	Employee Housing Area			Manufactured (expected)	Southwest portion of the site along Los Corralitos Road.
		57,052	**--**	**--**	**--**

* These uses were separately permitted and installed, and also would be permitted under proposed CUP 02303R1.
** These uses would require separate discretionary approvals of Plot Plans from Riverside County that are not proposed at this time, although the foreseeable environmental effects associated with constructing and operating the Equestrian Park Model Lodging units and the additional employee housing units are considered a part of the Project evaluated herein. Deviations from what is described in this EIR would require appropriate CEQA review as part of the discretionary Plot Plan approval process.

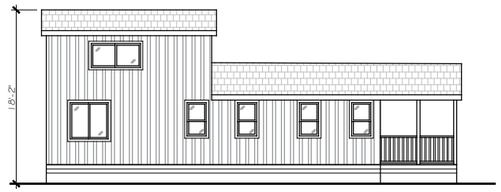
building that would be hauled to the site in pieces and installed on site, and architectural materials would consist of metal siding. Figure 3-3 also depicts the conceptual floor plans and elevations for the proposed Equestrian Park Model Lodging units. As shown, the Equestrian Park Model Lodging units would include a single story plus a loft, with a total of 420 s.f. of floor area and a 96 s.f. deck on the first floor, with the second-story loft including approximately 208 s.f. of floor space. Architectural materials are anticipated to consist of either metal or wood siding.



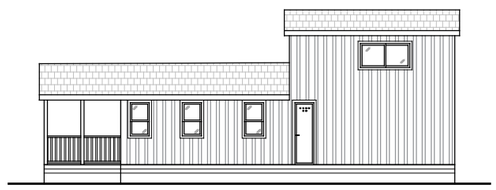
PROPOSED RV TRAILER (PM RV) - FIRST FLOOR
SCALE: 1/8" = 1'-0"



PROPOSED RV TRAILER (PM RV) - LOFT
SCALE: 1/8" = 1'-0"



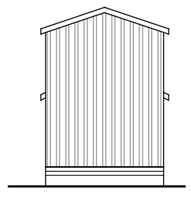
LEFT SIDE - ELEVATION
SCALE: 1/8" = 1'-0"



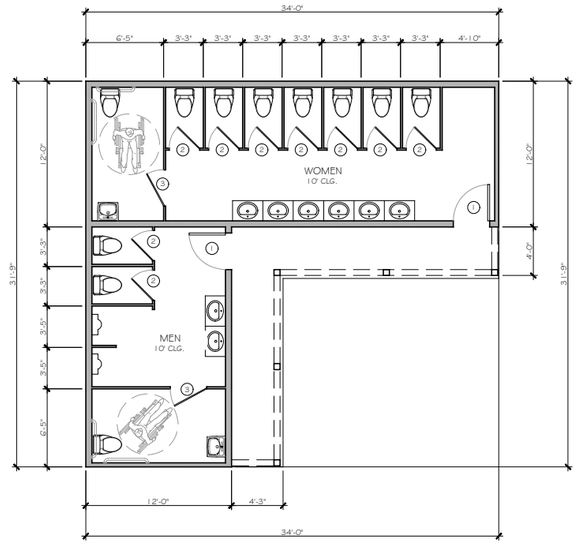
RIGHT SIDE - ELEVATION
SCALE: 1/8" = 1'-0"



FRONT - ELEVATION
SCALE: 1/8" = 1'-0"



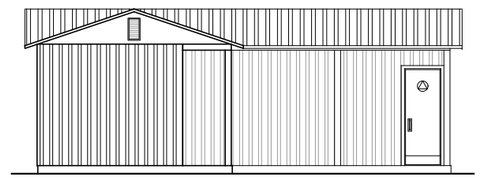
REAR - ELEVATION
SCALE: 1/8" = 1'-0"



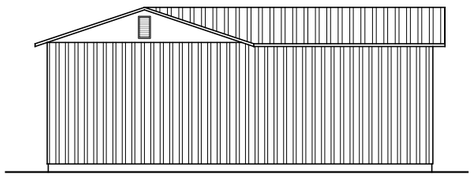
PROPOSED FLOOR PLAN - RESTROOMS
SCALE: 3/16" = 1'-0"

DOOR SCHEDULE SYMBOL: ①

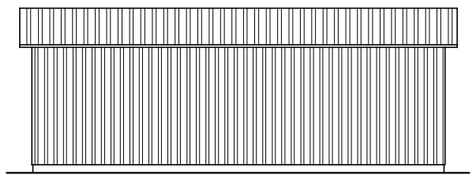
#	SIZE	THK.	# REQ'D	DESCRIPTION	REMARKS	LOCATION
1	3'-0" x 6'-0"	1 3/4"	2	3'-0" ENTRY DR.	ENTRY LOCKSET W/ D. BOLT (20 MIN. RATED)	ENTRY WOMEN / MEN
2	2'-6" x 6'-8"	1 3/4"	9	MAN DOOR	PRIVACY DOOR	WOMEN / MEN
3	3'-0" x 6'-8"	1 3/4"	2	MAN DOOR	PRIVACY DOOR	ADA TOILET WOMEN / MEN



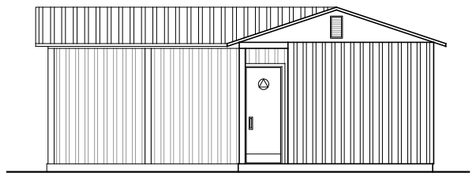
FRONT SIDE - ELEVATION
SCALE: 3/16" = 1'-0"



LEFT SIDE - ELEVATION
SCALE: 3/16" = 1'-0"



BACK SIDE - ELEVATION
SCALE: 3/16" = 1'-0"



RIGHT SIDE - ELEVATION
SCALE: 3/16" = 1'-0"

Source(s): Kolbrien (12-19-2025)

Figure 3-3

Not to Scale

Proposed Floor Plans and Elevations

C. Landscaping

The only new landscaping proposed as part of CUP 02303R1 would be the installation of shade trees within the parking lot to the west of the existing office building in the western portion of the site (the office building is identified as Building #4 on Figure 3-2). The addition of these shade trees is required pursuant to Ordinance No. 348. As shown on Figure 3-4, *Parking Lot Tree Shading Plan*, a total of four coast live oak (*Quercus agrifolia*) shade trees would be installed within the central island within the parking lot. No other landscaping is proposed as part of the Project.

D. Transportation and Parking

1. Site Access and Traffic Management

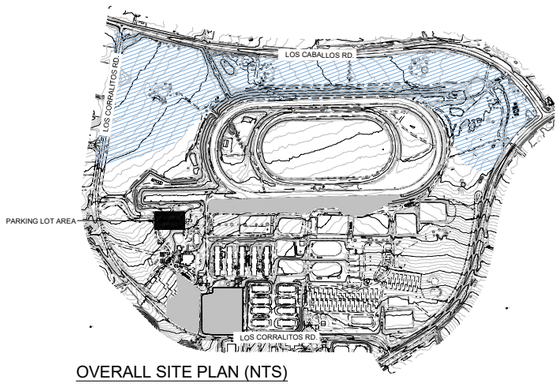
Vehicular access to Galway Downs would continue to be provided by several existing access driveways, with four driveways designated for visitor use (two connecting with Los Caballos Road and two connecting with Los Corralitos Road) and the remaining driveways designated for emergency access use only. Most inbound traffic for events at Galway Downs would continue to access the site via I-15 at the Temecula Parkway/SR-79 South interchange and by traveling east on SR-79 for 5.8 miles to Los Caballos Road, then northeast on Los Caballos Road for 0.5-mile. Upon arrival at the property, guests would then be directed to one of several entrances. Depending upon the purpose of a guest's visit, alternate signage and directions may be provided. Arrivals, parking, and departures would be managed in accordance with a County-approved event management plan.

Under proposed CUP 02303R1, events at Galway Downs would be conditioned to require traffic management by the California Highway Patrol (CHP) or other Caltrans approved traffic management company on SR-79 for any event anticipated to draw 3,500 or more one-way vehicle trips. When traffic management is required, traffic management would include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections.

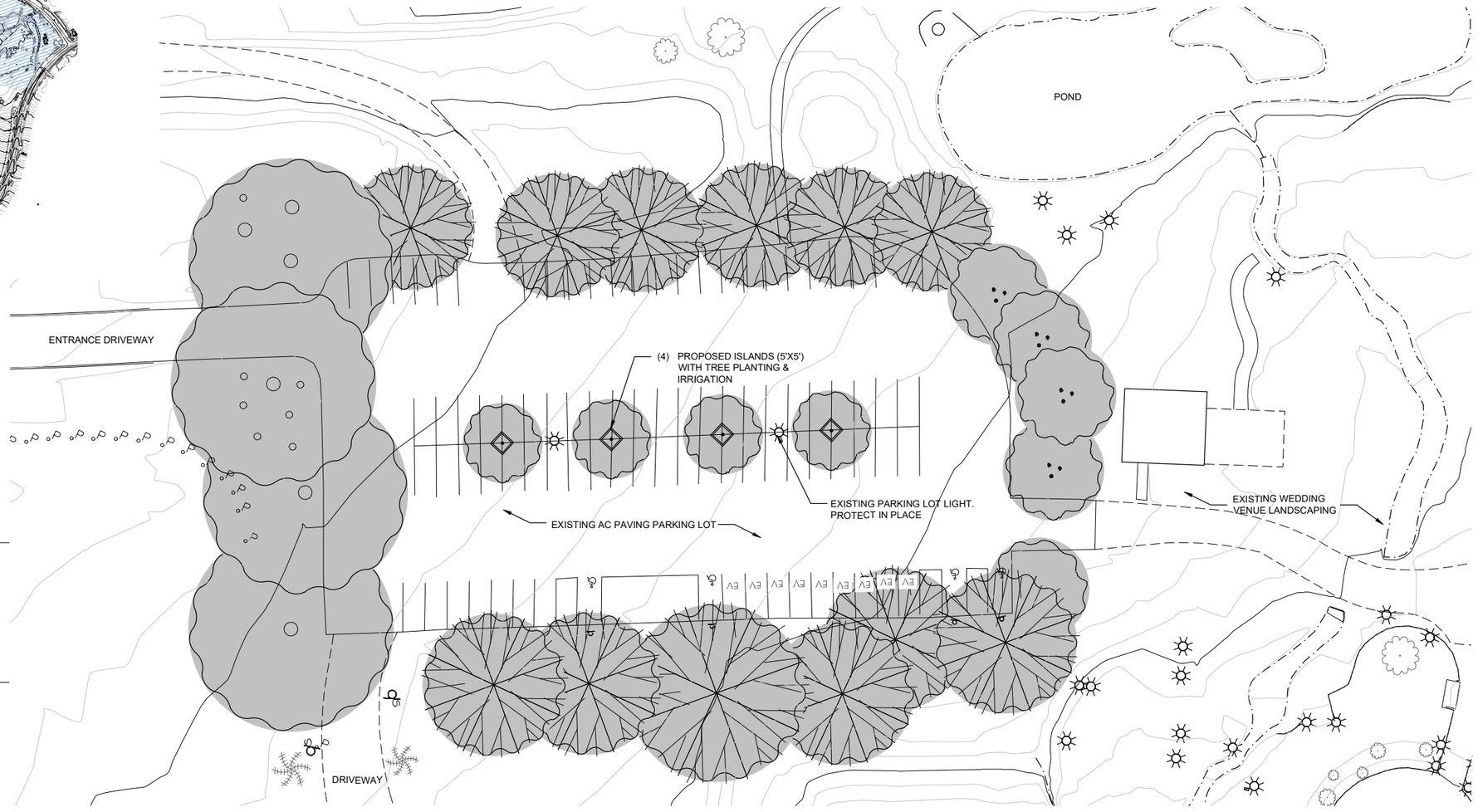
2. Driveway and Intersection Improvements

On SR-79 and pending approval of encroachment permits from Caltrans, the Project Applicant would install a traffic signal and adjust turning lane geometrics at the intersection of SR-79 and Los Caballos Road, and would also make signal timing improvements at the intersection of SR-79 and Anza Road. Specifically, as part of the Project, an eastbound left-turn lane and traffic signal would be installed at the intersection of Los Caballos Road and SR-79, and the existing traffic signal at the intersection of Anza Road at SR-79 would be modified to implement overlap phasing for the southbound right-turn lane and to increase the cycle length to 120 seconds.

As part of the Project, acceleration and deceleration lanes would be provided at the four visitor access driveways at Galway Downs. All four of the Project's main access driveways would be improved in



OVERALL SITE PLAN (NTS)



PLANT LEGEND

EXISTING TREES

SYMBOL	BOTANICAL/COMMON NAME
	EUCALYPTUS GLOBULUS BLUE GUM
	OLEA EUROPEA OLIVE TREE
	PLATANUS RACEMOSA CALIFORNIA SYCAMORE

PROPOSED TREES

SYMBOL	BOTANICAL/COMMON NAME	
	QUERCUS AGRIFOLIA LIVE OAK TREE	36" BOX STANDARD

PARKING LOT INFORMATION:
TOTAL PARKING STALL AREA: 11,865 SQ. FT.
PARKING STALLS: 87
REQUIRED PARKING LOT SHADE: 50%
PARKING LOT SHADE: 5,985 SQ. FT. (50.4% SHADED)

Source(s): Kolbrien (12-19-2025)

Figure 3-4

Not to Scale

Parking Lot Tree Shading Plan

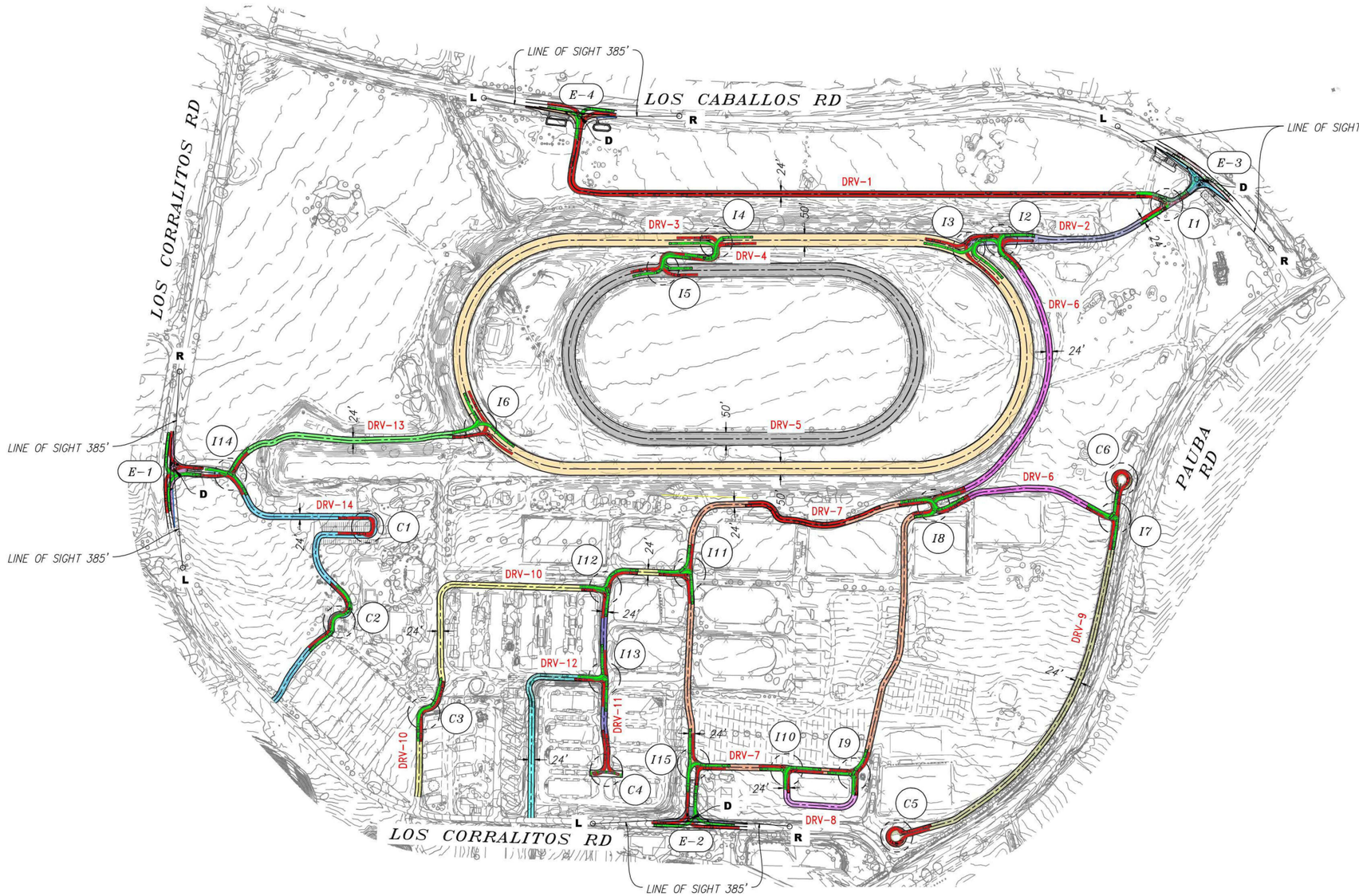
accordance with Riverside County Transportation Department Standard No. 803 and would be reconfigured as necessary to ensure that adequate sight distance is accommodated at each of the driveways. Vehicle turn movement and sight distance exhibits are on file with the County as part of proposed CUP 02303R1 for these driveways. Internal drive aisles that do not need to accommodate pedestrian access would be constructed at a minimum width of 24 feet and in a manner that accommodates fire apparatus vehicles, while drive aisles that need to accommodate pedestrian access would include a 16-foot-wide travel lane for vehicles with a minimum 4-foot-wide decomposed granite (d.g.) or concrete pedestrian walkway along one side of the drive aisle. The locations of interior driveways are shown on Figure 3-5, *Interior Driveways*.

3. Parking

The proposed parking plan at Galway Downs has been designed for maximum flexibility to accommodate the range of event parking demands. Parking for weekday equestrian activities would continue to occur as it does under baseline conditions, with a majority of the parking occurring in the existing permanent parking lot. Parking for weekend equine, sports, and special occasion events, inclusive of holiday weekends that may include Fridays or Mondays, would occur on site in the permanent parking lot and in various temporary parking locations depending on the location and size of the event. As part of ongoing event management, parking plans are designed by the Galway Downs operations team for each weekend/holiday's activities based on parking management plans approved by Riverside County. These parking plans would vary based on several dynamic variables affecting each event, including but not limited to:

- Number of anticipated participants, guests, competitors, and/or attendees;
- Estimated arrival and departure times;
- Car ridership (persons per carload), which is based on historical site-specific information;
- Points of ingress and egress;
- Wayfinding requirements;
- Labor (event employee and volunteer) planning; and
- Measures identified to prevent parking on nearby roads and private property, including but not limited to temporary signage and traffic control measures (cones, barriers, etc.).

The existing parking operation at Galway Downs has evolved to adapt to a variety of event types and sizes, and the need to activate different amounts and locations of temporary parking on the site to serve these events. The existing parking operations would continue under proposed CUP 02303R1, similar to what occurs under baseline conditions. CUP 02303R1 includes a daily use parking exhibit that accommodates parking for employees and daily users of the facility when no events are scheduled. CUP 02303R1 also includes an exhibit showing an example parking plan for typical multiple events that may simultaneously occur or overlap in scheduling of parking needs. In this example, shown on Figure 3-6, *Multiple Events Parking Exhibit*, up to 4,639 parking spaces would be activated within the southwestern, eastern, and north-central portions of the site. Figure 3-7, *All Potential Temporary Parking Exhibit*, shows all possible parking spaces on the site, although only those parking spaces needed to serve each event would be activated at any one time.



DRV-1
DRV-2
DRV-3
DRV-4
DRV-5
DRV-6
DRV-7
DRV-8
DRV-9
DRV-10
DRV-11
DRV-12
DRV-13
DRV-14
E-XX DRIVEWAY ENTRY NUMBER
IXX INTERSECTION NUMBER
CXX CURVE NUMBER



SIVTRUCKS FIRE DEPARTMENT AIR LIGHT #996

Overall Length	31.42ft
Overall Width	8.33ft
Overall Body Height	11.5ft
Track Width	7.30ft
Lock-to-lock time	4.50s
Syeering Angle	50Degrees

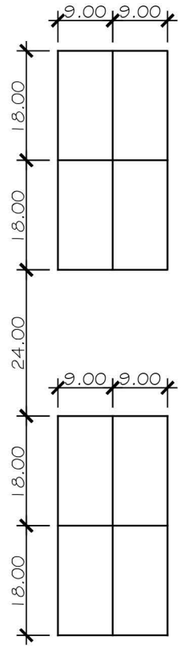
Source(s): Kolbrien (03-20-2026)

Figure 3-5

Not to Scale

Interior Driveways





TYPICAL DETAIL
TEMPORARY PARKING SPACES

ALL DRIVE ISLES ARE SHOWN AT 24' MINIMUM

TOTAL NUMBER OF PARKING SPACES =4,639

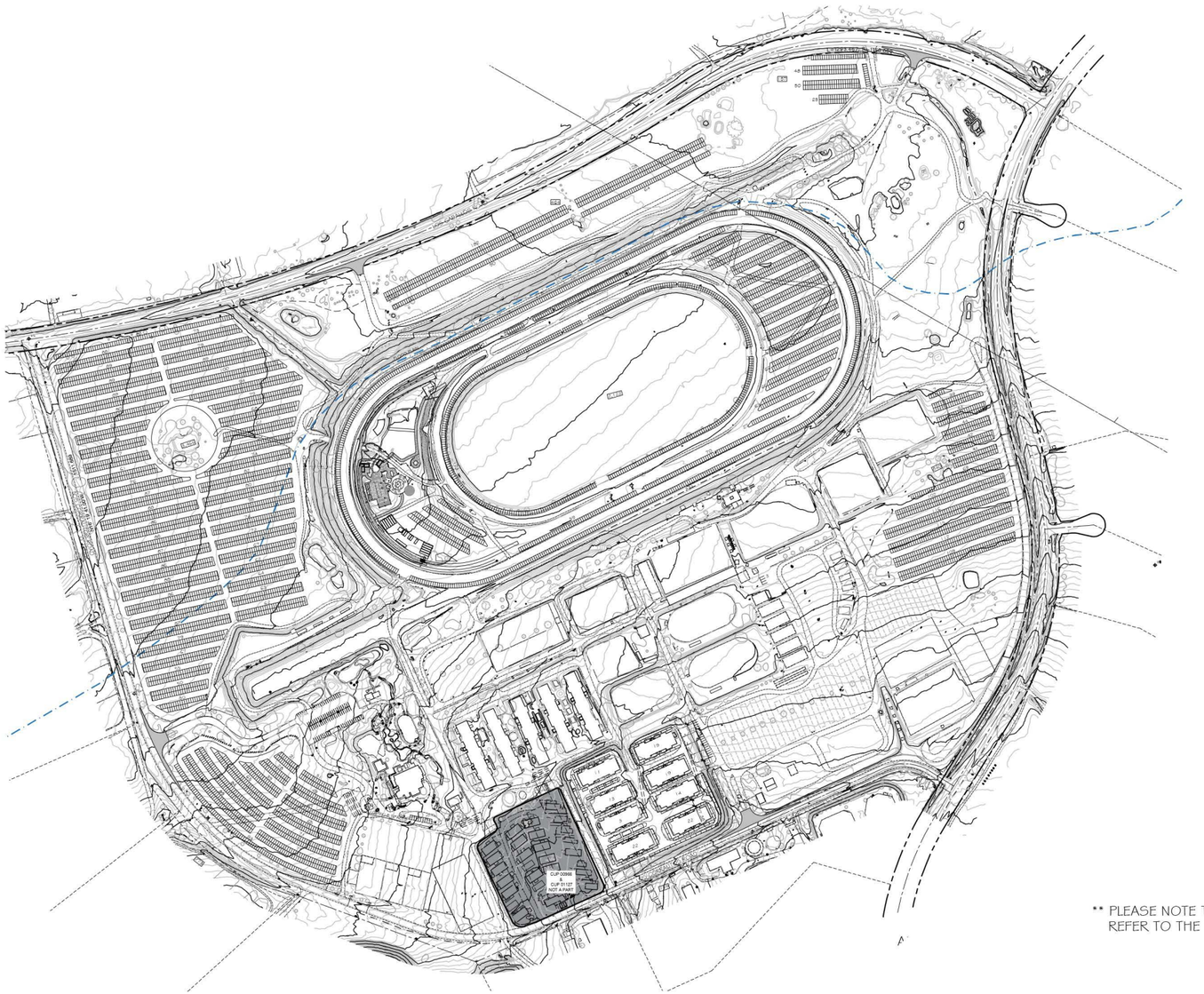
** PLEASE NOTE THAT NOT ALL THE PARKING AREAS SHOWN ON THIS PLAN ARE INTENDED FOR SIMULTANEOUSLY USE. REFER TO THE PROGRAMMING OVERVIEW FOR DETAILED USAGE GUIDELINES.

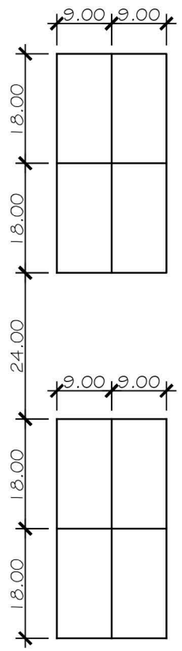
Source(s): Kolbrien (03-20-2026)

Figure 3-6

Not to Scale

Multiple Events Parking Exhibit





TYPICAL DETAIL
TEMPORARY PARKING SPACES

ALL DRIVE ISLES ARE SHOWN AT 24' MINIMUM

TOTAL NUMBER OF SPACES = 8,105

** PLEASE NOTE THAT NOT ALL THE PARKING AREAS SHOWN ON THIS PLAN ARE INTENDED FOR SIMULTANEOUSLY USE. REFER TO THE PROGRAMMING OVERVIEW FOR DETAILED USAGE GUIDELINES.

Source(s): Kolbrien (03-20-2026)

Figure 3-7

Not to Scale

All Potential Temporary Parking Exhibit

E. Trails

In conformance with Figure 8 (Southwest Area Plan Trails and Bikeway System) of the SWAP, several trails are designated in the area surrounding the Galway Downs property. Specifically, pursuant to Riverside County General Plan Amendment No. 1216, a Regional Open Space Trail is required on Pauba Road and a Wine Country Roadside Trail is required on Los Caballos Road and Los Corralitos Road. Each of these trails is required to be 4 to 8 feet in width. Based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing baseline conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project.

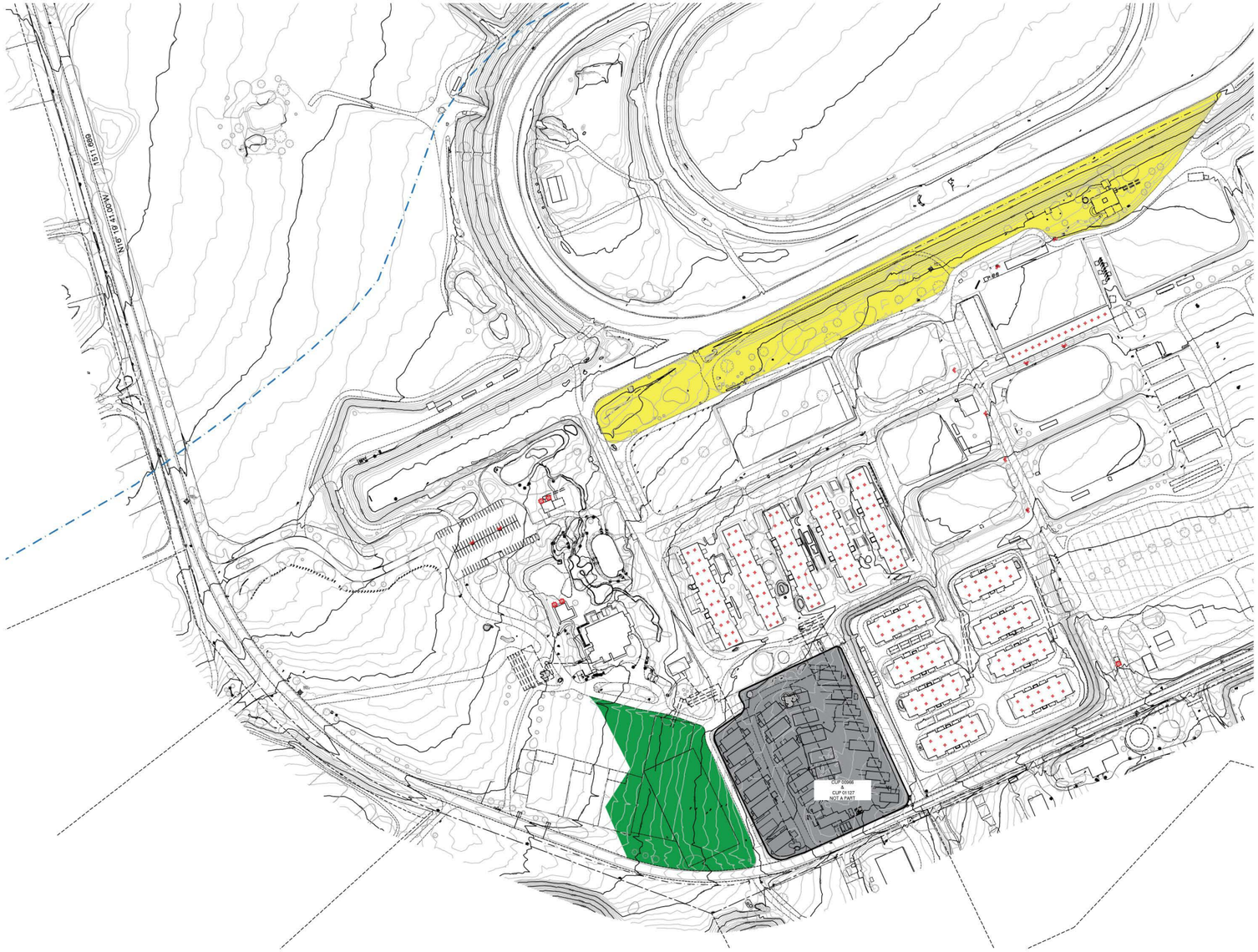
1. Americans with Disabilities Act (ADA) Compliance

Proposed CUP 02303R1 also includes a proposed Americans with Disabilities Act (ADA) access plan. Pathways for vehicles have been identified to route traffic towards appropriate parking lots for each event type, where ADA-accessible parking spaces would be provided. ADA-compliant pathways would be installed between each of the parking lots and the areas they are intended to serve, with separate parking areas identified for equestrian-oriented events, sports events, and special occasions. These improvements have been proposed to ensure that the Galway Downs facility meets all ADA accessibility requirements.

2. Permanent and Temporary Lighting

CUP 02303R1 includes lighting plans for permanent lighting for daily use, as well as temporary mobile lighting for events and special occasions, and temporary mobile lighting for all potential temporary parking areas. As shown on Figure 3-8, *Permanent Lighting Plan*, new permanent lighting is proposed for the existing stables in the southwestern portions of the property, within the existing pavilion area, near the warm up tracks (Oval and Upper Oval), along the existing retail building located next to the existing barn/restaurant building in the southwest portion of the site, and within the parking lot in the southwestern portion of the site. To illuminate other portions of the property, temporary mobile lighting is used and moved around the property as needed. As an example of a temporary lighting plan that would be used when multiple events are simultaneously occurring, and as shown on Figure 3-9, *Temporary Lighting Plan – Multiple Events Parking*, temporary lighting would consist of L.E.D. light poles that temporarily would be placed within each of the temporary parking areas previously depicted on Figure 3-6. Figure 3-10, *Temporary Lighting Plan – All Potential Temporary Parking*, shows all possible areas on the property where temporary lighting could occur, although not all of this lighting would ever be simultaneously activated. Temporary lighting would consist of mobile L.E.D. light poles.

All permanent and temporary lighting is required to comply with the requirements of Riverside County Ordinance Nos. 655 (Regulating Light Pollution) and 915 (Regulating Outdoor Lighting). Ordinance No. 655 regulates light pollution within unincorporated Riverside County to protect the County's dark skies, preserve the quality of the nighttime environment, and reduce energy consumption associated with outdoor lighting. The ordinance establishes standards governing the type, intensity, shielding, and orientation of outdoor lighting fixtures to minimize light trespass, glare, and skyglow. Ordinance No. 915 establishes specific



NOTES:

AREA #2: WINE COUNTY EQUESTRIAN PARK MODEL LODGING
INCLUSIVE OF CLOCK TOWER HOUSE
AND RV TRAILERS (PM RV) WITH SKIRTING
REFER TO SHEET C-9.2 FOR MORE DETAILS

DEFERRED TO LATER PERMITTING.
REFER TO SHEET C-7.1 FOR CONCEPTUAL PLAN ONLY.

AREA #4: EMPLOYEE HOUSING (TOTAL OF 18)
REFER TO SHEET C-9.2 FOR MORE DETAILS

DEFERRED TO LATER PERMITTING.

ELECTRICAL LEGEND

- L.E.D. WALL / CEILING LIGHT FIXTURE
- HIGH EFFICACY L.E.D. - EXTERIOR WALL LIGHT FIXTURE
- L.E.D. LIGHT POLE - EXTERIOR LIGHT FIXTURE

Source(s): Kolbrien (12-19-2025)

Figure 3-8

Not to Scale

Permanent Lighting Plan



ELECTRICAL LEGEND PERMANENT LIGHTING

L.E.D. WALL / CEILING LIGHT FIXTURE

HIGH EFFICACY L.E.D. - EXTERIOR WALL LIGHT FIXTURE

L.E.D. LIGHT POLE - EXTERIOR LIGHT FIXTURE

ELECTRICAL LEGEND TEMPORARY LIGHTING

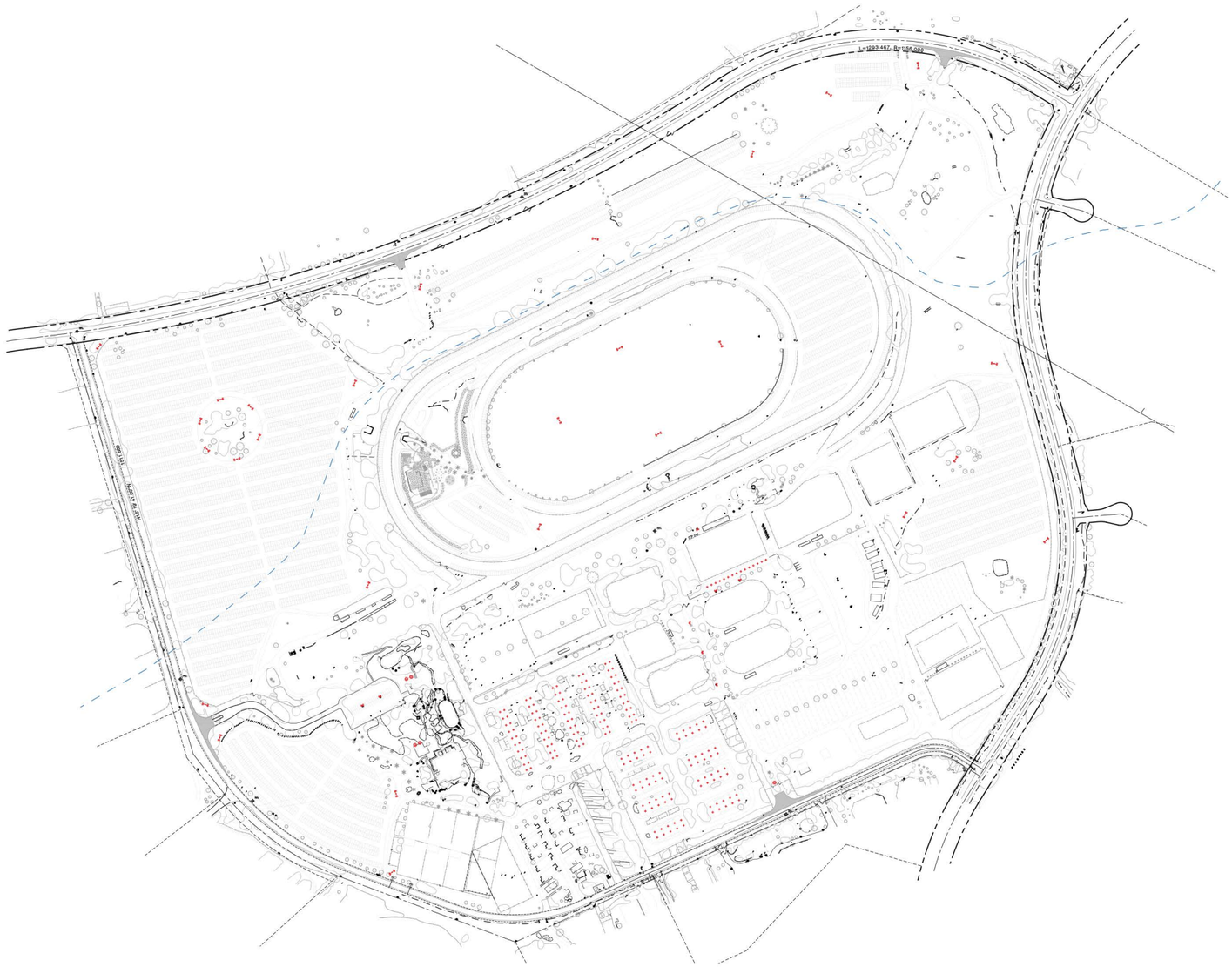
200 W SOLAR L.E.D. LIGHT TOWER
TELESCOPING TOWER, FOUR DIRECTIONAL BULBS

Source(s): Kolbrien (03-20-2026)

Figure 3-9

Not to Scale

Temporary Lighting Plan – Multiple Events Parking



ELECTRICAL LEGEND PERMANENT LIGHTING

	L.E.D. WALL / CEILING LIGHT FIXTURE
	HIGH EFFICACY L.E.D. - EXTERIOR WALL LIGHT FIXTURE
	L.E.D. LIGHT POLE - EXTERIOR LIGHT FIXTURE

ELECTRICAL LEGEND TEMPORARY LIGHTING

	200 W SOLAR L.E.D. LIGHT TOWER TELESCOPING TOWER, FOUR DIRECTIONAL BULBS

Source(s): Kolbrien (03-20-2026)

Figure 3-10

Not to Scale

Temporary Lighting Plan – All Potential Temporary Parking

technical standards for outdoor lighting, including requirements governing fixture shielding, lamp type, maximum allowable illumination levels, and the prohibition of lighting that directs illumination onto adjacent properties or the public right-of-way. The ordinance is intended to ensure that outdoor lighting is fully shielded and directed downward such that no direct light escapes above the horizontal plane of the fixture. All permanent and temporary outdoor lighting associated with the Project is required to be located, shielded, and directed in compliance with the applicable provisions of Ordinance No. 915, and the photometric plans submitted as part of CUP 02303R1 demonstrate that the Project's proposed lighting would comply with these requirements.

F. Water, Sewer, and Drainage

1. Water Service

Water service to the Galway Downs facility is currently provided by the Rancho California Water District (RCWD). Potable water lines occur beneath Los Corralitos Road, Pauba Road, and within a small segment of Los Caballos Road near the northwest corner of the site. A series of potable water lines traverse the site to provide water service to individual uses, with an existing water line traversing the northern portions of the property in an east-west orientation along the north side of the race track. In addition, several existing irrigation water lines (non-potable) traverse the property and are used to water landscaped areas. Fire water lines and fire hydrants also exist on the property. The only water-related improvement that would occur in association with the proposed Project is the installation of a new fire pump along the southern side of the existing race track. No other improvements for water service are proposed or necessary as part of the Project, beyond internal site connections for the new buildings to be installed on site, including the new restroom, the Wine Country Equestrian Park Model Lodging units, and the employee modular housing units.

2. Sewer Service

Under existing baseline conditions, wastewater generated on the Project site is collected by several existing on-site septic holding tanks, as sewer service is currently not available in the Project area. These holding tanks are routinely serviced by a septic service company, with the wastewater disposed of at a permitted off-site location. The Eastern Municipal Water District (EMWD), which ultimately would provide wastewater treatment for flows generated within the local portion of the RCWD service area, is planning to construct a modernized sewer system in the Temecula Valley Wine Country Region, as part of Phase II of the Wine Country sewer system improvements. In 2015, EMWD completed the first phase of a sewer system in Northern Wine Country (EMWD, 2025). EMWD's Northern Wine Country Phase II project will install 14,000 linear feet of sewer lines along Rancho California Road, Glen Oaks Road, Warren Road, and East Benton Road, along with 23,200 linear feet of sewer line along De Anza Road and De Portola Road as part of the Southern Wine Country sewer improvement project (EMWD, n.d.). Environmental impacts associated with the Northern Wine Country Phase II and Southern Wine Country sewer improvements will be evaluated as part of a CEQA compliance document to be prepared by EMWD. The EMWD sewer improvement projects are separate and apart from the Project evaluated in this EIR, other than for the fact that Galway Downs will connect to the new EMWD lines when they become available. EMWD sewer line connection is not required for the Project, as the Project can operate using septic holding tanks indefinitely if the EMWD connection does not become available for any reason.

In the interim period prior to completion of the Northern Wine Country Phase II project, sewer service at Galway Downs would continue to be handled by on-site septic holding tanks, as shown on Figure 3-11, *Interim On-Site Sewer Plan*. As shown, interim sewer service to the proposed Employee Modular Housing and the Equestrian Park Model Lodging areas would be accommodated by new 6- and 8-inch sewer lines and laterals that would convey wastewater to the northwestern portion of the site, where new 12-foot-wide by 30-foot-long holding tanks are proposed. In addition, new sewer lines would be constructed in the southwestern portion of the site to provide sewer service from the existing barn/restaurant and existing retail/restaurant dining uses to the proposed septic holding tanks in the northwest portion of the site.

Once the EMWD sewer lines within De Portola Road are installed and operational, the Galway Downs facility would be required to connect to the new sewer lines and eliminate the existing on-site septic holding tanks. As shown on Figure 3-12, *Conceptual On-Site Sewer Plan*, the 6- to 8-inch sewer lines that are proposed for interim conditions would be disconnected from the septic holding tanks and the sewer lines would be extended northerly across Los Caballos Road. As shown on Figure 3-13, *Conceptual Off-Site Sewer Plan*, a new 8-inch sewer line would be installed within an off-site parcel (APN No. 927-690-005) and would convey sewer flows northerly to De Portola Road where it would connect with the new Northern Wine Country Phase II sewer main. As part of the off-site sewer line construction, and as shown on Figure 3-13, the portion of the sewer line that would cross under an existing ephemeral drainage would be constructed using a jack and bore technique such that there would be no physical disturbance to the surface drainage feature.

3. Drainage and Water Quality

Under existing baseline conditions, runoff on the Project site is conveyed by a natural drainage system that primarily directs stormwater runoff through a combination of sheet flow, earthen channels, and culverts. Runoff generated within the southeastern portion of the Project site drains to an existing culvert beneath Pauba Road, where it is conveyed to an improved storm drain channel that runs along the east side of Pauba Road and ultimately is conveyed beneath a separate culvert where flows are conveyed into Temecula Creek located to the north of the Project site. Flows from the majority of the remainder of the site sheet flow towards Los Corralitos Road and northerly towards an existing on-site retention basin located just northwest of the existing racetrack. In addition, a well-defined ephemeral drainage enters the northeast region of the Project site and drains in a western direction towards the on-site retention basin. Flows within this retention basin partially infiltrate into the groundwater table. During peak rain events, runoff from the retention basin is conveyed northerly by an existing culvert located beneath Los Caballos Road, where it discharges into an existing drainage swale and ultimately is conveyed to Temecula Creek.

Drainage and water quality improvements proposed as part of the Project would be limited to the Project's reconfigured driveways, as runoff from the remaining portions of the site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing baseline conditions. As shown on Figure 3-14, *Proposed Water Quality Improvements*, each of the proposed reconfigured driveways would be paved with asphalt or concrete, and each of the proposed driveways is



LEGEND

6"SS — 6" LATERAL LINES

8"SS — 8" MAIN LINES

Ⓢ — PROPOSED MANHOLE EVERY 500'

#6 TANKS, SIZE:
12' WIDE
30' LONG
12' DEEP

Source(s): Kolbrien (08-06-2025)

Figure 3-11

Not to Scale

Interim On-Site Sewer Plan



Source(s): Kolbrien (12-19-2025)

Figure 3-12

Not to Scale

Conceptual On-Site Sewer Plan



LEGEND

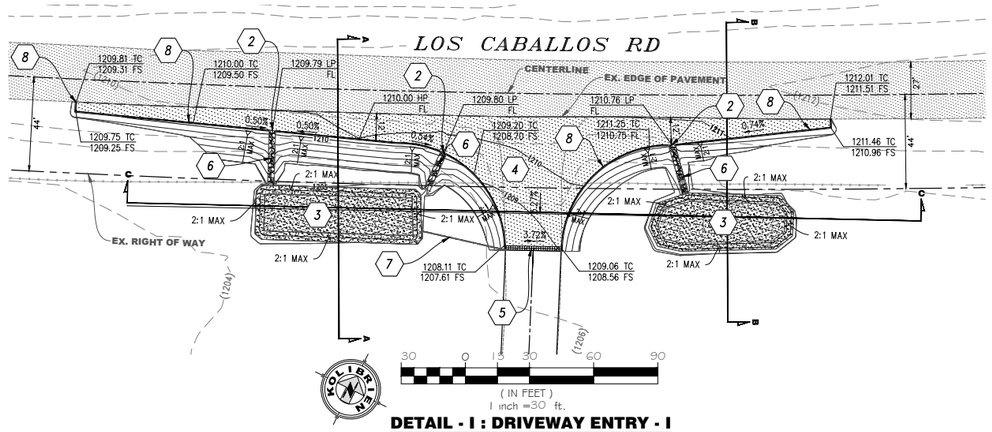
- PROPOSED FORCE MAIN
- 6" LATERAL LINES
- 8" MAIN LINES
- PROPOSED MANHOLE EVERY 500'
- PROPOSED LIFT STATION
- FUTURE SEWER LINE DE PORTOLA RD.
- #6 TANKS, SIZE: 12' WIDE 30' LONG 12' DEEP
- 15' SEWER EASEMENT RECORDED PER DOC. 2025-0353224 OFFICIAL RECORDS RIVERSIDE COUNTY

Source(s): Kolbrien (12-19-2025)

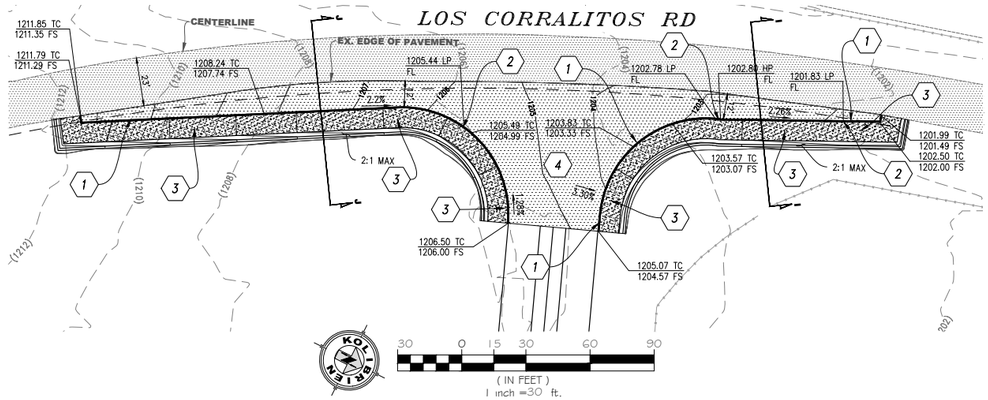
Figure 3-13

Not to Scale

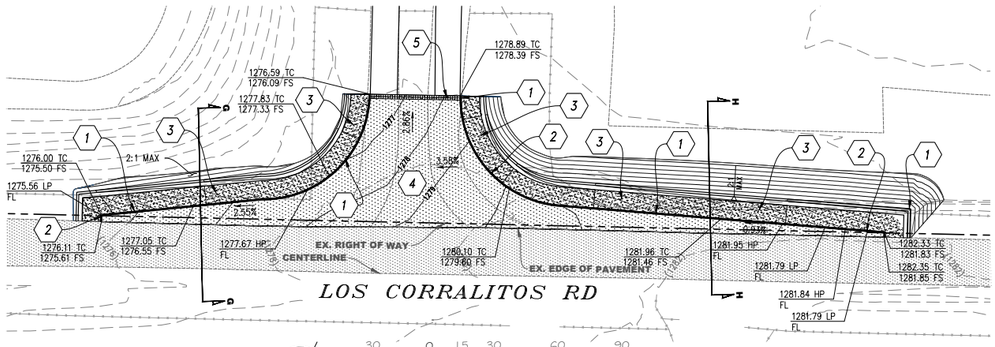
Conceptual Off-Site Sewer Plan



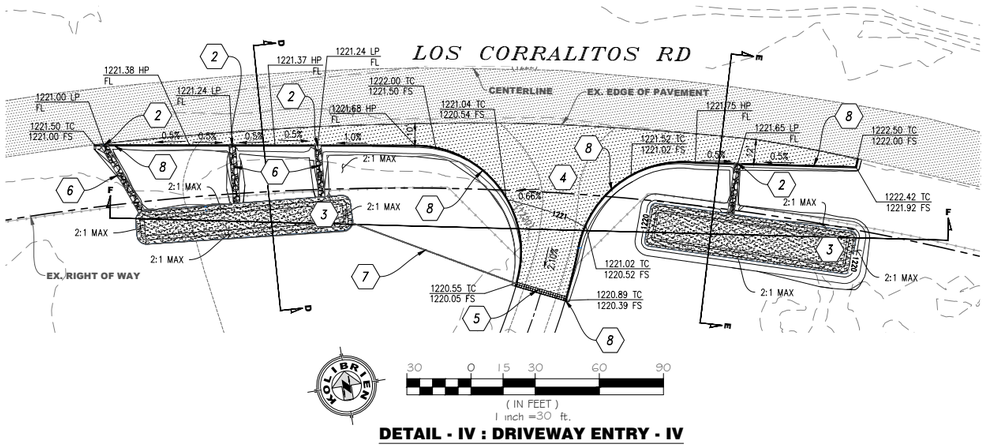
DETAIL - I : DRIVEWAY ENTRY - I



DETAIL - II : DRIVEWAY ENTRY - II



DETAIL - III : DRIVEWAY ENTRY - III



DETAIL - IV : DRIVEWAY ENTRY - IV

LEGEND:

- EX. LOT LINE
- CENTERLINE
- EX. RIGHT OF WAY
- EX. EASEMENT
- EX. EDGE OF PAVEMENT
- (1200) EXISTING ELEVATION
- (1200) EXISTING CONTOUR MAJOR
- 1202 PROP. CONTOUR MAJOR
- FLOWLINE
- PROPOSED CURB
- EX.ASPHALT SURFACE
- PROP. ASPHALT SURFACE

OWNER:

SFT REALITY GALWAY DOWNS LCC
38801 LOS CORRALITOS RD.
TEMECULA,CA 92592

APPLICANT:

JOHN JOHNSON
KOLIBRIEN CORP.
41197 GOLDEN GATE CIR., STE 103
MURRIETA, CA 92562
PHONE: 951-252-1034
Email: john@kolibrien.biz

ZONE/USE:

R-R

LAND SURVEYOR

JOHN JOHNSON, PE, PLS
KOLIBRIEN CORP.
42690 RIO NEDO, STE. G, TEMECULA, CA
PHONE: 951-252-1034
EMAIL: JOHN@KOLIBRIEN.BIZ

CIVIL/STRUCTURAL ENGINEER:

JOHN JOHNSON, PE, PLS
KOLIBRIEN CORP.
42690 RIO NEDO, STE. G, TEMECULA, CA
PHONE: 951-252-1034
EMAIL: JOHN@KOLIBRIEN.BIZ

SITE ADDRESS:

38801 LOS CORRALITOS RD
TEMECULA,CA 92592,USA

ASSESSOR'S PARCEL NO.

927-160-001,927-160-002

LEGAL DESCRIPTION

01 & 02 LOT 2 BKL 1 MB 133/91-92

BASIS OF BEARINGS:

THE BASIS OF BEARING IS THE CENTERLINE OF LOS CORRALITOS RD LOCATED WEST OF LOT 2 AS PER THE RECORDED MAP M.B. 133/91-92 BEING, N16°19'41"W

CONSTRUCTION NOTES

		QTY.
1	CONSTRUCT RETAINING CURB AS PER DETAIL4/SHEET 4	692 LF
2	INSTALL CURB OUTLET AS PER DETAIL8/SHEET 4	14 EA
3	CONSTRUCT AMENDED SOIL AS PER DETAIL5&6/SHEET 4	14545 SF
4	CONSTRUCT 0.45' AC PAVING OVER 0.5' CLASS II AGGREGATE BASE OVER COMPACTED SUBGRADE (90% MIN. COMPACTION) AS PER DETAIL3/SHEET 4	25681 SF
5	INSTALL TRENCH DRAIN AS PER DETAIL1/SHEET 4	92 LF
6	CONSTRUCT 3' WIDE ROCK SWALE AS PER DETAIL7/SHEET 4	522 SF
7	INSTALL 4" SD PIPE @0.5% MIN SLOPE	122 LF
8	CONSTRUCT 6" TYPE D-6 CURB PER CITY STD. 204A	795 LF

Source(s): Kolbrien (03-20-2026)

Figure 3-14

Not to Scale

Proposed Water Quality Improvements

designed to convey runoff generated by the driveways to adjacent self-retaining areas. The self-retaining areas would be improved to include an amended soil configuration, as also depicted on Figure 3-14, which would accommodate a total ponding depth of 6 inches and would include 8 inches of amended soil covered by 3 inches of mulch to provide water quality treatment for runoff from each driveway. No other drainage or water quality improvements are proposed or required as part of the Project.

G. Operational Programming

Galway Downs would continue to operate as 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, including during holiday weekends that may also include Fridays and Mondays. Similar to what occurs under existing baseline conditions, the equestrian activities that would occur under proposed CUP 02303R1 would be held within sub-venues on the property including barns, stables (permanent and temporary), arenas, turnouts, grass fields, training tracks for thoroughbreds, and parking for daily use. Other activities that would be permitted under CUP 02303R1 include special occasions which would occur in the Special Occasion Zone and non-equestrian sporting events, which would occur in portions of the Equine Zone. Events typically include outdoor food and beverage areas.

Programming for equestrian events would be similar to baseline conditions, and no changes are anticipated to equestrian-related programming other than a higher level of competitive activities. Sports events and special occasion events also would continue to occur in a manner substantially similar to baseline conditions, except that these activities would be fully permitted to occur on the site in designated zones with approval of CUP 02303R1.

Under CUP 02303R1, events at Galway Downs largely would operate similarly to baseline conditions. For ease of describing operational activities, events are categorized into three types: Equine, Sports, and Special Occasions. The events can also be characterized as either “spectator-driven” or “participant-driven.” Spectator-driven programming is an activity where attendance is driven primarily by fans/spectators, such as an entertainment special occasion event. Participant-driven programming is an activity where attendance is driven by both the participants and the spectators who are typically supporting the participants by their attendance (i.e., an “affiliated spectator”), such as an equestrian event or soccer game. A description of the three event types is provided below. These event types are currently permitted at Galway Downs and would continue to be permitted under the proposed Project, subject to proposed CUP 02303R1, proposed Exception No. 9 to Ordinance No. 847, and amended Article XIVd (Wine Country Zones [WC]) of Ordinance No. 348 pursuant to proposed CZ 22000010.

- Equine Events: Equine events are based on horse disciplines, including but not limited to, English Style such as Dressage, Hunter/Jumper, Eventing, Peruvian, etc., or multiple disciplines of Western styles such as Reining, Barrel Racing, Roping, etc. The duration of Equine Events typically ranges from two to five days and would be considered both a participant-driven and spectator-driven event.
- Sports Events: Sports events consist of competitive events including but not limited to soccer, lacrosse, rugby, and running (i.e., cross country racing). Sports events would vary by the number of

teams/individuals in the competition; would include small, medium, or large events; and would be considered both participant-driven and spectator-driven events. Running events would consist of one-day events. Field sports events primarily would consist of two- or three-day events on weekends.

- Special Occasions: Special occasions are indoor or outdoor events such as weddings, parties, concerts, conferences, charity banquets, corporate events, seasonal events, and other events of this type. Special occasion event attendance ranges from private events with invited guests to events that are open to the public and require the purchase of tickets.

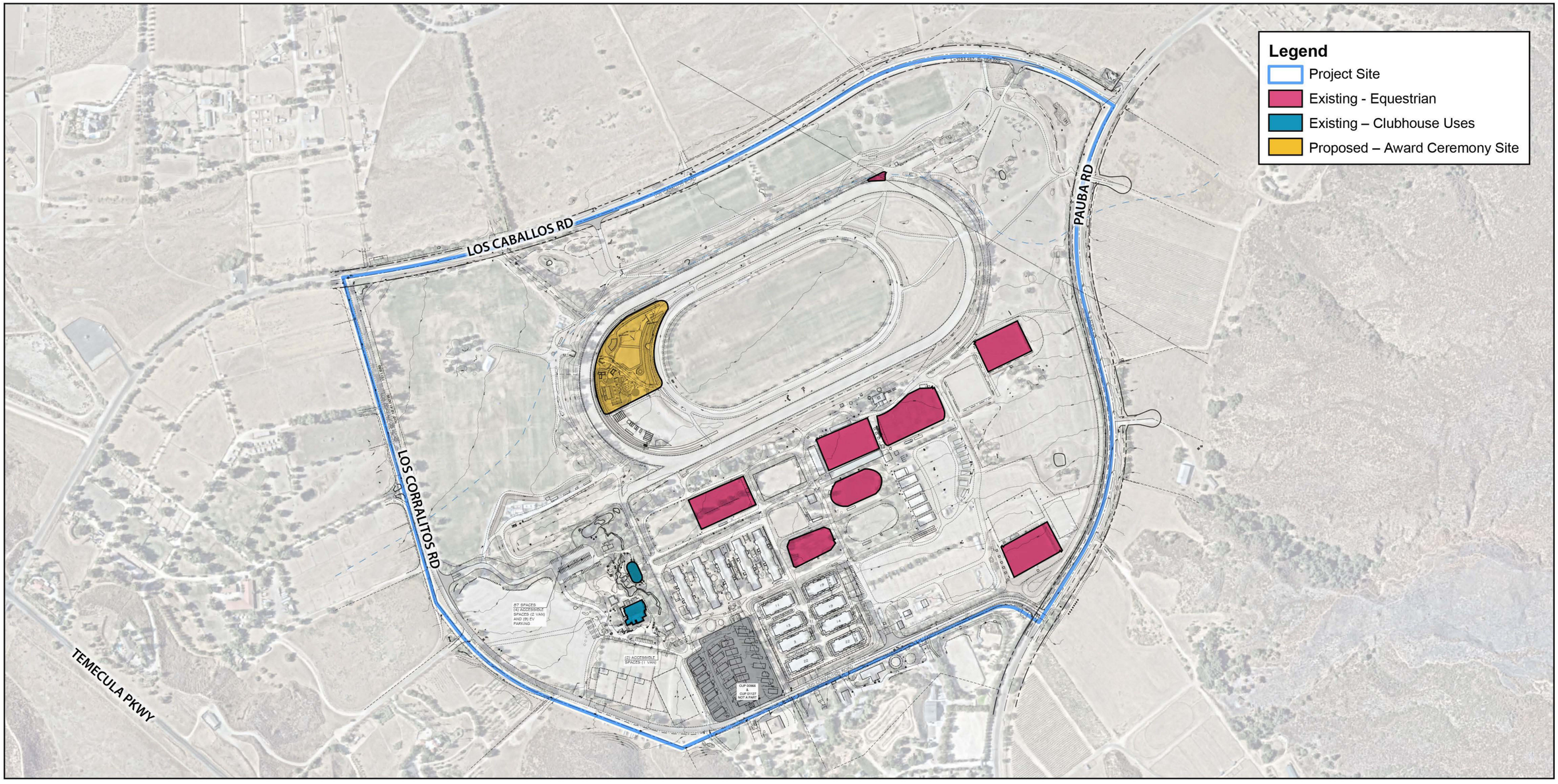
3.6.2 Exception No. 9 to Riverside County Noise Ordinance No. 847

Ordinance No. 847 (Regulating Noise) regulates noise sources throughout unincorporated Riverside County. Section 6.d of Ordinance No. 847 (Special Sound Sources Standards) states the following:

> "*d. Sound Amplifying Equipment and Live Music. No person shall install, use or operate sound amplifying equipment, or perform, or allow to be performed, live music unless such activities comply with the following requirements. To the extent that these requirements conflict with any conditions of approval attached to an underlying land use permit, these requirements shall control.*
>
> *1. Sound amplifying equipment or live music is prohibited between the hours of 10:00 p.m. and 8:00 a.m.*
>
> *2. Sound emanating from sound amplifying equipment or live music at any other time shall not be audible to the human ear at a distance greater than two hundred (200) feet from the equipment or music.*"

Section 7 (Exceptions) of Ordinance No. 847 allows for exceptions to the standards established by Sections 4 and 6 of Ordinance No. 847, including exceptions to the prohibition on sound amplifying equipment and live music. Section 7.a.3 of Ordinance No. 847 sets forth the process for seeking a Continuous Events Exception. Accordingly, the Project Applicant is seeking Exception No. 9 to Ordinance No. 847. Approval of Exception No. 9 to Ordinance No. 847 would authorize an exception to Section 6.d of Ordinance No. 847 in order to allow for periodic events requiring sound amplifying equipment to occur on the property that are audible for greater than 200 feet. Such sound amplification would be required to cease no later than 10:00 p.m.

Figure 3-15, *Existing and Proposed Sound Amplification Locations*, depicts the locations of the existing and proposed sources of sound amplification. As shown, the majority of the sound amplification activities occur under baseline conditions in association with the existing equestrian uses and clubhouse uses. Existing sources of sound amplification associated with the existing equestrian uses include the Sycamore Arena, Grand Prix Arena, Clock Tower Arena, Derby Arena, Eucalyptus Arena, Oval Warm-Up Area, and the Upper Pauba Arena. In addition, sound amplification occurs under baseline conditions in association with the



Source(s): ESRI, Kolbrien (12-19-2025), Nearmap (August 2024)

Figure 3-15

Not to Scale

Existing and Proposed Sound Amplification Locations

existing clubhouse uses in the southwestern portions of the property. Under the proposed Project, and as shown on Figure 3-16, *Exception No. 9 to Riverside County Ordinance No. 847*, sound amplification activities would continue to be permitted within the interior portions of the property between the hours of 8:00 a.m. and 10:00 p.m. without the need for additional exemptions to the provisions of Ordinance No. 847. No sound amplification would be allowed outside of the areas depicted on Figure 3-16, and no sound amplification would be allowed on site between the hours of 10:00 p.m. and 8:00 a.m.

3.6.3 Change of Zone No. 22000010 (CZ 22000010)

The Riverside County Zoning Ordinance (Riverside County Ordinance No. 348.4997; herein, "Ordinance No. 348") assigns zoning classifications and zoning regulations to all properties within unincorporated Riverside County. Under existing conditions, the Project site is zoned for "Wine Country – Equestrian (WC-E)" uses. The WC-E zone generally allows for single-family dwellings, Class I Equestrian Establishments, cottage industry uses, and vineyards and other limited agricultural uses. Uses that are allowed within the WC-E zone with approval of a Plot Plan include Class I and II wineries and Class II Equestrian Establishments on minimum parcel sizes ranging from 10 to 20 gross acres. In addition, uses that are allowed within the WC-E zone with approval of a CUP include Class II Equestrian Establishments on minimum parcel sizes ranging from 50 to 100 gross acres and employee housing subject to State requirements.

The Project Applicant is seeking to amend Ordinance No. 348 to modify Section 14.91 (Definitions), Section 14.96(C) (Conditionally Permitted Uses with a Conditional Use Permit), and Section 14.97 (Development Standards). In addition, CZ 22000010 would add Section 14.96(D) (Other Uses not Specifically Listed). The modifications to Ordinance No. 348 as part of CZ 22000010 are described in the following subsections.

A. Proposed Modifications to Section 14.91 (Definitions)

The Project Applicant is seeking to add three definitions, as set forth in Section 14.91 of Ordinance No. 348. Specific additions to Section 14.91 would include the following:

> "*N.* *EQUESTRIAN RECREATIONAL VEHICLE PARK*.
>
> *Locations designated for temporary use by vehicles, recreational vehicles, or trailers, such as overnight or short-term occupancy in association with events held on the establishment that are reserved for the exclusive use of participants for equestrian events. Such a facility is not intended and shall not be used by spectators or the general public. No occupancy shall exceed thirty (30) consecutive nights. Limited services and amenities (water, electricity, etc.) may be provided.*"
>
> "*V.* *MULTI-USE SPORTS FIELDS*.
>
> *Natural grass fields and/or other areas that can accommodate a variety of sports beyond equestrian or other separately permitted uses.*"



Source(s): UXR, 2026e

Figure 3-16

Not to Scale

Exception No. 9 to Riverside County Ordinance No. 847

"*DD. WINE COUNTRY EQUESTRIAN PARK MODEL LODGING.*

Overnight accommodations on a minimum 200-acre Class II Equestrian Establishment that accommodates overnight stays in Park Model RVs (PMRV) and are provided by the Equestrian Establishment. PMRV units may either be permanently or temporarily placed on the establishment. No occupancy shall exceed 30 consecutive days. Other forms of overnight accommodations, such as RVs, trailers, or tents brought to the establishment by visitors, shall be prohibited in areas designated Park Model Lodging (PML)."

B. Proposed Modifications to Section 14.96(C) (Permitted Uses with Approval of a Conditional Use Permit)

Section 14.96(C) of Ordinance No. 348 specifies uses that are permitted with a CUP for Class II Equestrian Establishments of over 50 acres and of over 100 acres. The Project Applicant is seeking to add a category of uses that are permitted with a CUP for Class II Equestrian Establishments of over 200 acres, as follows:

"4. A Class II Equestrian Establishment that includes one or more of the following appurtenant and incidental equestrian uses only in conjunction with established onsite equine land and a minimum operational parcel size of two hundred (200) gross acres:

a. Petting Zoo;

b. Polo-grounds;

c. Horse show facility;

d. Vendor sponsor area;

e. Equine equipment, service, and supply store, such as but not limited to, saddle and harness shop, tack shop, feed and grain store, custom-crafted equestrian goods shop;

f. Delicatessen or restaurant; drive-thru restaurants shall not be permitted;

g. Horse racing track or rodeo arena(s);

h. Animal hospital that provides temporary boarding facilities to board sick or injured animals;

i. Special Occasion Facility;

j. Multi-Use Sports Fields;

k. Equestrian Recreational Vehicle Park;

l. Wine Country Equestrian Park Model Lodging;

m. Ancillary Storage of livestock in conjunction with events: Storage of livestock, horses and cattle."

C. Addition of Section 14.96(D)

Section 14.96(D) is proposed to clarify that any use that is not specifically listed in Section 14.96 may be considered a conditionally permitted use if found to be substantially the same in character and intensity as other uses listed in this subsection. The specific language to be added is as follows:

> *"D. Any use that is not specifically listed above may be considered a permitted or conditionally permitted use provided that the Planning Director finds that the proposed use is substantially the same in character and intensity as those listed in the designated Subsections. Such a use is subject to the permit process which governs the category in which it falls."*

D. Proposed Modifications to Section 14.97 (Development Standards)

The Project Applicant is seeking to modify Section 14.97(B)(3) to prohibit parking on public streets during special occasion events, as follows (the addition is shown as underlined text):

> *"3. Automobile parking spaces shall comply with Section 18.12 of Ordinance No. 348 and shall be consistent with the rural standards of Temecula Valley Wine Country Policy Area of the Riverside County General Plan and the Temecula Valley Wine Country Design Guidelines. No parking on public streets shall be permitted for special occasions."*

The Project Applicant is also seeking to modify Section 14.97(C)(1) to adjust the standard related to the amount of area that must be set aside for permanent equine lands as part of Class II Equestrian Establishments, as follows (the additions are shown as underlined text):

> *"1. At least seventy-five percent (75%) of the net project area for the overall Class II Equestrian Establishment, inclusive of any areas for ancillary uses, shall be set-aside for permanent equine lands prior to issuance of certificate of occupancy or final inspection for the Class II Equestrian Establishment, whichever occurs first. Such areas may be temporarily utilized for Special Occasion Facility use, or Multi-Use Sports Fields or for temporary parking use as long as there are no permanent structures or improvements associated with these other uses placed within the defined equine lands area."*

The Project Applicant is also seeking at County request to add Section 14.97(C)(7) to indicate the maximum number of event attendees based on the size of the facility.

> *"7. Based on minimum facility size, horse show facilities, horse racing tracks, polo grounds, and rodeo arenas shall comply with the following maximum number of attendees (including participants) based on the minimum gross acreage of the facility property. The Planning Department has the discretion to further reduce the maximum number of attendees based on general site characteristics, parking, infrastructure, or other general capacity limits of the site or any potential impacts from the number of attendees.*
>
> *a. For properties with 20 acres minimum, the maximum number of attendees is 500*

people.

b. For properties with 50 acres minimum, the maximum number of attendees is 1,000 people.

c. For properties with 100 acres minimum, the maximum number of attendees is 1,500 people.

The Project Applicant is seeking to add Section 14.97(E) to add development standards for park model lodging uses within the WC-E zone, as follows:

"*E. Wine Country Equestrian Park Model Lodging Standards. In addition to the General Standards, the following standards shall apply to all Wine Country Equestrian Park Model Lodging facilities in the WC-E zone:*

1. An overall density of not more than 20 sites per acre may be allowed based on the boundary of the Wine Country Park Model Lodging area within an overall equestrian facility, with a maximum of 40 sites.

2. The minimum area of each park model lodging site shall be 1,000 square feet.

3. Where needed to enhance aesthetics or to ensure public safety, a fence, wall, landscape screen, earth mound or other screening approved by the Planning Director shall enclose the park model lodging facility.

4. All utility services within the park model lodging facility, including, but not limited to, electrical, telephone, and television services, shall be underground.

5. Each park model lodging site shall be provided with a water service outlet delivering safe, potable water.

6. Trash collection areas shall be adequately distributed and enclosed by a six-foot-high landscape screen, solid wall or fence, which is accessible on one side."

Finally, the Project Applicant is seeking to add Section 14.97(F) to add development standards for equestrian recreational vehicle parks within the WC-E zone, as follows:

"*F. Equestrian Recreational Vehicle Park Standards. In addition to the General Standards, the following standards shall apply to all Equestrian Recreational Vehicle Parks in the WC-E zone:*

1. An overall density of not more than 20 spaces per acre may be allowed, based on the boundary of the Equestrian Recreational Vehicle Park area within an overall equestrian facility.

2. The minimum area of each recreational vehicle space shall be 1,250 square feet.

3. *Recreational vehicle sites and driveways shall be of crushed stone, decomposed granite, grass or similar material so as to provide a level surface for recreational vehicle parking and minimize dust.*

4. *A parking space shall be provided for each recreational vehicle site not less than nine feet by 25 feet in size. The parking space may be part of the driveway into or through the site. Parking space shall be of rock, decomposed granite, grass or similar material so as to provide a level surface for car parking and to minimize dust.*

5. *All areas not in hard surface shall be landscaped pursuant to Section 18.12. of Ordinance 348 unless otherwise approved by the approving body.*

6. *Each recreational vehicle space shall be provided with a water service outlet delivering safe, potable water.*

7. *All utility services within the recreational vehicle park including, but not limited to, electrical, telephone, and television services, shall be underground.*

8. *Wheels shall not be removed from recreational vehicles, nor shall any fixture be added which will prevent the recreational vehicle from being moved under its own power or by a passenger vehicle.*

9. *No accessory structures including, but not limited to, ramadas, cabanas, and storage structures, shall be constructed on individual recreational vehicle spaces except patio covers may be constructed provided the following criteria are met and maintained.*

    a. *The patio covers are located or constructed and maintained by the park owner.*

    b. *The covers are of uniform size, style, and building materials.*

    c. *The patio covers are self-supporting and in no way permanently attached to a recreational vehicle.*

    d. *The patio covers are approved as part of the approval of the recreational vehicle park.*

10. *All awnings shall be supported off the individual recreational vehicle, shall remain attached to the recreational vehicle at all times, and shall not be connected in any way to a permanent structure. Free standing awnings shall not be permitted.*

11. *Structures to assist the handicapped shall be allowed.*

12. *The occupied area of the equestrian recreational vehicle park shall not exceed 75 percent of the lot area.*

13. *Recreation areas may be provided. Open space, pool areas, game courts, and similar areas, shall be considered recreation areas.*

14. *Trash collection areas shall be adequately distributed and enclosed by a six-foot-high landscape screen, solid wall or fence, which is accessible on one side."*

3.7 PROJECT'S TECHNICAL CHARACTERISTICS

3.7.1 Construction Characteristics

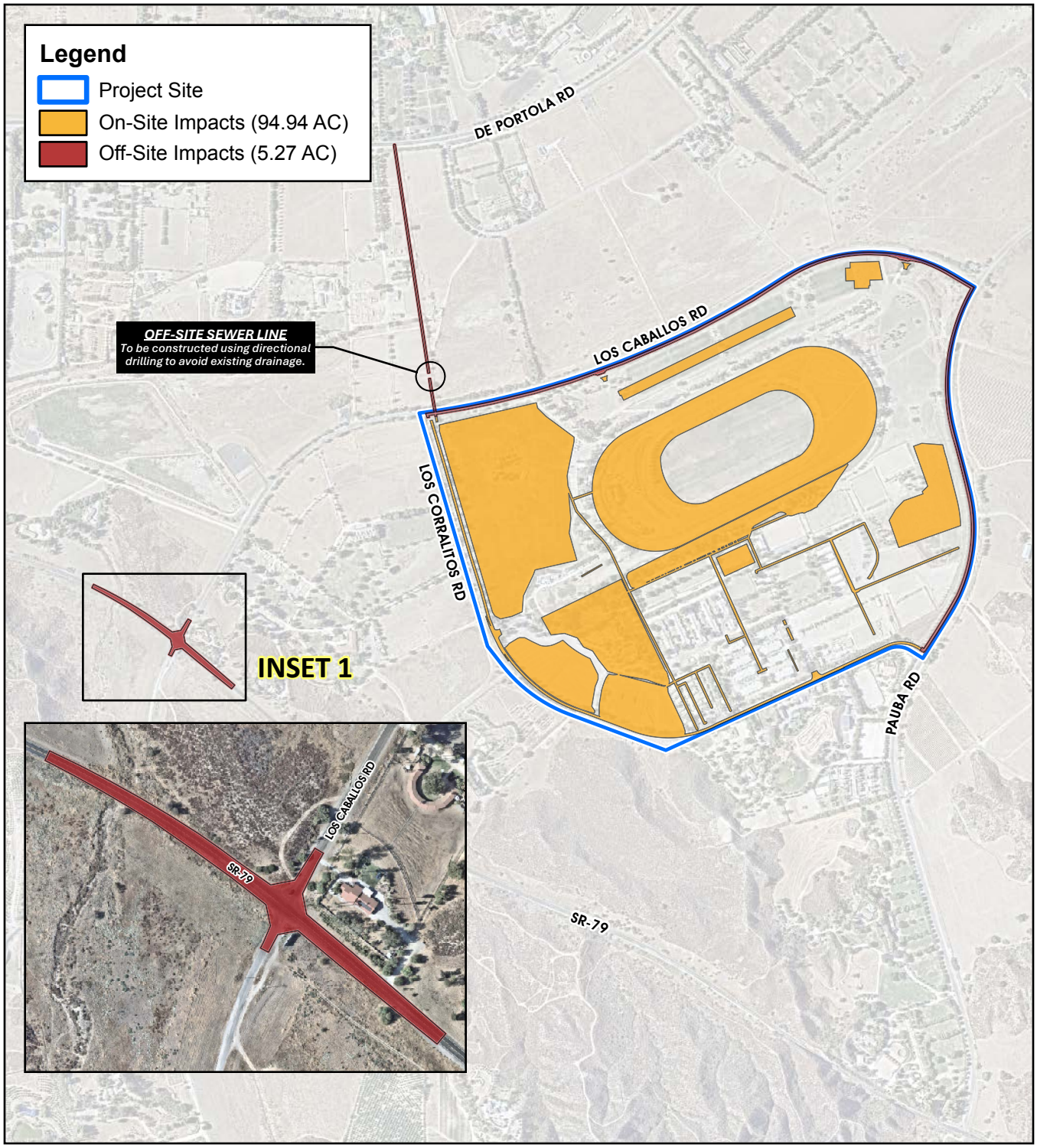
A. Physical Disturbances

Areas that would be physically disturbed with implementation of the Project, and conservatively inclusive of all areas where new construction, utility and driveway infrastructure, temporary parking, and new activities could occur, are depicted on Figure 3-17, *Limits of Disturbance,* totaling 94.94 acres on site and 5.27 acres off-site. As also shown, off-site disturbances associated with the Project would include the construction of the off-site sewer connection between the Project site and De Portola Road, and physical disturbances associated with the paving of driveway access points into the Project site and the installation of dedicated acceleration and deceleration lanes at each driveway location along Los Caballos Road (two paved driveways) and Los Corralitos Road (two paved driveways). It should be noted that while Figure 3-17 conservatively depicts Project-related disturbances along the majority of the Project site's frontages with Los Caballos Road and Pauba Road, no improvements are proposed or required along the Project site's frontage with Pauba Road, and Project-related improvements along Los Caballos Road would be limited to the construction of acceleration and deceleration lanes at the Project access driveways. Additionally, improvements are proposed off-site at the intersection of SR-79 at Los Caballos Road for installation of a traffic signal and the addition of an eastbound left-turn lane and associated intersection improvements, and the existing traffic signal at the intersection of SR-79 at Anza Road would be modified to implement overlap phasing for the southbound right-turn lane and to increase the cycle length to 120 seconds. The Project's on- and off-site improvements and associated limits of disturbance are part of the "whole of the action" analyzed in this EIR.

B. Construction Activities Schedule and Equipment

For purposes of analysis, Project construction was assumed to begin in January 2026 and last through October 2026 as shown in Table 3-3, *Construction Duration Assumptions*. Although construction will actually occur later than analyzed, the construction schedule utilized in the analysis represents a conservative approach for pertinent analysis topics such as air quality because as time passes and the analysis year increases, construction equipment becomes less polluting as emission regulations enforced by the California Air Resources Board (CARB) become more stringent.[1] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. (UXR, 2026a, p. 26)

[1] As shown in the CalEEMod User's Guide Version 2022, Appendix G, Table G-11, *Statewide Average Annual Offroad Equipment Emission Factors*, as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements (UXR, 2026a, p. 26).



Source(s): Esri, CADRE (08-25-2025), Nearmap Imagery (August 2024), RCIT (2024), UXR (06-16-2026)

Figure 3-17

Limits of Disturbance

Table 3-3 Construction Duration Assumptions

Construction Activity	Start Date	End Date	Days
Removal of Existing Structures	01/01/2026	01/14/2026	10
Fine Grading	01/15/2026	05/06/2026	80
Site Development	05/07/2026	10/21/2026	120
Paving	05/07/2026	10/21/2026	120

(UXR, 2026a, Table 3-3)

Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-4, *Construction Equipment Assumptions*, is assumed to operate up to a total of eight hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to Section 2.i of Riverside County Ordinance No. 847 (Regulating Noise) (UXR, 2026a, p. 27).

Table 3-4 Construction Equipment Assumptions

Construction Activity	Equipment[1]	Quantity	Hours
Removal of Existing Structures	Other Construction Equipment	1	8
Fine Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Crawler Tractors	2	8
Site Development	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8

(UXR, 2026a, Table 3-4)

3.7.2 Operational Characteristics

A. Peak Operations

As previously discussed in EIR Section 2.0, *Environmental Setting/Baseline*, the Galway Downs facility is an existing multi-faceted events facility that operates as a traditional equestrian facility most of the time but also hosts a variety of other activities primarily on weekends, including holiday weekends that may include Fridays or Mondays. The proposed Project would result in a higher level of competition for equestrian events than has been routinely hosted on the property and would permit special occasion and sports event uses to help the operator cover its obligations to the equestrian uses, as allowed and defined in the Wine Country Plan and as proposed by CUP 02303R1. As discussed in EIR Section 2.0, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal. 4th 439 to define the environmental baseline for operational conditions based on actual facility operations rather than solely on the activities authorized by the existing CUPs. The record demonstrates that sports events have

been occurring at Galway Downs on a recurring basis, and that the 2023 operational dataset, which forms the basis of the environmental baseline, captures those activities as part of the facility's actual operating conditions. Accordingly, the continuation of sports events under proposed CUP 02303R1 does not represent a change from the established baseline. The proposed Project would result in changes from that baseline in the following respects only: (1) formalizing and permitting sporting events that have been occurring as part of the facility's actual operations but that are not expressly authorized under the existing CUPs; (2) operation of up to 18 additional employee lodging units; (3) operation of up to 36 Equestrian Park Model Lodging units; and (4) operation of an Equestrian Recreational Vehicle (RV) area designated for temporary use by vehicles, RVs, or trailers, such as overnight or short-term occupancy in association with events held on the establishment that are reserved for the exclusive use of participants for equestrian events.

No increase in maximum daily vehicle trips would occur compared to maximum event attendance under existing baseline conditions, which is limited by the number of parking spaces that can be reasonably activated on the Galway Downs property at any one time. The provision of additional employee housing would reduce trips associated with employees traveling to and from work at Galway Downs. Similarly, the provision of Equestrian Park Model Lodging units and an Equestrian Recreational Vehicle area would reduce trips associated with equestrian activity and event participants traveling away from the property for overnight accommodations.

According to information provided by the Project Applicant, the expanded range of permitted activities at the Galway Downs facility would not result in an increase in the peak number of visitors that would be accommodated by the facility as compared to data for peak days from 2023, as the Galway Downs facility already was operating at maximum capacity during peak days observed in 2023. In 2023, the peak number of weekday visitors occurred on five days (April 21, April 28, May 26, June 2, and June 9, 2023), and consisted of approximately 4,458 two-way vehicle trips each day. The peak number of weekend day visitors occurred on May 28, 2023, and consisted of approximately 11,514 two-way vehicle trips. Accordingly, for purposes of analysis throughout this EIR, the proposed Project would not increase daily vehicular trips above existing peak day conditions. Event frequency may increase on weekends, but maximum peak day conditions would not exceed the peak day recorded in 2023. For context, in 2023 the Galway Downs facility experienced a total of 12 weekdays (all Mondays and Fridays) where there were more than 1,000 total one-way vehicle trips to the facility, and a total of 22 weekend days (Saturdays or Sundays) where the facility experienced more than 2,500 one-way vehicle trips.

B. Employment

Under baseline conditions, the Galway Downs facility employs 35 full-time employees (18 full-time facilities employees and 17 full-time operations employees), in addition to 132 part-time employees (27 part-time facilities employees and 105 part-time events-related employees), for a total of 167 employees. Because the peak number of employees needed for equestrian-oriented events also would be adequate for sports events and special occasions, no increase in the number of employees is anticipated as part of the Project (Clancy Sports, 2025).

4.0 ENVIRONMENTAL ANALYSIS

4.0.1 SUMMARY OF EIR SCOPE

In accordance with California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") Sections 15126 through 15126.4, this EIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulatively-considerable impacts that could occur from planning, constructing, and operating the proposed Project.

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared and distributed for a 30-day public review period on January 14, 2025, in accordance with State CEQA Guidelines Section 15082. An Initial Study was prepared for the Project to determine the required scope of this EIR. A copy of the Project's Initial Study is included in *Technical Appendix A* to this EIR. Based on the results of the Project's Initial Study as well as comments received during the NOP public review period and comments received during the public Scoping Meeting that was held on February 10, 2025, this EIR evaluates 13 primary environmental subject areas, as listed below. Each Subsection evaluates several specific subject matters related to the general topic of the Subsection. The title of each Subsection is not limiting; therefore, refer to each Subsection for a full account of the subject matters addressed therein.

4.1	Agriculture and Forestry Resources	4.8	Land Use and Planning
4.2	Air Quality	4.9	Noise
4.3	Biological Resources	4.10	Transportation
4.4	Cultural Resources	4.11	Tribal Cultural Resources
4.5	Energy	4.12	Utilities and Service Systems
4.6	Greenhouse Gas Emissions	4.13	Wildfire
4.7	Hydrology and Water Quality		

Refer also to the Project's Initial Study (*Technical Appendix A*) and EIR Subsection 5.4 for discussion of the environmental subjects that were scoped out from detailed analysis within this EIR. Environmental topics for which the Project would not result in potentially significant impacts and that are not evaluated in detail in this EIR include Aesthetics, Geology/Soils, Hazards/Hazardous Materials, Mineral Resources, Paleontological Resources, Population/Housing, Public Services, and Recreation.

4.0.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in State CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (State CEQA Guidelines Section 15130[a][1]). As defined in State CEQA Guidelines Section 15355:

'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

State CEQA Guidelines Section 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: (1) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (the "list of projects approach"); or (2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (the "summary of projections approach").

The summary of projections approach is used in this EIR, except for the evaluation of near-term vehicular traffic-related noise impacts, which relies instead on the list of projects approach. This methodology was determined to be appropriate by Riverside County because long-range planning documents contain a sufficient amount of information to enable an analysis of cumulative effects for all subject areas, with the exception of near-term vehicular-related noise effects, which require a greater level of detailed study.

Under this approach, the cumulative analysis under most sections considers impacts to each issue area based on the presumed buildout of the Riverside County General Plan as well as the general plans of any nearby jurisdictions that occur within the cumulative study area for each subject area. For most issue areas, this would encompass nearby areas within unincorporated Riverside County and nearby portions of the City of Temecula, although the cumulative study area may be smaller or larger depending on the issue area under evaluation. For example, for hydrology and water quality, the cumulative study area is defined as the Santa Margarita Watershed, which encompasses the southern portions of Riverside County as well as portions of northern San Diego County. For biological resources, the cumulative study area corresponds to the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as the MSHCP provides for the conservation of a wide variety of special-status plant and animal species and encompasses a broad region that generally represents biological conditions associated with the Project area; thus, the cumulative study area for biological resources includes all future land uses within western Riverside County as called for by the general plans of the County and the various cities that are included in the MSHCP region. Refer to the individual subsections within EIR Section 4.0 for a description of the specific cumulative study area used for each subject area evaluated in this EIR.

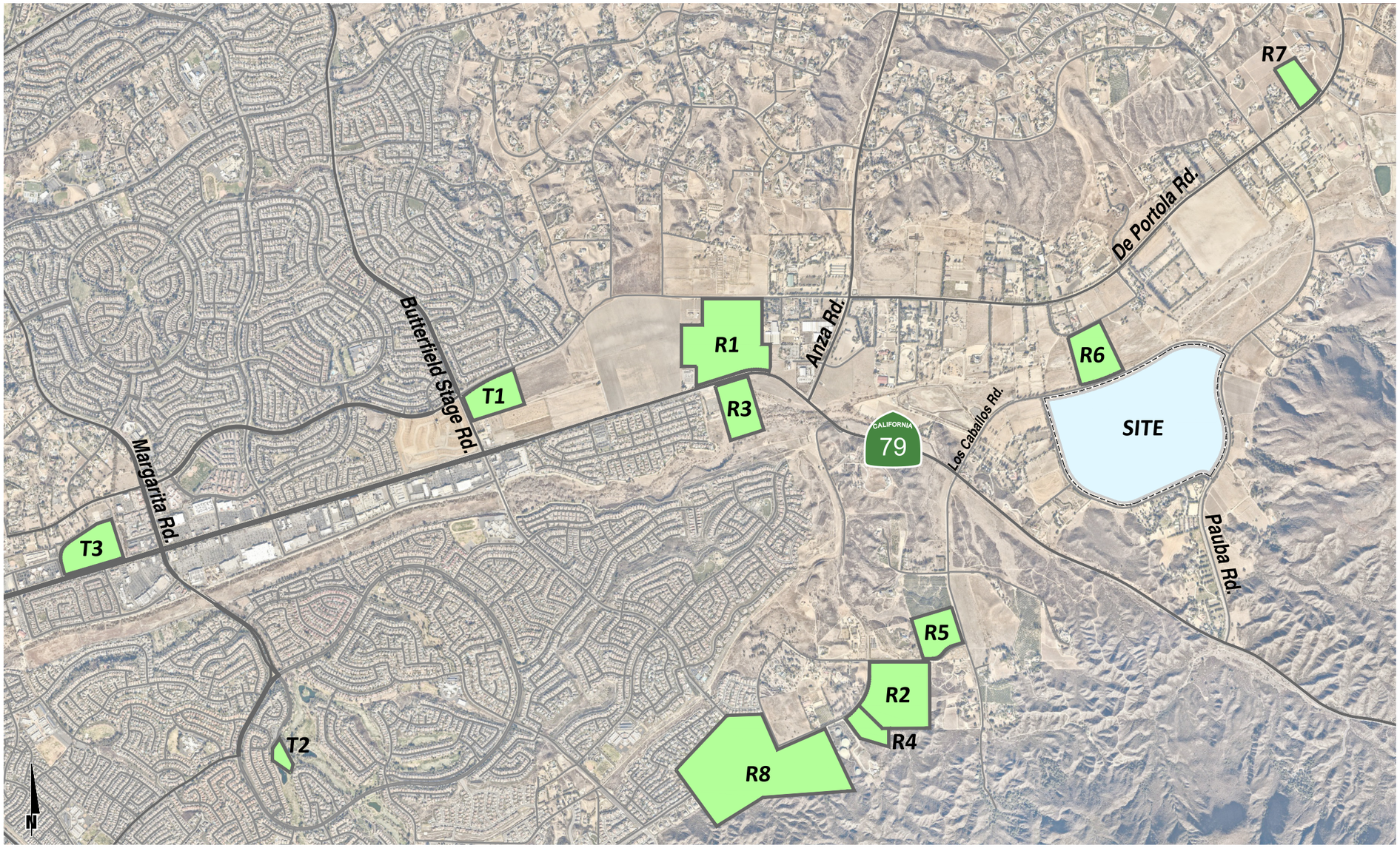
As noted, for most issue areas, nearby portions of unincorporated Riverside County and nearby portions of the City of Temecula are used as the Project's cumulative study area. This cumulative study area

encompasses a large area surrounding the Project site that has similar environmental characteristics to the Project area. This area generally contains a variety of rural land uses associated with the Temecula Wine Country area, including a mixture of equestrian-oriented uses, wineries, and rural residential land uses. This study area exhibits similar characteristics in terms of climate, geology, and hydrology. This study area also encompasses the service areas of the Project site's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that differ from those of the Project area, or are simply too far from the proposed Project site to produce environmental effects that could be cumulatively considerable.

The analysis of cumulatively-considerable traffic-related impacts to noise uses a combined approach, utilizing the list of projects approach for the near-term analysis of cumulatively-considerable impacts, and the summary of projections approach for the evaluation of long-term cumulatively-considerable impacts. With the combined approach, the cumulative impact analysis for traffic-related noise impacts overstates the Project's (and Project-related components') potential cumulatively-considerable impacts as compared to an analysis that would rely solely on the list of projects approach or solely on the summary of projections approach; therefore, the combined approach provides a conservative, "worst-case" analysis for cumulative traffic-related noise impacts.

For near-term conditions, the analysis of cumulatively-considerable vehicular-related noise impacts is based on existing traffic conditions plus ambient growth and the manual addition of traffic from past, present, and reasonably foreseeable projects. This analysis includes approved and pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project, as well as large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system facilities as the proposed Project and have the potential to be made fully operational in the foreseeable future. As shown in Table 4.0-1, *Cumulative Projects List*, and as depicted on Figure 4.0-1, *Cumulative Development Location Map*, the near-term cumulative impact analysis of traffic-related noise impacts includes 11 other past, present, and reasonably foreseeable projects within this study area in addition to the summary of projections (UXR, 2025, Table 4-5). The analysis of long-term cumulatively-considerable traffic impacts considers full buildout of nearby portions of unincorporated Riverside County and the City of Temecula based on the general plan land use plans for these jurisdictions.

For the issue of air quality, the cumulative study area comprises the South Coast Air Basin (SCAB), and the cumulative impact analysis relies on guidance from the South Coast Air Quality Management District (SCAQMD). The SCAQMD published a report providing direction on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD, 2003a). In this report, the SCAQMD states on page D-3:



Source(s): UXR, 2025

Figure 4.0-1

Not to Scale

Cumulative Development Location Map

Table 4.0-1 Cumulative Projects List

#	Project Name	Land Use	Quantity	Units[1]
R1	TTM 38995	Single Family Residential	287	DU
R2	TTM 37168	Single Family Residential	158	DU
R3	TTM 39073	Single Family Residential	34	DU
R4	CUP250016	Recreational Vehicle Park	8.25	Acres
R5	PP26177R01	Winery Tasting Room	0.600	TSF
R6	PPT220030 & 220031	Bed and Breakfast/Inn	10	Rooms
R7	PPT220037	Winery	3.243	TSF
R8	Pechanga Northern Boundary	Single Family Residential	132	DU
T1	De Portola Residential	Single Family Housing	162	DU
T2	Redhawk Golf Course SPA	Golf Course & Special Events	18	Holes
T3	Temecula Valley Hospital Master Plan Update	Behavioral Health	144	Beds
		Emergency Department Expansion	20.000	TSF
		Hospital Tower 2	125.000	TSF
		Medical Office - Phase 3	80.000	TSF
		Central Utility Plant	14.000	TSF
		Hospital Tower 3	125.000	TSF
		Medical Office - Phase 4	80.000	TSF

1. TSF = Thousand Square Feet; DU = Dwelling Unit.
(UXR, 2025, Table 4-5)

> *"...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The cumulative analysis provided in EIR Subsection 4.2, *Air Quality*, assumes that individual projects that do not generate emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant adverse air quality impact. Alternatively, individual project-related emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Compliance with the SCAQMD guidelines for evaluating direct and cumulatively-considerable impacts due to air quality emissions has been shown to result in a demonstrable reduction in air quality pollutants within the SCAB. Regulations promulgated by the SCAQMD have led to a dramatic reduction in the level of air quality pollutants within the SCAB, including levels of ozone, particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide (CO), and oxides of nitrogen (NO_X). As noted in the SCAQMD's prior 2016 version of the AQMP, "the remarkable historical improvement in air quality since the 1970s is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs" (SCAQMD, 2017a). Improvements also have been seen in ozone levels. Part of the control processes of the SCAQMD's duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by the SCAQMD CEQA Air Quality Handbook (SCAQMD, 2019). The single threshold of significance used to assess Project direct and cumulative impacts has in fact been successful, as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades.

Environmental impacts associated with buildout of the cumulative study area were evaluated in CEQA compliance documents prepared for the respective general plans of each of the above-named jurisdictions. The locations where each of these CEQA compliance documents is available for review are provided below. All of the CEQA compliance documents listed below are incorporated by reference pursuant to State CEQA Guidelines Section 15150.

- Riverside County General Plan Program EIR No. 521 (State Clearinghouse [SCH] No. 2009041065), available for review online at:
  https://planning.rctlma.org/general-plan-and-zoning/riverside-county-general-plan/riverside-county-general-plan-december-2015-0.

- Riverside County Temecula Valley Wine Country Community Plan EIR (SCH No. 2009121076), available for review online at:
  https://media.rivcocob.org/agenda/2013/12_03_13_files/temecula/

- City of Temecula General Plan Update EIR (SCH No. 2003061041), available for public review at the City of Temecula Planning Department, located at 41000 Main Street, Temecula, California 92590.

4.0.3 IDENTIFICATION OF IMPACTS

Subsections 4.1 through 4.13 of this EIR evaluate the 13 environmental subjects warranting analysis pursuant to CEQA based on the results of the Project's Initial Study (*Technical Appendix A*) as well as comment letters received in response to the Project's NOP and comments provided during the Project's February 10, 2025, public scoping meeting. The format of discussion is standardized as much as possible in each Subsection for ease of review. The environmental baseline is discussed first, followed by a discussion of the Project's potential environmental impacts based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant.

The thresholds of significance used in this EIR are based on the thresholds presented in State CEQA Guidelines Appendix G as applied by Riverside County to create the County's standard Environmental Assessment Form. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, and whether it is significant or less than significant.

Serving as the CEQA Lead Agency for this EIR, Riverside County is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. While Riverside County has generally elected to use the thresholds presented in State CEQA Guidelines Appendix G, it should be noted that CEQA affords the County discretion to formulate standards of significance and recognizes that the significance of a particular impact may vary with the setting (Cal. Code Regs., tit. 14, Section 15064, subd. (b)). The standards of significance used in this EIR are based on the independent judgment of Riverside County, taking into consideration the current State CEQA Guidelines Appendix G, the Riverside County Code of Ordinances, and adopted County policies and ordinances; the judgment of the technical experts that prepared this EIR's technical appendices; performance standards adopted, implemented, and monitored by regulatory agencies; significance standards recommended by regulatory agencies; and the standards in CEQA that trigger the preparation of an EIR. As required by State CEQA Guidelines Section 15126.2(a), impacts are identified in this EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project. A summarized "impact statement" is provided in each Subsection following the analysis.

The following terms are used to describe the level of significance of impacts related to the physical conditions within the area affected by the proposed Project:

- No Impact: No adverse change in the physical environment would occur.

- Less-than-Significant Impact: An adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this EIR.

- Significant Impact: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this EIR, requiring the consideration of mitigation measures.

Each Subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with, if any. If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- Less-than-Significant Impact with Mitigation: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).

- Significant and Unavoidable Impact: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this EIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to the Project's impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.

For any impact identified as significant and unavoidable, Riverside County would be required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines Section 15093 in order to approve the Project despite its significant impacts to the environment. The statement of overriding considerations would set forth the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record, that outweigh the unavoidable impacts.

4.1 AGRICULTURE AND FORESTRY RESOURCES

The information and analysis in this EIR Subsection 4.1 are based in part on information obtained from the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) (CDC, n.d.), the Riverside County Information Technology (RCIT) Map My County mapping program (RCIT, n.d.), the Riverside County General Plan Amendment 960 Final EIR (Riverside County, 2015a), the Riverside County General Plan (Riverside County, 2021a), and Southwest Area Plan (SWAP) (Riverside County, 2021b). Refer to EIR Section 7.0, *References*, for a complete list of these and other reference sources.

4.1.1 Existing Conditions

A. Forestry Resources

As shown in Figure 4.5.2 of the Riverside County General Plan Update EIR No. 521, aside from sparsely scattered lowland forests/woodlands, there are no forestry resources on the Project site or in the Project site's immediate vicinity under existing conditions. The absence of forestry resources on the Project site also was confirmed by a biological field evaluation of the Project site conducted in 2025 (Cadre, 2026a). The nearest forest land to the Project site occurs within the Cleveland National Forest, located approximately 1.9 miles south of the Project site. (Riverside County, 2015a, Figure 4.5.2)

B. Agricultural Resources

1. Regional Agricultural Setting

The Project site is located within the Temecula Valley Wine Country, a regionally significant agricultural area in southwestern Riverside County recognized for its concentration of viticulture, equestrian operations, and related agritourism uses. The region's Mediterranean climate, well-drained decomposed granite and sandy loam soils, and the marine cooling influence channeled through the Rainbow Gap have made the area particularly well suited to wine grape cultivation, and viticulture has been the dominant agricultural use in the surrounding landscape for several decades, supplanting much of the citrus and avocado production that historically characterized the area.

Riverside County formally recognized the area's distinctive agricultural character through adoption of the Temecula Valley Wine Country Community Plan (TVWCCP) in 2014, which established a long-term land use framework intended to preserve and enhance agricultural activities, support the local wine industry, and protect the rural and equestrian character of the surrounding community. The Community Plan divides the planning area into three policy areas – the Wine Country Policy Area, the Equestrian District Policy Area, and the Rural Residential Policy Area – each with land use and development standards tailored to maintain the agricultural and rural identity of the region. The Project site lies within the Equestrian District Policy Area, which the Community Plan identifies as an area where established equestrian facilities, boarding and training operations, and related agricultural and event uses are encouraged as compatible components of the broader agricultural setting.

According to information available from the Riverside County Agricultural Commissioner's Office, the top three categories of agricultural resources cultivated in Riverside County (by value) are nursery stock, dates,

and eggs. In 2024 (the most recent year for which data is available), the total gross value of agricultural production in Riverside County was approximately $1.77 billion, which represents a 14.8% increase from 2023 when total values were $1.54 billion. (Agricultural Commissioner, 2024, pp. 1-3)

The CDC reports that agricultural lands face continuing pressure from urbanization and rising production costs. The CDC's "2016-2018 California Farmland Conversion Report" (which is the most up-to-date Farmland Conversion Report published by the CDC) summarizes land use conversion between 2016 and 2018, and states that Riverside County as a whole experienced a net loss of 5,980 acres of Important Farmland between 2016 and 2018, representing a decline of 1.43% (CDC, n.d., Table A-25). Important Farmlands, as defined by Riverside County, include "Prime Farmland," "Statewide Important Farmland," and "Unique Farmland."

2. Historic and Existing Site Conditions

The existing Galway Downs facility opened in 1968 as the Rancho California Track and Training Center, which encompassed approximately 242 acres and served as a multipurpose event center for equestrians from across the country. The property has continuously operated as an equestrian-related events facility since that time, with the equestrian-oriented uses expanding over time to include additional equestrian- and non-equestrian-related events and facilities. Under existing baseline conditions, no portion of the Project site is utilized for agricultural production.

3. Zoning

As described in EIR Subsection 2.4, under existing conditions the Project site is zoned for "Wine Country – Equestrian (WC-E)" uses. The WC-E zone generally allows for equestrian facilities, limited agricultural uses, cottage industry uses, retail uses, Class I and II wineries, and Class II equestrian establishments, and also conditionally permits employee housing. (RCIT, n.d.; Riverside County, 2023a)

Lands to the west and a portion of the lands to the north, east, and south also are zoned for WC-E uses. Several properties to the southwest, northwest, and northeast are zoned for "Rural Residential (R-R)" land uses. Several parcels to the north of the Project site are zoned for "Residential Agriculture, 10-acre minimum lot sizes (R-A-10)," while lands to the southeast of the Project site are zoned for "Light Agriculture, 10-acre minimum lot sizes (A-1-10)." The R-R zoning classification generally allows for one-family dwellings and a variety of limited agricultural activities. The R-A-10 zoning classification generally allows for one-family dwellings along with limited agricultural activities on minimum 10-acre lot sizes. The A-1-10 zoning classification allows for one-family dwellings and a range of agricultural activities, along with certain non-agricultural uses subject to approval of a plot plan. (Riverside County, 2023a)

4. Agricultural Land Classifications

The goal of the CDC's FMMP is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, the FMMP's objective is to provide maps and statistical data to the public, academia, and local, state, and federal governments to assist them in making informed decisions for the best utilization of California's

farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. California Government Code Section 65570 mandates the FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local governments and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that the FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, the FMMP provides basic data from which observations and analyses can be made in the land use planning process. (CDC, n.d., p. 5)

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted (CDC, n.d., p. 6). Provided below is a description of the various map categories established by the FMMP:

- **Prime Farmland (P)**: Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, n.d., p. 6)
- **Farmland of Statewide Importance (S)**: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, n.d., p. 6)
- **Unique Farmland (U)**: Farmland of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. (CDC, n.d., p. 6)
- **Farmland of Local Importance (L)**: Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. (CDC, n.d., p. 6)
- **Grazing Land (G)**: Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. (CDC, n.d., p. 6)
- **Urban and Built-Up Land (D)**: Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. (CDC, n.d., p. 7)

- **Other Land (X)**: Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines or borrow pits; and water bodies smaller than 40 acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. (CDC, n.d., p. 7)

As shown on Figure 4.1-1, *FMMP Farmland Map*, under existing baseline conditions the Project site is mapped as containing "Farmland of Local Importance" and "Other Lands." The majority of the lands surrounding the Project site also are classified as containing "Farmland of Local Importance" and "Other Lands." A parcel to the east of the Project site (APN No. 927-170-016) is classified as containing "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland," while the area southeast of the Project site includes lands mapped as containing "Prime Farmland" along the eastern side of Pauba Road, south of Los Corralitos Road. "Farmland" is defined in Section II(a) of Appendix G of the California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") and by Riverside County to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." Thus, under existing conditions the Project site does not contain any areas of "Farmland" as mapped by the FMMP, while "Farmland" within the surrounding area is limited to the existing parcel to the east that contains "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland," and the lands to the southeast that are mapped as containing "Prime Farmland." (RCIT, n.d.)

5. Williamson Act Land Preserves and Agricultural Preserves

Agricultural Preserves are the result of Riverside County's participation in the California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (California Government Code Section 51200 *et seq.*). This program allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. The main purpose of the Williamson Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. According to RCIT, the Project site is not included in any Agricultural Preserves and is not subject to a Williamson Act contract. The nearest Agricultural Preserve and Williamson Act contracted land occurs immediately southeast of the Project site (Rancho California 5 Agricultural Preserve) along the east side of Pauba Road, north of Temecula Parkway/State Route 79 (SR-79). (RCIT, n.d.)

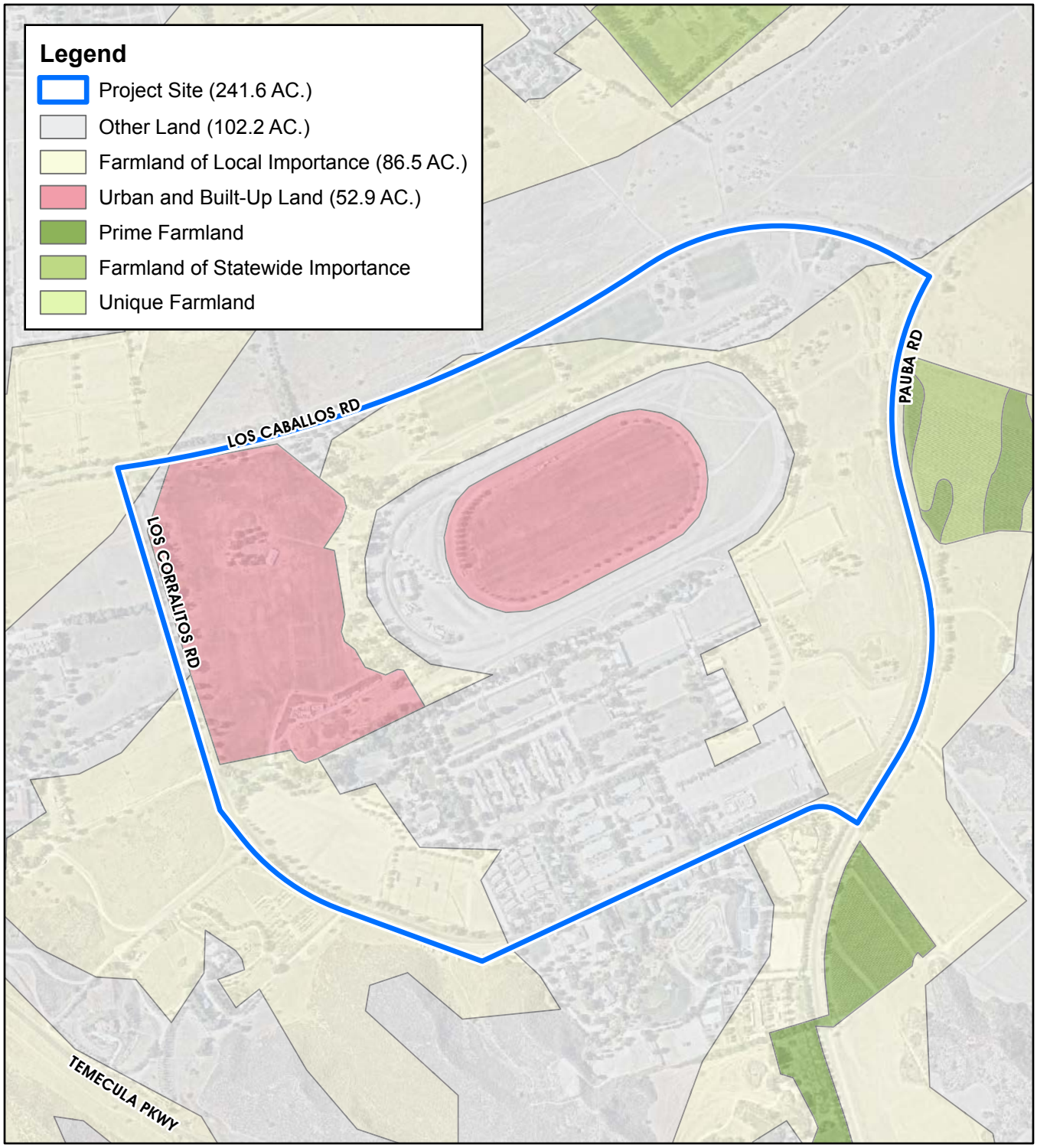
4.1.2 Applicable Regulatory Requirements

The following is a brief description of the State and local environmental laws and related regulations governing the protection of agricultural and forest resources.

A. State Regulations

1. California Land Conservation Act (CLCA)

The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (Cal. Gov. Code Section 51200, et seq.), enables local governments to enter into contracts with private landowners for the



Source(s): CDC (2020), ESRI, NearMap Imagery (August 2024)

Figure 4.1-1

FMMP Farmland Map

purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Pursuant to California Government Code Section 51230, counties and cities may establish agricultural preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA. Contracts pursuant to the CLCA are allowed only for areas within established agricultural preserves. Agricultural preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of a county or city. Once established, land uses within an agricultural preserve must be agricultural in nature, or other such uses that are not incompatible with agricultural uses. For lands within agricultural preserves, individual landowners may enter into a contract with a county or city, which would provide for the exclusion of uses other than agricultural, and other than those compatible with agricultural uses, for the duration of the contract, even if the land is sold to a new owner. In return for entering into a contract, the landowner is granted preferential taxes that are based upon agricultural and related land uses rather than fair market value. Contracts may be exited at the option of the landowner or local government by initiating the process of term nonrenewal. Under this process, the remaining contract term (nine years in the case of an original term of ten years) is allowed to lapse, with the contract null and void at the end of the term. During the nonrenewal process, the annual tax assessment continually increases each year until it is equivalent to current tax rates at the end of the nonrenewal period. Under a set of specifically defined circumstances, a contract may be cancelled without completing the process of term nonrenewal. Contract cancellation, however, involves a comprehensive review and approval process, and the payment of a fee by the landowner equal to 12.5% of the full market value of the property in question.

2. Farmland Mapping and Monitoring Program (FMMP)

The goal of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, the FMMP's objective is to provide maps and statistical data to the public, academia, and local, state, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the state. California Government Code Section 65570 mandates the FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local governments and the public. The FMMP was also directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that the FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, the FMMP provides basic data from which observations and analyses can be made in the land use planning process. Pursuant to the FMMP, all lands within California are classified into one of seven map categories, as previously summarized in EIR subsection 4.1.1.

3. California Forest Practice Act

The California Forest Practice Act (Public Resources Code Section 4511 et seq.) regulates commercial timber harvesting on privately-owned lands in California and is enforced by the California Department of Forestry and Fire Protection (CAL FIRE). As discussed below, no timber or forest resources exist on or in the vicinity of the Project site; accordingly, the Forest Practice Act has no application to the proposed Project.

B. Local Regulations

1. Local Ordinances

The following ordinances address farmland and agricultural preserves within unincorporated Riverside County.

- Riverside County Ordinance No. 509: This ordinance establishes uniform rules which apply to agricultural preserves. This ordinance determines which uses are agricultural or compatible uses within an agricultural preserve and prohibits all other uses within an agricultural preserve.
- Riverside County Ordinance No. 625: This "Right-to-Farm" Ordinance requires that development of residential uses adjacent to properties zoned primarily for agricultural purposes be regulated. Specifically, Riverside County Ordinance No. 625 ("Ordinance No. 625") states that if any agricultural operation that has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses shall cause said operation to become a nuisance. A note is to be added to the Environmental Constraints Sheet for any tentative land division that states:

  > *"...that no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three (3) years if it was not a nuisance at the time it began."*

  If any parcel within 300 feet of the site is zoned primarily for agricultural uses at the time of occupancy permit issuance, the Project shall comply with the "Right-to-Farm" Ordinance. Ordinance No. 625 defines land zoned for "primarily agricultural purposes" as any land lying within any one of the following zone classifications established by the Riverside County Land Use Ordinance No. 348: A-1 (Light Agriculture); A-P (Light Agriculture with Poultry); A-2 (Heavy Agriculture); A-D (Agriculture-Dairy); or C/V (Citrus/Vineyard).

2. Applicable Equestrian-Related Southwest Area Plan (SWAP) and Temecula Valley Wine Country Community Plan (TVWCCP) Policies

The Southwest Area Plan (SWAP) of the Riverside County General Plan, which was updated to incorporate certain policies from the adopted Temecula Valley Wine Country Community Plan (TVWCCP), includes the following policies related to equestrian-oriented land uses:

SWAP 1.2 Maintain distinct characters of the Winery, Equestrian, and Residential Districts through implementing zones to promote harmonious coexistence of these uses.

SWAP 1.6 Allow small-scale cottage inns or cottage industries. Encourage agricultural operations, equestrian activities and vineyard planting with such uses to reflect the unique character of this Policy Area.

SWAP 1.7 Develop and implement an integrated trails network that carefully considers equestrian uses, incidental commercial activities and agricultural operations, and includes, but is not limited to, regional trails, combination trails, bike paths, open space trails, historic trails, etc.

SWAP 1.17 Encourage equestrian establishments that promote the equestrian lifestyle as described in the Wine Country – Equestrian (WC-E) Zone.

SWAP 1.18 Permit incidental commercial uses such as western style stores, polo-grounds, or horse racing tracks, petting zoos, event grounds, horse show facilities, animal hospitals, restaurants, delicatessens, and special occasion facilities in conjunction with commercial equestrian establishments on lots larger than 10 acres to encourage equestrian tourism in this community.

In addition, the TVWCCP, which also is applicable to the Project area, includes the following additional policies related to equestrian-oriented land uses:

C 15.3 Develop a trail system which connects County parks and recreation areas while providing links to open space areas, equestrian communities, local municipalities, and regional recreational facilities (including other regional trail systems), and ensure that the system contains a variety of trail loops of varying classifications and degrees of difficulty and length.

C 16.2 Develop a multi-purpose trail network with support facilities which provide a linkage with regional facilities, and require trailheads and staging areas that are equipped with adequate parking, equestrian trailer parking (as appropriate), bicycle parking, restrooms, informative signage, interpretive displays, maps, and rules of appropriate usage and conduct on trails accessed from such facilities.

4.1.3 Basis for Determining Significance

Section II of Appendix G to the State CEQA Guidelines addresses typical adverse effects to forestry and agricultural resources, and includes the following threshold questions to evaluate a project's impacts on agricultural and forestry resources:

- Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code *section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section* 51104(g))?
- Would the project result in the loss of forest land or conversion of forest land to non-forest use?
- Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on forestry or agricultural resources if construction and/or operation of the Project would:

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;*

b. *Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve;*

c. *Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm");*

d. *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use;*

e. *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g));*

f. *Result in the loss of forest land or conversion of forest land to non-forest use; or*

g. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on forestry and agricultural resources.

4.1.4 Methodology

A. Overview

The analyses of potential agriculture and forestry resources impacts are based on the nature and degree of conversion or disruption of agricultural and forestry lands that would be brought about by the Project, along with how such changes, if any, affect the long-term viability of these resources within the region. The analysis of potential impacts to agriculture and forestry resources is based on a review of applicable state and local regulations and plans, as well as spatial data and mapping resources. Specific information sources consulted in the preparation of this analysis include: agricultural land use designations available through the CDC's FMMP, as accessed via the CDC's online mapping portal; parcel-level zoning, land use designation, Williamson Act contract status, and Agricultural Preserve boundary data available through the RCIT Map My County GIS mapping program; Riverside County Ordinance Nos. 348, 509, 625, and 915; the Riverside County General Plan and SWAP, including the applicable policies of the TVWCCP; and the Riverside County General Plan Amendment 960 EIR (EIR No. 521), which provides regional context for agricultural and forestry resources in western Riverside County.

Throughout the analysis, the term "Farmland" is used consistent with its definition in Section II(a) of Appendix G of the State CEQA Guidelines and as applied by Riverside County, which is limited to "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland" as mapped by the FMMP. "Farmland of Local Importance," "Grazing Land," "Urban and Built-Up Land," and "Other Land" are not considered "Farmland" for purposes of this analysis. For each threshold, the analysis evaluates both direct and indirect ways by which the Project could affect agricultural or forestry resources. Direct impacts are those resulting from the physical conversion of agricultural or forestry lands on the Project site. Indirect impacts are those that could result from Project-related changes to the surrounding environment, including noise, lighting, and other operating characteristics at Galway Downs that could affect the viability or continuity of agricultural or forestry uses on-site or off-site.

B. Environmental Baseline

Under baseline conditions, the Project site is developed as the Galway Downs facility and has operated continuously as an equestrian-oriented events facility since 1968. No portion of the Project site is a forest or used for agricultural production. Given the developed nature of the site and the extensive existing documentation of on-site physical conditions provided in EIR Section 2.0, the analysis of existing agricultural and forestry conditions for the Project site relied upon a review of aerial imagery, the FMMP maps, and RCIT GIS data, supplemented by the information contained in the Project's application materials for CUP 02303R1. Field reconnaissance of the Project site and surrounding area was also conducted in connection with the preparation of the biological resources analysis presented in EIR Subsection 4.3, which confirmed

the developed and disturbed character of the site and the absence of forestry resources and active agricultural operations. Existing conditions for surrounding land uses, including the location and extent of agriculturally-designated and agriculturally-zoned properties in the Project vicinity, were verified using RCIT GIS data and aerial imagery.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with minimal new physical construction and no new operational uses beyond those already occurring under baseline conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to convert vacant or agricultural land to a new use. The primary analytical questions addressed herein are therefore: (1) whether the limited physical improvements proposed as part of the Project, consisting of the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar canopy structure, additional area for equestrian RV park use, an off-site sewer line, and areas designated for up to 36 park model lodging units and 18 employee modular housing units, would directly or indirectly result in the conversion of any designated Farmland or forest land to a non-agricultural or non-forest use; and (2) whether Project approval and operation could indirectly affect the viability of agricultural or forestry resources on adjacent or nearby properties. In evaluating indirect impacts, particular attention was given to potential effects from Project-related lighting and noise, which were identified as potential concerns during the Project's public scoping process. Indirect effects associated with dust that could affect surrounding agricultural uses are separately addressed in EIR Subsection 4.2, *Air Quality*, under the analysis of Threshold c., which demonstrates that localized emissions associated with Project-related construction and operational activities would result in emissions of PM_{10} and $PM_{2.5}$ that are far below the South Coast Air Quality Management District (SCAQMD) thresholds of significance of 10.4 and 2.5 for construction and operation, respectively (refer to EIR Tables 4.2-11 and 4.2-12). Accordingly, indirect effects associated with dust that could affect surrounding land uses is not further discussed in this Subsection, as the analysis in Subsection 4.2 clearly demonstrates that such impacts would be less than significant.

4.1.5 Impact Analysis

Threshold a.:	**Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

As previously shown on Figure 4.1-1, the 241.6-acre Project site is classified by the FMMP as containing approximately 86.5 acres of "Farmland of Local Importance," 52.9 acres of "Urban and Built-Up Land," and 102.2 acres of "Other Lands." In addition, the Project's proposed off-site sewer line that would be constructed between the northwest corner of the Project site and De Portola Road would traverse off-site properties that contain lands classified as "Farmland of Local Importance" and "Other Lands." "Farmland" is defined in Section II(a) of Appendix G of the State CEQA Guidelines and by Riverside County to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." As previously noted,

"Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands" are not considered "Farmland" as that term is defined by CEQA, the County, or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other "Farmland" as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Thus, based on the FMMP mapping, the Project would not result in the conversion of "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance" (Farmland) to a non-agricultural use. No impact would occur.

Threshold b.: Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?

As defined by Riverside County Ordinance No. 625, "lands primarily zoned for agricultural use" include properties that are zoned for "Light Agriculture (A-1)," "Light Agriculture with Poultry (A-P)," "Heavy Agriculture (A-2)," "Agriculture-Dairy (A-D)," or "Citrus/Vineyard (C/V)" (Riverside County, 1994). Under existing baseline conditions, the Project site is zoned "Wine Country – Equestrian (WC-E)," which is not explicitly identified as an agricultural zoning classification by Ordinance No. 625. The WC-E zone generally allows for equestrian facilities, limited agricultural uses, cottage industry uses, retail uses, Class I and II wineries, and Class II equestrian establishments, and also conditionally permits employee housing. The proposed Project would be fully consistent with the site's WC-E zoning classification because the proposed Project does not introduce any land use that is incompatible with or displaces equestrian activity. To the contrary, the primary purpose of the proposed Project is to attract higher level of competition for equestrian events that can be hosted on the property, formalize uses that are already occurring as part of the established operational baseline, and provide supporting infrastructure, including sewer service, improved access, and overnight accommodations for employees and equestrian facility users that directly serves the equestrian function of the facility. The non-equestrian uses that occur on the property in the existing condition baseline and that would continue to occur, including sports events and special occasions, are secondary uses that would occur primarily on weekends in designated zones and are expressly subordinate to the site's primary equestrian character, as reflected in the retention of the 75% permanent equine lands requirement under the proposed development standards of CZ 22000010. Accordingly, the proposed Project would not conflict with existing agricultural zoning, and no impact would occur.

CZ 22000010 would ensure that the activities currently occurring at the Galway Downs facility are consistent with the applicable WC-E zoning classification. Thus, with approval of CZ 22000010, the proposed Project would be fully consistent with the site's WC-E zoning classification.

Pertaining to the Project's proposed construction of an off-site sewer line between the northwest corner of the Project site and De Portola Road, the proposed sewer line would be installed beneath the ground surface along the eastern boundary of APN No. 927-690-005 using standard trenching or, where crossing the ephemeral drainage feature, a jack and bore technique that avoids surface disturbance entirely. Upon completion of construction, the ground surface would be restored to pre-construction conditions, leaving no permanent above-ground infrastructure within the off-site parcel. APN No. 927-690-005 is not actively

used for agricultural production under existing conditions, as confirmed by a review of aerial imagery and RCIT GIS data, and the parcel is zoned "Wine Country – Equestrian (WC-E)," which is not an agricultural zoning classification under Ordinance No. 625. Subsurface utility installation is a standard ancillary infrastructure use within the WC-E zone and is consistent with the zone's purpose of supporting equestrian and related uses in the Wine Country area. See Ordinance No. 348, Article XIVd. Because the sewer line would be entirely subsurface, would not occupy or encumber any portion of the parcel surface upon completion, and would traverse a parcel that is neither actively farmed nor agriculturally zoned under Ordinance No. 625, construction of the proposed off-site sewer line would not interfere with any existing or reasonably foreseeable future agricultural use of APN No. 927-690-005 and would not conflict with the parcel's existing zoning classification. Impacts would be less than significant.

As previously noted, the Project site is not included in any Agricultural Preserves and is not subject to a Williamson Act contract. Thus, the proposed Project has no potential to conflict with any on-site Williamson Act contracts or Agricultural Preserves. The nearest Agricultural Preserve and Williamson Act contracted land (Rancho California 5 Agricultural Preserve) occurs immediately southeast of the Project site along the east side of Pauba Road, north of Temecula Parkway/SR-79 (RCIT, n.d.). Although the Project site occurs within close proximity of the Rancho California 5 Agricultural Preserve, the Project site is separated from this Agricultural Preserve by Pauba Road, which consists of a 110-foot-wide roadway, and no improvements are proposed to or along Pauba Road as part of the Project. Due to the separation provided by Pauba Road, and based on the range of activities anticipated under the proposed Project, there are no components of the Project that would indirectly affect ongoing agricultural operations within the Rancho California 5 Agricultural Preserve (refer also to the discussion and analysis of Threshold d., below). Furthermore, the Project would be subject to the provisions of Ordinance No. 625 (as described above in subsection 4.1.2.B.1), which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Based on mandatory compliance with Ordinance No. 625, impacts would be less than significant.

Threshold c.: Would the Project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?

Under existing conditions, land uses to the south, west, north, and northeast of the Project site are zoned for "Rural Residential (R-R)," "Residential Agriculture, 10-acre minimum lot sizes (R-A-10)," and "Wine Country – Equestrian (WC-E)," while lands to the southeast of the Project site (along the east side of Pauba Road) are zoned for "A-1-10 (Light Agriculture, 10-acre minimum lot sizes)." As previously noted, as defined by Riverside County Ordinance No. 625, "lands primarily zoned for agricultural use" include properties that are zoned for "Light Agriculture (A-1)," "Light Agriculture with Poultry (A-P)," "Heavy Agriculture (A-2)," "Agriculture-Dairy (A-D)," or "Citrus/Vineyard (C/V)" (Riverside County, 1994). Thus, under existing conditions, only the property to the southeast of the Project site that is zoned for "A-1-10" land uses comprises "agriculturally-zoned property" pursuant to Ordinance No. 625.

Although the Project site is adjacent to agriculturally-zoned property located to the southeast of the Project site, the Project would be subject to the provisions of Ordinance No. 625 (as described above in subsection 4.1.2.B.1), which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Moreover, as discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations rather than solely on the activities expressly authorized by the existing CUPs. The Galway Downs 2023 operational dataset, which captures the full range of activities occurring at the facility including equestrian events, sports events, and special occasion events, forms the environmental baseline against which Project impacts are measured. Accordingly, there would be no substantive change in the range of uses and activities that occur at the Galway Downs facility as compared to the established environmental baseline. The only Project-related improvements that would occur within 300 feet of the agriculturally-zoned property to the southeast would consist of a proposed temporary parking area as well as the construction of sewer lines to provide sewer service within the southeastern portions of the site.

The existing and proposed land uses associated with the Project are fully compatible with ongoing agricultural activities in the surrounding area for the following reasons. The Galway Downs facility has coexisted with the A-1-10 zoned properties to the southeast since 1968, and those agricultural operations have continued uninterrupted throughout decades of equestrian events, crowd noise, lighting, and traffic associated with the facility. The only new Project-related improvements within 300 feet of the A-1-10 zoned properties, a temporary parking area and subsurface sewer lines, are passive in character and would generate no operational noise, lighting, or activity beyond what already occurs under baseline conditions. The temporary parking area would be activated only during events, would be managed consistent with a County-approved event management plan, and would be surfaced and operated in a manner consistent with the rural character of the surrounding area. The subsurface sewer lines would be installed below grade and, upon completion of construction, would leave no permanent above-ground infrastructure within the area. With respect to construction noise, as demonstrated in EIR Subsection 4.9, *Noise*, temporary construction activity would be limited to daytime hours consistent with Riverside County Ordinance No. 847 and would not expose nearby sensitive receptors to noise levels exceeding the applicable threshold of significance. The Project would not introduce any use, structure, or operational activity within 300 feet of the A-1-10 zoned properties that is incompatible with or would foreseeably discourage the continuation of agricultural operations on those parcels. Based on mandatory compliance with Ordinance No. 625, the passive nature of the Project-related improvements within 300 feet of the agriculturally-zoned properties, and the absence of any new operational activities beyond the established environmental baseline, impacts would be less than significant.

Threshold d.: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Under existing conditions, the nearest lands classified as containing "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland" ("Farmland") occur approximately 115 feet east of the eastern boundary of the Project site, on the east side of Pauba Road, which are classified as "Unique Farmland," "Farmland of Statewide Importance" and "Prime Farmland." An additional property classified as "Prime Farmland" occurs approximately 265 feet southeast of the Project site.

The Project evaluated herein consists of proposed CUP 02303R1, CZ 22000010, and Exception No. 9 to Riverside County Ordinance No. 847. As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the environmental baseline for operational conditions is defined based on actual facility operations as documented in the 2023 operational dataset, consistent with the County's exercise of discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439. Under that baseline, the full range of activities currently occurring at Galway Downs, including equine events, sports events, and special occasions, is captured as existing conditions. With approval of the Project, the Galway Downs facility would continue to operate consistent with that established baseline. The Project would not introduce operational activities beyond those reflected in the 2023 baseline, and therefore would have no potential to result in indirect impacts to nearby agricultural properties beyond those already associated with existing facility operations. Regarding the nearest lands classified as "Prime Farmland," "Unique Farmland," and "Farmland of Statewide Importance" that occur on the east side of Pauba Road, approximately 115 feet east of the Project site's eastern boundary and approximately 265 feet to the southeast of the Project's southern boundary, no conversion of these parcels to non-agricultural use is proposed or anticipated as a result of the Project for reasons discussed below.

❑ **Project-Related Physical Disturbances**

The Project would not physically disturb, encumber, or alter any off-site parcel to the east of Pauba Road, inclusive of the parcels east of Pauba Road and south of Los Corralitos Road. No grading, construction, or infrastructure installation is proposed on or adjacent to the FMMP-mapped parcels along the eastern side of Pauba Road, and Pauba Road itself, a 110-foot-wide roadway, provides a substantial buffer between the Project site and the agricultural lands along the east side of Pauba Road. Thus, Project-related construction and operation would not directly affect existing agricultural lands along the east side of Pauba Road, and impacts would be less than significant.

Although the Project would include the construction of an off-site sewer line between the northwest corner of the Project site and De Portola Road, the proposed sewer line would be installed beneath the ground surface and would occur along the eastern boundary of APN No. 927-690-005. In addition, APN No. 927-690-005 is not actively being used for agricultural production under existing conditions (Cadre, 2026a, Table 1; Google Earth, 2025). Accordingly, construction of the proposed off-site sewer line would not interfere with any potential future agricultural activities on this off-site parcel and would have no potential to result in changes that could result in the conversion of this off-site property to non-agricultural uses. Impacts would be less than significant.

❑ **Project Indirect Impacts due to Noise**

Discussion and Applicability of Noise Thresholds of Significance

With respect to noise, the Galway Downs facility has operated as an active equestrian events center continuously since 1968, generating crowd noise, public address announcements, and other event-related noise that have coexisted with agricultural operations on the surrounding properties throughout that period. EIR Subsection 4.9, *Noise*, demonstrates that Project-related construction activities and long-term operational activities would generate noise levels that remain below the County of Riverside's exterior residential noise level thresholds of significance (i.e., 55 dBA Leq during daytime hours and 45 dBA Leq during nighttime hours for operational noise, and 80 dBA Leq and a 20 dBA Leq increase for temporary construction noise) at all nearby sensitive receptors, including the residences and equestrian-oriented properties surrounding the Project site. Although the County's significance thresholds are expressed as residential standards, for the reasons explained below, those thresholds are appropriate and sufficiently protective when applied to nearby equestrian-oriented properties, and the noise analysis in Subsection 4.9 therefore supports the conclusion that the Project would not result in significant noise impacts on the agricultural or equestrian receptors in the surrounding area.

Construction Noise Thresholds of Significance

This EIR uses an 80 dBA Leq significance threshold to evaluate Project-related construction activities, which is supported by recognized federal guidance and reflects established CEQA practice in California. The Federal Transit Administration (FTA), in its publication titled, “Transit Noise and Vibration Impact Assessment Manual,” establishes general-assessment construction noise impact criteria of 80 dBA Leq (8-hour) during daytime hours at residential land uses, with higher criteria for commercial (85 dBA Leq) and industrial (90 dBA Leq) receptors. The FTA criteria were developed in recognition of the inherently temporary, finite, and intermittent character of construction activity, which differs fundamentally from the continuous operational noise sources that drive the lower long-term ambient thresholds. (FTA, 2018)

The U.S. Environmental Protection Agency's (EPA) publication titled, “Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety” (the "EPA Levels Document") similarly recognizes that short-term, intermittent exposure to elevated noise levels associated with construction activity does not produce the same public-health concerns as chronic exposure to comparable levels (EPA, 1974).

Riverside County's General Plan Noise Element and County Code provisions governing construction noise (which exempt construction activity conducted during specified daytime hours from the operational exterior noise standards otherwise applicable to residential land uses, provided the activity complies with applicable construction-hour limitations) likewise reflect the recognition that temporary construction noise warrants a separate, higher significance threshold than long-term operational noise. The 80 dBA Leq construction threshold – although expressed as a residential standard – is also appropriate and sufficiently protective when applied to the nearby equestrian-oriented properties, which are typically improved with both a single-family residence and associated stables, paddocks, arenas, and pasture, and on which human occupants (residents, owners, trainers, handlers, and staff) are routinely present alongside the equine

occupants throughout the daytime hours when construction activity is permitted to occur. A threshold calibrated to protect the human receptors at these properties is therefore directly applicable to the residential component of the use, and the available scientific literature confirms that the threshold also is appropriate and protective of the equestrian component of the use. The equine auditory system is anatomically and physiologically similar to the human auditory system, sharing the same basic structures (pinna, external auditory meatus, tympanic membrane, ossicles, cochlea, vestibular system, and cranial nerve pathway) and the same general mechanisms of sound transduction and noise-induced injury. However, the equine hearing range (approximately 55 to 33,500 Hz, with best sensitivity in the 1,000 to 16,000 Hz range) is narrower at the low-frequency end than the human hearing range (approximately 20 to 20,000 Hz), and horses are not more sensitive than humans in the low-to-mid frequency range that dominates A-weighted environmental and construction noise analysis. Comparative studies of mammalian hearing have further found that the hearing threshold of horses is approximately 5 to 15 dB higher than that of humans – that is, horses are somewhat less sensitive to faint sounds than humans. Available reviews of the effects of noise on animals further indicate that acute responses (e.g., startle, elevated heart rate) in wildlife species generally occur only at noise levels greater than 95 dBA, which is well above the 80 dBA Leq construction threshold applied herein. Direct observations of thoroughbred racehorses at major Australian race venues confirm that horses are routinely exposed to Leq noise levels of 65–70 dBA in racing stalls and 70–90 dBA when moving between stalls, mounting yards, and racetracks during normal racing operations, without evidence of adverse physiological or behavioral effects. The 80 dBA Leq threshold applied in this EIR is therefore consistent with FTA guidance, with the EPA's longstanding distinction between short-term and chronic noise exposure, the County's own regulatory approach to construction activity, and the available scientific literature regarding equine response to ambient environmental noise, and constitutes a reasonable basis for evaluating the significance of Project-related construction noise impacts affecting nearby agricultural properties. (Brown, 2022; USFWS, 1988; Huybregts, 2008)

In addition to the 80 dBA Leq absolute construction noise threshold, this EIR applies a relative construction noise significance threshold of 20 dBA Leq increases above existing ambient daytime conditions to evaluate impacts resulting from the contribution of Project-related construction noise to the existing noise environment. This relative threshold is grounded in established principles of acoustics and human perception of changes in sound level. As documented in standard acoustical references, an increase of approximately 3 dBA represents a doubling of acoustic energy but is generally considered the threshold of perceptibility for the average listener; an increase of approximately 10 dBA is perceived as a doubling of loudness; and an increase of approximately 20 dBA is perceived as roughly a quadrupling of loudness and represents a clearly substantial change in the acoustic environment. (FTA, 2018, Table 4-5) For the same reasons discussed above with respect to the absolute 80 dBA Leq threshold, the 20 dBA Leq relative threshold – although derived from principles of human auditory perception – is also appropriate and sufficiently protective when applied to nearby equestrian-oriented properties. Human occupants (residents, owners, trainers, handlers, and staff) are routinely present at these properties throughout the daytime hours during which construction would occur, and a perception-based threshold calibrated to identify substantial changes in the acoustic environment as experienced by those human receptors is therefore directly applicable to the residential component of the use. As discussed above, equine hearing sensitivity in the frequency range that drives A-weighted environmental noise analysis is comparable to or

less sensitive than that of humans. Further, the available scientific literature confirms that horses habituate to continuous, predictable daytime noise exposure where the noise source is familiar and not associated with danger, and that the documented adverse responses of horses to noise exposure are associated primarily with sudden-onset, impulsive, or unusually loud events (such as firearms, which produce peak sound pressure levels of 140 to 175 dB) rather than with incremental changes in continuous broadband noise of the kind produced by typical construction activity. The 20 dBA Leq relative threshold is therefore equally protective of the equestrian component of the use, and provides a reasonable and conservative basis for evaluating the significance of Project-related construction noise increases at both residential and equestrian-oriented receptors in the surrounding area. (Brown, 2022; USFWS, 1988; Huybregts, 2008)

Operational Noise Thresholds of Significance

Although the operational noise analysis in EIR Subsection 4.9 is based on Riverside County's exterior residential noise level thresholds of 55 dBA Leq and 45 dBA Leq during daytime and nighttime hours, respectively, substantial evidence supports the conclusion that these thresholds are also appropriate and sufficiently protective when applied to evaluate potential operational noise impacts affecting nearby equestrian-oriented properties. As an initial matter, neither CEQA, the State CEQA Guidelines, the Riverside County General Plan Noise Element, nor the Temecula Valley Wine Country Community Plan establishes a separate numerical noise threshold for equestrian land uses, and no federal or state regulatory framework contains equine-specific exterior noise criteria. In the absence of an equine-specific threshold, the established practice under CEQA is to apply the most analogous, scientifically supported, and demonstrably protective standard available, and the County's residential exterior thresholds satisfy that test for the reasons explained below.

First, the available peer-reviewed and agency-sponsored scientific literature does not identify a continuous ambient noise level in the 45–55 dBA Leq range as a level at which adverse physiological or behavioral effects occur in horses. A frequently cited synthesis on this question is a publication produced by the United States Fish and Wildlife Service (USFWS) titled, “Effects of Aircraft Noise and Sonic Booms on Domestic Animals and Wildlife: A Literature Synthesis.” As demonstrated therein, domestic livestock, including horses, generally habituate to chronic, predictable noise exposure, and documented adverse responses (startle, elevated heart rate, transient cortisol increases) are associated primarily with sudden-onset, impulsive, or unusually loud events rather than with continuous ambient levels in the range governed by the County's residential thresholds. Independent reviews of the relevant scientific literature have similarly concluded that acute behavioral responses in wildlife species generally occur only at noise levels greater than 95 dBA, and that horses' adverse auditory responses are associated with extremely loud impulsive events (such as firearm noise at peak sound pressure levels of 140 to 175 dB) rather than with continuous ambient environmental noise. Direct field observations of thoroughbred racehorses at major race venues confirm that horses are routinely exposed to Leq noise levels of 65–70 dBA in racing stalls and 50–68 dBA in stable areas during the day, including during major race events, without evidence of adverse physiological or behavioral effects. During a separate observational study of horses stabled at a racecourse during a large outdoor music festival, horses exposed to Leq (15-minute) noise levels of up to 70 dBA generally exhibited "only low levels of agitation," with the limited adverse responses observed being primarily associated with visual stimuli or with short bursts of high-pitched singing rather than with the continuous ambient noise

level. The County's residential exterior threshold of 55 dBA Leq during daytime hours and 45 dBA Leq during nighttime hours is well below the noise levels at which horses have been observed without adverse effect, providing a substantial margin of safety. (Brown, 2022; USFWS, 1988; Huybregts, 2008)

Moreover, the County's residential exterior thresholds of 55 dBA Leq (daytime) and 45 dBA Leq (nighttime) are themselves derived from longstanding public-health research, including the EPA Levels Document. The EPA Levels Document identified ambient noise levels below which the public health and welfare of human receptors – including protection against hearing loss, sleep disturbance, speech interference, and general annoyance in outdoor residential and similar settings – would be safeguarded with an adequate margin of safety, and the County's residential thresholds reflect those protective levels. The human activities that drive these standards – sleep, speech communication, and outdoor enjoyment – occur at exposure durations and proximities considerably greater than those experienced by horses, which spend a substantial portion of their time at distances from property lines and are not vulnerable to the same speech-interference and sleep-disturbance effects that animate the human standards. In addition, while the equine auditory system is anatomically and physiologically similar to the human auditory system, horses are somewhat less sensitive to faint sounds than humans, with hearing thresholds approximately 5 to 15 dB higher than human hearing thresholds across the range of frequencies relevant to A-weighted environmental noise analysis. Applying the residential thresholds to equestrian properties is therefore a conservative approach: the thresholds are calibrated to protect a more continuously exposed and somewhat more noise-sensitive receptor (the human occupant) and, by extension, provide a meaningful margin of safety for the equine occupants and equestrian operations on the same and adjacent properties. (EPA, 1974)

For these reasons, the use of Riverside County's exterior residential noise standards of 55 dBA Leq (daytime) and 45 dBA Leq (nighttime) constitutes a reasonable, scientifically supported, and conservative basis for evaluating potential noise impacts on nearby equestrian-oriented properties, and the conclusions reached in Subsection 4.9 with respect to those receptors are supported by substantial evidence.

In addition to the County's absolute exterior residential noise level thresholds of 55 dBA Leq (daytime) and 45 dBA Leq (nighttime), this EIR applies a relative operational noise significance threshold of a 5.0 dBA Leq or greater Project-related increase at the nearest sensitive receivers. As discussed in greater detail in EIR Subsection 4.9, *Noise*, the 5.0 dBA Leq increase threshold is based on the Federal Interagency Committee on Noise (FICON) guidance and reflects the well-established acoustical principle that a "readily perceptible" noise level increase is the appropriate measure for determining the significance of a Project's contribution to the ambient noise environment. The 5.0 dBA Leq operational noise increase threshold is also appropriate when applied to nearby equestrian-oriented properties, for the same reasons discussed above with respect to the 80 dBA Leq absolute and 20 dBA Leq relative construction noise thresholds and the 55/45 dBA Leq operational thresholds. Specifically, the equine and human auditory systems are anatomically and physiologically similar; equine hearing sensitivity to faint sounds in the frequency range governed by A-weighted environmental noise analysis is comparable to or lower than that of humans; and horses are well-documented to habituate to continuous, predictable noise exposure that is not associated with danger. The 5.0 dBA Leq operational increase threshold is therefore equally protective of the equestrian component of the use, and provides a reasonable and conservative basis for evaluating the significance of Project-related

operational noise increases at both residential and equestrian-oriented receptors in the surrounding area. (Brown, 2022; Huybregts, 2008)

Summary of Project-Related Noise Impacts Affecting Sensitive Receptors

With respect to Project-related construction noise, and as indicated in the analysis presented in EIR Subsection 4.9, Project-related temporary 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. In addition, the Project would temporarily and intermittently 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 established in this EIR for construction activities.

The analysis presented in EIR Subsection 4.9 also includes an analysis of potential operational noise impacts that could result from implementation of the Project as proposed. Under long-term operational conditions, which includes all operational noise sources including the use of sound amplification equipment, 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 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; 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.

Accordingly, construction and operational activities that would be permitted under the proposed Project would not expose any nearby agricultural, equestrian-oriented, or winery properties to construction or operational noise levels exceeding Riverside County's threshold of significance for residential noise receptors, and as such Project indirect impacts to nearby properties would be less than significant.

Noise Impacts Affecting Agricultural Properties

In addition to the residential noise thresholds applied in EIR Subsection 4.9, the potential for Project-related noise to adversely affect equestrian and livestock operations on nearby agriculturally-zoned properties warrants separate consideration, as horses and livestock may react to sudden or sustained noise stimuli differently than human residential receptors. However, the record does not support a finding of significant indirect agricultural impact for the following reasons. First, the Galway Downs facility has operated as an active equestrian events center, including events with crowd noise, public address systems, and horse events, continuously since 1968. The equestrian and livestock operations on adjacent and nearby properties, including the Rancho California 5 Agricultural Preserve and the A-1-10 zoned properties to the southeast that contain FMMP-mapped "Farmland," have coexisted with these noise-generating activities for decades. Second, the proposed Project would not increase noise levels above those that currently occur under existing baseline conditions, as confirmed by the noise analysis in EIR Subsection 4.9, which

demonstrates that operational noise increases at the nearest sensitive receptors would range from 0.1 to 2.5 dBA Leq during the daytime, which is a change that is acoustically imperceptible under standard noise measurement methodology. Third, the primary new noise-generating element, exterior sound amplification under proposed Exception No. 9, would be limited to areas in the interior of the property between 8:00 a.m. and 10:00 p.m., and would be oriented away from the nearest agricultural properties to the east and southeast. For these reasons, the proposed Project would not expose nearby equestrian or livestock operations to noise conditions materially different from those to which they are already acclimated under baseline conditions, and indirect noise-related conversion of nearby agricultural lands would not occur. Impacts would be less than significant.

❑ **Project Indirect Impacts due to Lighting**

The Project would not expose nearby mapped "Farmland" to lighting impacts, thereby demonstrating that the Project would not result in adverse changes to the conditions necessary for continued agricultural use on nearby agricultural parcels (i.e., no light-driven changes to crop cycles, no glare affecting equestrian operations, etc.). As part of the application materials for CUP 02303R1, the Project Applicant has prepared electrical site plans identifying the locations of proposed permanent and temporary lighting elements, as previously depicted on EIR Figure 3-8, *Permanent Lighting Plan*, and Figure 3-10, *Temporary Lighting Plan – All Potential Temporary Parking*. As shown on EIR Figure 3-8, new permanent lighting elements only would be installed in the southwestern portion of the Project site and would include new permanent lighting for the existing stables in the southwestern portions of the property, within the existing pavilion area, near the warm-up tracks (Oval and Upper Oval), along the existing retail building located next to the existing barn/restaurant building in the southwest portion of the site, and within the parking lot in the southwestern portion of the site. Thus, the Project's permanent lighting elements would have no potential to adversely affect existing potential agricultural operations in the surrounding area. As shown on EIR Figure 3-10, temporary mobile lighting elements are proposed to illuminate the temporary parking areas that would be activated to serve events at the facility. Temporary lighting elements would be used infrequently during events that extend beyond sunset, and these temporary lighting elements would not be a permanent or fixed source of lighting in the local area.

In addition, a photometric plan (Sheet EO.2 of CUP 02303R1) has been prepared to demonstrate that Project-related temporary and permanent lighting would comply with Riverside County Ordinance No. 915 (Regulating Outdoor Lighting). Ordinance No. 915 requires that all outdoor luminaires, whether permanent or temporary, be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin or onto the public right-of-way. (Riverside County, 2012) The photometric plans included as part of CUP 02303R1 demonstrate that Project-related lighting would not direct any lighting onto the public right-of-way or onto adjacent properties, including on nearby agricultural, equestrian-oriented, or winery properties. Project-related lighting also would not spill onto the FMMP-mapped agricultural parcels across Pauba Road to the east and southeast or onto any other nearby agricultural, equestrian-oriented, or winery properties. Accordingly, and based on the preceding analyses, with implementation of CUP 02303R1 as proposed, the proposed Project would not indirectly impact nearby agricultural uses and would not result in conversion of Farmland to non-agricultural use, including nearby lands classified as "Farmland of Statewide

Importance" and "Prime Farmland," and as such Project indirect impacts due to lighting would be less than significant.

❑ **Project Indirect Impacts due to Nuisance Complaints**

The Project would be subject to the provisions of Ordinance No. 625 (as summarized above in subsection 4.1.2.B.1), which protects established agricultural operations from nuisance complaints arising from changed surrounding conditions and discourages the indirect conversion of agricultural land by insulating existing farming operations from incompatible land use pressure. The Project as evaluated herein would have no potential to result in direct or indirect impacts to the existing environment that, due to their location or nature, could result in the conversion of the nearby Prime Farmland or Farmland of Statewide Importance, or any other nearby agricultural, equestrian-oriented, or winery uses, to non-agricultural use.

❑ **Conclusion**

Based on the preceding analysis, the proposed Project would not result in any change in the existing environment that, due to its location or nature, could result in the conversion of nearby Farmland – including lands classified as "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland" – to non-agricultural use. As established in EIR Sections 2.0 and 3.0, the Project would continue to operate consistent with the 2023 environmental baseline and would not introduce operational activities beyond those already occurring at the Galway Downs facility. The Project would not physically disturb any off-site parcel currently being used for agricultural purposes; Project-related construction and operational noise levels would remain below the County of Riverside's adopted thresholds of significance at all nearby sensitive receivers, including the equestrian-oriented properties surrounding the Project site; Project-related lighting would be designed, shielded, and directed in compliance with Riverside County Ordinance No. 915 such that no light spillover would reach adjacent agricultural, equestrian-oriented, or winery properties; and the Project would be subject to the right-to-farm protections of Riverside County Ordinance No. 625, which insulate established agricultural operations from nuisance-based land use pressure. Accordingly, the Project would not indirectly affect the continued agricultural use of any surrounding Farmland or other agriculturally designated parcel, and indirect impacts of the Project on surrounding agricultural lands would be less than significant.

Threshold e.:	**Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?**
Threshold f.:	**Would the Project result in the loss of forest land or conversion of forest land to non-forest use?**
Threshold g.:	**Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?**

The Project site and surrounding areas are not zoned for forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned

Timberland Production (as defined by California Government Code Section 51104(g)) (RCIT, n.d.). As such, the Project has no potential to conflict with such zoning, and no impact would occur.

As shown in Figure 4.5.2 of the Riverside County General Plan Update EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update, aside from sparsely scattered lowland forests/woodlands there are no forestry resources in the Project's vicinity under existing conditions. The nearest forest land to the Project site is the Cleveland National Forest, located approximately 1.9 miles south of the Project site; however, no timber production occurs in association with the Cleveland National Forest (Riverside County, 2015a, Figure 4.5.2). Based on a review of aerial imagery, there are no forest-related uses within the vicinity of the Project site. As such, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

Although the Project would include the construction of an off-site sewer line between the northwest corner of the Project site and De Portola Road, the proposed sewer line would be installed beneath the ground surface and would occur along the eastern boundary of APN No. 927-690-005. In addition, APN No. 927-690-005 is not actively being used for the production of timber. Accordingly, construction of the proposed off-site sewer line would not interfere with any forestry-related uses, and no impact would occur.

Furthermore, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. No impact would occur.

4.1.6 Cumulative Impact Analysis

The cumulative study area for the evaluation of potential impacts to agriculture and forestry resources includes all of western Riverside County. Lands within western Riverside County generally exhibit similar climate, geologic, and soil characteristics, and agricultural production is evaluated by Riverside County and the State of California at the County level. Additionally, agricultural lands throughout western Riverside County are subject to future development that would preclude agricultural uses, based on the various land use designations applied to lands throughout western Riverside County by the County's General Plan and the general plans of other local jurisdictions.

As discussed under Threshold a., the entire 241.6-acre Project site is classified by the FMMP as "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands." As previously noted, "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands" are not considered "Farmland" as that term is defined by CEQA, the County, or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other "Farmland" as shown on the maps prepared pursuant to the FMMP of the California Resources Agency to non-agricultural use. Thus, based on the FMMP mapping, the Project would not result in the conversion of "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance (Farmland)" to a non-agricultural use, and cumulatively-considerable impacts would not occur.

Under existing conditions, the Project site is zoned WC-E, which is not an agricultural zoning classification based on Ordinance No. 625. Accordingly, the proposed Project would not conflict with existing agricultural

zoning and no cumulatively-considerable impacts would occur. Under existing conditions, the Project site operates as an equestrian-oriented facility, and the site's equestrian-related land uses would continue to occur under the proposed Project. In addition, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. Accordingly, the Project would not conflict with existing agricultural zoning, existing agricultural uses, Williamson Act contracts, or Riverside County agricultural preserves, and cumulatively-considerable impacts would not occur.

Although the Project site occurs adjacent to agriculturally-zoned property located to the southeast of the Project site, the Project would be subject to the provisions of Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Other cumulative developments similarly would be subject to compliance with Ordinance No. 625. Mandatory compliance with Ordinance No. 625 would ensure that cumulative development in the local area does not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Because both the Project and other cumulative developments would be required to comply with Ordinance No. 625, cumulatively-considerable impacts would be less than significant.

As discussed under the analysis of Threshold d., the Project would not introduce operational activities beyond the established 2023 environmental baseline, would not physically disturb any off-site agricultural parcel, and would not expose nearby Prime Farmland, Unique Farmland, Farmland of Statewide Importance, equestrian-oriented properties, or winery operations to construction noise, operational noise, lighting, or development pressures that would exceed the County's adopted thresholds of significance or otherwise differ materially from the conditions associated with existing facility operations. For the reasons set forth in the Threshold d. analysis, including the appropriateness of the County's residential noise thresholds for evaluating impacts on nearby equestrian-oriented properties, the absence of any light spillover beyond the Project site under Ordinance No. 915, and the Project's mandatory compliance with the right-to-farm provisions of Ordinance No. 625, the Project would not contribute any incremental pressure toward the conversion of nearby agricultural lands to non-agricultural use. In the broader cumulative context, western Riverside County is experiencing ongoing urbanization pressure that has resulted in a documented net loss of Important Farmland, as reported in the California Department of Conservation's 2016–2018 Farmland Conversion Report. The Project, however, does not propose to convert any land classified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and the Project site itself is classified as Farmland of Local Importance and Other Lands, neither of which constitutes "Farmland" for purposes of CEQA Appendix G. As established in the Threshold d. analysis, the Project's indirect effects on surrounding agricultural lands are de minimis under the County's adopted noise, lighting, and nuisance frameworks and would not combine with other cumulative development in the study area to produce a cumulatively considerable contribution to farmland conversion. All development in the cumulative study area, including the Project, is subject to the same uniform regulatory framework, including the County General Plan Noise Element, Ordinance No. 915, and Ordinance No. 625, that protects established agricultural operations from incompatible land use pressure. Accordingly, the Project's cumulative contribution to indirect impacts on agricultural lands would not be cumulatively considerable, and cumulative impacts would be less than significant.

The Project site and surrounding areas are not zoned for forest land (as defined in Public Resources Code (PRC) Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by California Government Code Section 51104(g)). As such, the Project has no potential to conflict with such zoning, and no cumulatively-considerable impacts would occur. In addition, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no cumulatively-considerable impacts due to the loss or conversion of forest land would occur. Furthermore, there are no components of the proposed Project that could result in the conversion of forest land to non-forest use, as there are no lands used for forest land uses; thus, no cumulatively-considerable impacts would occur.

4.1.7 Significance of Impacts Before Mitigation

Threshold a: No Impact. The entire 241.6-acre Project site is classified by the FMMP as "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands." "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines and by Riverside County to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." As previously noted, "Farmland of Local Importance," "Urban and Built-Up Land," and "Other Lands" are not considered "Farmland" as that term is defined by CEQA, the County, or the CDC, meaning that the Project would not convert "Prime Farmland," "Unique Farmland," "Farmland of Statewide Importance," or any other "Farmland" as shown on the maps prepared pursuant to the FMMP of the California Resources Agency to non-agricultural use. Thus, based on the FMMP mapping, the Project would not result in the conversion of "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance" (Farmland) to a non-agricultural use. No impact would occur.

Threshold b.: Less-than-Significant Impact. The Project site is zoned WC-E, which is not an agricultural zoning classification pursuant to Ordinance No. 625. The Project would be fully consistent with the WC-E zone because it would not displace or conflict with equestrian activity. To the contrary, its primary purpose is to attract higher level of competition for equestrian events and formalize uses already occurring under the established operational baseline, with all non-equestrian uses remaining subordinate to the site's equestrian character as reflected in the 75% permanent equine lands requirement of CZ 22000010. The Project site is not subject to any Williamson Act Contract or agricultural preserve. The nearest contracted land is separated from the Project site by Pauba Road, and no Project improvements would affect operations within the Agricultural Preserve. The off-site sewer line would be installed entirely below grade on a parcel that is neither actively farmed nor Williamson Act-encumbered, leaving no permanent above-ground infrastructure. Mandatory compliance with Ordinance No. 625 would further ensure that Project activities would not indirectly contribute to conversion of off-site farmland. Impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. Under existing conditions, the only property that comprises "agriculturally-zoned property" pursuant to Ordinance No. 625 is land to the southeast of the Project site that is zoned for "A-1-10" land uses. Although the Project site occurs adjacent to agriculturally-zoned property located to the southeast of the Project site, the Project would be subject to the provisions of Riverside County Ordinance No. 625, which protects agricultural operations from nuisance complaints and encourages the development, improvement, and long-term viability of agricultural land. Mandatory compliance with Ordinance No. 625 would ensure that Project-related construction and operational

activities would not indirectly cause or contribute to the conversion of off-site farmland to non-agricultural use. Based on mandatory compliance with Ordinance No. 625, impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. The proposed Project would not result in any change in the existing environment that, due to its location or nature, could result in the conversion of nearby Farmland – including lands classified as "Prime Farmland," "Farmland of Statewide Importance," or "Unique Farmland" – to non-agricultural use. As established in EIR Sections 2.0 and 3.0, the Project would continue to operate consistent with the 2023 environmental baseline and would not introduce operational activities beyond those already occurring at the Galway Downs facility. The Project would not physically disturb any off-site parcel currently being used for agricultural purposes; Project-related construction and operational noise levels would remain below the County of Riverside's adopted thresholds of significance at all nearby sensitive receivers, including the equestrian-oriented properties surrounding the Project site; Project-related lighting would be designed, shielded, and directed in compliance with Riverside County Ordinance No. 915 such that no light spillover would reach adjacent agricultural, equestrian-oriented, or winery properties; and the Project would be subject to the right-to-farm protections of Riverside County Ordinance No. 625, which insulate established agricultural operations from nuisance-based land use pressure. Accordingly, the Project would not indirectly affect the continued agricultural use of any surrounding Farmland or other agriculturally designated parcel, and indirect impacts of the Project on surrounding agricultural lands would be less than significant.

Thresholds e., f., and g.: No Impact. There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur.

4.1.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- The provisions of Ordinance No. 625 shall apply. Ordinance No. 625 requires that when lands are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future land buyers must be notified of any agricultural operations that are on-going in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints.

- All Project-related lighting, including both temporary and permanent lighting, is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside

County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

Design Features

There are no features inherent in the Project's design that are specifically included to reduce or avoid impacts to agriculture and forestry resources.

Mitigation

Project impacts to agriculture and forestry resources would be less than significant; therefore, mitigation measures are not required.

4.1.9 References

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4.2 AIR QUALITY

This EIR Subsection 4.2 is based on two technical reports prepared by Urban Crossroads, Inc. (UXR). The first report addresses the Project's potential to result in regional and localized air quality impacts, is titled, "Galway Downs (CUP02303R1) Air Quality Impact Analysis" (herein, "AQIA"), is dated March 4, 2026, and is included as *Technical Appendix B1* to this EIR (UXR, 2026a). The second report addresses the Project's potential to result in cancer and non-cancer related health risks during Project-related construction activities, and is titled, "Galway Downs (CUP02303R1) Construction Health Risk Assessment" (herein, "HRA"), is dated March 4, 2026, and is included as EIR *Technical Appendix B2* (UXR, 2026b). Refer to EIR Section 7.0, *References*, for a complete list of these and other reference sources.

4.2.1 Existing Conditions

A. South Coast Air Basin

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the 1977 Lewis-Presley Air Quality Management Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. As previously stated, the Project site is located within the SCAB, a 6,745 square-mile subregion of the SCAQMD, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego Air Basin to the south. (UXR, 2026a, p. 7)

B. Regional Climate

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to mid 60s (degrees Fahrenheit [°F]). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (UXR, 2026a, p. 7)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide (SO_2) to sulfates (SO_4) is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (UXR, 2026a, p. 7)

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately 9 inches in Riverside to 14 inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14.5 hours of possible sunshine. (UXR, 2026a, p. 7)

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (UXR, 2026a, p. 8)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO_X) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (UXR, 2026a, p. 8)

C. Wind Patterns

The distinctive climate of the Project area and the SCAB is determined by its terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Wind

patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season. (UXR, 2026a, p. 8)

D. Air Pollutants

1. Criteria Pollutants

Air quality regulations were first promulgated with the Federal Clean Air Act (CAA) of 1970. Air quality is defined by ambient air concentrations of seven "criteria air pollutants," which are a group of common air pollutants identified by the United States Environmental Protection Agency (U.S. EPA) to be of concern with respect to the health and welfare of the general public. Federal and State governments regulate criteria air pollutants by using ambient standards based on criteria regarding the health and/or environmental effects of each pollutant. The seven "criteria" air pollutants defined by the U.S. EPA are: (1) CO; (2) SO_2; (3) nitrogen dioxide (NO_2); (4) ozone (O_3); (5) respirable particulate matter with a diameter of 10 microns or less (PM_{10}), (6) fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and (7) lead (Pb). Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified below. (UXR, 2026a, pp. 8-9)

Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO emissions come from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment, and residential heating. CO concentrations tend to be highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. (UXR, 2026a, Table 2-1)

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O_2) supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with O_2 transport and competing with O_2 to combine with hemoglobin present in the blood to form carboxyhemoglobin. Hence, conditions with an increased demand for O_2 supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (O_2 deficiency) as seen at high altitudes. (UXR, 2026a, Table 2-1)

Sulfur Oxides (SO_x)

SO_2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants

and refineries. When SO_2 oxidizes in the atmosphere, it forms SO_4. Collectively, these pollutants are referred to as sulfur oxides (SO_X). Sources of SO_X include coal or oil burning power plants and industries, refineries, and diesel engines. (UXR, 2026a, Table 2-1)

A few minutes of exposure to low levels of SO_2 can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2. Animal studies suggest that despite SO_2 being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects of SO_2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor. (UXR, 2026a, Table 2-1)

Nitrogen Oxides (NO_X)

Nitrogen oxides (NO_X) consist of nitric oxide (NO), NO_2, and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with O_2. Their lifespan in the atmosphere ranges from one to seven days for NO and NO_2, to 170 years for N_2O. NO_X is typically created during combustion processes and are major contributors to smog formation and acid deposition. NO_X results from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment, and residential heating. NO_2 is a criteria air pollutant and may result in numerous adverse health effects. It absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by a regional monitoring station. (UXR, 2026a, Table 2-1)

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. In animals, exposure to levels of NO_2 considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of O_3 exposure increases when animals are exposed to a combination of O_3 and NO_2. (UXR, 2026a, Table 2-1)

Ozone (O_3)

O_3 is a highly reactive and unstable gas that is formed when reactive organic gases (ROG) and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing and storage, and pesticides. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. (UXR, 2026a, Table 2-1)

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for O_3 effects. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O_3 levels are associated with increased school absences. In recent years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and live in communities with high O_3 levels. O_3 exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes O_3 may be more toxic than exposure to O_3 alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes. (UXR, 2026a, Table 2-1)

Particulate Matter (PM)

Particulate matter (PM) includes inhalable particles with diameters that are generally 10 micrometers and smaller, which are referred to as PM_{10}, and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller, which are referred to as $PM_{2.5}$. (UXR, 2026a, Table 2-1)

PM_{10} is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Sources of PM_{10} include road dust, windblown dust, and construction. PM_{10} also is formed from other pollutants (acid rain, NO_X, SO_X, and organics), and from the incomplete combustion of any fuel. PM pollution is a major cause of reduced visibility (haze) which is caused by the scattering of light and consequently the significant reduction of air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Additionally, PM_{10} is a criteria air pollutant. (UXR, 2026a, Table 2-1)

$PM_{2.5}$ is a similar air pollutant to PM_{10} consisting of tiny solid or liquid particles that are 2.5 microns or smaller (often referred to as fine particles). $PM_{2.5}$ comes from fuel combustion in motor vehicles, equipment, and industrial sources, and residential and agricultural burning. $PM_{2.5}$ also is formed from reaction of other pollutants (acid rain, NO_X, SO_X, and organics). These particles are formed in the atmosphere from primary gaseous emissions that include SO_4 formed from SO_2 release from power plants and industrial facilities and nitrates that are formed from NO_X release from power plants, automobiles, and other types of combustion

sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions. $PM_{2.5}$ is a criteria air pollutant. (UXR, 2026a, Table 2-1)

A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels also have been related to hospital admissions for acute respiratory conditions in children, school and kindergarten absences, a decrease in respiratory lung volumes in normal children, and increased medication use in children and adults with asthma. Recent studies show that lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with preexisting respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$. (UXR, 2026a, Table 2-1)

Lead (Pb)

Lead (Pb) is a heavy metal that is highly persistent in the environment and is considered a criteria pollutant. In the past, the primary source of Pb in the air was emissions from vehicles burning leaded gasoline. The major sources of Pb emissions include ore and metals processing, particularly Pb smelters; resource recovery; the deterioration of Pb-based paints; and leaded gasoline use and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. (UXR, 2026a, Table 2-1)

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotients. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland), and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers. (UXR, 2026a, Table 2-1)

2. Additional Pollutants

The SCAQMD's primary focus is to achieve the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for criteria pollutants. However, it also has a broader mandate to control emissions of air contaminants and safeguard public health. As a result, SCAQMD regulates additional pollutants beyond criteria pollutants, including ROGs, volatile organic compounds (VOCs), and odors. Additional pollutants, their typical sources, and health effects are identified below.

Volatile Organic Compounds (VOCs)

VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms VOC and ROG are used interchangeably. (UXR, 2026a, Table 2-2)

Organic chemicals are widely used as ingredients in household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing and hobby products. Fuels are made up of organic chemicals. All of these products can release organic compounds while you are using them and, to some degree, when they are stored. (UXR, 2026a, Table 2-2)

Breathing VOCs can irritate the eyes, nose, and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several. (UXR, 2026a, Table 2-2)

Reactive Organic Gases (ROGs)

Similar to VOCs, ROGs are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_X react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms ROG and VOC (see previous) are used interchangeably. Sources and health effects are similar to VOCs, as discussed above. (UXR, 2026a, Table 2-2)

Odors

Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, natural sources, and vehicles. (UXR, 2026a, Table 2-2)

Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress. (UXR, 2026a, Table 2-2)

E. Existing Air Quality

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. NAAQS and CAAQS currently in effect are shown in Table 4.2-1, *Ambient Air Quality Standards*. (UXR, 2026a, p. 17)

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the State and federal standards. The most recent State and federal standards were updated by the California Air Resources Board (CARB) on July 16, 2024, and are presented in Table 4.2-1. The air quality in a region is considered to be in attainment by the State if the measured ambient air pollutant levels for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1- and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ are not to be exceeded. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the U.S. EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) is drafted by CARB. The SIP outlines the measures that the State will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the U.S. EPA will designate the area as a maintenance area. (UXR, 2026a, p. 17)

F. Regional Air Quality

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for seven of the most common air pollutants: CO, Pb, O_3, PM_{10}, $PM_{2.5}$, NO_2, and SO_2 which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 35 permanent monitoring stations and 2 single-pollutant source Pb air monitoring sites throughout the air district. On January 25, 2024, CARB adopted the proposed 2023 amendments to the State and national area designations. Table 4.2-2, *Attainment Status of Criteria Pollutants in the SCAB*, presents the attainment designations for the SCAB. Appendix 2.1 to the Project's AQIA (*Technical Appendix B1*) provides geographic representation of the State and federal attainment status for applicable criteria pollutants within the SCAB. (UXR, 2026a, p. 20)

G. Local Air Quality

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district in order to inform southern California residents about the air quality conditions. The Project site is located within the Temecula Valley area (SRA 26). The SRA 26 monitoring station is located approximately 6.6 miles northwest of the Project site and reports air quality statistics for O_3. The nearest station for CO, NO_2, and PM_{10} data was obtained from the Lake Elsinore area monitoring station, which is located approximately 21.2 miles northwest of the Project site in SRA 25. The nearest station for $PM_{2.5}$ data was obtained from the Coachella Valley 1 monitoring station which is located approximately 37.4 miles northeast of the Project site in SRA 30. It should be noted that data from the Lake Elsinore area and Coachella Valley 1 monitoring stations were utilized in lieu of the SRA 26 monitoring station only in instances where data was not available. (UXR, 2026a, p. 20)

Table 4.2-1 Ambient Air Quality Standards

Ambient Air Quality Standards						
Pollutant	**Averaging Time**	**California Standards [1]**		**National Standards [2]**		
		Concentration [3]	**Method [4]**	**Primary [3,5]**	**Secondary [3, 6]**	**Method [7]**
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	-	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µglm^3)		
Respirable Particulate Matter (PM_{10})[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		--		
Fine Particulate Matter ($PM_{2.5}$)[9]	24 Hour	--	--	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9.0 µg/m^3	15.0 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	--	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	--	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		--	--	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	--	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	-	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	-		-	0.5 ppm (1300 µglm^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	-	
	Annual Arithmetic Mean	-		0.030 ppm (for certain areas)[11]	-	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	-	-	High Volume Sampler and Atomic Absorption
	Calendar Quarter	-		1.5 µg/m^3 (for certain areas)[12]	Same es Primary Standard	
	Rolling 3-Month Average	-		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	**No National Standards**		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			
See footnotes on next page ...						

Table 4.2-1 Ambient Air Quality Standards (Cont'd)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U. S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant
7. Reference method as described by the U.S. EPA An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15.0 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990 California Air Resources Board (7/16/24)

(UXR, 2026a, Table 2-3)

Table 4.2-2 Attainment Status of Criteria Pollutants in the SCAB

Criteria Pollutant	State Designation	Federal Designation
O_3 - 1-hour standard	Nonattainment	--
O_3 - 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment
PB[1]	Attainment	Unclassified/Attainment

Note: See Appendix 2.1 of the Project's AQIA (*Technical Appendix B1*) for a detailed map of State/National Area Designations within the SCAB.
"-" = no standard.
(UXR, 2026a, Table 2-4)

The most recent three years of data available is shown in Table 4.2-3, *Project Area Air Quality Monitoring Summary 2022-2024*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2022 through 2024 were obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations. (UXR, 2026a, p. 20)

4.2.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to the issue of air quality.

A. Federal Regulations

1. Federal Clean Air Act

The CAA (42 U.S. Code Section 7401 *et seq.*) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes U.S. EPA to establish NAAQS to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include O_3, CO, NO_x, SO_2, PM_{10}, $PM_{2.5}$, and Pb.

One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop SIPs, applicable to appropriate industrial sources in the state, in order to achieve these standards. The CAA was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines.

Table 4.2-3 Project Area Air Quality Monitoring Summary 2022-2024

Pollutant	Standard	Year		
		2022	2023	2024
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.087	0.088	0.100
Maximum Federal 8-Hour Concentration (ppm)		0.079	0.082	0.077
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	0	0	1
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	4	3	6
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	0.9	1.3	1.8
Maximum Federal 8-Hour Concentration	> 20 ppm	0.6	0.7	1.0
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.037	0.042	0.045
Annual Federal Standard Design Value		0.007	0.007	0.007
PM_{10}				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	91	186	81
Annual Federal Arithmetic Mean (µg/m^3)		19.8	20.8	25.5
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	1	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	1	5	16
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	38.5	48.7	36.0
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	10.8	10.47	6.61
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	1	1	1

ppm = parts per million
µg/m^3 = microgram per cubic meter
Source: (UXR, 2026a, Table 2-5)

The sections of the federal CAA most directly applicable to implementation of the Project include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of O_3 (smog), CO, and PM_{10}. Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows the U.S. EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet federal air quality standards designed to protect public health. Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO_X on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas.

CAA Section 112 addresses emissions of hazardous air pollutants. Prior to 1990, CAA established a risk-based program under which only a few standards were developed. The 1990 CAA Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source.

For major sources, CAA Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, the U.S. EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk.

2. National Emissions Standards for Hazardous Air Pollutants Program

National Emission Standards for Hazardous Air Pollutants (NESHAPs) are stationary source standards for hazardous air pollutants. Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. The U.S. EPA develops national enforcement initiatives that focus on significant environmental risks and noncompliance patterns. For Fiscal Years 2014 to 2016, the Cutting Hazardous Air Pollutants National Initiatives Strategy focuses on categories of sources that emit HAPs.

Sources subject to NESHAPs are required to perform an initial performance test to demonstrate compliance. To demonstrate continuous compliance, sources are generally required to monitor control device operating parameters which are established during the initial performance test. Sources may also be required to install and operate continuous emission monitors to demonstrate compliance. Consistent with the U.S. EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, NESHAP sources that meet the CAA definition of "major source" generally receive a full compliance evaluation by the State or regional office at least once every two years.

B. State Regulations

1. California Clean Air Act

The California Clean Air Act (CCAA) establishes numerous requirements for district plans to attain State ambient air quality standards for criteria air contaminants. The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the CAAQS, by the earliest practical date. CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For districts with serious air pollution, its attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources.

2. Air Toxic Hot Spots Act

The Air Toxic Hot Spots Act (California Health and Safety Code Sections 44300, *et seq.*) requires facilities emitting specified quantities of pollutants to conduct risk assessments describing the health impacts to neighboring communities created by their emissions of numerous specified hazardous compounds. If the district determines the health impact to be significant, neighbors must be notified. In addition, State law

requires the facility to develop and implement a plan to reduce the health impacts to below significance, generally within five years. Additional control requirements for hazardous emissions from specific industries are established by the State and enforced by districts.

3. Air Quality Management Planning

CARB and local air districts throughout the State are responsible for developing clean air plans to demonstrate how and when California will attain air quality standards established under both the CAA and CCAA. For the areas within California that have not attained air quality standards, CARB works with local air districts to develop and implement State and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also include interim milestones for progress toward attainment. Air quality planning activities undertaken by CARB also include the development of policies, guidance, and regulations related to State and federal ambient air quality standards; coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies.

4. Title 24 Energy Efficiency Standards and California Green Building Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce greenhouse gas (GHG) emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and non-residential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. The 2022 Building Energy Efficiency Standards focuses on four key areas in newly constructed homes and businesses: (1) encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units; (2) establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt those technologies; (3) expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the State's progress toward a 100 percent clean electricity grid; and (4) strengthening ventilation standards to improve indoor air quality. The 2019 Building Energy Efficiency Standards already were 7% more efficient than the previous (2016) Building Energy Efficiency Standards for residential construction and 30% more efficient than the previous Standards for non-residential construction. The 2016 Building Energy Efficiency Standards also already were 28% more efficient for residential construction and 5% more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced.

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject to the requirements of the CALGreen Code.

As previously stated, the Title 24 Building Energy Efficient Standards and CALGreen Code are updated on a regular basis, with the most recent approved updates consisting of the 2025 Building Energy Efficiency Standards and 2025 CALGreen Code, which became effective on January 1, 2026. While the 2022 version introduced the first "electric-ready" requirements and expanded solar mandates, the 2025 update shifts the baseline for compliance to favor dual electric systems and more stringent efficiency metrics. The 2025 Title 24 standards require solar photovoltaic (PV) systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings. The CEC estimates that the 2025 code will save $4.8 billion in energy costs and reduce GHG emissions by 4 million metric tons (MMT) over its lifetime.

5. South Coast Air Quality Management District Rules

The SCAQMD enforces rules related to air pollutant emissions in the SCAB. Rules with applicability to the Project include, but are not limited to, those listed below.

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 431.2: Low Sulfur Fuel
- SCAQMD Rule 1113: Table of Standards
- SCAQMD Rule 1186: PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations
- SCAQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities

6. Senate Bill 535 – Disadvantaged Communities (2012)

Senate Bill (SB) 535 (De León, Chapter 830, 2012) recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality. Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. These investments are aimed at improving public health, quality of life, and economic opportunity in California's most burdened communities while at the same time reducing pollution that causes climate change. Authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), the State's cap-and-trade program

is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases. SB 535 requires that 25% of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. CalEPA is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (California Health and Safety Code, Section 39711[a]). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen).

7. Senate Bill 1000 – Environmental Justice in Local Land Use Planning (2016)

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed and Governor Brown signed SB 1000 in 2016, requiring local governments to identify environmental justice communities (called "disadvantaged communities") in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments' planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities.

8. Assembly Bill 617 (2017)

AB 617 was enacted into law in 2017 and relates to criteria air pollutants and toxic air contaminants from sources other than vehicles. In response to AB 617, CARB established the Community Air Protection Program (CAPP or Program). The Program's focus is to reduce exposure in communities most impacted by air pollution. Communities around the State are working together to develop and implement new strategies to measure air pollution and reduce health impacts. This first-of-its-kind statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air.

C. Local Regulations

1. Riverside County General Plan Air Quality Element

The Riverside County General Plan Air Quality Element identifies goals, policies, and programs that are meant to balance Riverside County's actions regarding land use, circulation, and other issues with their potential effects on air quality. The Air Quality Element addresses ambient air quality standards set forth by the U.S. EPA and CARB. The Air Quality Element contains policies designed to establish a regional basis for improving air quality. The following relevant and applicable policies from Riverside County's General Plan Air Quality Element have been identified for the Project:

AQ 1.1: Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.

AQ 1.4: Coordinate with the SCAQMD and [Mojave Desert Air Quality Management District (MDAQMD)] to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

AQ 2.1: The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

AQ 2.2: Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.

AQ 2.3: Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

AQ 3.1: Allow the market place, as much as possible, to determine the most economical approach to relieve congestion and cut emissions.

AQ 3.3: Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

AQ 4.1: Require the use of all feasible building materials/methods which reduce emissions.

AQ 4.2: Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.

AQ 4.6: Require stationary air pollution sources to comply with applicable air district rules and control measures.

AQ 4.7: To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.

AQ 4.9: Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.

4.2.3 Basis for Determining Significance

A. Thresholds of Significance

Section III of Appendix G to the California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") addresses typical adverse effects to air quality, and includes the following threshold questions to evaluate a project's impacts due to air quality emissions:

- *Would the project conflict with or obstruct implementation of the applicable air quality plan?*
- *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*
- *Would the project expose sensitive receptors to substantial pollutant concentrations?*
- *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section III of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact due to air quality emissions if construction and/or operation of the Project would:

a. *Conflict with or obstruct implementation of the applicable air quality plan;*
b. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard;*
c. *Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations; or*
d. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people*.

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to air quality emissions. Riverside County also has chosen to apply SCAQMD significance thresholds, as presented in SCAQMD's CEQA Air Quality Significance Thresholds (March 2023), to evaluate the Project's air quality impacts against the above thresholds.

4.2.4 Methodology

A. Overview

The proposed Project's potential air quality impacts are based on the nature and degree of air pollutant emissions that would be generated by the Project along with how those emissions are likely to affect regional and local air quality conditions within the SCAB. The analyses consider several factors, including: the

context of the development (i.e., the Project's physical relationship with and proximity to sensitive receptors and existing sources of air pollution); consistency with the SCAQMD's 2022 AQMP; the potential to result in a cumulatively-considerable net increase of any criteria pollutant for which the SCAB is in non-attainment under an applicable federal or State ambient air quality standard; the generation of short-term construction emissions and long-term operational emissions, including emissions from mobile, area, and stationary sources; the potential to expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants and localized concentrations of criteria pollutants; and the potential to create objectionable odors affecting a substantial number of people.

The analysis is based on a review of applicable federal, State, and local regulations and plans, as well as emissions modeling and air quality monitoring data. Specific information sources consulted in the preparation of this analysis include: ambient air quality standards and attainment designations established by the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB); the SCAQMD 2022 AQMP and associated CEQA Air Quality Handbook and significance thresholds; the SCAQMD's localized significance threshold methodology and look-up tables; emissions estimates prepared using the California Emissions Estimator Model (CalEEMod); ambient air quality monitoring data from the nearest representative SCAQMD monitoring station; the Riverside County General Plan and SWAP; and the Riverside County General Plan Amendment 960 Final EIR (EIR No. 521), which provides regional context for air quality conditions in western Riverside County.

B. Environmental Baseline

Under baseline conditions, the Project site is fully developed and has operated continuously as an equestrian-oriented events facility since 1968. Given the developed nature of the site and the extensive existing documentation of on-site physical conditions provided in EIR Section 2.0, the analysis of potential impacts to air quality relies on a comparison between established operating characteristics at the facility and any changes to operational activities that would occur with approval of the proposed Project. CEQA generally requires that the impacts of a project be evaluated against the conditions that exist at the commencement of the CEQA compliance process. As previously discussed in EIR Subsection 3.7.2.A, the operational characteristics of the Galway Downs facility that would be permitted by proposed CUP 02303R1 would be the same as what occurs under existing conditions.

While the Project's application materials include exhibits showing the maximum number of temporary and permanent parking spaces that could be accommodated at the facility, it is important to note that not all of the potential parking areas would be available during events, as space needed to host events at the facility would limit the location and number of temporary parking spaces that could be used to serve that event. As previously shown on EIR Figure 3-6, *Multiple Events Parking Exhibit*, during peak operations at the facility when multiple events are occurring, the facility only would be able to accommodate a maximum of 4,639 parking spaces. Data provided by the Project Applicant for 2023 includes days when the Galway Downs facility was operating at maximum capacity based on the amount of parking available at the facility, and shows that the facility had a peak of 5,757 one-way vehicular trips, which is more than the 4,639 vehicles that could be accommodated under the proposed Project based on available parking during multiple events. It is important to note that the 2023 peak occurred in the absence of the structured parking management

plan that would be required as a condition of CUP 02303R1; the parking management plan required under the proposed Project would impose a more formalized and consistently enforced ceiling on parking than currently exists. Accordingly, the proposed Project evaluated herein would not result in an increase in peak daily traffic-related air quality emissions beyond what already occurs under existing baseline conditions, even without assuming that existence of the parking management plan. Thus, an analysis of Project traffic-related operational air quality emissions is not necessary and is not provided herein as it clearly can be demonstrated that the proposed Project would have no potential to increase maximum daily traffic compared to the baseline condition, resulting in no increased vehicular-related air pollutant emissions.

Accordingly, the analysis herein evaluates the Project's potential to result in localized and regional air quality emissions and odors associated with the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar canopy structure, additional area for equestrian RV park use, and an off-site sewer line and roadway intersection improvements; and the future construction and operation of up to 36 park model lodging units and 18 additional employee modular housing units. (UXR, 2026a, pp. 28-29)

C. Scope of Analysis

1. Air Pollutant Modeling Methods

Regional and Localized Air Quality Emission Modeling

Land uses such as the Project affect air quality through construction-source and operational-source emissions. The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in the analysis presented herein. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources, and to quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the proposed Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendices 3.1 and 3.2 to the Project's AQIA (*Technical Appendix B1*), respectively. (UXR, 2026a, p. 25)

Construction-Related Mobile Source Health Risk Assessment Modeling

The analysis herein has been conducted in accordance with the guidelines in the *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (SCAQMD, 2003b). The U.S. EPA's American Meteorological Society/EPA Regulatory Model (AERMOD) model has been utilized. For purposes of analysis, the Lakes AERMOD View (Version 13.0.0) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View was utilized to incorporate the U.S. EPA's latest AERMOD Version 24142. (UXR, 2026b, p. 11)

2. Analysis Years

For purposes of analysis herein, it is assumed that construction activities associated with the Project would commence in January 2026 and would complete by October 2026. Although construction activities associated with the Project would commence at a later date than assumed, the analysis herein provides a "worst case" evaluation of the Project's potential construction-related impacts because air pollutant emissions in future years would be less than assumed herein due to the natural turnover of older construction equipment being replaced by newer, less polluting equipment. This would occur as a result of technological advancements and CARB requirements as reflected in the Statewide Average Annual Offroad Equipment Emission Factors, which are the standardized emission rates used to estimate air pollutant emissions from off-road construction equipment (e.g., excavators, loaders, graders, cranes) across California, developed by CARB. From an air quality analysis perspective, assuming construction activities would occur earlier than would actually occur presents a worst-case analysis of the maximum daily air pollutant emissions that would result from buildout of the Project.

Similarly, for Project-related operational emissions, although CalEEMod includes operational years through 2050, use of an earlier operational year (i.e., 2026) is conservative, and appropriate under CEQA to provide a worst-case analysis. Air pollutant emission factors for mobile sources and building energy use are expected to decline over time as a result of ongoing regulatory programs aimed at air quality improvement. As such, even though the activities associated with the Project would occur at a later date than the analytically assumed 2026 opening year, operational air pollutant emissions would not be greater and likely would be lower than those presented in this analysis. Accordingly, evaluating the Project's operational emissions using a 2026 operational year is expected to overstate, rather than understate, air pollutant emissions that would occur if the same facilities were modeled at a later year.

3. Construction Emissions Assumptions

Refer to Subsection 3.4 of the Project's AQIA (*Technical Appendix B1*) for a discussion of construction activities, construction duration, and construction equipment assumed as inputs in the analysis of the Project's construction-related air quality impacts. This information also is summarized in EIR Subsection 3.7.1. Construction-related emissions are evaluated herein for the near-term construction of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure, additional area for equestrian RV park use, and an off-site sewer line and roadway intersection improvements; and the future construction and operation of up to 36 park model lodging units and 18 additional employee modular housing units. As described in further detail in Subsection 3.4 of the Project's AQIA, construction activities associated with the Project would include removal of existing structures, fine grading, development and infrastructure installation activities, and paving. Each piece of equipment previously listed in Table 3-4 within EIR Section 3.0 is assumed to operate up to a total of eight hours per day. (UXR, 2026a, pp. 25-28)

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. The number of worker, vendor, and hauling trips per phase is presented below in Table 4.2-4, *Project Construction Trip Assumptions*. Worker trips are based on CalEEMod defaults.

It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. (UXR, 2026a, p. 27)

Table 4.2-4 Project Construction Trip Assumptions

Construction Activity	Worker Trips	Vendor Trips	Hauling Trips
Removal of Existing Structures	3	1	2
Fine Grading	20	3	0
Site Development	39	3	0
Paving	15	0	0

Source: (UXR, 2026a, Table 3-5)

4. Operational Emissions Assumptions

Refer to Subsection 3.5 of the Project's AQIA (*Technical Appendix B1*) for a discussion of area source emissions sources, energy-source emission sources, and stationary-source emissions that were assumed as inputs in the analysis of the Project's operational-related air quality impacts. As discussed in further detail in Subsection 3.5 of the Project's AQIA, CalEEMod modeling defaults were used to calculate the Project's natural gas demand in association with the Project's 36 park model lodging units and 18 additional employee modular housing units, although it should be noted that the Project would not result in a net increase in the consumption of natural gas as compared to existing (baseline) conditions. Thus, the resulting operational emissions disclosed herein in order to provide a "worst-case" analysis of the Project's potential operational impacts to air quality. Other operational sources of air quality emissions associated with the Project would include the increased use of consumer products and landscape maintenance equipment; energy source emissions, including anticipated increases in electricity consumption primarily associated with the new structures to be installed on site; and stationary source emissions, which includes the installation and operation of a new 300 horse-power diesel-powered fire pump. (UXR, 2026a, pp. 28-30)

D. Methodology for the Analysis of Threshold a.

The analysis of Threshold a. addresses Section III.a of Appendix G to the State CEQA Guidelines and evaluates whether the proposed Project would conflict with SCAQMD's 2022 Air Quality Management Plan (AQMP), which addresses State and federal requirements under the CAA. A conflict with the 2022 AQMP standards and requirements would inhibit the SCAQMD's ability to achieve State and federal standards for air quality, thereby leading to a significant air quality impact in the SCAB. A conflict with the SCAQMD 2022 AQMP would occur if the Project's construction or operations would exceed the SCAQMD regional thresholds or localized significance thresholds (LSTs), or if the Project were to exceed the growth assumptions in the AQMP based on the years of Project build-out phase.

E. Methodology for the Analysis of Threshold b.

Threshold b. addresses Section III.b of Appendix G to the State CEQA Guidelines, and emissions generated by a development project would be significant under Threshold b. if emissions are projected to exceed the Regional Thresholds established by the SCAQMD for criteria pollutants.

The SCAQMD has developed regional and localized significance thresholds for criteria pollutants emitted daily, as summarized in Table 4.2-5, *Regional Emissions Significance Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. (UXR, 2026a, p. 24)

Table 4.2-5 Regional Emissions Significance Thresholds

Pollutant	Construction	Operations
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = pounds per day
ppm = parts per million
$\mu g/m^3$ = micrograms per cubic meter
Source: (UXR, 2026a, Table 3-1)

F. Methodology for the Analysis of Threshold c.

Threshold c. addresses Section III.c of Appendix G to the State CEQA Guidelines. Under this threshold, impacts would be potentially significant if emissions are projected to exceed the Localized Significance Thresholds (LSTs) established by the State and the SCAQMD for criteria pollutants, if the Project would cause or contribute to CO "Hot Spots," or if Project-related construction or long-term operational activities would expose nearby sensitive receptors to substantial pollutant concentrations resulting in potential cancer or non-cancer health risk impacts. The methodologies for these evaluations are presented below.

1. Localized Significance Thresholds (LSTs)

The analysis of localized air quality impacts makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* ("LST Methodology") (SCAQMD, 2008). The SCAQMD has established that localized impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or State ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as LSTs. The SCAQMD established LSTs in response to the SCAQMD

Governing Board's Environmental Justice Initiative I-4.[1] LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor. (UXR, 2026a, p. 30)

The SCAQMD has developed localized significance thresholds for criteria pollutants, as summarized in Table 4.2-6, *Construction- and Operational-Related Localized Thresholds of Significance*. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. (UXR, 2026a, p. 24)

Table 4.2-6 Construction- and Operational-Related Localized Thresholds of Significance

Pollutant	Construction	Operations
NO_X	0.18 ppm	0.18 ppm
CO (1-hour average)	20 ppm	20 ppm
CO (8-hour average)	9 ppm	9 ppm
PM_{10}	10.4 µg/m^3	2.5 µg/m^3
$PM_{2.5}$	10.4 µg/m^3	2.5 µg/m^3

Source: (UXR, 2026a, Table 3-2)

2. Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use to the Project site where an individual could remain for 24 hours has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. (UXR, 2026a, pp. 31-32)

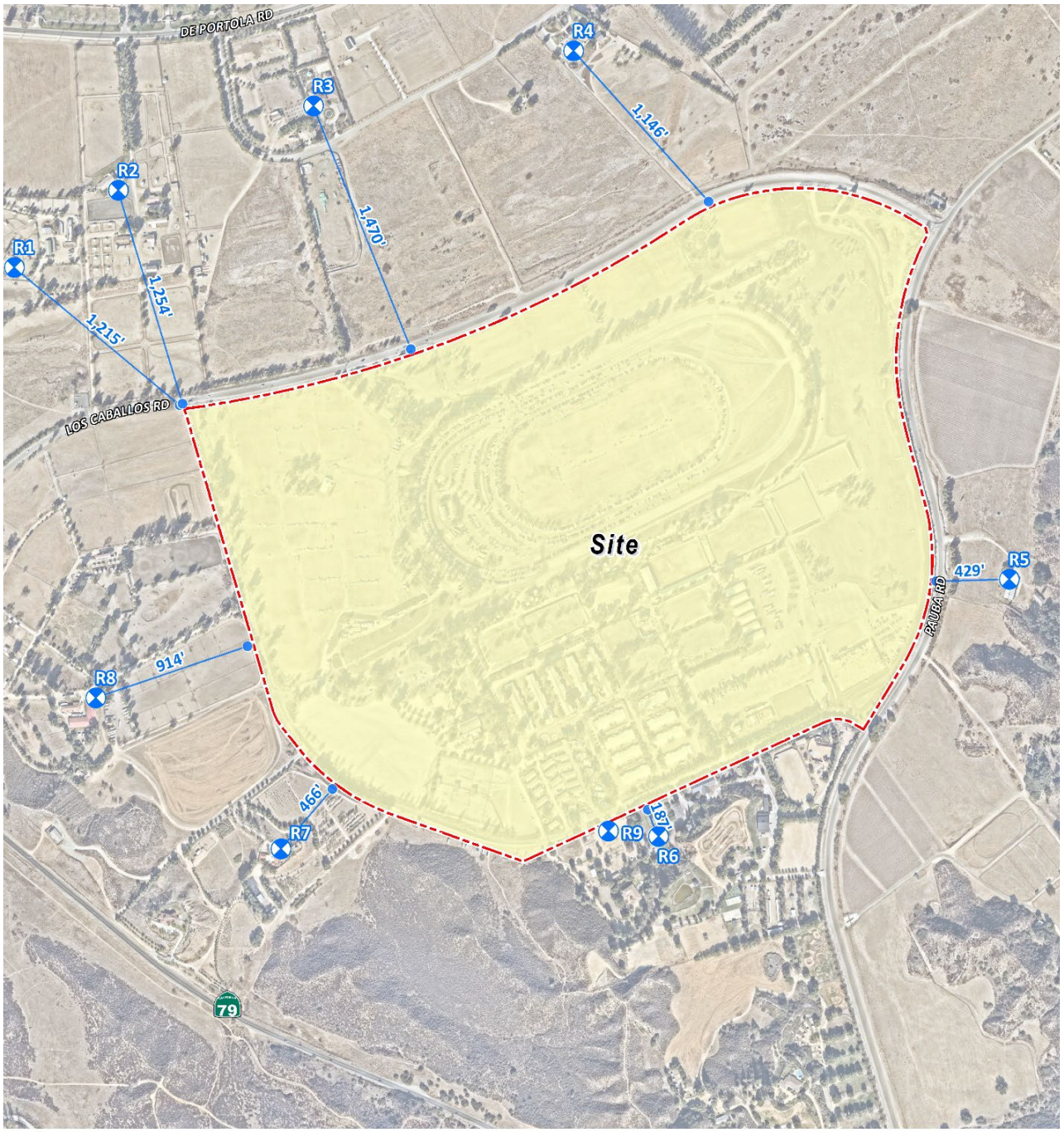
Per the LST Methodology, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically on-site for 8 hours or less. However, LST Methodology explicitly states that "LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours." Therefore, any adjacent land use where an individual could remain for 1 or 8 hours, that is located at a closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis must be

[1] The purpose of SCAQMD's Environmental Justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. Further, SCAQMD defines Environmental Justice as "...equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution." (UXR, 2026a, p. 30)

considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of 1 and 8 hours. (UXR, 2026a, p. 32)

Receptors in the Project study area are described below and shown on Figure 4.2-1, *Receptor Locations*. Localized air quality impacts were evaluated at sensitive receptor land uses nearest the Project site. All distances are measured in a straight line from the Project boundary to each receptor location. (UXR, 2026a, p. 32)

- Receptor R1: Location R1 represents the existing residence at 43540 Avenida Felicita, approximately 1,215 feet northwest of the Project site. Receptor R1 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R2: Location R2 represents the existing residence at 35325 De Portola Road, approximately 1,254 feet northwest of the Project site. Receptor R2 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R3: Location R3 represents the existing residence at 35536 Belle Chaine Loop, approximately 1,470 feet northwest of the Project site. Receptor R3 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R4: Location R4 represents the existing residence at 35897 Belle Chaine Loop, approximately 1,146 feet northwest of the Project site. Receptor R4 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R5: Location R5 represents the existing residence at 36435 Mustang Circle, approximately 429 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R5 is placed at the building façade.
- Receptor R6: Location R6 represents the existing residence at 38831 Pauba Road, approximately 187 feet south of the Project site. Receptor R6 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R7: Location R7 represents the existing residence at 44130 Maggie Weed Lane, located approximately 466 feet southwest of the Project site. Receptor R7 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R8: Location R8 represents the existing residence at 24020 Lawson Road, approximately 914 feet west of the Project site. Receptor R8 is placed at the private outdoor living areas (backyard) facing the Project site.
- Receptor R9: Location R9 represents the Temeku Equine, Inc. veterinary facility at 43250 Los Corralitos Road, located approximately 51 feet south of the Project site.



Source(s): UXR, 2026a

Figure 4.2-1

Not to Scale

Receptor Locations

The SCAQMD recommends that the nearest sensitive receptor be considered when determining a Project's impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). (UXR, 2026a, p. 34)

As previously stated, and consistent with LST Methodology, the nearest industrial/commercial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at these sites for periods of 1 to 8 hours. (UXR, 2026a, p. 34)

Evaluation of Construction-Source LST Emissions

Based on SCAQMD's LST Methodology, emissions for concern during construction activities are NO_X, CO, $PM_{2.5}$, and PM_{10}. The LST Methodology states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. (UXR, 2026a, p. 31)

It should be noted that in order to model worst-case conditions, the highest daily peak on-site emissions resulting from overlapping construction activity were modeled. A ground level release height and a 1 meter (approximately 3.28 feet) initial vertical dimension (sigma z) were utilized for fugitive dust emissions of PM_{10} and $PM_{2.5}$ consistent with SCAQMD's LST guidance. In order to account for equipment exhaust emissions from NO_2, CO, PM_{10}, and $PM_{2.5}$ a release height of 5.0 meters was utilized consistent with SCAQMD's LST guidance. In order to account for meteorological conditions at the Project site, meteorological data from the SCAQMD's Temecula monitoring station was utilized, as this is the nearest station to the Project site for which meteorological data is available. Additionally, a receptor height of 2 meters and regulatory default options were utilized consistent with SCAQMD's LST guidance. (UXR, 2026a, p. 31)

Evaluation of Operational-Source LST Emissions

As described in further detail in Subsection 3.6 of the Project's AQIA (*Technical Appendix B1*) and as discussed further under the analysis of Threshold c. in EIR Subsection 4.2.5, based on SCAQMD's LST Methodology, emissions for concern during long-term Project operations include on-site emissions of NO_X, CO, $PM_{2.5}$, and PM_{10}. Table 4.2-6 presents the SCAQMD's LSTs used to evaluate the potential significance of the Project's localized air quality impacts during long-term operational activities. Project-related localized emissions exceeding the operational LSTs presented in Table 4.2-6 would be considered a significant direct and cumulatively-considerable impact of the proposed Project. (UXR, 2026a, p. 34)

3. Localized Thresholds for CO Emissions

Based on the SCAQMD's CEQA Air Quality Handbook (1993), a project's localized CO emissions impacts would be significant if they exceed the following California standards for localized CO concentrations (UXR, 2026a, p. 35):

- 1-hour CO standard of 20.0 parts per million (ppm)

- 8-hour CO standard of 9.0 ppm

4. Toxic Air Contaminant Thresholds of Significance

The analysis herein also evaluates the Project's potential health risk impacts to sensitive receptors (i.e., existing residents in the surrounding area) and adjacent workers associated with the development of the Project, more specifically, health risk impacts associated with exposure to toxic air contaminants (TACs) including diesel particulate matter (DPM) from heavy-duty diesel trucks and equipment associated with on-site and off-site construction activity. The SCAQMD regulates levels of air toxics through a permitting process that covers both construction and operation. The SCAQMD has adopted Rule 1401 for both new and modified sources that use materials classified as air toxics. The SCAQMD CEQA Guidelines for permit processing consider the following types of projects significant (SCAQMD, 2017c):

- Any project involving the emission of a carcinogenic or toxic air contaminant identified in SCAQMD Rule 1401 that exceeds the maximum individual cancer risk of 10 in one million if the project is constructed with best available control strategy for toxics using the procedures in SCAQMD Rule 1401. (SCAQMD, 2017c)
- Any project that could accidentally release an acutely hazardous material or routinely release a toxic air contaminant posing an acute health hazard above an acute or chronic hazard index of 1.0. (SCAQMD, 2017c)

Although the Project's potential construction-related health risks also are considered herein, TAC analyses apply to the operational phase of a proposed project if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The only stationary source associated with the proposed Project is a new 300-horsepower diesel-powered fire pump that would be installed along the southern side of the existing race track. However, the fire pump is an emergency standby source that would not operate on a routine basis; rather, its operation would be limited to brief periodic testing and maintenance activities necessary to ensure operational readiness and to actual emergency situations (e.g., a fire on the property requiring suppression). Due to the limited and infrequent nature of fire pump operation, the fire pump would not result in sustained or routine emissions of DPM or other TACs at levels that could expose sensitive receptors to substantial pollutant concentrations. Additionally, although horse trailers, event support vehicles, and temporary generators may visit the site during equestrian competitions and special events, these uses are episodic rather than continuous or regular in nature. Unlike warehouse, distribution, or transfer uses where diesel trucks queue and idle on a daily basis, the Project's operational profile would not generate the sustained, high-frequency diesel activity that drives TAC operational analysis. Accordingly, due to the lack of routine stationary source TAC emissions and the absence of mobile sources subject to extended on-site idling, no operational TAC analysis is needed for the Project. (UXR, 2026b, p. 17)

Modeling Inputs for Construction-Related Mobile Source Health Risk Assessment

The Project's HRA (EIR *Technical Appendix B2*) was prepared based on SCAQMD guidelines to produce conservative estimates of risk posed by Project-related DPM emissions during Project-related construction

activities. The emissions calculations for the construction HRA are based on an assumed mix of construction equipment and durations as described in further detail EIR Section 3.0 (refer specifically to EIR subsection 3.7.1.B). (UXR, 2026b, p. 8)

The modeled emission sources for construction activity are illustrated on Exhibit 2-1 of the Project's HRA (EIR *Technical Appendix B2*). Consistent with SCAQMD's LST Methodology, DPM emissions from construction equipment were modeled using adjacent volume sources with a release height of 5 meters and an initial vertical dimension of 1.4 meters. On-road truck emissions were modeled as a line source (made up of multiple adjacent volume sources). (UXR, 2026b, p. 8)

To support the Project development, there would be off-site improvements include a sewer connection to De Portola Road, paving of driveways, installation of a traffic signal at Los Caballos Road and SR-79, and installation of acceleration/deceleration lanes along Los Caballos and Los Corralitos Roads with a total disturbance area of 4.10 acres. Construction emissions from this off-site work would, therefore, be relatively short term, not concentrated in one area, and would be reduced at any given location as construction work moves linearly along the existing public right-of-way and farther from sensitive uses. The physical constraints would limit the amount of construction equipment that could be used, and any off-site and utility infrastructure construction would not use equipment totals that would exceed the equipment totals previously presented in EIR Table 3-4. (UXR, 2026b, p. 9)

Exposure Quantification for Construction-Related Mobile Source Health Risk Assessment

The model offers additional flexibility by allowing the user to assign an initial release height and vertical dispersion parameters for mobile sources representative of a roadway. For purposes of evaluating Project construction-related DPM emissions, the roadways were modeled as adjacent volume sources. Roadways were modeled using the U.S. EPA's haul route methodology for modeling of on-site and off-site truck movement. More specifically, the Haul Road Volume Source Calculator in Lakes AERMOD View has been utilized to determine the release height parameters. Based on the U.S. EPA methodology, the Project's modeled sources would result in a release height of 3.49 meters and an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters. (UXR, 2026b, p. 11)

Model parameters are presented in Table 4.2-7, *AERMOD Model Parameters*. The model requires additional input parameters including emission data and local meteorology. Meteorological data from the SCAQMD's Temecula monitoring station was used to represent local weather conditions and prevailing winds. (UXR, 2026b, p. 11)

Table 4.2-7 AERMOD Model Parameters

Dispersion Coefficient (Urban/Rural)	Urban (population 2,492,442)
Terrain (Flat/Elevated)	Elevated (Regulatory Default)
Averaging Time	1 year (5-year Meteorological Data Set)
Receptor Height	0 meters (Regulatory Default)

Source: (UXR, 2026b, Table 2-3)

Universal Transverse Mercator coordinates for World Geodetic System 84 were used to locate the Project site boundaries, each volume source location, and receptor locations in the Project vicinity. The AERMOD dispersion model summary output files for the Project are presented in Appendix 2.3 to the Project's HRA (*Technical Appendix B2*). Modeled sensitive receptors were placed at residential and non-residential locations. (UXR, 2026b, p. 11)

Receptors may be placed at applicable structure locations for residential property and not necessarily the boundaries of the properties containing these uses because the human receptors (residents) spend a majority of their time at the residence and not on the property line. It should be noted that the primary purpose of receptor placement is focused on long-term exposure. For example, the HRA evaluates the potential health risks to residents over a period of 30 years of exposure. Notwithstanding, as a conservative measure, receptors were placed at either the outdoor living area or the building façade, whichever is closer to the Project site. (UXR, 2026b, p. 11)

Discrete receptors were placed in all directions nearest to the Project site and Project truck routes in order to account for the predominant wind directions in the Project vicinity (UXR, 2026b, p. 11).

For purposes of evaluating construction-related health risks, receptors include residential land uses in the vicinity of the Project. These receptors are included in the analysis since residents may be exposed at these locations over the course of Project construction. This methodology is consistent with SCAQMD and the State Office of Environmental Health Hazard Assessment (OEHHA) recommended guidance. (UXR, 2026b, p. 12)

Any impacts to residents located further away from the Project site than the modeled receptors would have a lesser impact than what has already been disclosed herein at the Maximally Exposed Individual Receptor (MEIR) because concentrations dissipate with distance. (UXR, 2026b, p. 12)

All receptors were set to existing elevation height so that only ground-level concentrations are analyzed. United States Geological Survey National Elevation Data terrain data using AERMAP was utilized in the HRA modeling to set elevations. (UXR, 2026b, p. 12)

Discrete variants for daily breathing rates, exposure frequency, fraction of time at home, and exposure duration were obtained from relevant distribution profiles presented in the 2015 OEHHA Guidelines. Table 4.2-8, *Exposure Assumptions for Individual Cancer Risk (Construction Activity)*, summarizes the Exposure Parameters for residents based on 2015 OEHHA Guidelines. Appendix 2.4 to the Project's HRA (*Technical Appendix B2*) includes the detailed risk calculation. (UXR, 2026b, p. 12)

Carcinogenic Chemical Risk for Construction-Related Mobile Source Health Risk Assessment

Excess cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to potential carcinogens over a specified exposure duration. The estimated risk is expressed as a unitless probability. The cancer risk attributed to a chemical

Table 4.2-8 Exposure Assumptions for Individual Cancer Risk (Construction Activity)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
0 to 2	1,090	10	0.80	1.00	250	8
16 to 41	230	1	0.80	1.00	250	8

Source: (UXR, 2026b, Table 2-4)

is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 10 in one million implies a likelihood that up to 10 people out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. (UXR, 2026b, p. 12)

Guidance from CARB and the State OEHHA recommend a refinement to the standard point estimate approach when alternate human body weights and breathing rates are utilized to assess risk for susceptible subpopulations such as children. For the inhalation pathway, the procedure requires the incorporation of several discrete variates to effectively quantify dose. Once determined, contaminant dose is multiplied by the CPF in units of inverse dose expressed in milligrams per kilogram per day $(mg/kg/day)^{-1}$ to derive the cancer risk estimate. Therefore, to assess exposures, the analysis relies on the dose algorithm described in Subsection 2.4 of the Project's HRA (*Technical Appendix B2*). (UXR, 2026b, p. 12)

Non-Carcinogenic Exposures for Construction-Related Mobile Source Health Risk Assessment

An evaluation of the potential noncarcinogenic effects of chronic exposures also was conducted. Adverse health effects are evaluated by comparing a compound's annual concentration with its toxicity factor or Reference Exposure Level (REL). The REL for diesel particulates was obtained from OEHHA for this analysis. The chronic REL for DPM was established by OEHHA as 5 micrograms per cubic meter ($\mu g/m^3$). Non-cancer health effects are expressed as a hazard index (HI), which is calculated using the equation provided in Subsection 2.5 of the Project's HRA (*Technical Appendix B2*). (UXR, 2026b, pp. 13-14)

Sensitive Receptors for Construction-Related Mobile Source Health Risk Assessment

The Project's HRA evaluates potential cancer and non-cancer related health risks at the same sensitive receptors locations utilized for the Project's AQIA, as previously described above in EIR subsection 4.2.4.F.2 and as previously depicted on Figure 4.2-1. (UXR, 2026b, p. 14)

G. Methodology for the Analysis of Threshold d.

Threshold d. evaluates Section III.d of Appendix G of the State CEQA Guidelines. SCAQMD Rule 402 ("Nuisance") and California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. The potential to violate Rule 402 or Section 41700

is used herein as a basis to consider a project's odors or other emissions to be significant and require feasible mitigation measures.

4.2.5 Impact Analysis

Threshold a.:	**Would the Project conflict with or obstruct implementation of the applicable air quality plan?**

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what used to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as State and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State and federal ambient air quality standards. Currently, these State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. (UXR, 2026a, p. 36)

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. (UXR, 2026a, p. 36)

It should be noted that although SCAG has released an updated 2024-2050 RTP/SCS, the 2022 AQMP is based on the 2020-2045 version of the RTP/SCS. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD 1993 CEQA Handbook. These indicators are discussed below. (UXR, 2026a, p. 36)

- ***Consistency Criterion No. 1:*** *The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

The violations that Consistency Criterion No. 1 refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded (UXR, 2026a, p. 36).

Construction Impacts – Consistency Criterion 1

As indicated under the analysis of Thresholds b. and c., below, the Project's regional and localized emissions during construction would be below the SCAQMD Regional Thresholds and LSTs. Accordingly, the proposed Project would be consistent with the AQMP according to this criterion. (UXR, 2026a, p. 36)

Operational Impacts – Consistency Criterion 1

As indicated under the analysis of Thresholds b. and c., below, the Project's operational-source emissions, including all non-mobile sources, were evaluated and found not to exceed the applicable regional or localized significance thresholds (refer to the analysis of Thresholds b. and c., below). Mobile-source emissions were not included in this analysis because the Project would not alter traffic volumes or associated mobile emissions. Accordingly, operation-related air quality impacts would be less than significant. On the basis of the preceding discussion, Project-related operational activities are determined to be consistent with the first criterion. (UXR, 2026a, pp. 36-37)

- ***Consistency Criterion No. 2:*** *The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in County of Riverside General Plan is considered to be consistent with the AQMP. (UXR, 2026a, p. 37)

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments but rather are a function of development scope and maximum area of disturbance. Irrespective of the Project site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds would be exceeded, Project-related construction activities would not result in a conflict with the AQMP according to this criterion. (UXR, 2026a, p. 37)

Operational Impacts – Consistency Criterion 2

The Project site is located within an unincorporated portion of the County of Riverside. As per the General Plan, the unincorporated portions of the County are divided into 19 area plans. These area plans provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. (UXR, 2026a, p. 37)

The County of Riverside General Plan and Southwest Area Plan designate the Project site for "Rural Residential (RR)" land uses, which allows for single-family residences with a minimum lot size of 5 acres, and allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses, and

governmental uses. Neighborhood-serving small-scale commercial uses that are compatible with the surrounding uses are allowed. (UXR, 2026a, p. 37)

New structures that are proposed be constructed, installed, or permitted on site as part of the Project include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure that is proposed to be placed over an existing arena to support rooftop solar panels, and an additional area for equestrian recreational vehicle park use. Additionally, areas are proposed where 36 park model lodging units could be placed and where 18 additional employee modular housing units could be placed; the design of these areas would be subject to future County approvals. In addition, several additional structures that were installed on the site without permits would be permitted as part of Conditional Use Permit (CUP) 02303R1, including an existing 1,513 square foot (s.f.) barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. These uses are all compatible with the Project site's adopted RR land use designation, as the expanded uses to be permitted as part of the Project represent both equestrian activities as well as limited commercial uses on site that are compatible with surrounding land uses. (UXR, 2026a, pp. 37-38)

The proposed Project does not include any proposal for a General Plan Amendment, as the Project is fully consistent with the site's adopted RR land use designation. Additionally, as part of their review of the proposed Project, Riverside County reviewed the Project for compliance with all applicable goals and policies of the Riverside County General Plan and determined that the Project would not conflict with any General Plan policy adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, Project impacts due to a conflict with the General Plan goals and policies would be less than significant. Furthermore, the Project as evaluated herein would not exceed the regional or localized air quality significance thresholds (refer to the analysis of Thresholds b. and c., below). (UXR, 2026a, p. 38)

On the basis of the preceding discussion, Project operational-related activities are determined to be consistent with the second criterion (UXR, 2026a, p. 38).

AQMP Consistency Conclusion

The Project would not have the potential to result in or cause NAAQS or CAAQS violations. The Project's proposed uses are consistent with the site's adopted General Plan land use designation and the Project would not exceed the regional or localized construction and operational thresholds; thus, the Project's development intensity is consistent with the development intensities allowed within the General Plan. As such, the Project is considered to be consistent with the AQMP, and impacts due to a conflict with the AQMP would therefore be less than significant. (UXR, 2026a, p. 38)

Threshold b.: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

A. Construction Emissions

1. Project-Related Construction Activities

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following construction activities: removal of existing structures, fine grading, site development, and paving, as described below. (UXR, 2026a, p. 25)

- Removal of Existing Structures. The proposed restroom building is intended to replace the existing trailer that currently serves as a public restroom. The existing trailer would not be demolished but instead would be hauled offsite, which is anticipated to require up to two total trips one-way or four total trips two-way. (UXR, 2026a, p. 25)

- Fine Grading. The proposed Project would result in approximately 78,489 square feet (1.8 acres) of new impervious areas on-site, which only would require fine grading. It is anticipated that no import/export would be required. As such, the analysis assumes a balanced site. (UXR, 2026a, p. 26)

- Site Development. In addition to the activities mentioned above, the construction of the proposed Project would include utility installation, building construction, and landscaping. For analytical purposes, these activities will be grouped under site development. (UXR, 2026a, p. 26)

- Paving. Paving emissions are primarily associated with exhaust emissions from on-site equipment and vehicular trips to the site by construction workers and vendor trips. (UXR, 2026a, p. 26)

- Off-Site Utility and Infrastructure Improvements. To support the Project development, there would be off-site improvements including a sewer connection to De Portola Road, paving of driveways, installation of a traffic signal at Los Caballos Road and SR-79, and installation of acceleration/deceleration lanes along Los Caballos and Los Corralitos Roads with a maximum disturbance area of approximately 4.10 acres. Construction emissions from this off-site work would, therefore, be relatively short term, not concentrated in one area, and would be reduced at any given location as construction work moves linearly along the existing public right-of-way and farther from sensitive uses. The physical constraints would limit the amount of construction equipment that could be used, and any off-site and utility infrastructure construction would not use equipment totals that would exceed the equipment totals previously presented in Table 3-4 within EIR Section 3.0. (UXR, 2026a, p. 26)

2. Construction Emissions Summary

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions without mitigation for both summer and winter periods are summarized in Table 4.2-9, *Construction Emissions Summary*. Detailed unmitigated construction model outputs are presented in Appendix 3.1 to the Project's AQIA (*Technical Appendix B1*). Under the assumed scenarios, emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the SCAQMD. Accordingly, construction activities associated with the proposed Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and construction-related regional air quality impacts would therefore be less than significant. (UXR, 2026a, p. 28)

Table 4.2-9 Construction Emissions Summary

Year	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
2026	4.10	30.00	30.00	0.06	4.30	2.30
Winter						
2026	4.10	30.00	30.00	0.06	4.30	2.30
Maximum Daily Emissions	4.10	30.00	30.00	0.06	4.30	2.30
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Note: Emissions estimates assume implementation of applicable dust control measures consistent with SCAQMD Rule 403.
Source: (UXR, 2026a, Table 3-6)

B. Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources: area source emissions, energy source emissions, and stationary source emissions. Mobile-source emissions are not included in the analysis as Project-related traffic is assumed to remain consistent with existing conditions (as discussed in EIR Subsection 3.7.2). As a result, mobile-source emissions would not change relative to existing conditions and are therefore excluded from the proposed Project-related emissions analysis. (UXR, 2026a, p. 28)

1. Area Source Emissions

Project operations are anticipated to result in area source emissions associated with the following activities/sources (UXR, 2026a, p. 29):

- Architectural Coatings. Over a period of time, the buildings that are part of the Project would require maintenance and would therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod. (UXR, 2026a, p. 29)

- Consumer Products. Consumer products include, but are not limited to, detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod. (UXR, 2026a, p. 29)
- Landscape Maintenance Equipment. Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines) by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod, which scales landscape maintenance equipment activity based on the size of the land use types and acreage associated with the new development components of the Project. It should be noted that the landscape maintenance emissions modeled in CalEEMod reflect only the new structures and associated landscaped areas that would be developed as part of the Project; existing developed portions of the Project site are anticipated to continue to be maintained consistent with existing landscaping practices and equipment, and their associated emissions are not newly attributed to the Project. The modeled emissions do not incorporate the emissions reductions that would be realized from implementation of AB 1346. (UXR, 2026a, p. 29)

2. Energy Source Emissions

Combustion Emissions Associated with Electricity and Natural Gas

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity. However, because electrical generating facilities for the Project area are located either outside the region (State) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are excluded from the evaluation of significance. Natural gas and electricity usage associated with the Project was calculated by CalEEMod. (UXR, 2026a, p. 29)

3. Stationary Source Emissions

The proposed Project was conservatively assumed to include installation of a 300 HP diesel-powered fire pump. The fire pump was estimated to operate for up to 0.5 hours per day for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered fire pump were calculated using CalEEMod. (UXR, 2026a, p. 29)

4. Operational Emissions Summary

Operational activities for summer and winter scenarios are presented in Table 4.2-10, *Summary of Peak Operational Emissions*. Detailed operation model outputs for the Project are presented in Appendix 3.2 to the Project's AQIA (*Technical Appendix B1*). As shown in Table 4.2-10, the Project would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. As such, operational activities associated with the proposed Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and Project operational-related regional air quality impacts would therefore be less than significant. (UXR, 2026a, p. 30)

Table 4.2-10 Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Area	3.42	0.93	3.97	0.01	0.07	0.07
Energy	0.04	0.72	0.46	0.00	0.06	0.06
Stationary	0.25	0.69	0.63	0.00	0.04	0.04
Maximum Daily Emissions	3.71	2.34	5.06	0.01	0.17	0.17
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area	3.07	0.90	0.38	0.01	0.07	0.07
Energy	0.04	0.72	0.46	0.00	0.06	0.06
Stationary	0.25	0.69	0.63	0.00	0.04	0.04
Maximum Daily Emissions	3.35	2.30	1.47	0.01	0.17	0.17
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (UXR, 2026a, Table 3-7)

Threshold c.: Would the Project expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?

During both construction and operation, the Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations. The following provides an analysis based on the applicable LSTs established by the State and SCAQMD, followed by an analysis of the Project's potential to result in or contribute to CO "hot spots" and a discussion and analysis of the Project's potential to result in impacts due to cancer- or non-cancer-related health risks during both construction and long-term operation.

A. Localized Significance Thresholds Analysis

1. Background on Localized Significance Threshold (LST) Development

The SCAQMD states that lead agencies can use LSTs as another indicator of significance in their air quality impact analyses. LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue

of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the LST Methodology. (UXR, 2026a, pp. 30-31)

2. Emissions Considered

Based on SCAQMD's LST Methodology, emissions of concern during construction activities are on-site NO_X, CO, $PM_{2.5}$, and PM_{10}. The LST Methodology clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. (UXR, 2026a, p. 31)

3. Dispersion Modeling

In order to estimate localized pollutant concentrations resulting from Project construction, the SCAQMD-approved AERMOD dispersion model was utilized. The modeling approach utilized is discussed below. (UXR, 2026a, p. 31)

Sources

It should be noted that in order to model worst-case conditions, the highest daily peak on-site emissions resulting from overlapping construction activity were modeled. A ground level release height and a one meter (approximately 3.28 feet) initial vertical dimension (sigma z) were utilized for fugitive dust emissions of PM_{10} and $PM_{2.5}$ consistent with SCAQMD's LST guidance. In order to account for equipment exhaust emissions from NO_2, CO, PM_{10}, and $PM_{2.5}$, a release height of 5.0 meters was utilized consistent with SCAQMD's LST guidance. (UXR, 2026a, p. 31)

Meteorological Data and Model Options

In order to account for meteorological conditions at the Project site, meteorological data from SCAQMD's Temecula monitoring station was utilized, as this is the nearest station to the Project site for which meteorological data is available. Additionally, a receptor height of two meters and regulatory default options were utilized, consistent with SCAQMD's LST guidance. (UXR, 2026a, p. 31)

Receptors

Refer above to EIR subsection 4.2.3.F.2 and Figure 4.2-1 for a description and graphical depiction of receptor locations considered in the LST analysis (UXR, 2026a, pp. 31-34)

4. Construction-Source Localized Emissions

Emissions during the peak construction activity would not exceed SCAQMD's LSTs at the maximally exposed receptor location, as shown in Table 4.2-11, *Construction Localized Significance Summary*. All other modeled locations in the study area would experience lower concentrations, resulting in a reduced impact. AERMOD Outputs from the model runs for construction LSTs are provided in Appendix 3.3 to the Project's

AQIA (*Technical Appendix B1*). Accordingly, the Project's localized impacts during construction activity would be less than significant. (UXR, 2026a, p. 34)

Table 4.2-11 Construction Localized Significance Summary

Peak Construction	CO		NO2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.01	2.78E-03	7.48E-03	0.08	0.07
Background Concentration [A]	1.80	1.00	0.045	--	
Total Concentration	1.81	1.00	0.05	0.08	0.07
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**

A. Highest concentration from the last three years of available data.
Notes: PM_{10} and PM2.5 concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm.
Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO_2.
Source: (UXR, 2026a, Table 3-8)

5. Operational-Source Localized Emissions

The LST analysis generally includes on-site sources (area, energy, and on-site cargo handling equipment, as previously discussed above). In order to account for any potential impacts on on-site receptors as a result of operational activity, a scenario conservatively assuming 2026 emissions was analyzed. As shown in Table 4.2-12, *Localized Significance Summary for Peak Operations*, emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed on-site receptors as a result of operational activities. Accordingly, Project-related regional operational air quality emissions would be less than significant. (UXR, 2026a, p. 34)

Table 4.2-12 Localized Significance Summary for Peak Operations

Peak Operations	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	6.91E-04	5.12E-04	1.95E-04	0.01	0.01
Background Concentration	1.80	1.00	0.045	--	--
Total Concentration	1.80	1.00	0.05	0.01	0.01
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (UXR, 2026a, Table 3-9)

B. Carbon Monoxide (CO) "Hot Spot" Analysis

A CO hot spot is defined as a localized concentration of carbon monoxide exceeding the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time the most recent CEQA Air Quality

Handbook (1993) was published by SCAQMD, the air basin was designated as nonattainment, requiring projects to perform hot spot analyses to ensure they did not worsen the existing conditions. Over the last two decades, background CO concentrations have been significantly reduced due to regulatory controls on tailpipe emissions, which have culminated in the air basin achieving attainment status for CO. (UXR, 2026a, p. 35)

The 2003 AQMP's findings underscore that CO hot spots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the State's attainment status for CO further diminish the need for detailed microscale hot spot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns. (UXR, 2026a, p. 35)

In 2003, SCAQMD as part of its AQMP development process, prepared modeling to determine the potential for CO hot spots at the four busiest intersections in the air basin. As summarized in the 2003 AQMP, even at one of the busiest intersections at that time, only 0.7 ppm of CO is attributable to vehicular traffic and the remaining 7.7 ppm were due to ambient background conditions. As previously shown in Table 4.2-3, the background 1-hour and 8-hour concentrations are well below the applicable AAQS. (UXR, 2026a, p. 35)

Since Project-related mobile activity is assumed to remain consistent with existing conditions, the Project would not result in changes to traffic volumes or vehicle emissions. Accordingly, Project-related traffic at nearby intersections would not cause or contribute to a CO hot spot, as background CO concentrations are low and mobile-source emissions would not change relative to existing conditions. (UXR, 2026a, p. 35)

C. Project Construction-Related DPM Source Cancer and Non-Cancer Risks

Provided below is a summary of the results of the HRA for the MEIR, Maximally Exposed Individual Worker (MEIW), and Maximally Exposed Individual School Child (MEISC) for Project-related construction activities.

1. Residential Exposure Scenario

The land use with the greatest potential exposure to Project construction-source DPM emissions is Receptor R6 (refer to Figure 4.2-1), which represents the existing residence at 38831 Pauba Road, approximately 187 feet south of the Project site. Receptor R6 is placed at the structure directly facing the Project site and represents the MEIR. The maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 0.52 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than or equal to 0.01, which would not exceed the applicable threshold of 1.0. Receptor R6 would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. As such, based on the previous discussion, cancer and non-cancer risks would be less than significant and no mitigation is required. Because all other modeled receptors would experience lower concentrations of DPM during Project construction, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a

significant human health or cancer risk to adjacent residential land uses as a result of Project construction activity, and impacts would be less than significant. (UXR, 2026b, p. 16)

2. Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project construction-source DPM emissions is Receptor R9 (refer to Figure 4.2-1), which represents the existing Temeku Equine, Inc. veterinary facility at 43250 Los Corralitos Road, located approximately 51 feet south of the Project site, and represents the MEIW. At the MEIW, the maximum incremental cancer risk impact is 0.02 in one million which is less than the SCAQMD threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be less than or equal to 0.01, which would not exceed the applicable significance threshold of 1.0. As such, based on the previous discussion, cancer and non-cancer risks would be less than significant and no mitigation is required. Receptor R7 is the worker receptor that would experience the highest concentrations of DPM during Project construction due to meteorological conditions at the site. All other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby workers during construction activities, and impacts would be less than significant. (UXR, 2026b, p. 16)

3. School Child Exposure Scenario

Proximity to sources of toxins is critical to determining the impact. In published studies, the range of relative cancer risk and the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80% drop-off in pollutant concentrations is expected at approximately 1,000 feet from a source. These findings demonstrate that proximity is a key factor in assessing health risks relative to mobile sources and other emission sources, including construction-related activities. (UXR, 2026b, pp. 16-17)

The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. (UXR, 2026b, p. 17)

A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust than and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above. (UXR, 2026b, p. 17)

Schools were not analyzed in the Project's HRA because there are no schools located within one-quarter mile of the Project site, which is the standard evaluation distance for identifying potentially affected sensitive receptors. The nearest school is the Tony Tobin Elementary School, located at 45200 Morgan Hill Drive in the City of Temecula, approximately 2.1 miles southwest of the Project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than

one-quarter mile from the air pollution source, there would be no significant impacts that would occur to any schools in the vicinity of the Project. Therefore, the Project would not cause a significant human health or cancer risk to nearby school children, and impacts would be less than significant. (UXR, 2026b, p. 17)

D. Project Operational-Related DPM Source Cancer and Non-Cancer Risks

The Project evaluated herein consists of proposed 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, approval of which generally would allow the Project 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 sports events (primarily on the weekends and holiday 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. New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed CUP 02303R1 include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure, and additional area for equestrian recreational vehicle park use. Existing structures that would be permitted with the Project include an existing 1,513 square foot (s.f.) barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future; the design of these areas would be subject to future County review and approvals.

TAC analyses apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, and thus, due to the lack of significant stationary source emissions, no TAC analysis is needed for long-term operations and no impact would occur. (UXR, 2026b, p. 17)

E. Community Health

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (commonly referred to as the "Friant Ranch" decision), the California Supreme Court held that an EIR must make a "reasonable effort" to correlate a project's air pollutant emissions with specific human health impacts, or alternatively, explain in plain terms why such a correlation is not reasonably feasible. The Court further recognized, however, that connecting a project's air emissions to particular health consequences is often difficult, and that lead agencies retain the discretion to determine, based on substantial evidence, that quantitative correlation of project-level emissions to specific human health outcomes is not feasible in a given case. As discussed below, that determination is appropriate here.

Most local agencies, including Riverside County, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development

project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), Riverside County has determined that existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Consistent with the discretion recognized by the Court in Friant Ranch, this determination is supported by substantial evidence and reflects the County's reasoned professional judgment regarding the limits of currently available analytical tools. Instead, readers are directed to the Project's AQIA (*Technical Appendix B1*) as presented above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation.

Notwithstanding, the Project's AQIA (*Technical Appendix B1*) does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ by comparing the proposed Project's on-site emissions to the applicable SCAQMD LSTs. The LST analysis above determined that the Project would not result in localized emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ that would exceed the SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$, both of which are established for the express purpose of protecting public health with an adequate margin of safety.

Because the Project's emissions would comply with federal, State, and local air quality standards that have been established for the protection of public health, the proposed Project's incremental emissions are not at a magnitude that would meaningfully correlate to identifiable, Project-specific health effects through any currently available regional modeling program. Attempting to model Project-specific health effects at this level of emissions would not provide a reliable indicator of health effects and would constitute the kind of speculative analysis that the California Supreme Court in Friant Ranch acknowledged is not required. The disclosure provided in this Community Health discussion, the localized significance analysis presented in the Project's AQIA, and the regional and operational emissions analyses presented elsewhere in this EIR collectively constitute the reasonable effort to address health-related effects that Friant Ranch requires under the circumstances of this Project.

Threshold d.: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. (UXR, 2026a, p. 39)

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the

temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. (UXR, 2026a, p. 39)

The proposed Project would entail a continuation of activities at an existing equestrian-related events facility and would not introduce new odor-generating uses or expand current operations. The Project site is located within a rural area characterized by surrounding agricultural and equestrian land uses that are not considered sensitive to agricultural-related odors, as such odors are typical and expected in this setting. Existing equestrian activities already generate intermittent odors associated with horse stalls and manure management. However, these conditions would not increase under the Project. Current best management practices would continue, including the use of absorbent shavings in stalls, daily and in some cases twice-daily cleaning, and removal of manure and soiled bedding within 24 hours by a third-party-hauler, with no long-term on-site storage of byproducts. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed Project would be less than significant and no mitigation is required. (UXR, 2026a, p. 39)

4.2.6 Cumulative Impact Analysis

With exception of the issue of odors, the cumulative study area for air quality includes Riverside County and the SCAB. The SCAB is designated as a nonattainment area for State standards of O_3, PM_{10}, and $PM_{2.5}$. The region also is designated as a nonattainment area for federal standards of O_3 and $PM_{2.5}$. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source. (UXR, 2026a, pp. 39-40)

As previously shown in Table 4.2-2, the CAAQS designates the Project site as nonattainment for O_3 PM_{10}, and $PM_{2.5}$ while the NAAQS designates the Project site as nonattainment for O_3 and $PM_{2.5}$. The SCAQMD has published a report on how to address cumulative impacts from air pollution, titled, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. Page D-3 of this SCAQMD report clearly states:

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for [Toxic Air Contaminant (TAC)] emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should*

be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. (UXR, 2026a, pp. 39-40)

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant." (UXR, 2026a, p. 40)

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively-considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Conversely, project-level construction and operational emissions that exceed SCAQMD thresholds would be considered cumulatively considerable. SCAQMD's thresholds of significance for project-specific direct and cumulatively-considerable impacts have clearly been successful, as application of these thresholds has led to significant air quality improvements throughout the SCAB. (UXR, 2026a, p. 40)

As discussed under the analysis of Threshold a., based on the level of air quality emissions anticipated for the proposed Project, the proposed Project would not result in a conflict with the SCAQMD AQMP. Because the Project would be consistent with and would not interfere with implementation of the SCAQMD AQMP, the Project's cumulatively-considerable impacts due to a conflict with the SCAQMD AQMP would be less than significant.

The Project-specific evaluation of emissions presented under the analysis of Threshold b. demonstrates that the Project's construction and operational regional emissions of criteria pollutants would be below the SCAQMD Regional Thresholds (refer to Table 4.2-9 and Table 4.2-10). Therefore, the Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and cumulatively-considerable impacts would be less than significant.

As indicated under the analysis of Threshold c., the Project's localized emissions during construction would be below the applicable SCAQMD LSTs for emissions of criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations (refer to Table 4.2-11). In addition, the Project's localized emissions during long-term operations also would be below the applicable SCAQMD LSTs for emissions of criteria pollutants and would not expose sensitive receptors to substantial pollutant concentrations (refer to Table 4.2-12). Additionally, the analysis under Threshold c. provides substantial evidence that the proposed Project would not cause or contribute to any CO "hot spots." Furthermore, Project construction-related DPM emissions would not expose nearby sensitive receptors, including the MEIR, MEIW, and MEISC, to cancer or non-cancer health risks exceeding the thresholds of significance of 10 in one million and 1.0, respectively; therefore, based on SCAQMD guidance, the Project's localized DPM-related health risk

impacts during construction would be less than significant on a cumulatively-considerable basis. Additionally, under long-term operating conditions, the proposed Project would not have the potential to expose sensitive receptors to substantial pollutant concentrations, and cumulatively-considerable impacts related to operational health risks would not occur. Thus, Project-related air quality emissions would not expose nearby sensitive receptors to substantial pollutant concentrations and impacts would be less-than-cumulatively considerable.

With respect to odors, and as discussed under the analysis of Threshold d., the proposed Project would be required to comply with SCAQMD Rules 1113, 402, and 431.2 to prevent occurrences of public nuisances (including odors) during both construction and long-term operation and would be subject to Riverside County's solid waste regulations (Riverside County Ordinance No. 745). Other developments within the cumulative study area similarly would be required to comply with SCAQMD rules and regulations and the solid waste regulations of the applicable local jurisdictions. Therefore, Project impacts due to other emissions (such as those leading to odors) would be less-than-cumulatively considerable.

4.2.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project's regional and localized construction- and operational-source emissions would not exceed applicable regional significance thresholds or LSTs. Additionally, the Project is consistent with the site's existing General Plan land use designation, and the analyses of Thresholds b. and c. demonstrate that the Project's construction and long-term operational activities would not exceed any of the SCAQMD Regional Thresholds or LSTs. As such, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

Threshold b.: Less-than-Significant Impact. As indicated in Table 4.2-9 and Table 4.2-10, Project construction- and operational-related regional emissions would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants. As such, Project regional construction- and operational-related emissions would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard, and impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. As indicated in Table 4.2-11 and Table 4.2-12, Project-related construction and operational emissions would not exceed the SCAQMD LSTs for any criteria pollutant. Additionally, Project-related traffic at nearby intersections would not cause or contribute to a CO hot spot, as background CO concentrations are low and mobile-source emissions would not change relative to existing conditions. Furthermore, construction activities associated with the proposed Project would not expose nearby sensitive receptors, including the MEIR, MEIW, and MEISC, to cancer or non-cancer health risks due to DPM emissions exceeding the thresholds of significance of 10 in one million and 1.0, respectively; therefore, based on SCAQMD guidance, the Project's localized DPM-related health risk impacts during construction would be less than significant. Additionally, under long-term operating conditions, the proposed Project would not have the potential to expose sensitive receptors to substantial pollutant concentrations, and significant cancer or non-cancer health risk impacts would not occur.

Therefore, the Project would not expose sensitive receptors, which are located within one mile of the Project site, to substantial pollutant concentrations, and impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. The proposed Project would entail a continuation of activities at an existing equestrian-related events facility and would not introduce new odor-generating uses or expand current operations. The Project site is located within a rural area characterized by surrounding agricultural and equestrian land uses that are not considered sensitive to agricultural-related odors, as such odors are typical and expected in this setting. Existing equestrian activities already generate intermittent odors associated with horse stalls and manure management. However, these conditions would not increase under the Project. Current best management practices would continue, including the use of absorbent shavings in stalls, daily and in some cases twice-daily cleaning, and removal of manure and soiled bedding within 24 hours by a third-party hauler, with no long-term on-site storage of byproducts. Additionally, potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed Project would be less than significant and no mitigation is required.

4.2.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- The Project is required to comply with the provisions of SCAQMD Rule 403, "Fugitive Dust," by implementing the following dust control measures during construction activities, such as earth-moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, Riverside County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.
    - All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.

- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the midmorning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.

- The Project is required to comply with the provisions of SCAQMD Rule 1113, "Table of Standards," by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the SCAQMD Table of Standards.
- The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 431.2 (Low Sulfur Fuel) and Rule 1186 / 1186.1 (Street Sweepers).
- The Project is required to comply with the provisions of SCAQMD Rule 402, "Nuisance," which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.

Design Features

Although there are no features inherent in the Project's design that are specifically included to reduce or avoid impacts due to air quality emissions, future operations at Galway Downs would continue to be subject to best management practices to address potential odor impacts, as outlined in the Project's Manure Management Program, which is included in the Project's Application Materials (available at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501 during the County's normal business hours). Measures outlined in the Manure Management Program and that would be enforced as part of proposed CUP 02303R1 include, but are not necessarily limited to, the use of absorbent shavings in stalls; daily and in some cases twice-daily cleaning; and removal of manure and soiled bedding within 24 hours by a third-party hauler, with no long-term on-site storage of byproducts.

Mitigation

❑ **Project-Specific Mitigation**

Project impacts to air quality would be less than significant; therefore, mitigation measures are not required.

❑ **Applicable Mitigation Measures from the Temecula Wine Country Community Plan Program Environmental Impact Report**

Although mitigation measures are not required, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's air quality emissions during construction activities. Refer also to EIR *Technical Appendix K*, which includes an analysis demonstrating why WCCP PEIR mitigation measures not

listed below either are not applicable to the proposed Project, or includes an explanation that the required measures already have been addressed either as part of the Project's application materials or through the analysis conducted as part of this EIR for the Galway Downs Project.

WCCP PEIR MM AQ-10: The County shall require implementing projects to comply with the following Mitigation Measures for Construction Equipment and Vehicles Exhaust Emissions:

- The County shall require implementing projects to select construction equipment to be used on site based on low emission factors (equipment which releases little atmospheric pollutants) and high energy efficiency (equipment which requires less energy to do the same work). Examples of low emission and high energy efficiency equipment include use of EPA Tier 2 (or better) emission compliant construction equipment and use of alternative fueled construction equipment (natural gas) as deemed appropriate by the County during application review (see GHG-1 for criteria).
- The County shall require implementing projects to include a statement on grading plans that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.
- The County shall require implementing projects to utilize electric- or diesel-powered equipment, in lieu of gasoline-powered engines, as deemed appropriate by the County during application review (see GHG-1 for criteria).
- The County shall require implementing projects to include a statement on grading plans that work crews will shut off equipment when not in use. During smog season (May through October), the overall length of the construction period will be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time.
- The County shall require implementing projects to time construction activities so as to not interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site; if deemed necessary by the County to maintain acceptable levels of service and safety, a flag person shall be retained to maintain safety adjacent to existing roadways.
- The County shall require implementing projects to use EPA-rated engines of Tier 3 or better, or prevailing ARB construction fleet specifications (see GHG-1 for criteria).
- As soon as electric utilities are available at construction sites, the County shall require implementing projects to supply the construction site with electricity from the local utility and all equipment that can be electrically operated shall use the electric utility rather than portable generators, where reasonable and feasible (see GHG-1 for criteria).

- The County shall require implementing projects to retain on site dust generated by the development activities, and keep dust to a minimum by following the dust control measures listed below:

  a) During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

  b) During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would require watering at least three times per day which include wetting down such areas in the late morning, mid-day after work is completed for the day, and whenever wind exceeds 15 miles per hour. Soil stabilizers may also be used instead of watering as deemed appropriate by the County during application review, to comply with County and SCAQMD nuisance and dust regulations.

  c) Immediately after clearing, grading, earthmoving, or excavation is completed, the entire area of disturbed soil shall be treated until the area is paved or otherwise developed so that dust generation will not occur.

  d) Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.

  e) Trucks transporting soil, sand, cut or fill materials, and/or construction debris to or from the site shall be tarped/covered from the point of origin.

WCCP PEIR MM AQ-11: Where applicable, the County shall require implementing projects to apply Conservation Management Practices for Confined Animal Facilities:

1. Manure Handling
   a. Cover manure prior to removing material offsite; and
   b. Spread the manure before 11:00 AM and when wind conditions are less than 25 miles per hour; and
   c. Utilize coning and drying manure management by removing manure at laying hen houses at least twice per year and maintain a base of no less than 6 inches of dry manure after clean out; or in lieu of complying with conservation management practice (1c) comply with conservation management practice (1d).
   d. Utilize frequent manure removal by removing the manure from laying hen houses at least every seven days and immediately thin bed dry the material.
2. Feedstock Handling
   a. Utilize a sock or boot on the feed truck auger when filling feed storage bins.

3. Disturbed Surfaces
   a. Maintain at least 70 percent vegetative cover on vacant portions of the facility; or
   b. Utilize conservation tillage practices to manage the amount, orientation and distribution of crop and other plant residues on the soil surface year-round, while growing crops (if applicable) in narrow slots or tilled strips; or
   c. Apply dust suppressants in sufficient concentrations and frequencies to maintain a stabilized surface.
4. Unpaved Roads
   a. Restrict access to private unpaved roads either through signage or physical access restrictions and control vehicular speeds to no more than 15 miles per hour through worker notifications, signage, or any other necessary means; or
   b. Cover frequently traveled unpaved roads with low silt content material (i.e., asphalt, concrete, recycled road base, or gravel to a minimum depth of four inches); or
   c. Treat unpaved roads with water, mulch, chemical dust suppressants or other cover to maintain a stabilized surface
5. Equipment Parking Access
   a. Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; or
   b. Apply material with low silt content (i.e., asphalt, concrete, recycled road base, or gravel to a depth of four inches).

WCCP PEIR MM AQ-13: Construction contractors supplying heavy duty diesel equipment, greater than 50 horsepower, will be encouraged to apply for AQMD SOON funds. Information including the AQMD website will be provided to each contractor which uses heavy duty diesel for onsite construction activities.

4.2.9 References

Cited As	Reference
SCAQMD, 2003b	South Coast Air Quality Management District, 2003. *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. August 2003. Accessed March 5, 2026. Available online at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=a86e1d61_2
SCAQMD, 2017c	South Coast Air Quality Management District, 2017. *Rule 1401, New Source Review of Toxic Air Contaminants*. September 1, 2017. Accessed March 5, 2026. Available online at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf

Cited As	Reference
UXR, 2026a	Urban Crossroads, Inc., 2026. *Galway Downs (CUP02303R1) Air Quality Impact Analysis*. March 4, 2026. Included as EIR *Technical Appendix B1*.
UXR, 2026b	Urban Crossroads, Inc., 2026. *Galway Downs (CUP02303R1) Construction Health Risk Assessment*. March 4, 2026. Included as EIR *Technical Appendix B2*.

4.3 BIOLOGICAL RESOURCES

The analysis in this Subsection 4.3 is based, in part, on information provided in two separate technical studies prepared by Cadre Environmental (herein, "Cadre"). The first report addresses the Project's general impacts to biological resources, is titled, "*Biological Resources Technical Reports, Galway Downs Project Site*" (herein, "BTR"), is dated April 2026, and is included as EIR *Technical Appendix C1* (Cadre, 2026a). The second report addresses the Project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), is titled, "Western Riverside County - MSHCP Consistency Analysis, Galway Downs Project Site," is dated April 2026, and is included as EIR *Technical Appendix C2* (Cadre, 2026b). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

4.3.1 Existing Conditions

Under existing baseline conditions, the 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 during holidays and on the weekends. Galway Downs includes a variety of existing recreational- and event-related amenities, including a horse racetrack and equestrian facilities; multi-use sports fields; lodging facilities; restaurants; retail space; Recreational Vehicle (RV) park with club house; grooms quarter; barn structures; office space; and horse corrals. Provided below is a summary of the biological resources that occur on the site and in the Project's off-site improvement areas under existing conditions.

A. Vegetation Communities

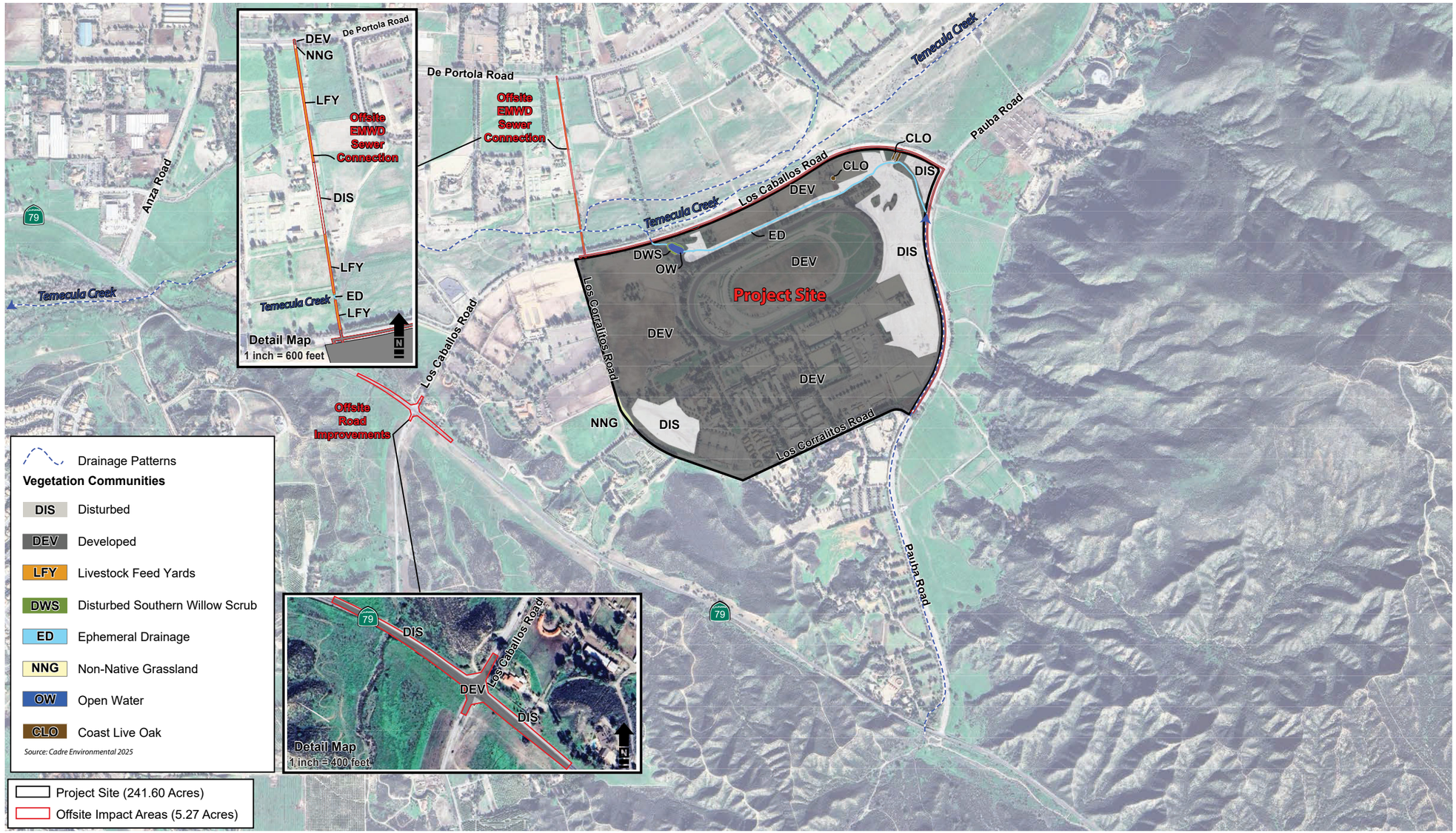
1. Summary of Vegetation Communities

Cadre conducted site visits to map the existing vegetation communities that occur on the site and within the Project's off-site improvement areas. Table 4.3-1, *Existing Vegetation Communities*, summarizes the existing vegetation communities, which are described below and are depicted on Figure 4.3-1, *Vegetation Communities Map*. (Cadre, 2026a, p. 10)

Table 4.3-1 Existing Vegetation Communities

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

(Cadre, 2026a, Table 1)



Source(s): CADRE Environmental (April 2026)

Figure 4.3-1

Not to Scale

Vegetation Communities Map

- **Developed**. The majority of the Project site is characterized as developed including but not limited to all equestrian and event center facilities. Vegetation within these areas 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. (Cadre, 2026a, pp. 11-12)

- **Disturbed**. Disturbed regions of the Project site include areas devoid of vegetation including event center parking areas and select equestrian facilities (Cadre, 2026a, p. 12).

- **Ephemeral Drainage.** A well-defined unvegetated ephemeral drainage enters the northeast region of the Project site and drains in a western direction where it is captured in a detention basin (Open Water) which is bordered by disturbed southern willow scrub. The basin overflows into a channel which exits the Project site through a culvert extending north under Los Caballos Road and drains into Temecula Creek. The offsite alignment for the Project's sewer connection to the new Eastern Municipal Water District (EMWD) main within De Portola Road also traverses a short reach of Temecula Creek (ephemeral drainage). (Cadre, 2026a, p. 12)

- **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 (Cadre, 2026a, p. 12).

- **Non-Native Grassland/Live Stock Feed Yards**. Non-native grassland areas are dominated by false barley (*Hordeum murinum*), Mediterranean grass (Schismus barbatus), wild oat (*Avena fatua*), ripgut grass (*Bromus diandrus*), foxtail chess (*Bromus madritensis* ssp. *rubens*), stinknet (*Oncosiphon piluliferum*), cheeseweed, Russian thistle, common fiddleneck (*Amsinckia intermedia*), doveweed (*Croton setigerus*), common sow thistle (*Sonchus oleraceus*), 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. (Cadre, 2026a, p. 12)

- **Coast Live Oak**. A few mature coast live oaks (*Quercus agrifolia*) are located in the northeast region of the Project site (Cadre, 2026a, p. 27).

- **Disturbed Southern Willow Scrub**. The northern region of the open water basin is bordered by disturbed southern willow scrub and dominated by scattered arroyo willow (*Salix lasiolepis*) saplings, Eucalyptus, annual sunflower (*Helianthus annuus*), mulefat (*Baccharis salicifolia*), tocalote, and non-native grasses (Cadre, 2026a, p. 12).

2. Sensitive Habitats

Natural communities are evaluated using NatureServe's Heritage Methodology, the same system used to assign global and state rarity ranks for plant and animal species in the California Natural Diversity Database (CNDDB). The basic ranking concepts of rarity and threats used in the "Heritage Methodology" since the 1970's remain the same, using the best and most recent scientific information available. For rarity, the ranking involves the knowledge of range and distribution of a given type of vegetation, and the proportion of occurrences that are of good ecological integrity. Threats and trends are likewise considered in categories such as residential and commercial development, agriculture, energy production and mining, and invasive and other problematic species and genes (among others). Threat scope (typically assessed within a 20-year timeframe for vegetation) and severity are used to calculate an overall threat score, which is added to the overall rarity score for a single rank of 1 through 5. Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (State) rank ranging from 1 (very rare and threatened) to 5 (demonstrably secure). Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents. (Cadre, 2026a, pp. 34-35)

No sensitive natural communities listed by the California Department of Fish and Wildlife (CDFW) as sensitive were documented within or adjacent to the Project site (Cadre, 2026a, p. 35).

B. Sensitive Plants

No State- or federally-listed threatened or endangered plant species were documented or expected to occur onsite based on a lack of suitable habitat, and no suitable habitat was documented within the Project site for special-status plants or species not covered under the MSHCP, as outlined in Table 2, *Sensitive Plant Species with Potential to Occur within Project Site*, of the Project's BTR (*Technical Appendix C1*). (Cadre, 2026a, pp. 35-41)

In addition, the Project site is not located within an MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA) or the MSHCP Criteria Area Plant Species Survey Area (CAPSSA), indicating that surveys are not required for the Project site pursuant to MSHCP Sections 6.1.3 and 6.3.2. (Cadre, 2026a, p. 35)

C. Wildlife Species

Suitable habitat was documented onsite for one (1) special-status invertebrate species not covered under the MSHCP including Crotch's bumble bee (*Bombus crotchii*), a State Candidate Endangered (SCE) species, as outlined in Table 3, *Sensitive Wildlife Species with Potential to Occur within Project Site*, of the Project's BTR (*Technical Appendix C1*). Suitable scattered foraging habitat for the Crotch's bumble bee is present with the Project site and nesting habitat onsite where debris piles were documented. Burrows representing

suitable nesting resources were also documented within this region of the Project site. As stated by Hatfield, et al.: (Cadre, 2026a, p. 41)

> "*Bombus crotchii inhabits open grassland and scrub habitats. Nesting occurs underground. Male's perch and chase moving objects in search of mates. This species is classified as a short-tongued species, whose food plants include Asclepias, Chaenactis, Lupinus, Medicago, Phacelia, and Salvia (Williams et al. 2014). Bumble bees are social insects that live in colonies composed of a queen, workers, and reproductives (males and new queens). Colonies are annual and only the new, mated queens overwinter. These queens emerge from hibernation in the early spring and immediately start foraging for pollen and nectar and begin to search for a nest site. Nests are often located underground in abandoned rodent nests, or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. Initially, the queen does all of the foraging and care for the colony until the first workers emerge and assist with these duties. Bumble bees collect both nectar and pollen of the plants that they pollinate. In general, bumble bees forage from a diversity of plants, although individual species can vary greatly in their plant preferences, largely due to differences in tongue length. Bumble bees are well-known to engage in 'buzz pollination,' a very effective foraging technique in which they sonicate the flowers to vibrate the pollen loose from the anthers. Tomatoes (Solanaceae), blueberries (Ericaceae), and many other important food plants are pollinated by bumble bees in this way.*" (Cadre, 2026a, pp. 41-42)

The Crotch's bumble bee was not documented onsite following focused surveys conducted during the spring of 2025 (Cadre, 2026a, p. 42).

A review of historic aerials was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. Historic aerials taken in 2011 and 2023 represent an ideal baseline during which known (previously documented) inundated vernal pools and seasonal depressions can easily be seen. As previously stated, an inundated detention basin captures flows from a well-defined unvegetated ephemeral drainage extending in a western direction through the northern region of the Project site. This feature represents low quality habitat for vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and western spadefoot (*Spea hammondii*). (Cadre, 2026a, p. 42)

The Project site occurs partially within a predetermined Survey Area for the burrowing owl. Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented within the property including foraging habitat documented within the northern region of the Project site. Based on the presence of suitable habitat, focused MSHCP burrowing owl surveys were conducted during the spring of 2025. No burrowing owl or characteristic sign such as white-wash, feathers, tracks, or pellets were detected within or immediately adjacent to the Project site during the 2025 survey efforts. (Cadre, 2026a, p. 42)

A total of ten (10) sensitive species have potential to occur or were observed within the Project site including grasshopper sparrow (*Ammodramus savannarum*), sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), California horned

lark (*Eremophila alpestris actia*), Stephens' kangaroo rat (*Dipodomys stephensi*), bobcat (*Lynx rufus*), mountain lion (*Puma concolor*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). As previously stated, the MSHCP has determined that these sensitive species potentially occurring within Project site have been adequately covered (as indicated in MSHCP Table 2-2, *Species Considered for Conservation Under the MSHCP Since 1999*). Sensitive species that can be excluded from occurring onsite or known to occur within the region with potential to occur onsite are presented in Table 3, *Sensitive Wildlife Species with Potential to Occur within Project Site*, of the Project's BTR (*Technical Appendix C1*). (Cadre, 2026a, p. 42)

Critical habitat designations by the United States Fish and Wildlife Service (USFWS) were researched to determine if any of the Project site is located within or adjacent to USFWS critical habitat. The Project site does not occur within or adjacent to a designated critical habitat for federally endangered or threatened species. (Cadre, 2026a, p. 56)

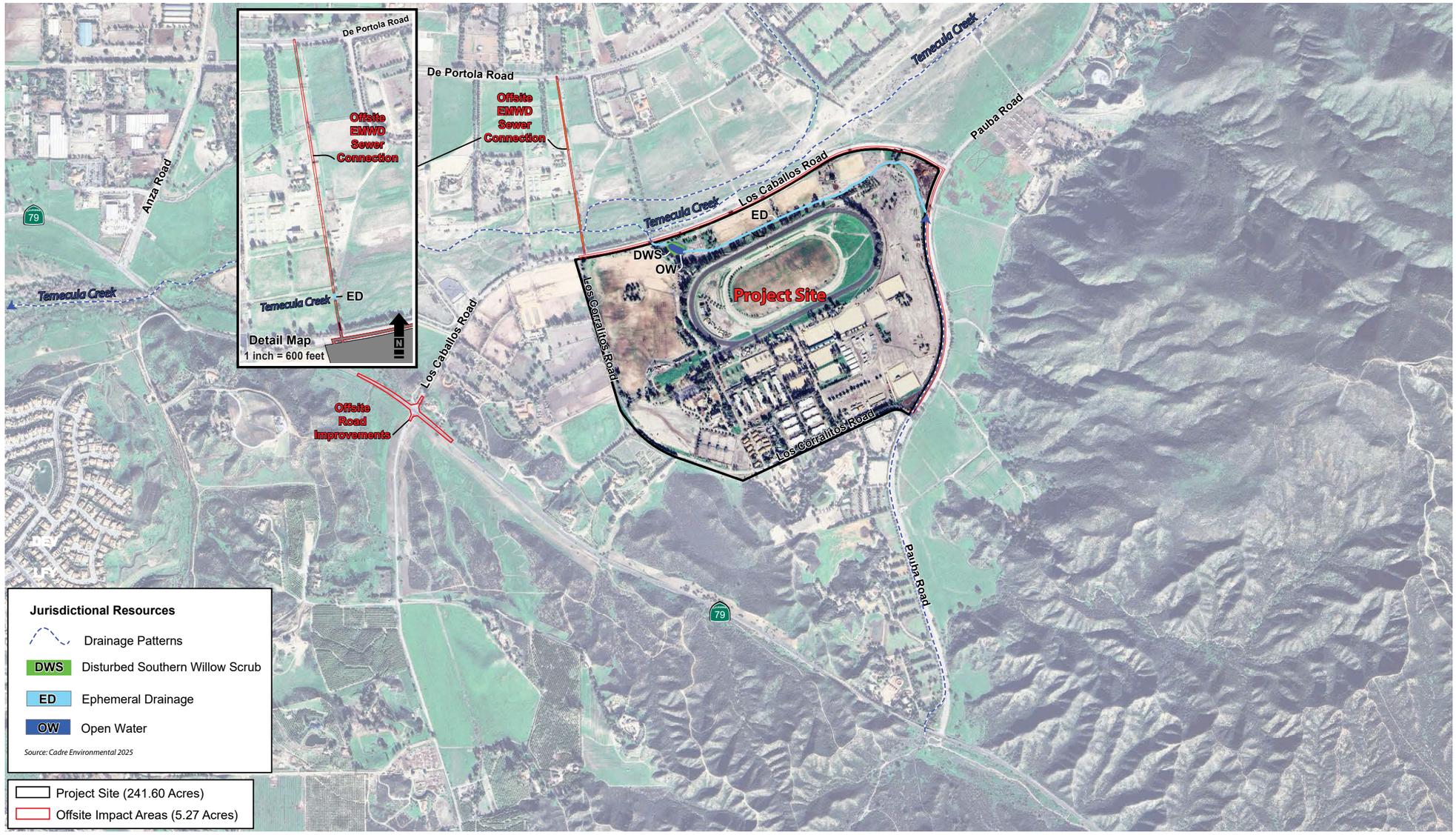
D. Jurisdictional Resources

A well-defined unvegetated ephemeral drainage which enters the northeast region of the Project site and drains in a western direction where it is captured in a detention basin represents a potential resource regulated by the United States Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW), as shown in Figure 4.3-2, *Jurisdictional Resources Map*. The detention basin overflows into a channel that exits the Project site through a culvert extending north under Los Caballos Road and drains into Temecula Creek. The offsite alignment area for the EMWD sewer connection also traverses a short reach of Temecula Creek (ephemeral drainage) which represents a potential resource regulated by the USACE, RWQCB and CDFW. (Cadre, 2026a, pp. 27-28)

E. Regional Connectivity/Wildlife Movement Corridors

The onsite regions of the Project site, including offsite road improvements are not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor. As previously stated, the Project site is an existing equestrian and events facility 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 previously shown in Figure 4.3-1 and as previously outlined in Table 4.3-1. The offsite alignment for the proposed EMWD sewer connection is located within and bisects Proposed Constrained Linkage 24, which contributes to local and regional wildlife movement. As stated by the MSHCP: (Cadre, 2026a, p. 58)

> "*Proposed Linkage 24 is comprised of the portion of Temecula Creek east of Redhawk Parkway and west of Pauba Road. This Linkage provides Habitat for wetland species and a connection to Core Areas in Wilson Valley. The Linkage is constrained by existing roadways and planned community Development. Planning Species for which Habitat is provided for within this Linkage include bobcat,*



Source(s): CADRE Environmental (April 2026)

Figure 4.3-2

Not to Scale

Jurisdictional Resources Map

mountain lion, Stephens' kangaroo rat, Aguanga kangaroo rat, western pond turtle, yellow warbler, southwestern willow flycatcher, arroyo chub, loggerhead shrike, tree swallow, white-tailed kite, Cooper's hawk and least Bell's vireo. In addition to maintenance of habitat quality, maintenance of existing floodplain processes along Temecula Creek is important for these species. While specific studies of movement along this Linkage have not been conducted, it likely provides for movement of common mammals such as bobcat." (Riverside County, 2003, p. 3-95)

4.3.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of biological resources.

A. Federal Regulations

1. Endangered Species Act (ESA)

The purpose of the federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened.

The ESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants.

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species.

Section 10 of the ESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved habitat conservation plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding available to carry out the steps. HCPs may benefit not only landowners but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation.

2. Clean Water Act Section 401

Clean Water Act (CWA) § 401 water quality certification provides states and authorized tribes with an effective tool to help protect water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. Under § 401, a federal agency cannot issue a permit or license for an activity that may result in a discharge to waters of the U.S. until the state or tribe where the discharge would originate has granted or waived § 401 certification. The central feature of CWA § 401 is the state or tribe's ability to grant, grant with conditions, deny, or waive certification. Granting certification, with or without conditions, allows the federal permit or license to be issued consistent with any conditions of the certification. Denying certification prohibits the federal permit or license from being issued. Waiver allows the permit or license to be issued without state or tribal comment. States and tribes make their decisions to deny, certify, or condition permits or licenses based in part on the proposed project's compliance with Environmental Protection Agency (EPA)-approved water quality standards. In addition, states and tribes consider whether the activity leading to the discharge will comply with any applicable effluent limitations guidelines, new source performance standards, toxic pollutant restrictions, and other appropriate requirements of state or tribal law.

Many states and tribes rely on § 401 certification to ensure that discharges of dredge or fill material into a water of the U.S. do not cause unacceptable environmental impacts and, more generally, as their primary regulatory tool for protecting wetlands and other aquatic resources. However, § 401 is limited in scope and application to situations involving federally-permitted or licensed activities that may result in a discharge to a water of the U.S. If a federal permit or license is not required, or would authorize impacts only to waters that are not waters of the U.S., the activity is not subject to the CWA § 401.

3. Clean Water Act Section 404

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Wetlands subject to Clean Water Act Section 404 are defined as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into

waters of the United States, unless the activity is exempt from Section 404 regulation (e.g. certain farming and forestry activities).

The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment; or (2) the nation's waters would be significantly degraded. Applications for permits must, to the extent practicable: (l) demonstrate steps have been taken to avoid wetland impacts; (2) demonstrate that potential impacts on wetlands have been minimized; and (3) provide compensation for any remaining unavoidable impacts. Proposed activities are regulated through a permit review process.

An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Army Corps of Engineers (USACE), which evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines. However, for most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or State basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption.

4. Executive Order 11990 – Protection of Wetlands

The purpose of Executive Order (EO) 11990 is to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, the Order requires federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. The Order applies to:

- Acquisition, management, and disposition of federal lands and facilities construction and improvement projects which are undertaken, financed, or assisted by federal agencies;

- Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

The procedures require the determination of whether or not the proposed project will be in or will affect wetlands. If so, a wetlands assessment must be prepared that describes the alternatives considered. The procedures include a requirement for public review of assessments.

5. Migratory Bird Treaty Act (16 USC Section 703-712)

The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The migratory bird species protected by the MBTA are listed in 50 CFR 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. Sections 703-712). The MBTA implements Conventions

between the United States and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds.

B. State Regulations

1. California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The California Department of Fish and Wildlife (CDFW) works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met.

Section 2081 subdivision (b) of the California Fish and Game Code (CFGC) allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs).

If a species is listed by both the federal ESA and CESA, CFGC Section 2080.1 allows an applicant who has obtained a federal incidental take statement (federal Section 7 consultation) or a federal incidental take permit (federal Section 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination (CD) is issued and no further authorization or approval is necessary under CESA.

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement.

2. Natural Community Conservation Planning Act (NCCP)

CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the California and Federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in number significantly.

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental

organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP participants.

There are currently 17 approved NCCPs (includes 6 subarea plans) and more than 9 NCCPs in various stages of planning (includes 2 subarea plans), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California.

3. California Fish and Game Code, Section 1600, et seq.

CFGC section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or (3) deposit debris, waste or other materials that could pass into any river, stream, or lake. The CFGC indicates that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA.

4. Native Plant Protection Act (NPPA) of 1977

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations.

5. Oak Woodlands Conservation Program

The Oak Woodlands Conservation Program offers landowners, conservation organizations, cities and counties an opportunity to obtain funding for projects designed to conserve and restore California's oak woodlands. While the Program is statewide in nature, it provides opportunities to address oak woodland issues on a regional priority basis. The Program is designed to help local efforts achieve oak woodland protection, and provides a mechanism to achieve sustainable ranch and farming operations and healthy oak woodlands.

6. Unlawful Take or Destruction of Nests or Eggs (CFGC Sections 3503.5-3513)

Section 3503.5 of the CFGC specifically protects birds of prey, stating: "It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Section 3513 of the CFGC duplicates the federal protection of migratory birds, stating: "It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act."

C. Regional and Local Regulations

1. Western Riverside County Multiple Species Habitat Conservation Plan

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the WRC-MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis.

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of FESA, as well as a Natural Community Conservation Plan (NCCP) pursuant to the California Fish and Game Code. The USFWS issued a Biological Opinion and FESA Section 10 permit for the MSHCP on June 22, 2004, and CDFW issued an NCCP Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include Riverside County and 18 cities, are allowed to authorize 'incidental take' of covered plant and wildlife species.

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The MSHCP includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for MSHCP compliance. These studies may identify the need for specific measures to avoid, minimize, and reduce impacts to covered species and their habitat.

The Western Riverside County MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP's coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre 'cells' with identified conservation objectives.

2. Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres.

On May 3, 1996, the USFWS issued a permit to the RCHCA to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a CESA Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. To date, more than $50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003.

3. Riverside County Oak Tree Management Guidelines

In March 1993, Riverside County issued Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. The guidelines are generally considered to be the most effective where minimum lot sizes are 2.5 acres or larger, or where oak woodlands are concentrated in a relatively small portion of a project site. The guidelines include recommendations for oak inventories, land use designs to cluster home sites in order to reduce impacts to oaks, and mitigation measures for oak conservation.

4. Ordinance No. 559 – Regulating the Removal of Trees

Ordinance No. 559 regulates the removal of living native trees on parcels of property greater than one-half acre, with an elevation above 5,000 feet above mean sea level (amsl) within the unincorporated area of Riverside County without first obtaining a permit to do so. The purpose of the ordinance is to ensure that the timberlands of Riverside County are protected and the ecological balance of such timberlands is preserved.

5. Ordinance No. 499 – Regulating Encroachments in County Highways

Section 4 of Riverside County Ordinance No. 499 establishes regulations for the removal of trees within the right-of-way (ROW) of any County highway without first obtaining a permit from the County Transportation Director. The County Transportation Director may issue a permit if they are satisfied that such removal or trimming is in the public interest or is necessary for the improvement of the right of way or the construction of improvements on adjacent land. The County Transportation Director may impose such conditions as they deem reasonable or necessary, including requirements for the work to be done only by a qualified tree

surgeon or tree trimmer actually engaged in that business, and for bond, insurance or other security to protect person and property from injury or damage. A permit for removal of a tree may be conditioned upon its relocation or replacement by one or more other trees of a kind or type to be specified in the permit.

4.3.3 Basis for Determining Significance

Section IV of Appendix G to the CEQA Guidelines addresses typical adverse effects to biological resources, and includes the following threshold questions to evaluate a project's impacts to biological resources:

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

- Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- Would the project have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

- Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IV of Appendix G to the CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to biological resources if construction and/or operation of the Project would:

a. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State conservation plan;*

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

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

d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;*

e. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service;*

f. *Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; or*

g. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts to biological resources.

4.3.4 Methodology

A. Overview

The analyses of potential biological resources impacts are based on the nature and degree of disturbance to native vegetation, wildlife, and sensitive habitats that would be brought about by the Project along with how such changes, if any, affect the long-term viability of these resources within the region. The analysis of potential impacts to biological resources is based on a review of applicable federal, State, and local regulations and plans, as well as spatial data, mapping resources, and existing biological literature pertaining to the Project site and surrounding area. The methodology used to evaluate the Project's potential impacts to biological resources is described in the subsections that follow. EIR Subsection 4.3.4.B establishes the environmental baseline against which Project-related impacts are evaluated. EIR Subsection 4.3.4.C identifies the scope of the analysis, including the Project's limits of physical disturbance, the field surveys (including habitat assessments, focused surveys for special-status species, and a jurisdictional resource assessment), and literature review conducted to characterize the biological resources within and adjacent to the Project's area of disturbance, and the analytical questions addressed by this Subsection. The impact analysis in EIR subsection 4.3.5 then applies the information developed through the field surveys and literature review to evaluate the Project's potential impacts against each of the significance thresholds identified in EIR subsection 4.3.3, *Basis for Determining Significance*, including the Project's consistency with the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) and the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) (the latter of which is evaluated through a series of MSHCP consistency analyses corresponding to the applicable sections of the

MSHCP), the Project's potential to impact special-status plants and sensitive wildlife, and the Project's potential to conflict with applicable local policies and ordinances protecting biological resources.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County, within the Temecula Valley Wine Country Policy Area. The site includes a wide range of existing physical features and uses including a horse racetrack, polo fields, stables, barns, arenas, training tracks, an existing on-site retention basin, a permanent parking area, multiple temporary parking areas, an existing clock tower house, grooms quarters, retail and restaurant/dining buildings, office space, recreational vehicle uses, and various storage structures, along with associated internal driveways and access points. The vast majority of the site is subject to ongoing physical disturbance under existing conditions in association with equestrian operations, special occasion events, sports events, temporary parking activation, and routine facility maintenance, which collectively limit the establishment of undisturbed native habitats across much of the property. Notwithstanding the developed and disturbed nature of the site, the baseline conditions also include a well-defined ephemeral drainage that enters the northeastern portion of the Project site and conveys flows westerly toward the on-site retention basin, the on-site retention basin itself (which partially infiltrates flows into the underlying Pauba aquifer), and the segment of Temecula Creek located north of the Project site that would be crossed via jack and bore by the Project's off-site sewer alignment. Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential impacts to biological resources evaluates the incremental effects of the proposed Project relative to the physical and biological conditions existing at the Project site at the time the Notice of Preparation for this EIR was published, as documented through the field surveys, habitat assessments, jurisdictional delineation, and literature review described in the following subsections.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with minimal new physical construction and no new operational uses beyond those already occurring under existing conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to convert undeveloped, native habitat to a new use. The primary analytical questions addressed herein are therefore: (1) whether the limited physical improvements proposed as part of the Project, consisting of the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure, additional area for equestrian RV park use, an off-site sewer line, and future areas for up to 36 park model lodging units and 18 employee modular housing units, would directly or indirectly result in adverse effects to special-status plant or wildlife species, sensitive natural communities, riparian or other jurisdictional resources, or established wildlife movement corridors; (2) whether the Project's off-site sewer alignment, which would cross beneath Temecula Creek using a jack and bore technique, would result in adverse effects to the bed, banks, or riparian habitat associated with the creek; (3) whether Project approval and operation could conflict with any applicable local policies or ordinances protecting biological resources, including Riverside County Ordinance Nos. 559 (Regulating the Removal of Trees) and 449

(Regulating Encroachments in County Highways); and (4) whether the Project would conflict with the provisions of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) or the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP). In evaluating indirect impacts, particular attention was given to potential effects from Project-related lighting and noise on adjacent off-site biological resources and to the potential for indirect effects on sensitive resources within and downstream of the Project site, which were identified as potential concerns during the Project's public scoping process.

1. Project-Related Physical Disturbances

The Project's potential to impact sensitive biological resources considers the extent of physical ground disturbance that would occur as a result of the Project and the biological resources that are present within these areas in the baseline condition. The Project's limits of physical disturbance previously were depicted on EIR Figure 3-17, *Limits of Disturbance*, which shows that implementation of the Project would result in permanent physical impacts to 94.94 acres on site and 5.27 acres off-site, with an additional 0.68-acre of temporary off-site impacts. The Project's impact limits account for all areas where new construction, utility and driveway infrastructure (including the construction/installation of the off-site sewer line), temporary parking, and new activities could occur. It should be noted that while a majority of the Galway Downs site is subject to disturbance under existing conditions in association with on-going events and activities at the facility, the analysis herein conservatively accounts for all areas that potentially may be impacted as part of Project implementation.

2. Field Surveys

Habitat Assessments and Focused Surveys

To assess the Project site for biological resources, an initial reconnaissance survey within the Project's on- and off-site limits of disturbance was conducted by Cadre on March 17, 2025, in order to characterize and identify potential wildlife habitats, sensitive resources, and to establish the accuracy of the data identified in the literature search and previous surveys. Geologic and soil maps were examined to identify local soil types that may support sensitive taxa. Aerial photographs, topographic maps, and vegetation and rare plant maps prepared by previous studies in the region were used to determine community types and other physical features that may support sensitive plants/wildlife, uncommon taxa, or rare communities that occur within the Project site. (Cadre, 2026a, p. 5)

The MSHCP has determined that all of the sensitive species potentially occurring within the Project site and off-site improvement areas have been adequately covered, as indicated in MSHCP Table 2-2, *Species Considered for Conservation Under the MSHCP Since 1999*. However, additional surveys may be required for narrow endemic plant, criteria area, and specific wildlife species if suitable habitat is documented onsite and/or if the property is located within a pre-determined "Survey Area." Based on the initial MSHCP review of predetermined Survey Areas, habitat assessments and focused surveys (as warranted) were conducted for the following seven (7) species (five Riparian, Riverine, and Vernal Pool species, and two wildlife species): (Cadre, 2026a, pp. 5-6)

Section 6.1.2 Riparian, Riverine, Vernal Pool Species

- Riverside fairy shrimp (Streptocephalus woottoni), Federal Endangered (FE);
- Vernal pool fairy shrimp (Branchinecta lynchi), Federal Threatened (FT);
- Least Bell's vireo (Vireo bellii pusillus), FE, State Endangered (SE);
- Southwestern willow flycatcher (Empidonax traillii extimus), FE, SE;
- Western yellow-billed cuckoo (Coccyzus americanus occidentalis), SE.

Wildlife Species

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

A habitat assessment was also conducted for, but not limited to, the following target species not covered by the MSHCP (Cadre, 2026a, p. 6):

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

Crotch's Bumble Bee Surveys

A habitat assessment was conducted for the Crotch's bumble bee (CBB) on May 8, 2025, by Huffman Environmental using CBB-approved biologists and surveyors. The primary objective of the assessment was to identify optimal nectar resources, thereby determining areas with the highest likelihood of CBB occurrence. Nectar patches were delineated based on the relative abundance of blooming or soon-to-bloom floral species known to be preferred by CBB. These mapped patches defined the CBB Survey Area. (Cadre, 2026a, p. 7)

Three survey rounds were conducted on May 8, 27, and June 11, 2025 maintaining a minimum of two weeks between each survey in accordance with protocol guidelines. Survey efforts were scheduled to coincide with the peak blooming periods of potential nectar and pollen sources and the expected active flight periods of CBB. Surveys were conducted using a combination of meandering transects and passive visual monitoring with the aid of binoculars. If a bee individual was encountered, it was observed and identified through a combination of field observation and photography, without physical capture. All surveys were conducted under protocol-defined weather conditions, which included ambient temperatures between 60°F and 90°F, sustained wind speeds less than 10 mph, and the absence of fog or precipitation. (Cadre, 2026a, pp. 7-8)

MSHCP Focused Burrowing Owl Surveys

The Project Site occurs partially within a predetermined MSHCP Survey Area for the burrowing owl. Focused surveys for burrowing owl were conducted by Cadre in the spring of 2025 in accordance with the 2006 MSHCP Burrowing Owl Survey Instructions. Burrowing owl surveys were conducted during weather that is conducive to observing owls outside their burrows and detecting burrowing owl sign. Four (4) focused burrowing owl surveys were conducted on March 23, April 13, May 15, and May 31, 2025, from one hour before sunrise to two hours after sunrise or in the early evening two hours before sunset to one hour after

sunset. All surveys were conducted following MSHCP guidelines and 2012 CDFW Staff Report on Burrowing Owl Mitigation and recommended survey procedures. (Cadre, 2026a, pp. 8-10)

Jurisdictional Delineation and MSHCP Riparian, Riverine, and Vernal Pool Resources

The biological reconnaissance and habitat assessment efforts conducted for the Project evaluated the on-site and off-site limits of disturbance for the presence of potentially jurisdictional features regulated under MSHCP Section 6.1.2, as well as for features that could be subject to the jurisdiction of the United States Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act, the Regional Water Quality Control Board (RWQCB) under Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act, and the CDFW under Section 1600 et seq. of the California Fish and Game Code.

Based on this assessment, the only potentially jurisdictional feature that could be physically affected by Project-related activities is the segment of Temecula Creek located north of the Project site, which would be crossed by the Project's off-site sewer alignment. A formal jurisdictional delineation of Temecula Creek was not conducted as part of this analysis because the proposed off-site sewer line would be installed beneath the drainage using a jack and bore (i.e., directional drilling) technique that would avoid any surface disturbance to the bed, banks, or associated riparian vegetation of the creek; and because Temecula Creek is a dynamic ephemeral drainage feature whose channel alignment, bank locations, and limits of associated riparian habitat have historically migrated within the off-site property over time, such that the precise jurisdictional limits of the creek would need to be field-verified immediately prior to construction in order to accurately reflect the conditions at the time the off-site sewer line is installed. Accordingly, the analysis herein addresses the Project's potential to affect jurisdictional resources based on the documented presence and approximate location of Temecula Creek as a potentially jurisdictional feature, with the understanding that the precise jurisdictional boundaries would be confirmed through a formal delineation conducted in advance of construction of the off-site sewer line.

The Project site also was assessed for potential jurisdictional resources regulated by MSHCP Section 6.1.2. Activities within inland streams, wetlands, and riparian areas in western Riverside County fall under the jurisdiction of MSHCP Section 6.1.2. The MSHCP requires, among other things, assessments for riparian/riverine and vernal pool resources. As projects are proposed within the MSHCP Plan Area, an assessment of the potentially significant effects of those projects on riparian/riverine areas, and vernal pools are required, as currently mandated by CEQA, using available information augmented by project-specific mapping provided to and reviewed by the permittee's biologist(s). Riparian/riverine areas and vernal pools are defined as follows in accordance with MSHCP Section 6.1.2: (Cadre, 2026a, p. 10)

> "*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.*" (Riverside County, 2003, p. 6-21)

For purposes of this analysis, the first part of the MSHCP definition is applied to riparian habitat, and the second part is applied to riverine areas. Vernal pools are defined as: (Cadre, 2026a, pp. 10-11)

"...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." (Riverside County, 2003, p. 6-22)

3. Literature Review

Scientific literature and industry standard databases were consulted in addition to available aerial photographs, topographic maps, and vegetation and rare plant maps prepared by previous studies in the region, in addition to the Western Riverside County MSHCP. These include, but are not limited to, the following: (Cadre, 2026a, p. 5)

- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants in California;
- United States Fish and Wildlife Service (USFWS) Species Occurrence Database;
- The Information for Planning and Consultation (IPaC) database from the USFWS;
- USFWS Critical Habitat Mapper;
- The California Natural Diversity Database (CNDDB), a CDFW Natural Heritage Division species account database;
- List of Special Animals available from CDFW;
- State- and federally-listed endangered and threatened animals of California available from CDFW;
- Endangered, Threatened, and Rare Plants of California published by CDFW;
- Special Vascular Plants and Bryophytes List published by CDFW;
- iNaturalist Database;
- eBird;
- CDFW Biogeographic Information and Observation System (BIOS) mapping platform;
- Applicable County of Riverside Ordinances; and
- Riverside County General Plan and SWAP.

4.3.5 Impact Analysis

Threshold a.:	**Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?**

The Project area is subject to two separate habitat conservation plans: the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan (HCP) and the Western Riverside County MSHCP. Each is discussed below.

A. Project Consistency with the SKR HCP

As previously noted, the SKR HCP was prepared under the direction of the RCHCA Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. According to

Figure S-1 of the SKR HCP, the Project site is not located within or adjacent to any SKR core reserve areas. Additionally, the Project site occurs within a portion of unincorporated Riverside County that is not subject to payment of fees towards the establishment and long-term maintenance of the SKR HCP core reserve pursuant to Riverside County Ordinance No. 663; thus, no fees would be required pursuant to Ordinance No. 663. The Project would not conflict with any provisions of the SKR HCP; thus, a less-than-significant impact would occur. (RCHCA, 1996, Figure S-1 and Figure 3)

B. Project Consistency with the Western Riverside County MSHCP

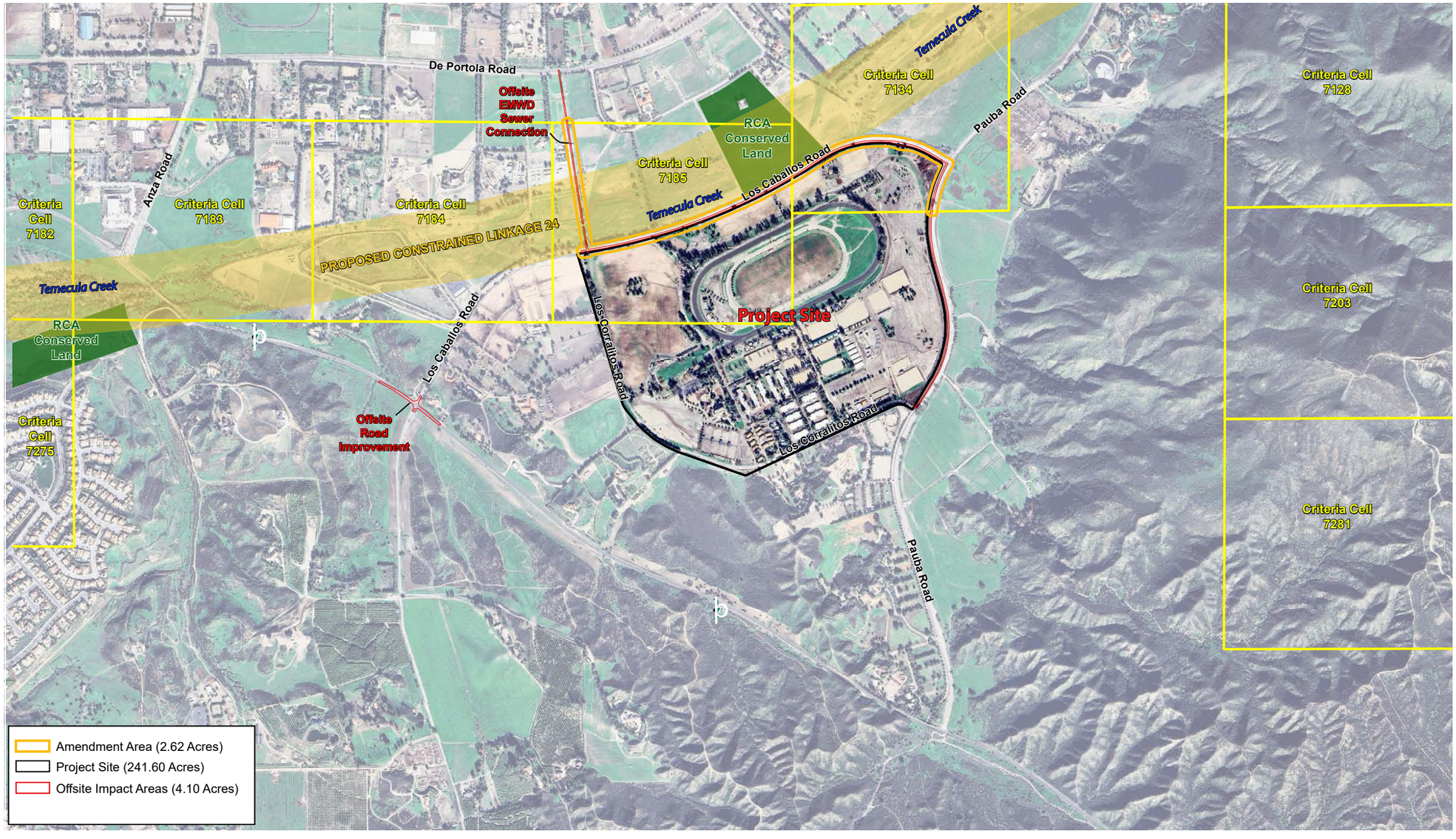
Provided below is an evaluation of the Project's consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures).

1. Project Relationship to MSHCP Reserve Assembly

The Project site is located within the Western Riverside County MSHCP Southwest Area Plan (SWAP), and is partially located within Subunit 2, Temecula Creek & Pechanga Creek. The Project site is located partially within MSHCP Criteria Cells 7134 and 7185, as shown in Figure 4.3-3, *MSHCP Relationship Map*. (Cadre, 2026b, p. 59)

The Project would not include an expansion of areas subject to impact on site, as all portions of the existing Galway Downs facility are subject to disturbances associated with ongoing events. The entire onsite portion of the Project site previously completed MSHCP Habitat Acquisition and Negotiation Strategy (HANS) No. 2039 and Joint Project Review (JPR) No. JPR 10-12-27-01, and a consistency determination for the on-site portions of the Project was issued on January 6, 2011, with no onsite conservation required. Thus, the proposed Project would not conflict with the MSHCP Reserve Assembly requirements within the Project's on-site areas, and no impact would occur. (Cadre, 2026b, p. 24)

The offsite EMWD sewer connection between the northwest corner of the Project site and De Portola Road is proposed within and bisects Proposed Constrained Linkage 24. The construction of the off-site portions of the EMWD sewer connection would result in temporary impacts to 0.17-acre of disturbed habitat and 0.29-acre of active livestock feed yards (non-native grassland) within Criteria Cell 7185 and Proposed Constrained Linkage 24. Temporary impact areas would be recontoured to preexisting conditions following construction of the sewer connection, and all staging would occur within the proposed temporary impact area. The proposed action would not conflict with reserve design goals for Criteria Cell 7185 due to the fact that all permanent impacts within Criteria Cell 7185 and Proposed Constrained Linkage 24 associated with the sewer connection would occur within the MSHCP Covered Roads layer (i.e., for the portion of the sewer line extending across Los Caballos Road, which accounts for an ultimate width of 100 feet), while the



Source(s): CADRE Environmental (April 2026)

Figure 4.3-3

Not to Scale

MSHCP Relationship Map

remaining impacts within Criteria Cell 7185 and Proposed Constrained Linkage 24 resulting from the off-site sewer connection would be temporary and would be restored to their natural condition following construction of the new off-site sewer line (as required by Mitigation Measure MM 4.3-2). Accordingly, and assuming approval of the required amendment to the JPR as discussed below, the proposed off-site sewer connection would not conflict with the conservation criteria identified by the MSHCP for Criteria Cell 7185 and Proposed Constrained Linkage 24, and therefore impacts due to a conflict with the MSHCP Reserve Criteria would be less than significant. (Cadre, 2026b, p. 25)

Although the Project site currently is subject to approved HANS No. 2039 and JPR 10-12-27-01, the prior JPR did not account for the approximately 2.62 acres of offsite impacts that would extend into Criteria Cell 7185, and as such the Project would require an amendment to JPR 10-12-27-01. Although the Project would not impact any sensitive resources within the 2.62 acres that must be added to JPR 10-12-27-01, and although all off-site impacts associated with the proposed sewer connection would represent temporary impacts that would not have the potential to interfere with the MSHCP Reserve Assembly Requirements for Criteria Cells 7185 (as discussed above), because the Project would require an amendment to the JPR, a potentially significant impact conservatively is identified. (Cadre, 2026b, p. 25)

The Project also would require improvements to the developed regions of Los Caballos Road at the intersection with SR-79, which would occur outside of any MSHCP Criteria Cells. Thus, Project-related off-site road improvements would not conflict with the MSHCP Reserve Assembly requirements, and impacts would be less than significant. (Cadre, 2026b, p. 24)

2. Project Consistency with MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)

An MSHCP Section 6.1.2 assessment was conducted by Cadre 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. (Cadre, 2026b, p. 32)

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: (Cadre, 2026b, p. 32)

> "*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.*"

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

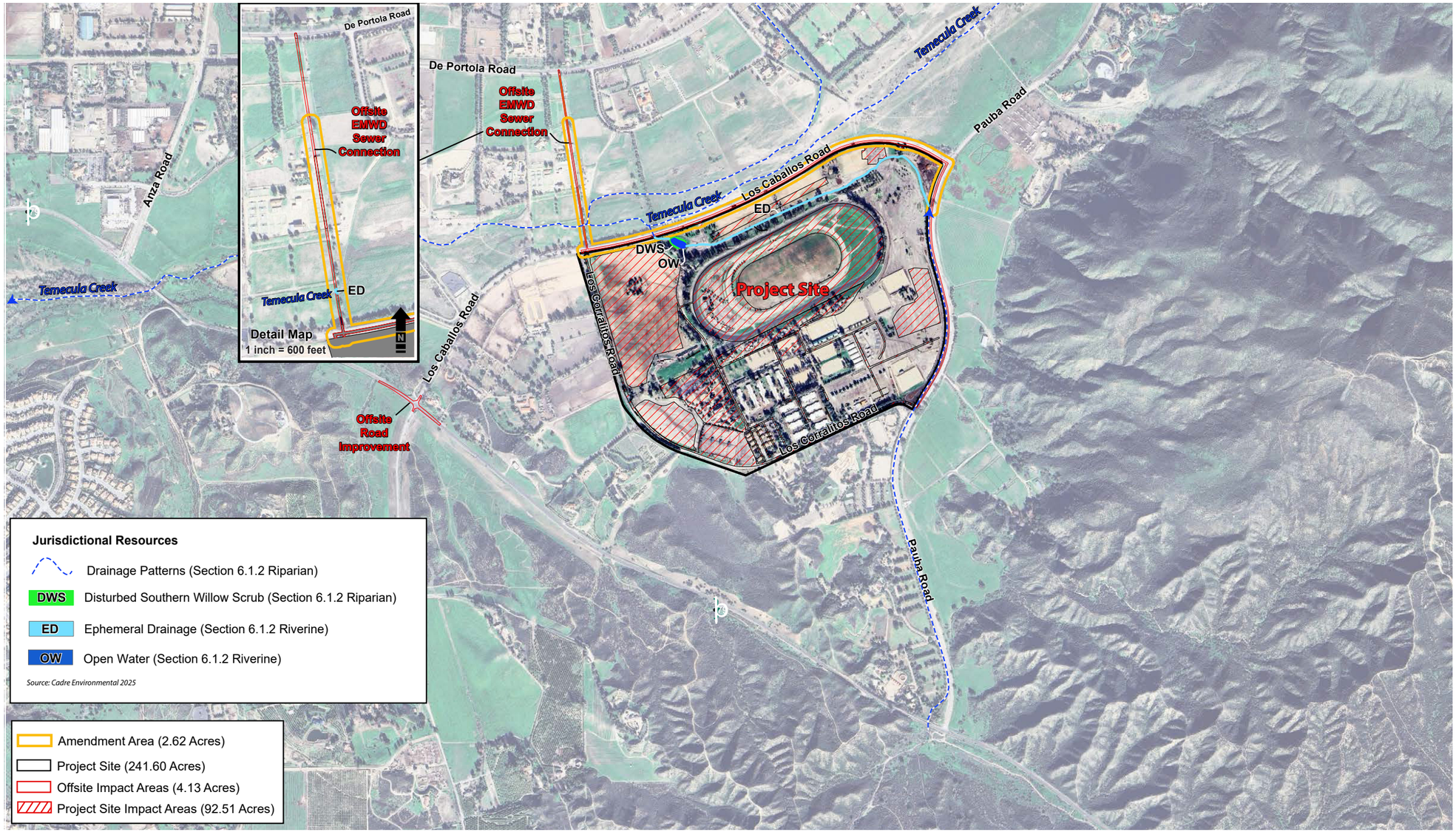
> "*...seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the*

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." (Cadre, 2026b, pp. 32-33)

Project Impacts to MSHCP Riparian/Riverine Resources

The Project site and off-site improvement areas were assessed for the presence or absence of any drainages, swales, or signs of flow that may qualify as a riparian or riverine resource. The Project site contains a small 0.13-acre patch of disturbed southern willow scrub dominated by scattered arroyo willow saplings that comprises a Section 6.1.2 riparian resource, and also contains an existing east-west oriented drainage that comprises a Section 6.1.2 riverine resource. However, the Project has been designed to completely avoid impacts both to the disturbed southern willow scrub riparian resource and the existing east-west oriented ephemeral drainage that is considered a riverine resource. Thus, no MSHCP Section 6.1.2 riverine habitats would be impacted within the Project site, as shown in Figure 4.3-4, *MSHCP Section 6.1.2 Jurisdictional Resources Impact* Map. Additionally, no MSHCP Section 6.1.2 riparian habitats are located within the on- and off-site impact areas, as shown in Figure 4.3-5, *Vegetation Communities Impact Map*. Specifically, no riparian scrub, woodland, or forest habitat is present within the on- or off-site impact areas including but not limited to mulefat scrub, southern willow scrub, or southern cottonwood willow riparian. (Cadre, 2026b, p. 33)

The offsite EMWD sewer connection area would traverse a short reach of Temecula Creek (ephemeral drainage), which represents an MSHCP Section 6.1.2 riverine resource. However, the active channel of Temecula Creek (comprising approximately 0.01-acre) would be avoided by implementing directional drilling (e.g., jack and bore technique) underneath the creek. Temporary impact areas would be recontoured to preexisting conditions following construction of the sewer connection and all staging would occur within the proposed temporary impact area. However, based on a review of aerial photographs, it appears that the precise location of the off-site portions of Temecula Creek has shifted over time. As a precise timeline for when the new EMWD sewer main within De Portola Road will be completed is not currently available, there is a potential that the location identified on the Project's plans where the directional drilling is required may not exactly match the precise location of the drainage at the time the sewer line needs to be constructed. Accordingly, a subsequent jurisdictional delineation would be required prior to installation of the off-site sewer line beneath Temecula Creek. Therefore, in the absence of a subsequent jurisdictional delineation of the off-site portion of Temecula Creek, there is a potential that construction of the sewer line could result in significant direct impacts to approximately 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek, which would result in a potential conflict with MSHCP Section 6.1.2. This is evaluated as a potentially significant impact for which mitigation measures would be required. (Cadre, 2026b, p. 33)

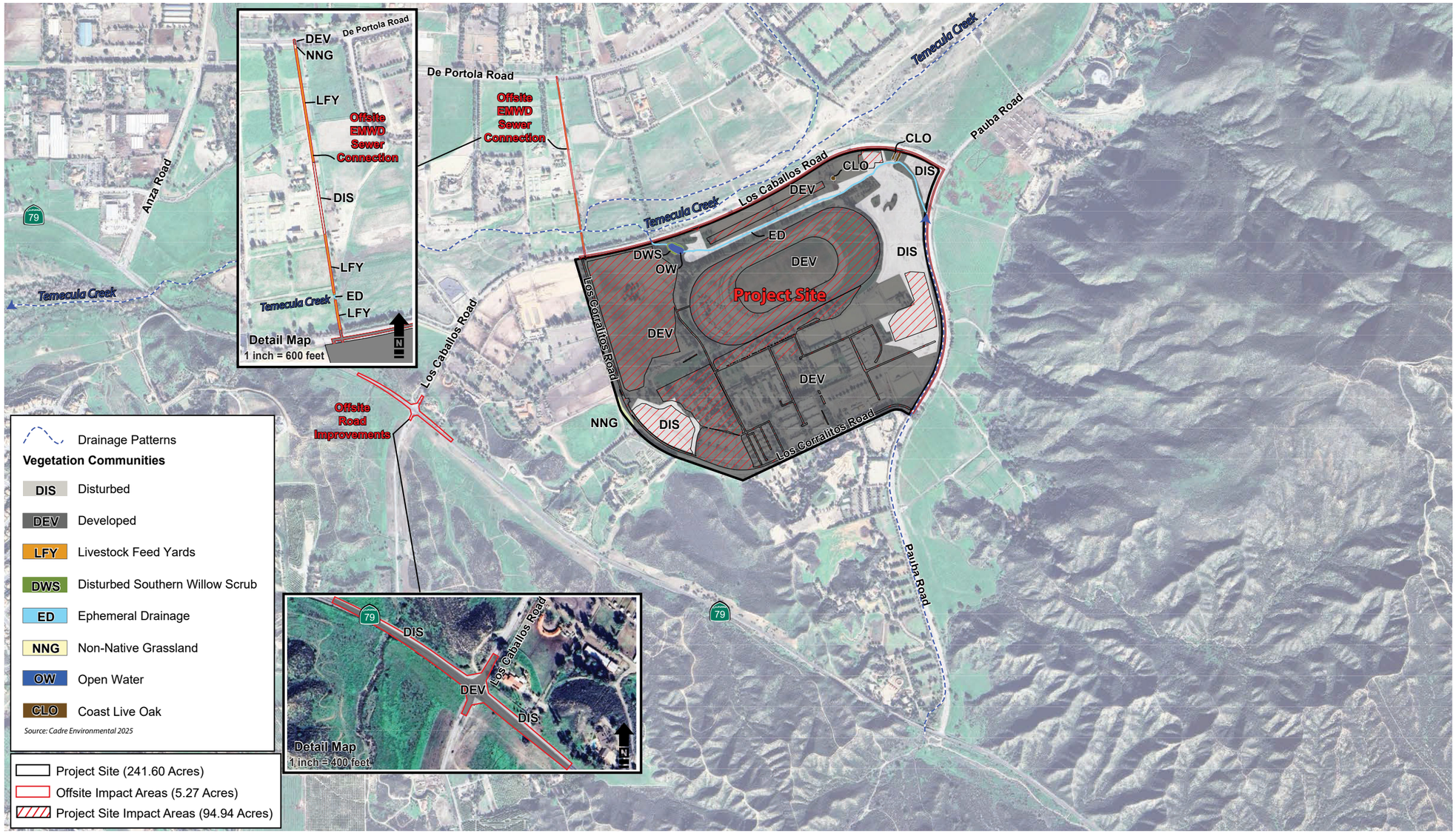


Source(s): CADRE Environmental (April 2026)

Figure 4.3-4

Not to Scale

MSHCP Section 6.1.2 Jurisdictional Resources Impact Map



Source(s): CADRE Environmental (April 2026)

Figure 4.3-5

Not to Scale

Vegetation Communities Impact Map

Project Impacts to Vernal Pools Regulated by the MSHCP

No evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded within the Project site or off-site impact areas. 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 become 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. (Cadre, 2026b, p. 35)

Consistent with conditions documented during the site assessment, the Project site and off-site impact areas are 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 Project site or off-site improvement areas. (Cadre, 2026b, p. 35)

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. (Cadre, 2026b, p. 35)

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 Project site and off-site improvement areas. No features are present that would support fairy shrimp, and no standing water or other sign of areas that pond water was recorded. Accordingly, the proposed Project would not result in any impacts to vernal pools regulated by the MSHCP, and as such the Project would not conflict with the provisions of Section 6.1.2 with respect to vernal pools. No impact due to a conflict with MSHCP Section 6.1.2 would occur. (Cadre, 2026b, p. 35)

Project Impacts to Fairy Shrimp

Based on the initial MSHCP review of predetermined Survey Areas, habitat assessments and focused surveys (as warranted) were conducted for the following five (5) MSHCP Section 6.1.2 Riparian, Riverine, Vernal Pool Species (Cadre, 2026a, p. 6):

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

- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), SE.

As noted above, no evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded within the Project's on- or off-site impact areas, and soils on site are 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 Project site or off-site improvement areas, and no sign or indication of inundation was documented within the Project site and off-site impact areas during a review of historic aerials. Therefore, none of the conditions (i.e., no inundated depressions including road ruts, hydric soils, historic inundation, etc.) were observed or documented within the Project site or off-site improvement areas, and no features are present that would support fairy shrimp. No standing water or other sign of areas that pond water was recorded. Accordingly, the proposed Project would not result in any impacts to protected species of fairy shrimp, and therefore would not conflict with the provisions of MSHCP Section 6.1.2 with respect to fairy shrimp. No impact would occur. (Cadre, 2026b, pp. 39-40)

3. Project Consistency with MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species)

The Project site and off-site improvement areas do not occur within the MSHCP-defined NEPSSA area for narrow endemic plant species. Therefore, the proposed Project has no potential to conflict with the provisions of MSHCP Section 6.1.3, and no impact would occur. (Cadre, 2026b, p. 40)

4. Project Consistency with MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface)

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

Water Quality/Hydrology

As discussed in further detail in EIR Subsection 4.7, *Hydrology and Water Quality*, 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

As discussed in further detail in EIR Subsection 4.7, *Hydrology and Water Quality*, runoff generated on the portions of the Project site proposed for improvement with reconfigured driveways would sheet flow to one of four self-retaining areas that currently exist on site, which implement Low Impact Development (LID) principles in order to prevent the release of toxins, chemicals, petroleum products, exotic plant material, or other elements that could degrade or harm downstream biological or aquatic resources. Toxic sources associated with the Project would be limited to those commonly associated with the facility, such as nutrients, metals, toxicity, bacteria/pathogens, pesticide/herbicides, and total dissolved solids. The Project's existing self-retaining areas already consist of self-treatment areas as required to meet Waste Discharge Requirements and as required by the NPDES permit system, which would reduce or prevent the level of toxins introduced into downstream areas associated with the proposed Project.

Lighting

Construction activities associated with the Project would be minor and would occur during daylight hours in conformance with the provisions of Section 2 of Riverside County Ordinance No. 847 (Regulating Noise); thus, no lighting is anticipated in association with Project construction activities.

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

Noise

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

An analysis of the Project's potential impacts due to noise is presented in EIR Subsection 4.9, *Noise*. As concluded under the analysis of Threshold c. in Subsection 4.9, Project-related construction activities would expose nearby sensitive receptors to noise levels ranging from 55.4 to 67.6 dBA Leq, which would not exceed the identified threshold of significance of 80 dBA Leq at the nearest noise-sensitive receiver locations, including locations within nearby MSHCP Criteria Cells. In addition, the Project would contribute to construction noise increases ranging from 1.2 to 13.2 dBA Leq during the daytime hours at the nearest receiver locations, which is below the 20 dBA Leq noise level increase significance threshold for Project construction activities. Therefore, noise impacts due to daytime Project construction noise would be less than significant at the nearest lands subject to conservation under the MSHCP. Under long-term operational conditions, the daytime hourly noise levels at the off-site receiver locations are expected to range from 42.4 to 49.3 dBA Leq while the nighttime hourly noise levels at the existing off-site receiver locations are expected to range from 29.9 to 39.8 dBA Leq, which would not exceed the daytime threshold of significance of 55.0 dBA Leq or the nighttime threshold of significance of 45.0 dBA Leq at the nearest sensitive receptors, including nearby lands that may be conserved pursuant to the MSHCP; thus, operational noise impacts would be less than significant. In addition, Project-related noise increases at the nearest sensitive receptors would range from 0.1 to 2.5 dBA Leq during the daytime and from 0.1 to 0.3 dBA Leq during the nighttime, which would not exceed the identified threshold of significance for noise increases of 5.0 dBA Leq. Furthermore, the Project would not result in an increase in the amount of traffic generated by the facility as compared to existing conditions, and therefore the Project would have no potential to result in significant impacts due to traffic-related noise. Accordingly, the Project would not conflict with the noise provisions of the MSHCP Section 6.1.4 during either construction or long-term operations.

Invasive Species

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

Barriers

Barriers are intended to reduce or minimize unauthorized public access and associated impacts to protected resources. The only new walls or fencing proposed as part of the Project consists of a proposed perimeter fence around the award ceremony area proposed along the west side of the inner horse racetrack. This proposed fence would occur interior to the Project, and would have no effect on wildlife or wildlife movement as this portion of the Project site already is constrained by existing site improvements, including

the outer horse racing track. Accordingly, the Project would not conflict with the MSHCP Section 6.1.4 provisions related to barriers, and no impact would occur.

5. Project Consistency with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures)

MSHCP Section 6.3.2 includes specific requirements for survey needs and procedures related to criteria area plant species, amphibians, mammals, the burrowing owl, and other species identified as not adequately covered by the MSHCP. Each is discussed below.

Project Consistency with MSHCP Section 6.3.2 Requirements for Criteria Area Plant Species and Mammals

The Project site and off-site improvements areas do not occur within a predetermined Survey Area for MSHCP criteria area plant species (i.e., CAPSSA), are not located within an Amphibian Species Survey Area, and are not located within any MSHCP Mammal Species Survey Areas; thus, the Project has no potential to conflict with the provisions of MSHCP Section 6.3.2 related to the CAPSSA, amphibians, or mammals. No impact would occur. (Cadre, 2026b, pp. 41, 45)

Project Consistency with MSHCP Section 6.3.2 Requirements for the Burrowing Owl

The Project site occurs partially within a predetermined Survey Area for the burrowing owl. 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 discussed in subsection 7.3.1 of the Project's MSHCP Consistency Analysis (*Technical Appendix C2*). (Cadre, 2026b, p. 42)

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. All suitable areas of the Project site and off-site improvement areas 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. (Cadre, 2026b, pp. 42-43)

Results from the habitat assessment indicated that suitable burrowing owl burrows and foraging habitat were documented within and adjacent to the Project site and off-site improvement areas. Accordingly, because 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. (Cadre, 2026b, p. 43)

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. 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 were monitored at a short distance from the entrance, and at a location that would not interfere with potential owl behavior, when present. (Cadre, 2026b, p. 43)

Suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented adjacent to the property including foraging habitat documented throughout the Project site and off-site improvement areas. Therefore, focused surveys were conducted by Cadre Environmental during the spring and summer of 2025. No burrowing owls were detected within or adjacent to the Project site or off-site improvement areas. Accordingly, the proposed Project would not result in any impacts to known burrowing owl locations, and the Project would therefore be consistent with the provisions of MSHCP Section 6.3.2 with respect to the burrowing owl. (Cadre, 2026b, p. 44)

Although no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site or off-site improvement areas to become occupied by the burrowing owl prior to the commencement of construction activities on site. If present, the Project could result in impacts to the burrowing owl in conflict with MSHCP Section 6.3.2. This is evaluated as a significant impact for which mitigation would be required.

Project Consistency with MSHCP Section 6.3.2 Requirements for Other Species

None of the 28 MSHCP species not adequately covered has the potential to occur within the Project's on- or off-site impact areas, as presented in Table 6 of the Project's MSHCP Consistency Analysis (*Technical Appendix C2*). Accordingly, the Project has no potential to conflict with Section 6.3.2 of the MSHCP with respect to other species considered not adequately conserved, and no impact would occur. (Cadre, 2026b, p. 46)

6. MSHCP Consistency Conclusion Summary

As indicated in the preceding analysis, the proposed Project would be fully consistent with all applicable provisions of the MSHCP, with exception of the need to amend JPR 10-12-27-01 to include the Project's anticipated 2.62 acres of off-site impacts, which is evaluated as a potentially significant impact as the amendment to the JPR is required in order to demonstrate compliance with MSHCP requirements related to Reserve Assembly. Additionally, the Project has the potential to result in impacts to the burrowing owl, if the site or off-site improvement areas were to become occupied prior to commencement of construction activities; thus, prior to mitigation, potential impacts to the burrowing owl represent a conflict with MSHCP Section 6.3.2. Accordingly, the Project has the potential to result in a conflict with the MSHCP Reserve Assembly Requirements as well as MSHCP Section 6.3.2 with respect to the burrowing owl; this is evaluated as a significant impact of the proposed Project for which mitigation would be required.

Threshold b.:	**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?**
Threshold c.:	**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?**

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed Project.

A. Impacts to Special-Status Plants

The Project site and off-site improvement areas are not located within an MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA) and are not located within an MSHCP Criteria Area Plant Species Survey Area; thus, focused surveys were not required pursuant to MSHCP Sections 6.1.3 and 6.3.2, respectively. In addition, no State- or federally-listed threatened or endangered plant species were documented or expected to occur onsite based on a lack of suitable habitat, as outlined in Table 2 of the Project's BTR (*Technical Appendix C1*). Accordingly, the Project would result in no impacts to State- or federally-listed threatened or endangered plant species or to any other special-status plants or species of local concern. (Cadre, 2026a, p. 35)

B. Impacts to Sensitive Wildlife

As more fully discussed above in subsection 4.3.1.C, suitable habitat was documented onsite for one (1) special-status invertebrate species not covered under the MSHCP including Crotch's bumble bee (*Bombus crotchii*), a State Candidate Endangered (SCE) species. The Crotch's bumble bee was not documented onsite or in the Project's off-site improvement areas following focused surveys conducted during the spring of 2025. As such, the proposed Project would not result in any impacts to the Crotch's bumble bee. (Cadre, 2026a, p. 41)

As also discussed above in subsection 4.3.1.C, the Project site and off-site improvement areas do not contain any vernal pools or soils that could support vernal pools. The only feature on site that potentially could serve as habitat for sensitive fairy shrimp species is an inundated detention basin that captures flows from a well-defined unvegetated ephemeral drainage extending in a western direction through the northern region of the Project site. This feature represents low quality habitat for vernal pool fairy shrimp (*Branchinecta lynchi*), Riverside fairy shrimp (*Streptocephalus woottoni*), and western spadefoot (*Spea hammondii*). Additionally, the Project has been designed to avoid impacts to this existing inundated detention basin, and as such the Project would not result in any impacts to sensitive fairy shrimp species. Accordingly, impacts to sensitive fairy shrimp species would not occur. (Cadre, 2026a, pp. 75-76)

As discussed above under the analysis of Threshold a., suitable burrowing owl burrows potentially utilized for refugia and/or nesting were documented adjacent to the property including foraging habitat documented throughout the Project site and off-site improvement areas. Therefore, focused surveys were conducted by Cadre Environmental during the spring and summer of 2025. No burrowing owls were detected within or adjacent to the Amendment Area. Accordingly, the proposed Project would not result in any impacts to known burrowing owl locations, and the Project would therefore be consistent with the provisions of MSHCP Section 6.3.2 with respect to the burrowing owl. (Cadre, 2026a, p. 76)

Although no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. If present, the Project could result in impacts to the burrowing owl in conflict with MSHCP Section 6.3.2. This is evaluated as a significant impact for which mitigation would be required. (Cadre, 2026a, p. 76)

A total of ten (10) sensitive species have potential to occur or were observed within the Project site including grasshopper sparrow (*Ammodramus savannarum*), sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), California horned lark (*Eremophila alpestris actia*), Stephens' kangaroo rat (*Dipodomys stephensi*), bobcat (*Lynx rufus*), mountain lion (*Puma concolor*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). As previously stated, the MSHCP has determined that these sensitive species potentially occurring within Project site have been adequately covered (as indicated in MSHCP Table 2-2, *Species Considered for Conservation Under the MSHCP Since 1999*). Accordingly, Project impacts to these species would be less than significant. (Cadre, 2026a, p. 76)

Threshold d.:	**Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

The Project site, including off-site road improvements, is not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor. As previously described, the Project site is an existing equestrian and events facility that 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 previously shown in Figure 4.3-1 and as previously outlined in Table 4.3-1. (Cadre, 2026a, p. 81)

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

> "*Proposed Linkage 24 is comprised of the portion of Temecula Creek east of Redhawk Parkway and west of Pauba Road. This Linkage provides Habitat for wetland species and a connection to Core Areas in Wilson Valley. The Linkage is constrained by existing roadways and planned community Development. Planning Species for which Habitat is provided for within this Linkage include bobcat,*

mountain lion, Stephens' kangaroo rat, Aguanga kangaroo rat, western pond turtle, yellow warbler, southwestern willow flycatcher, arroyo chub, loggerhead shrike, tree swallow, white-tailed kite, Cooper's hawk and least Bell's vireo. In addition to maintenance of habitat quality, maintenance of existing floodplain processes along Temecula Creek is important for these species. While specific studies of movement along this Linkage have not been conducted, it likely provides for movement of common mammals such as bobcat." (Riverside County, 2003, p. 3-95)

All offsite impacts associated with the proposed EMWD sewer connection would be temporary. Temporary impact areas within upland habitats would be recontoured to preexisting conditions following construction of the sewer connection and all staging will occur within the proposed temporary impact area. Accordingly, the proposed Project's off-site sewer connection would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.

Threshold e.: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?

The northern region of the open water basin in the northern portion of the Project site is bordered by a small 0.13-acre patch of disturbed southern willow scrub dominated by scattered arroyo willow saplings. The proposed Project has been designed to completely avoid the disturbed southern willow scrub, as no grading or improvements are proposed as part of the Project within this 0.13-acre patch of disturbed southern willow scrub. No other vegetation associated with sensitive natural communities occur within the Project's impact areas. Accordingly, the Project would not result in any impacts to sensitive vegetation communities, and no impact would occur. (Cadre, 2026a, p. 77)

A total of 99.52 acres of primarily disturbed and developed vegetation communities conservatively would be directly and permanently impacted as a result of Project implementation, as outlined Table 4.3-2, *Project Impacts to Vegetation Communities*, and as previously illustrated on Figure 4.3-5, *Vegetation Communities Impact Map*. Impact areas associated with the Project and evaluated herein are considered conservative in nature because the majority of the Project site is subject to active disturbances under existing conditions in association with ongoing site operations. Mandatory payment of the MSHCP Local Development Mitigation Fees as required pursuant to Riverside County Ordinance No. 810 (Habitat Conservation Plan Mitigation Fee) would ensure direct impacts to all vegetation communities would be covered by the MSHCP. The construction of the EMWD sewer connection would result in temporary impacts to 0.19-acre of developed/disturbed habitat and 0.49-acre of active livestock feed yards (non-native grassland). Temporary impact areas would be recontoured to preexisting conditions following construction of the sewer connection, and all staging would occur within the proposed temporary impact area. (Cadre, 2026a, p. 77)

Accordingly, and based on the preceding analysis, the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional

plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service, and impacts would be less than significant (Cadre, 2026a, p. 74).

Table 4.3-2 Project Impacts to Vegetation Communities

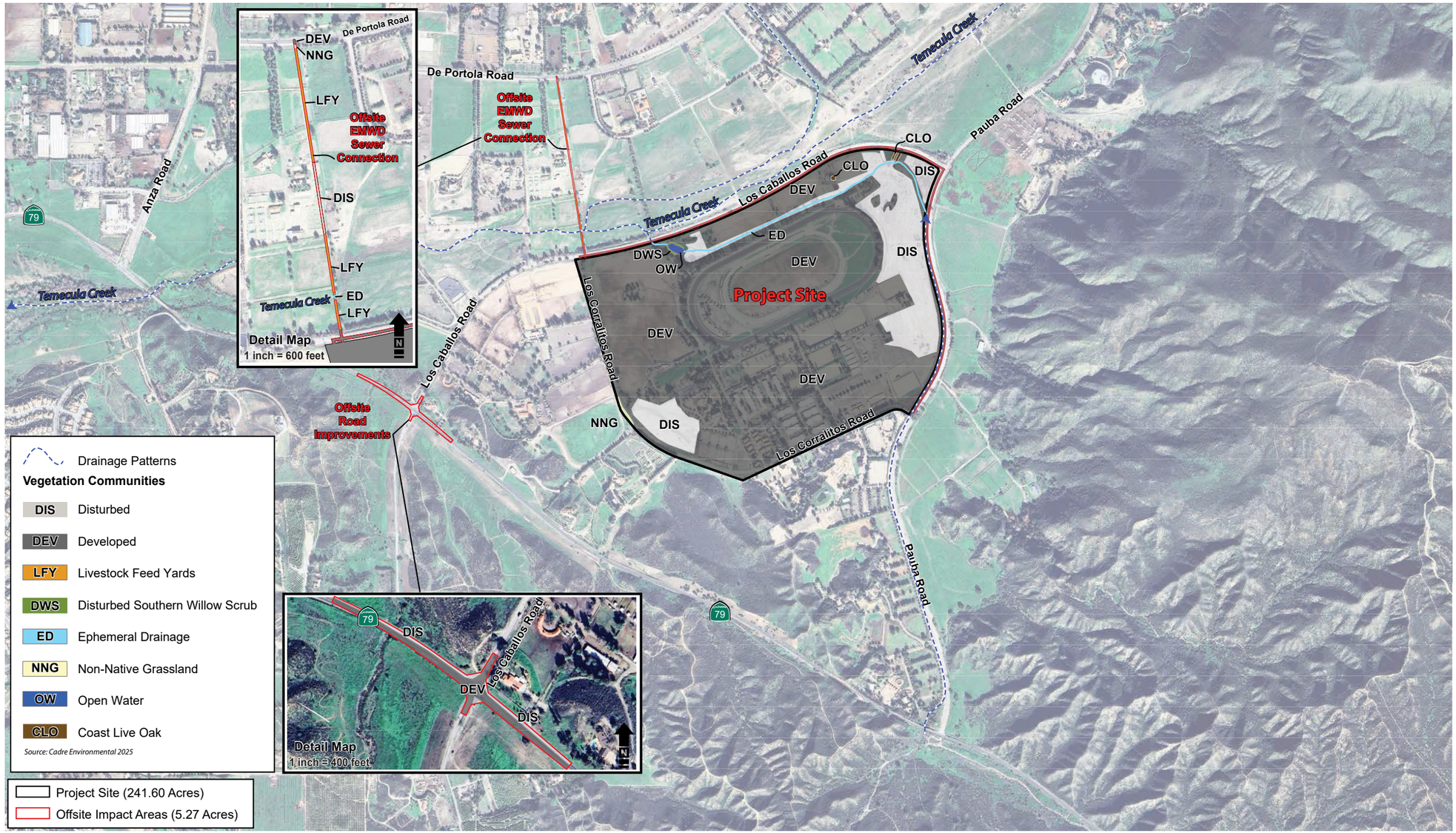
Vegetation Community	Onsite (ac)	Offsite (ac)	Project Site Total (ac)	Onsite Impacts PERM (ac)	Offsite Impacts PERM (ac)	Offsite Impacts TEMP (ac)
Developed	205.48	4.23	209.71	83.84	4.21	0.02
Disturbed	34.89	0.54	35.43	11.10	0.37	0.17
Ephemeral Drainage	0.32	0.01	0.33	--	--	--
Open Water	0.31	--	0.31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

(Cadre, 2026a, Table 4)

Threshold f.: Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The well-defined unvegetated ephemeral drainage (0.32-acre) which enters the northeast region of the Project site and drains in a western direction where it is captured in a detention basin (open water) represents a potential resource regulated by the USACE, RWQCB and CDFW, as shown in Figure 4.3-6, *Jurisdictional Resources Impact Map*. The detention basin overflows into a channel which exits the Project site through a culvert extending north under Los Caballos Road and drains into Temecula Creek. The offsite EMWD sewer connection impact area also traverses a short reach of Temecula Creek (0.01-acre, ephemeral drainage), which represents a potential resource regulated by the USACE, RWQCB and CDFW. (Cadre, 2026a, p. 78)

The proposed Project has been designed to completely avoid the existing unvegetated ephemeral drainage located in the northern portion of the Project site, as shown on Figure 4.3-6. In addition, a note has been added to the plans included as part of CUP 02303R1 to require directional drilling (e.g., jack and bore technique) beneath the existing 0.01-acre portion of Temecula Creek, such that there would be no surface impacts to this existing drainage. However, based on a review of aerial photographs, it appears that the precise location of the off-site portions of Temecula Creek has shifted over time. As a precise timeline for when the new EMWD sewer main within De Portola Road will be completed is not currently available, there is a potential that the location identified on the Project's plans where the directional drilling is required may not exactly match the precise location of the drainage at the time the sewer line needs to be constructed. Accordingly, a subsequent jurisdictional delineation would be required prior to installation of the off-site sewer line beneath Temecula Creek. Therefore, in the absence of a subsequent jurisdictional delineation of



Source(s): CADRE Environmental (April 2026)

Figure 4.3-6

Not to Scale

Jurisdictional Resources Impact Map

the off-site portion of Temecula Creek, there is a potential that construction of the sewer line could result in significant direct impacts to the approximately 0.01-acre ephemeral drainage within Temecula Creek. This is evaluated as a potentially significant impact for which mitigation would be required. (Cadre, 2026a, p. 78)

Threshold g.: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines, Riverside County Ordinance No. 499, and Riverside County Ordinance No. 559 (Regulating the Removal of Trees).

As previously indicated in Table 4.3-2 and depicted on Figure 4.3-5, although the Project site contains approximately 0.18-acre of Coast Live Oak habitat and contains several mature regulated coast live oak trees within the northeastern portion of the Project site, the Project has been designed to fully avoid these oak trees. Specifically, the areas mapped as containing Coast Live Oak in the northeast corner of the Project site occur outside of the Project's anticipated limits of physical disturbance, as shown on Figure 4.3-5. As such, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines, and no impact would occur.

Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,313 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project.

In addition, the Project would not result in the removal of any existing trees either on site or within the Project's off-site improvement areas. Therefore, the Project has no potential to conflict with Riverside County Ordinance Nos. 559 (Regulating the Removal of Trees) or 449 (Regulating Encroachments in County Highways).

Accordingly, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

4.3.6 Cumulative Impact Analysis

The cumulative impact analysis considers development of the Project in conjunction with other development projects located within the purview of the Western Riverside County MSHCP. This study area for cumulatively-considerable impacts to biological resources is appropriate because the MSHCP encompasses a large area surrounding the Project site, and provides for the long-term protection of sensitive plant, animal, and plant communities throughout the MSHCP area. Additionally, most cumulative development projects within the Project vicinity would be subject to the provisions of the MSHCP, and the general range of habitats, species, and climate are fairly consistent throughout the MSHCP plan area.

The permanent impacts of the Project would not result in cumulative impacts (State CEQA Guidelines Section 15355) to environmental resources within the region of the Project site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects. The Project Site is located completely within the County of Riverside, MSHCP permittees. As stated in the Final EIR/Environmental Impact Statement (EIS) prepared in conjunction with the MSHCP (included as MSHCP Volume Four): (Cadre, 2026a, p. 83)

> "*Implementation of the MSHCP and Covered Projects will not result in a cumulative adverse effect, either directly or through habitat modifications, on any of the Covered Species, including the 31 species that are currently listed as threatened or endangered and the one species that is currently proposed for listing. Implementation of the MSHCP will benefit the Covered Species by preserving their habitat in order to address their life cycle needs. Thus, based on the features of the Plan itself, impacts to Covered Species are mitigated below a level of significance.*" (Riverside County, 2003, Volume 4, p. 5.1-7)

Although the Project conservatively would result in the permanent loss of 94.94 acres of vegetation communities onsite and 4.58 acres of vegetation communities offsite (total 99.52 acres), the vegetation communities that would be impacted by the Project consist primarily of disturbed, developed and non-native grassland habitats. The MSHCP was developed to address the comprehensive regional planning effort and anticipated growth in the County of Riverside. (Cadre, 2026a, pp. 84-85)

As also stated in Volume 4 of the MSHCP:

> "*The Plan will not cause adverse cumulative effects related to the reduction of sensitive vegetation communities within the Plan Area; rather, the Plan is designed to preserve sufficient acreage of the sensitive vegetation communities present in western Riverside County. Similarly, the Plan will not cause adverse cumulative effects related to interference with the movement of any native resident or migratory fish or wildlife species or obstruction of genetic flow for the identified Planning Species. Part of the purpose and goals of the MSHCP is to use regional planning efforts to assemble a reserve that will preserve contiguous blocks of habitat in large enough areas to ensure that the reserve will allow movement of species and flow of genetic information.*
>
> *The MSHCP will not cause adverse cumulative impacts by conflicting with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan or other approved local, regional, or State habitat conservation plan either within or outside of the Plan area. Rather, the MSHCP has been written specifically to complement existing HCPs, such as the Stephens' kangaroo rat long-term HCP.*" (Riverside County, 2003, pp. 5.1-7 and 5.1-8)

The proposed Project has been designed and conservation measures would be implemented to remain in compliance with all MSHCP conservation goals and guidelines and therefore would not result in an adverse cumulative impact. Notwithstanding, provided below is a discussion of the Project's potential to result in cumulatively-considerable impacts to biological resources. (Cadre, 2026a, p. 85)

As indicated under the analysis of Threshold a., the proposed Project has no potential to conflict with the SKR HCP as the Project site and off-site improvement areas are not located within any of the SKR core reserve areas, and the Project site is located outside of areas subject to payment of fees pursuant to Ordinance No. 663. As also indicated under the analysis of Threshold a., the proposed Project would not result in any conflicts with MSHCP Section 6.1.2 pertaining to vernal pools and sensitive fairy shrimp species; would not conflict with MSHCP Section 6.1.3 with respect to NEPSSA species; would not conflict with any provisions of MSHCP Section 6.1.4 relating to the urban/wildlands interface; and would not conflict with MSHCP Section 6.3.2 with respect to CAPSSA species, amphibians, mammals, or other species not considered adequately conserved under the MSHCP. However, although the Project would not directly conflict with the MSHCP Reserve Assembly requirements, because the Project would require an amendment to JPR 10-12-27-01 to address the Project's off-site impacts, a potentially significant impact is conservatively identified. In addition, although the Project has been designed to avoid a small 0.13-acre patch of disturbed southern willow scrub dominated by scattered arroyo willow saplings that comprises a Section 6.1.2 riparian resource and an existing east-west oriented drainage that comprises a Section 6.1.2 riverine resource, both located within the northern portions of the Project site, the Project also has been designed to avoid approximately 0.01-acre of off-site MSHCP riparian resources (ephemeral drainage) within Temecula Creek during the construction of the off-site sewer line. Because Temecula Creek appears to shift in location over time, the Project has the potential to result in direct impacts to up to 0.01-acre of MSHCP riparian resources in the absence of mitigation. In addition, the Project has the potential to result in a conflict with MSHCP Section 6.3.2 with respect to the burrowing owl if the Project were to fail to implement MSHCP-required pre-construction surveys. Other cumulative developments within the MSHCP region similarly would have the potential to result in conflicts with provisions of the MSHCP. Accordingly, prior to mitigation, the Project's potential impacts due to a conflict with the MSHCP would be cumulatively considerable.

As discussed under the analysis of Thresholds b. and c., the Project would result in no impacts to State- or federally-listed threatened or endangered plant species or to any other special-status plants or species of local concern. In addition, and with the exception of potential impacts to the burrowing owl, the proposed Project would not result in any significant impacts to sensitive wildlife species. However, although no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. If present, the Project could result in impacts to the burrowing owl in conflict with MSHCP Section 6.3.2. This is evaluated as a significant impact for which mitigation would be required. As other cumulative developments within the region similarly would have the potential to result in significant impacts to the burrowing owl, Project impacts to the burrowing owl would represent a cumulatively-considerable impact of the Project in the absence of mitigation.

As discussed under the analysis of Threshold d., the onsite regions of the Project site, including offsite road improvements, are not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor, and due to ongoing uses at the Project site the Project site does not serve as a local wildlife corridor. All offsite impacts associated with the proposed EMWD sewer connection would be temporary, and would not adversely affect any wildlife movement corridors. Accordingly, the Project would have no potential to

adversely affect the movement of any native resident or migratory fish or wildlife species, and impacts would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold e., the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service, and impacts would be less than significant. As such, the Project has no potential to result in cumulatively-considerable impacts to riparian habitat or other sensitive natural communities.

As discussed under the analysis of Threshold f., the proposed Project has been designed to completely avoid the existing unvegetated ephemeral drainage located in the northern portion of the Project site, and as such would have no impacts to any drainages within the on-site areas. However, in the absence of a subsequent jurisdictional delineation of the off-site portion of Temecula Creek, there is a potential that construction of the sewer line could result in significant direct impacts to the approximately 0.01-acre ephemeral drainage within Temecula Creek. As other cumulative developments similarly would have the potential to result in significant impacts to State- or federally-protected waters, Project impacts to 0.01-acre of ephemeral drainage within Temecula Creek conservatively are evaluated as a cumulatively-considerable impact.

As discussed under the analysis of Threshold g., although the Project site contains approximately 0.18-acre of Coast Live Oak habitat and contains several mature regulated coast live oak trees within the northeastern portion of the Project site, the Project has been designed to fully avoid these oak trees. As such, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines, and no impact would occur. In addition, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,313 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. In addition, the Project would not result in the removal of any existing trees either on site or within the Project's off-site improvement areas, and as such the Project has no potential to conflict with Riverside County Ordinance Nos. 559 (Regulating the Removal of Trees) or 449 (Regulating Encroachments in County Highways). Accordingly, and aside from potential cumulatively-considerable impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and cumulatively-considerable impacts would not occur.

4.3.7 Significance of Impacts Before Mitigation

Threshold a: Significant Direct and Cumulatively-Considerable Impact. The proposed Project is not located within or adjacent to any SKR core reserve areas and is not subject to payment of SKR HCP fees pursuant to Riverside County Ordinance No. 663; thus, the proposed Project has no potential to conflict with the SKR HCP. The proposed Project would not conflict with MSHCP provisions relating to vernal pools, sensitive fairy shrimp, narrow endemic plant species, or the urban/wildlands interface. In addition, the Project would not conflict with MSHCP Section 6.3.2 with respect to CAPSSA species, mammals, amphibians, or other species not considered adequately conserved. However, while the Project would not directly conflict with the MSHCP Reserve Assembly requirements, because the Project's previously-issued JPR 10-12-27-01 did not

account for the Project's off-site sewer impacts, a revision to the JPR is required; this is conservatively evaluated as a potentially significant impact. Additionally, although the Project has been designed to completely avoid on- and off-site riparian and riverine resources subject to regulation under MSHCP Section 6.1.2, the off-site portion of Temecula Creek that traverses the proposed off-site sewer alignment appears to shift over time, and there is a potential that the location identified on the Project's CUP application materials may not match the precise location of the drainage at the time the sewer line would be installed. Thus, a subsequent jurisdictional delineation would be required prior to construction of the off-site sewer line. Accordingly, the Project's potential to result in significant direct impacts to approximately 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek conservatively represents a significant impact due to a conflict with MSHCP Section 6.1.2. In addition, while no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. If present, the Project could result in impacts to the burrowing owl in conflict with MSHCP Section 6.3.2. This is evaluated as a significant impact for which mitigation would be required.

Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact. The Project would result in no impacts to State- or federally-listed threatened or endangered plant species or to any other special-status plants or species of local concern. Additionally, the Crotch's bumble bee was not documented onsite following focused surveys conducted during the spring of 2025. As such, the proposed Project would not result in any impacts to the Crotch's bumble bee. The Project also has been designed to avoid impacts to the existing inundated detention basin located on site, which is the only feature on site that potentially could serve as habitat for sensitive fairy shrimp species. Thus, the Project would not result in any impacts to sensitive fairy shrimp species. Although no burrowing owls or burrows were identified during the focused survey, there is potential for the Project site to become occupied by the burrowing owl prior to the commencement of construction activities on site. If present, the Project could result in impacts to the burrowing owl in conflict with MSHCP Section 6.3.2. This is evaluated as a significant impact for which mitigation would be required.

Threshold d.: Less-than-Significant Impact. The onsite regions of the Project site including offsite road improvements are not located within an MSHCP linkage area, designated travel route, or wildlife movement corridor. In addition, all offsite impacts associated with the proposed EMWD sewer connection would be temporary. Temporary impact areas within upland habitats would be recontoured to preexisting conditions following construction of the sewer connection and all staging will occur within the proposed temporary impact area. Accordingly, the proposed Project's off-site sewer connection would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.

Threshold e.: Less-than-Significant Impact. A total of 99.52 acres of primarily disturbed and developed vegetation communities conservatively would be directly and permanently impacted as a result of project implementation. The proposed Project has been designed to completely avoid disturbed southern willow scrub within the on-site areas, as no grading or improvements are proposed as part of the Project within this

0.13-acre patch of disturbed southern willow scrub. No other vegetation associated with sensitive natural communities occur within the Project's impact areas. Accordingly, the Project would not result in any impacts to sensitive vegetation communities, and no impact would occur. Therefore, the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service, and impacts would be less than significant.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project has been designed to completely avoid the existing unvegetated ephemeral drainage located in the northern portion of the Project site. In addition, a note has been added to the plans included as part of CUP 2303R1 to require directional drilling (e.g., jack and bore technique) beneath the existing 0.01-acre portion of Temecula Creek, such that there would be no surface impacts to this existing drainage. However, based on a review of aerial photographs, it appears that the precise location of the off-site portions of Temecula Creek has shifted over time. As a precise timeline for when the new EMWD sewer main within De Portola Road will be completed is not currently available, there is a potential that the location identified on the Project's plans where the directional drilling is required may not exactly match the precise location of the drainage at the time the sewer line needs to be constructed. Accordingly, a subsequent jurisdictional delineation would be required prior to installation of the off-site sewer line beneath Temecula Creek. Therefore, in the absence of a subsequent jurisdictional delineation of the off-site portion of Temecula Creek, there is a potential that construction of the sewer line could result in significant direct impacts to the approximately 0.01-acre ephemeral drainage within Temecula Creek. This is evaluated as a potentially significant impact for which mitigation measures would be required.

Threshold g.: No Impact. Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines, Riverside County Ordinance No. 449, and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). Although the Project site contains approximately 0.18-acre of Coast Live Oak habitat and contains several mature regulated coast live oak trees within the northeastern portion of the Project site, the Project has been designed to fully avoid these oak trees. In addition, the Project would not result in the removal of any existing trees either on site or within the Project's off-site improvement areas, and as such the Project has no potential to conflict with Riverside County Ordinance Nos. 559 (Regulating the Removal of Trees) or 449 (Regulating Encroachments in County Highways). Thus, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines, and no impact would occur. Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet amsl in elevation, while the maximum elevation at the Project site is approximately 1,313 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Accordingly, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

4.3.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee*.

Design Features

The proposed Project has been designed to avoid impacts to the existing unvegetated ephemeral drainage located in the northern portion of the Project site. In addition, the Project has been designed to avoid direct and indirect impacts to the mature coast live oak trees (*Quercus agrifolia*) that are present in the northeastern region of the Project site. These mature oak trees occur along the eastern and western sides of the existing easternmost access driveway along Los Caballos Road. While this driveway would be improved and paved, the proposed improvements would not affect the existing coast live oak trees. There are no other features inherent in the Project's design that are specifically included to reduce or avoid impacts to biological resources.

Mitigation

MM 4.3-1 Prior to approval of the Project's proposed Conditional Use Permit No. CUP02303R1, the Project Applicant shall obtain an amendment to JPR 10-12-27-01 to expand the area covered by the JPR to include the 2.62 acres of additional Project-related off-site impacts within Assessor's Parcel Number (APN) 927-690-005 and within the impacted portions of Los Caballos Road and De Portola Road to address impacts associated with the off-site construction of the proposed sewer line between the northwest corner of the Project site and the future EMWD sewer main within De Portola Road, and to address the proposed reconfiguration of the Project's driveways along Los Caballos Road and De Portola Road.

MM 4.3-2 Prior to issuance of grading or construction permits that facilitate or authorize off-site construction of the sewer line between the northwest corner of the Project site and the EMWD sewer main within De Portola Road, the Project Applicant shall provide Riverside County with a Jurisdictional Delineation map and technical report prepared by a Qualified Biologist meeting the qualifications defined by the Western Riverside County MSHCP with demonstrated experience conducting jurisdictional delineations in accordance with the USACE Wetland Delineation Manual and applicable Regional Supplements. The Jurisdictional Delineation shall identify the jurisdictional limits of Temecula Creek within APN 927-690-005 under Section 404 of the Clean Water Act (USACE jurisdiction), Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act (RWQCB jurisdiction), and Fish and Game Code Section 1602 (CDFW jurisdiction), in relation to

ground-disturbing activities associated with the sewer line installation. The plans included as part of the grading or construction permit application shall depict the limits of federal and state jurisdiction of Temecula Creek within APN 927-690-005, and shall require directional drilling (e.g., jack and bore) beneath all mapped jurisdictional areas such that there would be no surface impact to the drainage feature within those jurisdictional limits. The grading and construction plans associated with the off-site sewer construction shall further require that all temporary impact areas be recontoured to pre-existing conditions following completion of sewer line construction. Prior to commencement of sewer line installation, the Project Applicant shall provide Riverside County with pre-construction photographs of the creek alignment and proposed bore location documenting existing conditions. Prior to final grading and sewer line installation inspection, the Project Applicant shall provide Riverside County with post-construction photographs of the drainage and sewer alignment demonstrating that the drainage feature has been completely avoided and left in its existing condition and that all non-jurisdictional areas subject to disturbance during off-site sewer line construction have been recontoured to pre-existing grades.

MM 4.3-3 In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days prior to commencement of any ground-disturbing activities at the Project site, as discussed below.

- Pre-Construction Survey: The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the RCA and Wildlife Agencies (i.e., CDFW and/or USFWS).

- Burrowing Owl Management Plan: In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on site, a burrowing owl management plan shall be prepared and implemented in coordination with the Western Riverside County Regional Conservation Authority (RCA) and CDFW that shall detail the relocation of owls from the Project site, passively and/or actively. If additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented.

A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if required, shall be provided to the Riverside County Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and ground-disturbing activities.

4.3.9 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.3-1 would ensure that the Project's previously-issued JPR 10-12-27-01 is updated to include the Project's off-site impacts associated with the construction of an off-site sewer line and the Project's driveway improvements along Los Caballos Road and De Portola Road, and would reduce the Project's potential indirect impact to the MSHCP Reserve Assembly requirements to below a level of significance. Implementation of Mitigation Measure MM 4.3-2 would ensure that a future jurisdictional delineation is conducted within the off-site sewer alignment, requires adjustments to grading associated with the off-site sewer alignment as needed to completely avoid the 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek, and requires recontouring of the off-site areas subject to sewer line construction to their pre-existing conditions. Implementation of Mitigation Measure MM 4.3-3 would ensure that pre-construction surveys for the burrowing owl are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and that a burrowing owl management plan is prepared and implemented in order to address the relocation of owls from the Project site, passively and/or actively. Implementation of the required mitigation would ensure Project consistency with MSHCP Section 6.3.2. With implementation of the required mitigation, the proposed Project would be fully consistent with the MSHCP, and impacts would be reduced to less-than-significant levels.

Thresholds b. and c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.3-3 would ensure that pre-construction surveys for the burrowing owl are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and that a burrowing owl management plan is prepared and implemented in order to address the relocation of owls from the Project site, passively and/or actively. Implementation of the required mitigation would ensure Project consistency with MSHCP Section 6.3.2. With implementation of the required mitigation, Project impacts to the burrowing owl would be reduced to below a level of significance.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.3-2 would ensure that a future jurisdictional delineation is conducted within the off-site sewer alignment, and further requires adjustments to the off-site sewer alignment as needed to completely avoid the 0.01-acre of MSHCP riparian resources (ephemeral drainage) within Temecula Creek. Implementation of the required mitigation would ensure that Project impacts associated with the off-site sewer line construction would completely avoid all areas containing riparian resources, and would reduce Project impacts to below a level of significance.

4.3.10 References

Cited As	Reference
Cadre, 2026a	Cadre Environmental, 2026. *Biological Resources Technical Report, Galway Downs Project Site*. April 2026. Included as EIR *Technical Appendix C1*.

Cited As	Reference
Cadre, 2026b	Cadre Environmental, 2026. *Western Riverside County – MSHCP Consistency Analysis, Galway Downs Project Site*. April 2026. Included as EIR *Technical Appendix C2*.
RCHCA, 1996	Riverside County Habitat Conservation Agency, 1996. *Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County California*. March 1996. Accessed August 26, 2025. Available on-line at: https://www.rchca.us/DocumentCenter/View/549/SKR-Habitat-Conservation-Plan
Riverside County, 2003	Riverside County, 2003. *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), Volumes I and IV*. June 17, 2003. Accessed August 26, 2025. Available on-line at: https://www.wrc-rca.org/document-library/

4.4 CULTURAL RESOURCES

The analysis in this EIR Subsection 4.4 is based on a Phase I Cultural Resources Study (herein, "CRS") prepared by BFSA Environmental Services (herein "BFSA"), entitled "Phase I Cultural Resources Study for the Galway Downs Project," dated June 19, 2026, and included as *Technical Appendix D* to this EIR (BFSA, 2026). All references used in this Subsection are included in EIR subsection 4.4.10, *References*, and EIR Section 7.0, *References*.

It should be noted that confidential information has been redacted from *Technical Appendix D* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and BFSA is considered confidential in respect to places that have traditional tribal cultural significance (Government Code Section 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection 4.4, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (California Code of Regulations [CCR] Section 15120[d]).

4.4.1 Existing Conditions

The Project site is located in unincorporated western Riverside County, California. The following provides a brief discussion on the prehistoric and historic context of the Project area for general understanding of the relevance of resources identified within the site's proximity. Refer to Section 2.3 of the Project's CRS (*Technical Appendix D*) for a complete discussion of the prehistoric and historic setting.

A. Prehistoric Setting

1. Paleo-Indian Period (Late Pleistocene: 11,500 to circa 9,000 Year Before the Present [YBP])

Archaeologically, the Paleo Indian Period is associated with the terminus of the late Pleistocene (12,000 to 10,000 YBP). The environment during the late Pleistocene was cool and moist, which allowed for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands. However, by the terminus of the late Pleistocene, the climate became warmer, which caused the glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes. The coastal shoreline at 10,000 YBP, depending upon the particular area of the coast, was near the 30-meter isobath, or two to six kilometers further west than its present location. Paleo Indians were likely attracted to multiple habitat types, including mountains, marshlands, estuaries, and lakeshores. These people likely subsisted using a more generalized hunting, gathering, and collecting adaptation utilizing a variety of resources including birds, mollusks, and both large and small mammals. (BFSA, 2026, p. 2.0-7)

2. Archaic Period (Early and Middle Holocene: circa 9,000 to 1,300 YBP)

Archaeological data indicates that between 9,000 and 8,000 YBP, a widespread complex was established in the southern California region, primarily along the coast. This complex is locally known as the La Jolla Complex, which is regionally associated with the Encinitas Tradition and shares cultural components with

the widespread Milling Stone Horizon. The Encinitas Tradition is best recognized for its pattern of large coastal sites characterized by shell middens, grinding tools that are closely associated with the marine resources of the area, cobble-based tools, and flexed human burials. While ground stone tools and scrapers are the most recognized tool types, coastal Encinitas Tradition sites also contain numerous utilized flakes, which may have been used to pry open shellfish. Artifact assemblages at coastal sites indicate a subsistence pattern focused upon shellfish collection and nearshore fishing. This suggests an incipient maritime adaptation with regional similarities to more northern sites of the same period. Other artifacts associated with Encinitas Tradition sites include stone bowls, doughnut stones, discoidals, stone balls, and stone, bone, and shell beads. (BFSA, 2026, p. 2.0-8)

The coastal lagoons in southern California supported large Milling Stone Horizon populations circa 6,000 YBP. The ensuing millennia were not stable environmentally and, by 3,000 YBP, many of the coastal sites in central San Diego County had been abandoned. The abandonment of the area is usually attributed to the sedimentation of coastal lagoons and the resulting deterioration of fish and mollusk habitat. By 5,000 YBP, an inland expression of the La Jolla Complex is evident in the archaeological record, exhibiting influences from the Campbell Tradition from the north. These inland Milling Stone Horizon sites have been termed "Pauma Complex." By definition, Pauma Complex sites share a predominance of grinding implements (manos and metates), lack mollusk remains, have greater tool variety (including atlatl dart points, quarry-based tools, and crescentics), and seem to express a more sedentary lifestyle with a subsistence economy based upon the use of a broad variety of terrestrial resources. Although originally viewed as a separate culture from the coastal La Jolla Complex, it appears that these inland sites may be part of a subsistence and settlement system utilized by the coastal peoples. (BFSA, 2026, pp. 2.0-8 and 2.0-9)

More recent work has identified a more localized complex known as the Greven Knoll Complex, which is a redefined northern inland expression of the Encinitas Tradition. All expressions of the inland Milling Stone in southern California north of San Diego County may be grouped together in the Greven Knoll Complex. The Greven Knoll Complex is broken into three phases and obtained its name from the type-site Greven Knoll located in Yucaipa, California. Presently, the Greven Knoll Site is part of the Yukaipa't Site and was combined with the adjacent Simpson Site. Excavations at Greven Knoll recovered manos, metates, projectile points, discoidal cogged stones, and a flexed inhumation with a possible cremation. It is believed that the Greven Knoll Site was occupied between 5,000 and 3,500 YBP. The Simpson Site contained mortars, pestles, side-notched points, and stone and shell beads. (BFSA, 2026, p. 2.0-9)

Phase I of the Greven Knoll Complex generally is dominated by the presence of manos and metates, core tools, hammerstones, large dart points, flexed inhumations, and occasional cremations. Mortars and pestles are absent from this early phase, and the subsistence economy emphasized hunting. The similarity of the material culture of Greven Knoll Phase I and that found in the Mojave Desert at Pinto Period sites indicates that the Greven Knoll Complex was influenced by neighbors to the north at that time. Accordingly, Greven Knoll Phase I may have appeared as early as 9,400 YBP and lasted until about 4,000 YBP. Greven Knoll Phase II is associated with a period between 4,000 and 3,000 YBP. Artifacts common to Greven Knoll Phase II include manos and metates, Elko points, core tools, and discoidals. Pestles and mortars are present; however, they are only represented in small numbers. Finally, there is an emphasis upon hunting

and gathering for subsistence. Greven Knoll Phase III includes manos, metates, Elko points, scraper planes, choppers, hammerstones, and discoidals. Again, small numbers of mortars and pestles are present. Greven Knoll Phase III spans from approximately 3,000 to 1,000 YBP and shows a reliance upon seeds and yucca. Hunting is still important, but bones seem to have been processed to obtain bone grease more often in this later phase. (BFSA, 2026, pp. 2.0-9 and 2.0-10)

The shifts in food processing technologies during each of these phases indicate a change in subsistence strategies; although people were still hunting for large game, plant-based foods eventually became the primary dietary resource. The development of mortars and pestles during the middle Holocene can be attributed to the year-round exploitation of acorns as a main dietary provision. Additionally, the warmer and drier climate may have been responsible for groups from the east moving toward coastal populations, which is archaeologically represented by the interchange of coastal and eastern cultural traits. (BFSA, 2026, p. 2.0-10)

3. Late Prehistoric Period (Late Holocene: 1,300 YBP to 1790)

Many Luiseño hold the worldview that as a population they were created in southern California. Archaeological and anthropological data, however, proposes a scientific/archaeological perspective, suggesting that at approximately 1,350 YBP, Takic-speaking groups from the Great Basin region moved into Riverside County, marking the transition to the Late Prehistoric Period. Inland southern California was occupied by "proto-Yuman" populations before 1,000 YBP. It is believed that Takic expansion occurred starting around 3,500 YBP moving toward southern California, with the Gabrielino language diffusing south into neighboring Yuman (Hokan) groups around 1,500 to 1,000 YBP, possibly resulting in the Luiseño dialect. (BFSA, 2026, p. 2.0-10)

The final Takic expansion would not have occurred until about 1,000 YBP, resulting in Vanyume, Serrano, Cahuilla, and Cupeño dialects. The Luiseño did not simply replace Hokan speakers, but were rather a northern San Diego County/southern Riverside County Yuman population who adopted the Takic language. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations. Technological developments during this period included the introduction of the bow and arrow between A.D. 400 and 600 and the introduction of ceramics. Atlatl darts were replaced by smaller arrow darts, including Cottonwood series points. Other hallmarks of the Late Prehistoric Period include extensive trade networks as far-reaching as the Colorado River Basin and cremation of the dead. (BFSA, 2026, pp. 2.0-10 and 2.0-11)

4. Protohistoric Period (Late Holocene: 1790 to Present)

Ethnohistoric and ethnographic evidence indicates that three Takic-speaking groups occupied portions of Riverside County: the Cahuilla, the Gabrielino, and the Luiseño. The geographic boundaries between these groups in pre- and proto-historic times are difficult to place, but the Project site is located well within the borders of ethnographic Luiseño territory. This group was a seasonal hunting and gathering people with

cultural elements that were very distinct from Archaic Period peoples. These distinctions include cremation of the dead, the use of the bow and arrow, and exploitation of the acorn as a main food staple. Along the coast, the Luiseño made use of available marine resources by fishing and collecting mollusks for food. Seasonally available terrestrial resources, including acorns and game, were also sources of nourishment for Luiseño groups. Elaborate kinship and clan systems between the Luiseño and other groups facilitated a wide-reaching trade network that included trade of Obsidian Butte obsidian and other resources from the eastern deserts, as well as steatite from the Channel Islands. Groups in the vicinity of the Project site, neighboring the Luiseño, include the Cahuilla and the Gabrielino. (BFSA, 2026, p. 2.0-11)

B. Historic Setting

The Galway Downs facility is located east of the City of Temecula within a portion of the former Rancho Pauba. After Mexico achieved its independence from Spain in 1821, Alta California became the northern frontier of Mexico, and the secularization of the missions took place throughout the next decade. The former mission lands were transferred to prominent Mexican families, and the subdivision of former mission rancho lands was common during the ensuing years. The general area was eventually split into Rancho Temecula, Rancho Santa Rosa, and San Jacinto Rancho, and further divided into Pauba Rancho, La Laguna Rancho, and Little Temecula Rancho. (BFSA, 2026, p. 2.0-16)

In 1873, Ezekial (Esquial) Murrieta came to the area from central California, where he was a successful sheep rancher. After Ezekiel Murrieta returned to Spain, his brother Juan Murrieta, along with Francisco Sanjurjo and Jose Maria Gonzales, brought 100,000 sheep to the area. The Southern Emigrant Trail, and later, the Butterfield Overland Stage, bisected Murrieta's land. In 1882, the Murrieta brothers deeded the right-of-way to the Southern Pacific Railroad. In 1884, the Temecula Land and Water Company bought and subdivided the land into 40-acre parcels. The railroad brought settlers to the area, spurring its growth. (BFSA, 2026, p. 2.0-16)

Eventually, the Santa Fe Railroad purchased the railroad; however, it was rerouted due to a decade of flooding, and Murrieta became a spur from Corona. The railroad was then closed, and the last train left Murrieta in 1935. Temecula had been growing since the 1860s, becoming more popular in the 1880s as a result of the railroad and the Butterfield Stage route. Temecula boomed in the later part of the nineteenth century as a result of ranching operations lead by Walter Vail and the Wolf Valley granite deposits. The granite quarry brought steady employment, which contributed to the town's growth. Since Temecula granite was of such high quality, much of it can be found on San Francisco's famous Market Street. Many of Riverside County's government buildings, paving stones, and hitching posts from the era are made of granite from Temecula. The granite industry played a vital role in the development of the region until the early twentieth century. New and improved methods for creating concrete drove the price of granite lower than the cost required to quarry it. By 1915, most granite operations around Temecula had closed. (BFSA, 2026, pp. 2.0-16 and 2.0-17)

Nevertheless, the region did continue to prosper as a result of ranching and farming. Through the mid-1960s, the economy of the region centered around the Vail Ranch; the cattle business and agriculture were the stimuli for most business ventures. The ranch was sold in 1964 to the Kaiser Development Company. As a

result, the region began to experience an influx of development during the latter part of the twentieth century as people came to settle in Temecula and the surrounding areas. (BFSA, 2026, p. 2.0-17)

By 1946, SR-79 had been constructed in its current location adjacent to the Project site. A review of historic aerial images and topographic maps indicate that the Project site was previously utilized for agriculture before transitioning into an equestrian training center in the late 1960s. Between 1946 and 1967, the entire Galway Downs event facility consisted of cultivated fields. (BFSA, 2026, p. 4.0-2)

Equestrian facility uses originally opened on the Project site in 1968 as the Rancho California Track and Training Center, a multipurpose event center for equestrian-related activities. Aerial photography confirms continued development of the site for the expansion of the events facility for equestrian-related activities in the following decades (BFSA, 2026, p. 4.0-2). By 1976, the majority of the property was cleared and prepared for the facility's operations, and extensive improvements were made to include a recreational vehicle (RV) park, kitchen, restaurant, hay barn, and check-in gate. In 1980, the facility was purchased by a new owner, at which point the facility was renamed as "Galway Downs." The new owner installed a 5/8-mile racetrack inside the larger track, along with the installation of additional barns and infrastructure, which includes the construction of additional structures, the grading of dirt roads, and the planting of numerous trees throughout the Project site.

In 2010, the Galway Downs facility was purchased by Ken and Tina Smith, who continue to own and manage the facility. Galway Downs includes a variety of existing recreational- and event-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with clubhouse; grooms' quarters; office space; a clock tower house; and storage spaces.

C. Records Search Results

To determine if cultural resources were previously recorded on or off the Project site in areas where physical disturbance would occur as a result of the proposed Project, BFSA conducted a records search and a Sacred Lands Files (SLF) search. The search results indicate that 12 resources are recorded within one mile of the Project site, one of which is located on the Project site (P-33-013281). Site P-33-013281 is a prehistoric lithic scatter recorded by Compass Rose Archaeological Inc. (Compass Rose) in 2004. Of the remaining 11 resources located off site and within one mile of the Project site, three are prehistoric and eight are historic. The prehistoric resources consist of one village site, one bedrock milling feature and petroglyph site, and one bedrock milling feature with an associated lithic scatter. The historic resources include six isolates, one trash scatter, and the Dorland Ranch. (BFSA, 2026, p. 4.0-1)

Additionally, 51 reports are recorded within a one-mile radius of the Project, five of which overlap the Project site (Keller 1991; Schmidt 2004; Claredon et al. 2018; Chatterton and Walters 2018; Stropes and Smith 2011). The Keller (1991) study surveyed the entire Galway Downs property and did not identify any cultural resources within the Project site. In 2004, Compass Rose surveyed portions of the southwest and southeast quadrants of the Galway Downs property and identified one prehistoric lithic scatter (P-33-013281) within the site. Within the western half of the Project site, the Stropes and Smith (2011) study surveyed the western

and northern portions of the Galway Downs property and did not identify any cultural resources. Similarly, the Claredon et al. (2018) and Chatterton and Walters (2018) studies overlapped linear segments of the Project's off-site disturbance area near the intersections of Pauba Road and State Route 79 (SR-79) and Los Caballos Road and SR-79; neither report identified any cultural resources within these areas. (BFSA, 2026, pp. 4.0-1 and 4.0-2.)

D. Field Survey Results

To assess the site for presence or absence of visible cultural resources, BFSA conducted an intensive pedestrian survey of the Project's physical disturbance area accompanied by a representative of the Pechanga Band of Luiseño Indians. The survey focused on the Project's physical disturbance area and directly adjacent portions of the Project, which includes portions of the Galway Downs events facility property and two areas of off-site impacts. Specifically, the off-site impact areas include the intersection of Los Caballos Road at SR-79, where the Project Applicant would install a traffic signal and adjust turning lane geometrics; and the off-site sewer line connection, which would extend from the northwest boundary of the Project site northerly through an off-site parcel (Assessor's Parcel Number [APN] No. 927-690-005) and ultimately connecting to a planned EMWD sewer line within De Portola Road. (BFSA, 2026, p. 4.0-4)

During the survey, ground visibility was moderate to good, at times hindered by the existing development. Vegetation consisted of non-native weeds, grasses, and trees. Within the Galway Downs events facility property, the site appeared to have been previously impacted by agriculture use and cleared for the development of the events facility, as observed in the historic aerial photographs. The existing development includes numerous buildings and ancillary structures, a racetrack, dirt roads, and areas cleared for equestrian-related activities. Within the linear alignments located alongside SR-79, the areas have been previously cleared during SR-79 development. The linear alignment extending from the northwest corner of the Galway Downs property to De Portola Road through a portion of APN 927-690-005 that would be disturbed for a sewer line installation primarily consists of areas cleared for equestrian use or covered with non-native weeds and grasses. (BFSA, 2026, p. 4.0-4)

The prehistoric lithic scatter (P-33-013281), previously recorded within the southeast portion of the Galway Downs property by Compass Rose in 2004, was not expressed on the surface of the site during the current survey. The entire site area has been cleared for equestrian use, and no artifacts were identified. As such, Site P-33-013281 appears to no longer be extant on the surface. No subsurface testing was conducted for Site P-33-013281, as this site occurs in a portion of the Project site that is proposed as a temporary parking area that would not entail any grading within this area. (BFSA, 2026, p. 4.0-5)

During the survey, three previously unrecorded cultural resources, designated Temp-1, Temp-3, and Iso-1 were identified in the field. Site Temp-1 consists of two buildings constructed between 1967 and 1976. Site Temp-3 is a fragment of a prehistoric bedrock milling feature that is not in situ. Finally, Iso-1 is a prehistoric mano fragment. Of the identified resources, only Site Temp-1 is situated within the Project's physical disturbance area; however, Iso-1 and Temp-3 are located directly adjacent to the proposed disturbance area. (BFSA, 2026, p. 4.0-9)

1. Site Temp-1

A review of historic aerial photographs indicates that several structures were built on the Project site between 1967 and 1976; however, only two buildings were identified within the physical disturbance area and have been recorded as Site Temp-1. The buildings are located in the southwest portion of the Galway Downs property, directly northwest and southeast of the wedding venue building, and approximately 800 feet southwest of the central racetrack. One of the buildings, which currently functions as a sales office, is located northwest of the large wedding venue building and measures approximately 43 by 40 feet. The second building, southeast of the wedding venue and about 275 feet from the sales office, measures approximately 30 by 40 feet. Both buildings are shown as being located in the Project's physical disturbance area; however, according to the current Project design, neither would be removed by or altered as part of implementation of the Project, as the only improvements proposed as part of the Project in this area would consist of two entry parking lots. Because these buildings would not be impacted by the Project, evaluation for significance and CRHR eligibility were determined unnecessary. (BFSA, 2026, p. 4.0-12)

2. Site Temp-3

Site Temp-3 was identified adjacent to the Project's physical disturbance area, located south of Galway Downs and Los Corralitos Road. Site Temp-3 is a fragment of a prehistoric bedrock milling feature, which is clearly not in situ. The milling feature contains one to three slicks and is situated on a boulder that has been broken and moved. As such, the entire site has been previously impacted and is disturbed. No surface artifacts were observed in association with Site Temp-3. Currently, the bedrock is used as a decorative boulder marking the entrance to an off-site property on Los Corralitos Road, which lies outside the Project's physical disturbance area. The boulder measures approximately 1 by 1 meter, with the most prominent slicks measuring approximately 20 by 40 centimeter (cm) and 10 by 5 cm. (BFSA, 2026, p. 4.0-15)

Based upon the results of the survey, Site Temp-3 appears to be a limited-use resource processing site common to this area of Riverside County and is not considered unique under CEQA criteria. No associated artifacts were noted, and the site has been substantially previously disturbed. As such, the resource does not maintain integrity and is not considered eligible for the CRHR. (BFSA, 2026, p. 4.0-15)

3. Iso-1

Isolate Iso-1 is a granitic prehistoric groundstone fragment, identified near the western boundary of the Galway Downs property. Iso-1 is a shaped, bifacial mano that measures approximately 10 by 11 by 4 cm. Although located in the Project site, the prehistoric isolate Iso-1 is situated outside of the Project's physical disturbance area. Further, because this resource consists only of a single isolate, Iso-1 would not be considered CRHR-eligible. Specifically, because Iso-1 is not associated with a historically significant event or individual and does not embody the distinctive characteristics of a type, period, or method of construction, CRHR Criteria 1, 2, and 3 are not applicable. The criterion most relevant to prehistoric archaeological resources is Criterion 4, which applies to resources that have yielded, or have the potential to yield, information important in the prehistory or history of the local area, California, or the nation. An isolated artifact – that is, a single surface find unassociated with a broader archaeological deposit, features, faunal or floral remains, or other cultural materials – has limited research potential because it lacks the

contextual information necessary to address meaningful research questions regarding past human behavior, chronology, land use, or subsistence patterns. Isolates generally do not constitute significant archaeological sites precisely because the absence of associated cultural context precludes the kind of systematic data recovery needed to contribute to the understanding of California prehistory. Because Iso-1 consists of a single artifact in isolation, it does not possess the research potential required to satisfy CRHR Criterion 4. Therefore, Iso-1 is not eligible for listing in the CRHR, and no further evaluation is warranted. (BFSA, 2026, p. 4.0-16)

4. Summary of Results

The Phase I CRS identified three cultural resources recorded as Temp-1, Temp-3, and Iso-1. Resources Temp-3 and Iso-1 are not located in the Project's physical disturbance area. Although adjacent to the Project's physical disturbance area, the prehistoric resources Iso-1 and Site Temp-3 are not considered CRHR-eligible. Site Temp-1, which consists of two historic buildings constructed on the property between 1967 and 1976, is located in the Project's physical disturbance area. However, according to the current Project design, neither of these buildings would be impacted by the Project. As such, none of the resources identified during the current survey would be affected by the Project. Nevertheless, all three resources were recorded using the appropriate California Department of Parks and Recreation (DPR) forms and submitted to the South Coastal Information Center (SCIC). (BFSA, 2026, p. 4.0-17)

4.4.2 Applicable Regulatory Requirements

A. Federal Regulations

1. National Register of Historic Places (NRHP)

The National Register of Historic Places (NRHP) is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act (NHPA) of 1966, the National Park Service's NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources. Under Federal Law, the listing of a property in the NRHP places no restrictions on what a non-federal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. NRHP listing does not lead to public acquisition or require public access.

2. National Historic Landmarks Program

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, just over 2,500 historic places bear this national distinction. Working with citizens throughout the nation, the National Historic Landmarks Program draws upon the expertise of National Park Service staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks.

3. American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) requires each executive branch agency with statutory or administrative responsibility for the management of federal lands, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies are also required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of federal lands are required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites.

4. Federal Antiquities Act

The Antiquities Act is the first law to establish that archaeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments.

B. State Regulations

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: “No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value.”

2. California Code of Regulations Title 14, Section 1427

CCR Title 14, Section 1427 provides that: “No person shall collect or remove any object or thing of archeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archeological or historical interest or value is found.”

3. California Register of Historic Resources

The State Historical Resources Commission (SHRC) has designed this program for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register of Historical Resources (CRHR) is the authoritative guide to the state's significant historical and archeological resources. The CRHR program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

In order for a resource to be included on the CRHR, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California, or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

For resources included on the CRHR, environmental review may be required under CEQA if property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act. A property owner also may place his or her own plaque or marker at the site of the resource.

Consent of owner is not required, but a resource cannot be listed over an owner's objections. The SHRC can, however, formally determine a property eligible for the California Register if the resource owner objects.

4. Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations.

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code Section 65300 *et seq.*) and specific plans (defined in Government Code Section 65450 *et seq.*). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code Section 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment.

5. Assembly Bill 52

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code (PRC), relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The PRC now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). To help determine whether a project may have such an effect, the PRC requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (PRC Section 21080.3.1.)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. PRC Section 21084.3(b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015.

Section 21074 of the PRC defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe.

6. State Health and Safety Code

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the HSC makes it a misdemeanor to intentionally

disturb, mutilate or remove interred human remains. Section 7051 specifies that the removal of human remains from "a place where it has been interred, or from a place where it is deposited while awaiting interment, cremation, reduction, or hydrolysis, with intent to sell it or to dissect it, without authority of law, or written permission of the person or persons having the right to control the remains . . . or with malice or wantonness," is a public offense punishable by imprisonment in a state prison. Lastly, HSC Sections 8010-8011 establish the California Native American Graves Protection and Repatriation Act (NAGPRA) consistent with the federal law addressing the same. NAGPRA stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect."

7. California Code of Regulations Section 15064.5

CCR Title 14, Chapter 3, Section 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in State CEQA Guidelines Section 15064.5, as follows:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852) including the following:

a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

b. Is associated with the lives of persons important in our past;

c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

d. Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

C. Local Regulations

1. Ordinance No. 578 - Establishment of Historic Preservation Districts

This ordinance is intended to facilitate the preservation of areas deemed historically important to the County of Riverside. The ordinance specifies that a Historic Preservation District may be established if the Riverside County Board of Supervisors adopts a resolution that includes the boundaries of the Historic Preservation District and finds that the proposed Historic Preservation District is in conformity with the Cultural and Paleontological section of the Multipurpose Open Space Element of the Riverside County General Plan. It must also find that, for the county, State, or nation: the area exemplifies or reflects significant aspects of the cultural, political, economic or social history; the area is identified with historic personages or with important events in history; or, that the area embodies the distinguishing characteristics of a significant architectural period which is inherently valuable for the study of architecture unique to the history of the county, State, or nation. (Riverside County, 2015a, p. 4.9-25)

Under this ordinance, no building or structure within the boundaries of an adopted Historic Preservation District can be constructed or altered, except in strict compliance with the plans approved in conjunction with the issuance of a Historic District Alteration Permit by the Riverside County Planning Director. The ordinance also outlines how such certificates are to be reviewed and processed in order to preserve the "historical significance and related construction theme" of the Historic District. (Riverside County, 2015a, p. 4.9-26)

2. Riverside County Historic Preservation Commission

The Riverside County Historical Commission was established in 2005 to advise the Board of Supervisors on historical preservation matters. It is tasked with working to discover and identify persons, events and places of historical importance within Riverside County, and to make recommendations relating to the preservation of appropriate historic sites and structures. To accomplish this, the Riverside County Historical Commission established criteria and procedures to identify and recognize historic landmarks in Riverside County. These criteria should be used when reviewing a potentially historically or culturally significant site that could be affected by the proposed development. Such resources are noted in the countywide list provided in Table 4.9-A of Riverside County EIR No. 521. (Riverside County, 2015a, p. 4.9-26)

3. Riverside County Planning Department Procedures

The Riverside County Archaeologist reviews all proposed land use projects subject to CEQA and not otherwise deemed categorically exempt. The Riverside County Archaeologist reviews various internal databases for information that might pertain to the age of any buildings found on site, grading permits,

ground disturbance activities, and building permits. Where buildings are 45 years or older, the project applicant is required to perform an architectural history evaluation to assess potential historic value as part of a Phase I Cultural Resources Study. When the study is completed, and if historic-period resources were identified during a survey, a copy of the report is transmitted to the Riverside County Historic Preservation Officer (CHPO) for review and comment. The CHPO sends relevant comments back to the Riverside County Archaeologist. (Riverside County, 2015a, p. 4.9-26)

Vacant parcels within areas known to have prehistoric or historic resources trigger a Phase I Cultural Resources Study. Similarly, any parcels with environmental, geomorphological, or vegetative features known to increase the likelihood of cultural resources being present trigger a "Phase I" cultural resources study. Such studies are required to follow the reporting formula found on the Riverside County Planning Department's website which mirror the recommendations published by the SHPO in 1987. (Riverside County, 2015a, p. 4.9-26)

The Riverside County Archeologist reviews all Phase I cultural resources studies for completeness and reasonable conclusions based on current industry standards in archeology. The Phase I study serves to advise the Riverside County Archeologist on matters relating to any identified prehistoric or historic resources, provide the requisite information to complete the project-related CEQA analysis and guide the Riverside County Archeologist in determining which land use conditions of approval and/or mitigation measures apply to the proposed project. (Riverside County, 2015a, p. 4.9-26)

Copies of studies are provided to tribes, upon their request, as a confidential document. If a proposed project is subject to the requirements of the Traditional Tribal Places Act (commonly referred to as SB 18), a Phase I report is forwarded to tribes who request it as part of consultation under SB 18. Typically, official tribal consultations are scheduled after the report has been sent to the tribe(s) to maximize consultation efforts. (Riverside County, 2015a, p. 4.9-26)

4.4.3 Basis for Determining Significance

Section V of Appendix G to the State CEQA Guidelines addresses typical adverse effects to cultural resources, and includes the following threshold questions to evaluate the Project's impacts on cultural resources.

- *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*
- *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*
- *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

Significance thresholds set forth in Riverside County's Environmental Assessment Checklist, are derived from Section V of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed

Project would have a significant impact on cultural resources if construction and/or operation of the Project would:

a. *Alter or destroy an historic site;*

b. *Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5;*

c. *Alter or destroy an archaeological site;*

d. *Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5;*

e. *Disturb any human remains, including those interred outside of formal cemeteries*.

The significance thresholds set forth in the Riverside County's Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on cultural resources.

4.4.4 Methodology

A. Overview

The analyses of potential cultural resources impacts are based on the nature and degree of disturbance to historical resources, archaeological resources, and human remains that would be brought about by the Project, along with how such changes, if any, affect the integrity and significance of these resources within and adjacent to the Project's limits of physical disturbance. The analysis of potential impacts to cultural resources is based on a review of applicable federal, State, and local regulations and plans, as well as the results of the Project's CRS (EIR *Technical Appendix D*). The CRS included an archaeological records search conducted through the South Coastal Information Center (SCIC) at San Diego State University, a review of the NRHP index, historic United States Geological Survey (USGS) topographic maps, historic aerial photographs, and Bureau of Land Management (BLM) land patent records; an intensive pedestrian field survey of the Project's physical disturbance area conducted by BFSA and a representative of Pechanga as further described below; an SLF search conducted through the Native American Heritage Commission (NAHC); and outreach to Native American tribal representatives. Government-to-government tribal consultation conducted by Riverside County, as the Lead Agency under CEQA, pursuant to AB 52 and SB 18 was meaningfully conducted and completed revealing no known tribal cultural resources on the property. The tribal consultation process is addressed in EIR Subsection 4.11, *Tribal Cultural Resources*, and not repeated herein. The methodology used to evaluate the Project's potential impacts to cultural resources is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, developed equestrian-oriented events facility that has operated continuously since 1968 and that contains a variety of recreational- and event-related amenities, including but not limited to a horse racetrack, stables, barns, arenas, and other

equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with clubhouse; grooms' quarters; office space; a clock tower house; and storage spaces. The Project's off-site improvement areas, which include linear alignments along SR-79 near the intersections of SR-79 with Pauba Road and Los Caballos Road, and an off-site sewer alignment extending from the northwest corner of the Galway Downs property through a portion of Assessor's Parcel Number 927-690-005 to De Portola Road, have been previously disturbed by roadway development and historic agricultural and residential use. The physical environmental baseline for the cultural resources evaluation is as described above in Subsection 4.4.1D, *Field Survey Results*. As a result of long-standing land use activities, the ground surface across the majority of the Project's physical disturbance area has been previously cleared, graded, disced, developed, or otherwise disturbed, and the potential for surface scatters of intact prehistoric or historic artifacts to remain in their original context is correspondingly reduced. Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential impacts to cultural resources evaluates the proposed Project relative to the physical conditions existing at the Project site at the time the NOP for this EIR was published (January 14, 2025), as documented through the records search, field survey, SLF search, and tribal consultation efforts described in the following subsections.

C. Criteria for Evaluating Significance of Cultural Resources

The significance of cultural resources identified within or adjacent to the Project's limits of physical disturbance is evaluated under the criteria established by PRC Section 5024.1 for listing in the CRHR and the criteria set forth in CCR Section 15064.5 for evaluating whether a project would result in a substantial adverse change in the significance of a historical or archaeological resource.

Pursuant to PRC Section 5024.1(c), a cultural resource is eligible for listing in the CRHR if it meets one or more of the following four criteria and retains sufficient integrity to convey its historical significance: (1) it is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) it is associated with the lives of persons important in our past; (3) it embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic values; or (4) it has yielded, or may be likely to yield, information important in prehistory or history. The integrity of a resource is evaluated based on the seven aspects of integrity recognized by the National Register of Historic Places and applied to the CRHR: location, design, setting, materials, workmanship, feeling, and association. A resource that does not retain sufficient integrity to convey its historical significance under one or more of the four CRHR criteria is not considered CRHR-eligible.

Under CCR Section 15064.5(b), a project is considered to have a substantial adverse change in the significance of a historical or archaeological resource if it would result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired. The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of the resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR; that account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in an historical resources survey meeting the

requirements of PRC Section 5024.1(g); or that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by the Lead Agency for purposes of CEQA. For archaeological resources, CCR Section 15064.5(c) provides that if a resource qualifies as a "historical resource" under CCR Section 15064.5(a), it shall be treated as a historical resource; if it qualifies only as a "unique archaeological resource" under PRC Section 21083.2, it shall be treated in accordance with PRC Section 21083.2; and if it qualifies as neither, the effects of the project on the resource shall not be considered a significant effect on the environment under CEQA.

The CRHR eligibility determinations and substantial-adverse-change determinations presented in the impact analysis within EIR subsection 4.4.5 are based on the application of these criteria to the cultural resources identified through the records search and field survey described above.

D. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with minimal new physical construction and no new operational uses beyond those already occurring under existing baseline conditions, the analytical framework for the impact analysis focuses on: (1) whether the physical improvements proposed as part of the Project, consisting of the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar canopy structure, additional area for equestrian RV park use, an off-site sewer line, offsite intersection improvements at SR-79 with Pauba Road and Los Caballos Road; and the future development of two areas designated to contain up to 36 park model lodging units and 18 employee modular housing units, would result in direct or indirect impacts to any previously identified cultural resources located within or adjacent to the Project's limits of physical disturbance; (2) whether ground-disturbing activities associated with the Project, including fine grading, trenching, and installation of the off-site sewer line, could encounter previously unrecorded subsurface historical or archaeological resources, taking into consideration the Project site's long history of agricultural use and equestrian-related disturbance, the Project site's proximity to Temecula Creek and other natural water sources that historically supported Native American occupation and use, and the documented presence of cultural resources within the broader Project vicinity; and (3) whether ground-disturbing activities associated with the Project could result in the inadvertent discovery or disturbance of human remains, including those interred outside of formal cemeteries. The Project's potential to impact cultural resources considers the extent of physical ground disturbance that would occur as a result of the Project and the cultural resources that are or may be present within these areas in the baseline condition.

The Project's limits of physical disturbance previously were depicted on EIR Figure 3-17, *Limits of Disturbance*, which shows that implementation of the Project would result in physical impacts to 94.9 acres on site and 3.9 acres off-site. The Project's impact limits account for all areas where new construction, utility and driveway infrastructure (including the construction/installation of the off-site sewer line), temporary parking, and new activities could occur. It should be noted that while a majority of the Galway Downs site is subject to disturbance under existing conditions in association with on-going events and activities at the facility, the analysis herein conservatively accounts for all areas that potentially may be impacted as part of Project implementation.

E. Research Methods

1. Archaeological Records Search

BFSA conducted an archaeological records search for the Project and the surrounding area within a one-mile radius at the SCIC on March 17, 2025, with the results included as Appendix C to the Project's CRS (*Technical Appendix D*). BFSA also reviewed the NRHP index, historic USGS data, and historic aerial photographs (1946 to 2025). In addition, land patent records, held by the BLM and accessible through the BLM General Land Office website, were reviewed for pertinent project information. The BFSA research library also was consulted for any relevant historical information. (BFSA, 2026, p. 3.0-1)

2. Sacred Land Files Search

BFSA requested an SLF search by the NAHC. The SLF search results were positive for recorded Native American sacred sites or locations of religious or ceremonial importance within the Project vicinity. The NAHC suggested contacting Pechanga and other local Native American groups for further information. In accordance with previous recommendations of the NAHC, BFSA contacted all Native American contacts listed in previous NAHC response letters at least two weeks prior to the initiation of the field survey. All correspondence is provided in Appendix D to the Project's CRS (*Technical Appendix D*). (BFSA, 2026, pp. 3.0-1 and 3.0-2)

3. Field Survey

Historic aerial photographs, maps, and a mobile Trimble Global Positioning System unit facilitated the orientation and location of Project boundaries. In accordance with County of Riverside CEQA review requirements, an intensive pedestrian reconnaissance was conducted by BFSA that employed a series of parallel survey transects spaced at approximately 15-meter intervals to locate archaeological sites within the Project site and off-site improvement areas. Eddie Ortiz of Pechanga actively participated in the survey. The archaeological survey of the Project site and off-site improvement areas was conducted on March 19 and 20, 2025. The entirety of the Project's on- and off-site improvement areas were covered by the survey process and photographs were taken to document conditions during the survey. (BFSA, 2026, p. 3.0-1)

4.4.5 Impact Analysis

Threshold a.:	**Would the Project alter or destroy an historic site?**
Threshold b.:	**Would the Project cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, Section 15064.5?**

As discussed in detail above in EIR subsection 4.4.1C, based on the results of the CRS prepared for the Project, one historical resource was recorded as Temp-1, which is depicted as occurring within the Project's physical disturbance area. Site Temp-1 consists of two historic-era buildings constructed on the Project site between 1967 and 1976; however, neither of these buildings would be physically altered or removed as a result of the proposed Project, as the only Project-related disturbances within this portion of the Project site would consist of the installation of shade trees at the existing entry parking lot (as previously depicted on EIR Figure 3-4) and the use of undeveloped portions of this area for temporary parking (as previously shown

on EIR Figure 3-7). Accordingly, no impact to Site Temp-1 would occur with implementation of the proposed Project. (BFSA, 2026, p. 5.0-1)

Historic aerial photographs confirm that the Project site has been disturbed by human activity for decades. The Galway Downs property was used for cultivated agriculture from at least the 1940s until the late 1960s, when it was cleared and developed into an equestrian events facility that has been in continual operation until the present day. The off-site sewer alignment corridor proposed through APN 927-690-005 has similarly been disturbed by past residential and agricultural use, and the linear alignment along the SR-79 at Los Caballos Road intersection where the Project Applicant would be responsible for making intersection improvements were disturbed when the SR-79 highway was constructed. This history of disturbance is important for two reasons. First, agricultural activities such as clearing, discing, and grading destroy surface artifact scatters, the most visible evidence of historic occupation. Second, the physical ground disturbances at Galway Downs and in the Project's off-site disturbance areas occurred before CEQA and other environmental laws were enacted, meaning no systematic effort was made at the time to identify or protect historical resources in place that may have been present. As a result, the likelihood of finding intact historical resources on the ground surface across the Project's physical disturbance area is low. However, surface disturbance does not necessarily destroy buried deposits. For these reasons, while no significant surface historical resources would be impacted by the Project, there remains a possibility that buried historic sites and resources could be encountered during grading and subsurface construction activities. (BFSA, 2026, p. 5.0-1; UCSB, n.d.)

Accordingly, implementation of the proposed Project would not alter or destroy any known historic site or cause a substantial adverse change in the significance of any known historical resource pursuant to CCR Section 15064.5, either on site or off site. However, the possibility cannot be ruled out that previously undiscovered historical resources remain buried beneath the ground within areas that would be subject to Project-related ground disturbing construction activities. The potential for inadvertent discovery of and impact to such resources during grading or other subsurface construction activities is concluded to be a significant impact requiring mitigation.

Threshold c.:	**Would the Project alter or destroy an archaeological site?**
Threshold d.:	**Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations, Section 15064.5?**

As previously summarized in EIR subsection 4.4.1.C, the records search conducted by BFSA identified 12 cultural resources identified within a one-mile radius of the Project site, one of which was recorded on the Project site (P-33-013281). As previously discussed, P-33-013281 was not identified during the field survey and appears to no longer be extant on the surface of the site. Moreover, neither of the two archaeological resources (Temp-3 and Iso-1) identified during the current survey would be affected by the Project.

Similar to the discussion above about the potential for discovery of subsurface historical resources, historic aerial photographs confirm that the Project site and the Project's proposed off-site disturbance areas have been disturbed by human activity for decades. This history of disturbance is important for two reasons. First,

agricultural activities such as clearing, discing, and grading destroy surface artifact scatters, the most visible evidence of prehistoric occupation. Second, the physical ground disturbances at Galway Downs and in the Project's off-site disturbance areas occurred before CEQA and other environmental laws were enacted, meaning no systematic effort was made at the time to identify or protect archaeological resources in place that may have been present. As a result, the likelihood of finding intact archaeological resources on the ground surface across the Project's physical disturbance area is low. However, surface disturbance does not necessarily destroy buried deposits. The Project site lies less than one mile east of Temecula Creek, a permanent water source that supported Native American occupation throughout the region, and archaeological resources have been documented within the broader Project vicinity. For these reasons, while no significant surface resources would be impacted by the Project, there remains a possibility that buried archaeological sites and resources could be encountered during grading and subsurface construction activities. (BFSA, 2026, p. 5.0-1; UCSB, n.d.)

Accordingly, implementation of the proposed Project would not alter or destroy any known archaeological site or cause a substantial adverse change in the significance of any known archaeological resource pursuant to CCR Section 15064.5, either on site or off site. However, the possibility cannot be ruled out that previously undiscovered archaeological resources remain buried beneath the ground within areas that would be subject to Project-related ground disturbing construction activities. The potential for inadvertent discovery of and impact to such resources during grading or other subsurface construction activities is concluded to be a significant impact requiring mitigation.

Threshold e.: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project site does not contain a cemetery and no known cemeteries are located within the immediate Project site vicinity. Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project-related construction. In the event of such a discovery, all work in the vicinity is required to halt, and the County Coroner is required to be notified in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be, or are suspected to be, Native American, the Coroner is required to notify the NAHC within 24 hours. The NAHC will designate a Most Likely Descendant ("MLD") pursuant to Public Resource Code Section 5097.98. Treatment and disposition of Native American human remains shall be determined through consultation with the MLD in accordance with applicable law. This EIR does not prescribe specific treatment measures and defers to the process established under State law. The potential for discovery of human remains is considered a significant impact requiring mitigation.

4.4.6 Cumulative Impact Analysis

This cumulative impact analysis considers implementation of the proposed Project in conjunction with other development projects and planned development within western Riverside County. Western Riverside County was selected as the cumulative study area because it encompasses the broader geographic region

within which the Project site's cultural resources, including prehistoric archaeological sites and historic-era resources, have their cultural, historical, and territorial context. The Project site lies within the ethnographic territory of the Luiseño people and within a landscape that has been continuously occupied by Native American groups since the Paleo-Indian Period. Development throughout this region has the ongoing potential to affect the same categories of cultural resources including prehistoric archaeological deposits and historic-era structures and features that are present within and adjacent to the Project site. Accordingly, the cumulative analysis evaluates the Project's incremental contribution to the region-wide pattern of cultural resource loss and disturbance associated with continued development in western Riverside County.

With respect to Thresholds a. and b., the Project would not alter or destroy any known historic site and would not cause a substantial adverse change in the significance of any known historical resource, as no significant historical resources were identified within the Project's physical disturbance area during the CRS. Site Temp-1, the only identified resource within the disturbance area, would not be physically affected by the Project. Although there is a possibility that previously undiscovered historical resources remain buried beneath the surface within areas subject to Project-related ground disturbance, this potential is substantially reduced by the Project site's long history of agricultural clearing, discing, and equestrian-related grading prior to the enactment of CEQA. Other development projects within western Riverside County similarly have the potential to affect known or previously undiscovered historical resources, and the cumulative loss of historical resources throughout the region as a result of ongoing urbanization is a result of the general urbanization of western Riverside County. The Project's incremental contribution to the cumulative pattern of historical resource impacts, should subsurface historical resources be encountered and impacted during Project-related construction activities, would be a cumulatively-considerable contribution to a significant cumulative impact.

With respect to Thresholds c. and d., the Project would not impact any known archaeological sites and would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CCR Section 15064.5. The previously recorded prehistoric lithic scatter P-33-013281, located within the southeastern portion of the Project site, could not be relocated during the 2025 field survey and no surface expression of the resource was observed, suggesting the surface component of the site has been eliminated by decades of equestrian-related disturbance. However, as noted above, the possibility of buried subsurface deposits cannot be entirely ruled out given the Project site's proximity to Temecula Creek and the documented presence of prehistoric resources within the broader Project vicinity. Other development projects within western Riverside County, particularly those located in proximity to Temecula Creek and other water sources that historically supported Native American occupation, similarly have the potential to encounter previously undiscovered subsurface archaeological resources. The Project's incremental contribution to cumulative impacts on archaeological resources, should subsurface resources be encountered during Project-related construction activities, would be a cumulatively-considerable contribution to a significant cumulative impact.

With respect to Threshold e., the Project site does not contain a known cemetery and no human remains have been identified within the Project's physical disturbance area. Nevertheless, given the Project site's

location within Luiseño ethnographic territory, its proximity to Temecula Creek, and the positive results of the NAHC Sacred Lands File search, the possibility that buried human remains could be encountered during ground-disturbing construction activities cannot be entirely eliminated. Other development projects within western Riverside County, particularly those located within areas of known Native American occupation, similarly have the potential to encounter buried human remains during construction. Although the Project and other cumulative development projects would be subject to compliance with the provisions of HSC Section 7050.5 as well as PRC Section 5097 *et seq.*, the Project's incremental contribution to cumulative impacts on human remains, should they be encountered during Project-related construction activities, would be a cumulatively-considerable contribution to a significant cumulative impact.

4.4.7 Significance of Impacts Before Mitigation

Thresholds a. and b.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known historic sites and would not cause a substantial adverse change in the significance of any known historical resources pursuant to CCR Section 15064.5. However, there is a possibility that previously-undiscovered historical resources occur beneath the surface of the ground and may be discovered and impacted during Project-related ground-disturbing construction activities. The potential for impacts to previously-undiscovered historical resources would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

Thresholds c. and d.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known archaeological sites and would not cause a substantial adverse change in the significance of any known archaeological resources pursuant to CCR Section 15064.5. However, given the Project site's proximity to natural sources of water and the presence of known archaeological resources within the Project site's vicinity, there is a possibility that previously-undiscovered archaeological resources occur beneath the surface of the ground and may be discovered and impacted during Project-related ground-disturbing construction activities. The potential for impacts to previously-undiscovered archaeological resources would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project site does not contain a cemetery and no known cemeteries are located within the immediate Project site vicinity. Although mandatory compliance with the applicable provisions of HSC Section 7050.5 and PRC Section 5097 *et seq.*, is a regulatory requirement and not mitigation, the Project's potential to inadvertently encounter and impact buried human remains during ground-disturbing construction activities would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

4.4.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- California Government Code Section 6254(r): Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254(r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code Section 6254(r).

- California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98: If human remains are discovered during any ground-disturbing construction activity, HSC Section 7050.5 requires that all work within the vicinity of the discovery immediately cease, and no further excavation or disturbance occur until the County Coroner has been notified and has made the determinations required by law. If the Coroner determines the remains to be, or to be reasonably suspected to be, Native American, the Coroner is required to notify the Native American Heritage Commission (NAHC) within 24 hours, and compliance with all applicable provisions of PRC Section 5097.98 is required regarding the treatment and disposition of the remains and any associated grave goods.

Design Features

There are no features inherent in the Project's design that are specifically included to reduce or avoid impacts to cultural resources.

Mitigation

Please note that the numbering below reflects Riverside County's condition of approval numbering system.

MM 4.4-1 **015 – Planning-CUL: Unanticipated Resources.** The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

**A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. Tribal Cultural Resources are also considered cultural resources.*

*** If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.*

MM 4.4-2 **060 – Planning-CUL: Native American Monitor.** Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

MM 4.4-3 **070 – Planning-CUL: Artifact Disposition.** Prior to Grading Permit Final Inspection. In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources, (with the exception of sacred items, burial goods, and Human Remains) and provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods. Historic Resources - All historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. Pre-contact resources - A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s). This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloguing, analysis and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in the Phase IV Report. The details of any disposition of artifacts shall be documented in the Phase IV report.

MM 4.4-4 **Human Remains**: In the event that human remains are encountered during ground-disturbing construction activities on site or within the Project's off-site improvement areas, compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097 et seq. shall be required. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant, the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

4.4.9 Significance of Impacts After Mitigation

Thresholds a. and b.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.4-1 through MM 4.4-3 would ensure that any historical resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated, including if necessary curation of the historical artifact(s) at the Western Science Center in Hemet or as directed by the County Archaeologist. Implementation of the required mitigation would ensure that any potential impacts to subsurface historical sites or resources would be reduced to less-than-significant levels.

Thresholds c. and d.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.4-1 through MM 4.4-3 would ensure that any archaeological sites or resources identified on site or within the Project's off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Archaeological Monitor, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation. In the event that human remains are discovered during construction activities, Mitigation Measure MM 4.4-4 would require the Project Applicant to comply with the applicable provisions of HSC Section 7050.5 and PRC Section 5097 *et seq*. Mandatory compliance

with Mitigation Measure MM 4.4-4, State law, and applicable regulatory requirements would reduce the Project's potential impacts to buried human remains to less-than-significant levels.

4.4.10 References

Cited As	Reference
BFSA, 2026	Brian F. Smith and Associates ("BFSA"), 2026. *A Phase I Cultural Resources Study for the Galway Downs Project*. June 19, 2026.
Riverside County, 2015a	Riverside County, 2015a. *Environmental Impact Report No. 521*. February 2015. Accessed April 25, 2024. Available online at: https://planning.rctlma.org/general-plan-and-zoning/riverside-county-general-plan/riverside-county-general-plan-december-2015-0
UCSB, n.d.	University of California, Santa Barbara ("UCSB"), n.d. *Aerial Photography* (online geospatial collection). No date. Accessed March 10, 2026. Available online at: https://www.library.ucsb.edu/geospatial/aerial-photography

4.5 ENERGY

This EIR Subsection 4.5 is based in part on the information contained in the Project's Energy Analysis Report (herein, "EA"), titled "Galway Downs (CUP02303R1) Energy Analysis," dated June 15, 2026, and appended to this EIR as *Technical Appendix E* (Urban Crossroads, 2026c). Refer to EIR Section 7.0, *References*, for a complete list of reference sources.

4.5.1 Existing Conditions

The most recent data for California's estimated total energy consumption and natural gas consumption is from 2023, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates and includes: (Urban Crossroads, 2026c, p. 6)

- As of 2023, approximately 6,817 trillion British Thermal Units (BTUs) of energy were consumed.
- As of 2023, approximately 648 million barrels of petroleum were consumed.
- As of 2023, approximately 2,085 billion cubic feet of natural gas were consumed.
- As of 2023, approximately 1,227 thousand short tons of coal were consumed.

According to the EIA, in 2023 the U.S. petroleum consumption comprised about 89% of all transportation energy use. In 2024, about 252,048 million gallons (or about 6.001 million barrels) of finished petroleum products were consumed in the U.S., an average of about 690 million gallons per day (or about 16.43 million barrels per day). In 2021, California consumed approximately 12,157 million gallons in motor gasoline (33.31 million per day) and approximately 3,541 million gallons of diesel fuel (9.7 million per day). (Urban Crossroads, 2026c, p. 6)

The most recent data provided by the EIA for energy use in California is reported from 2023 which shows approximate energy usage by each of the following sectors (Urban Crossroads, 2026c, p. 6):

- 44.5% for transportation uses
- 21.4% for industrial uses
- 17.1% for residential uses
- 17.0% for commercial uses

According to the EIA, California used approximately 239,480 million kilowatt hours (kWh) of electricity in 2023. By sector in 2023, residential uses utilized 34.6% of the state's electricity, followed by 47.2% for commercial uses, 18.0% for industrial uses, and 0.3% for transportation. Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. (Urban Crossroads, 2026c, p. 6)

According to the EIA, California used approximately 21,036 million therms of natural gas in 2023. In 2023 (the most recent year for which data is available), by sector, industrial uses utilized 31.6% of the State's natural gas, followed by 31.3% used as fuel in the electric power sector, 22.8% from residential, 12.7% from

commercial, 1.5% from transportation uses and the remaining 3% was utilized for the operations, processing and production of natural gas itself. While the supply of natural gas in the United States and production in the lower 48 states has increased greatly since 2008, California produces little, and imports 90% of its supply of natural gas. (Urban Crossroads, 2026c, p. 6)

In 2024, total system electric generation for California was 278,338 gigawatt-hours (GWh), down 1 percent (2,802 GWh) from 2023. The total system electric generation is the sum of all utility-scale instate generation plus net electricity imports from power plants with a nameplate capacity of at least one megawatt (MW). Clean energy resources accounted for 62% of California's power mix, a 4% increase from 58% in 2023. In-state generation was 216,181 GWh in 2024, virtually unchanged from the 2023 value of 216,047 GWh. Imported energy decreased to 62,157 GWh, down 5% (3,361 GWh) from 2023. Natural gas is the main source for electricity generation at 40% of the total in-state electric generation system power as shown in Table 4.5-1, *Total Electricity System Power (California 2024)*. (Urban Crossroads, 2026c, pp. 6-7)

Table 4.5-1 Total Electricity System Power (California 2024)

Fuel Type	California In-State Generation (GWh)	% of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total Imports (GWh)	Total California Energy Mix (GWh)	Total California Power Mix
Coal	263	0.12%	124	5,775	5,899	6,162	2.21%
Natural Gas	86,479	40.00%	84	8,091	8,176	94,655	34.01%
Oil	36	0.02%	-	0	0	36	0.01%
Other (Waste Heat / Petroleum Coke)	198	0.09%	13	9	22	220	0.08%
Unspecified	-	0.00%	80	3,971	4,051	4,051	1.46%
Total Thermal and Unspecified	*86,976*	*40.23%*	*301*	*17,846*	*18,147*	*105,123*	*37.77%*
Nuclear	18,379	8.50%	208	9,026	9,234	27,613	9.92%
Large Hydro	25,222	11.67%	4,479	1,079	5,558	30,780	11.06%
Biomass	4,754	2.20%	614	26	640	5,394	1.94%
Geothermal	10,453	4.84%	212	2,139	2,351	12,803	4.60%
Small Hydro	3,969	1.84%	269	2	270	4,240	1.52%
Solar	50,666	23.44%	536	8,081	8,616	59,283	21.30%
Wind	15,761	7.29%	9,195	8,145	17,341	33,102	11.89%
Total Non-GHG and Renewable Resources	*129,205*	*59.77%*	*15,512*	*28,498*	*44,010*	*173,215*	*62.23%*
System Totals	***216,181***	***100.00%***	***15,813***	***46,344***	***62,157***	***278,338***	***100.00%***

Source: (Urban Crossroads, 2026c, Table 2-1)

An updated summary of and context for energy consumption and energy demands within the State is presented in "U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts" excerpted below (Urban Crossroads, 2026c, p. 7):

- In 2024, California was the fourth-largest total electricity producer in the nation. It is also the nation's third-largest electricity consumer and imports the second-largest amount of electricity of any state.
- In 2024, California was the eighth-largest producer of crude oil among the 50 states, and the State ranked third in crude oil refining capacity.

- California is the largest consumer of jet fuel in the nation and second-largest consumer of motor gasoline after Texas.
- California is the second-largest total energy consumer among the states, after Texas, but its per capita energy consumption is the third-lowest in the nation.
- In 2024, renewable resources, including hydroelectric power and small-scale solar power, supplied 57% of California's in-state electricity generation. Natural gas fueled another 35% and nuclear power provided almost all the rest.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. Given the nature of the Project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the Project: electricity, natural gas, and transportation fuel for vehicle trips associated with the uses planned for the Project. (Urban Crossroads, 2026c, p. 7)

A. Electricity

Southern California's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California Independent Service Operator (ISO) studies revealed the extent to which the Mojave Desert Air Basin (MDAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2023 IEPR provides information and policy recommendations on advancing a clean, reliable, and affordable energy system. (Urban Crossroads, 2026c, p. 9)

California's electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California ISO is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities. (Urban Crossroads, 2026c, p. 9)

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, utilities file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies

the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State. (Urban Crossroads, 2026c, p. 9)

Electricity currently is provided to the Project site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and 180 incorporated cities within a service area encompassing approximately 50,000 square miles. Based on SCE's 2023 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. (Urban Crossroads, 2026c, p. 9)

Table 4.5-2, *SCE 2023 Power Content Mix*, shows SCE's specific proportional shares of electricity sources in 2023. As indicated in Table 4.5-2, the 2023 SCE Power Mix has renewable energy at 37.6% of the overall energy resources. Biomass and waste resources are at 0.1%, geothermal resources are at 5.2%, eligible hydroelectric resources are at 0.7%, solar energy is at 19.8%, and wind power is at 11.7%. (Urban Crossroads, 2026c, pp. 9-10)

Table 4.5-2 SCE 2023 Power Content Mix

Energy Resources	2023 SCE Power Mix
Eligible Renewable	37.6%
Biomass & Waste	0.1%
Geothermal	5.2%
Eligible Hydroelectric	0.7%
Solar	19.8%
Wind	11.7%
Coal	0.0%
Large Hydroelectric	4.5%
Natural Gas	20.0%
Nuclear	9.1%
Other	0.1%
Unspecified Sources of Power*	28.8%
Total:	**100%**

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

(Urban Crossroads, 2026c, Table 2-2)

4.5.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to energy use and conservation.

A. Federal Regulations

1. Intermodal Surface Transportation Efficiency Act (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for Riverside County is the Southern California Association of Governments (SCAG). SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the applicable planning document for the area.

2. Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) authorizes over $200 billion to improve the nation's transportation infrastructure, enhance economic growth, and protect the environment. TEA-21 creates new opportunities to improve air and water quality, restore wetlands and natural habitat, and rejuvenate urban areas through transportation redevelopment, increased transit, and sustainable alternatives to urban sprawl. Several provisions of TEA-21 create new opportunities for water quality improvements.

B. State Regulations

1. Integrated Energy Policy Report (IEPR)

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code Section 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the Integrated Energy Policy Report (IEPR).

The 2023 IEPR focuses on providing updates on a variety of energy issues facing California. These issues require action if the State is to meet its climate, energy, air quality, and other environmental goals in an equitable way while maintaining reliability and controlling costs. The 2023 IEPR discusses speeding up the connection of clean resources to the electricity grid, the potential use of clean and renewable hydrogen, and the California Energy Demand Forecast to 2040. The report also provides updates on topics such as gas decarbonization, energy efficiency, the Clean Transportation Program, Assembly Bill 1257 (Bocanegra,

Chapter 749, Statutes of 2013), and publicly owned utilities' progress toward peak demand reserves and margins.

2. California Code of Regulations Title 24, Part 6, Energy Efficiency Standards

California Code of Regulations (CCR), Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2025 Standards for building construction, which went into effect on January 1, 2026, improved upon the former 2022 Standards for residential and nonresidential buildings. While the 2022 version introduced the first "electric-ready" requirements and expanded solar mandates, the 2025 update shifts the baseline for compliance to favor dual electric systems and more stringent efficiency metrics. The CEC estimates that the 2025 code will save $4.8 billion in energy costs and reduce greenhouse gas (GHG) emissions by 4 million metric tons over its lifetime.

3. California Renewable Portfolio Standards (RPS)

The California Energy Commission (CEC) implements and administers portions of California's Renewables Portfolio Standard (RPS). The RPS has been progressively strengthened through successive legislation. Senate Bill (SB) 350 established a 50% renewable energy target by December 31, 2030. SB 100, enacted in 2018, further raised California's RPS requirements and set binding interim targets requiring that eligible renewable energy resources supply 44% of retail electricity sales by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030. SB 100 also established the policy goal that eligible renewable energy resources and zero-carbon resources together supply 100% of retail electricity sales by December 31, 2045. The Clean Energy, Jobs, and Affordability Act of 2022 (SB 1020) added additional interim zero-carbon targets of 90% by December 31, 2035, and 95% by December 31, 2040, consistent with the 2045 carbon neutrality goal. In addition to targets under Assembly Bill (AB) 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the State by 2045 and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the California Department of Food and Agriculture (CDFA), and California Air Resources Board (CARB) to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

4. Pavley Fuel Efficiency Standards (AB 1493)

In California, AB 1493 establishes fuel efficiency ratings for model year 2009 to 2016 passenger cars and light trucks.

5. Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and the Governor signed, SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings,

initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024 and 45% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

6. State of California Energy Plan

The State Energy Plan, drafted by the CEC, identifies emerging trends in energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan recommends reductions in congestion and increased efficiency in the use of fuel supplies. The plan also encourages urban designs that reduce vehicle miles traveled (VMT) and promote pedestrian and bicycle access.

C. Local Regulations

1. Riverside County General Plan Policies Related to Energy Efficiency

The Riverside County General Plan includes a number of policies related to energy efficiency in buildings. Policies from the General Plan related to energy and energy efficiency are summarized below and were obtained from the General Plan Land Use Element, Multipurpose Open Space Element, and Air Quality Element.

- Land Use Element, Policy LU 4.1: Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: (AI 1, 3, 6, 14, 23, 24, 41, 62)
  a. Compliance with the design standards of the appropriate area plan land use category.
  b. Require that structures be constructed in accordance with the requirements of Riverside County's zoning, building, and other pertinent codes and regulations.
  c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.
  d. Require that new development utilize drought tolerant landscaping and incorporate adequate drought-conscious irrigation systems.
  e. Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 Part 6 and/or Part 11, of the California Code of Regulations (CCR).

f. Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.

g. Encourage innovative and creative design concepts.

h. Encourage the provision of public art that enhances the community's identity, which may include elements of historical significance and creative use of children's art.

i. Include consistent and well-designed signage that is integrated with the building's architectural character.

j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.

k. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.

l. Mitigate noise, odor, lighting, and other impacts on surrounding properties.

m. Provide and maintain landscaping in open spaces and parking lots.

n. Include extensive landscaping.

o. Preserve natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.

p. Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.

q. Design parking lots and structures to be functionally and visually integrated and connected.

r. Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity.

s. Establish safe and frequent pedestrian crossings.

t. Create a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.

u. Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas.

v. Manage wild land fire hazards in the design of development proposals located adjacent to natural open space.

- Multipurpose Open Space Element, Policy OS 16.1: Continue to implement Title 24 of the California Code of Regulations (the "California Building Standards Code") particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted

pursuant to County ordinance. Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of within CCR Title 24. (AI 62)

- Multipurpose Open Space Element, Policy OS 16.2: Specify energy efficient materials and systems, including shade design technologies, for county buildings. (AI 68, 70)
- Multipurpose Open Space Element, Policy OS 16.3: Implement public transportation systems that utilize alternative fuels when possible, as well as associated urban design measures that support alternatives to private automobile use.
- Multipurpose Open Space Element, Policy OS 16.4: Undertake proper maintenance of County physical facilities to ensure that optimum energy conservation is achieved.
- Multipurpose Open Space Element, Policy OS 16.5: Utilize federal, state, and utility company programs that encourage energy conservation. (AI 63, 64)
- Multipurpose Open Space Element, Policy OS 16.6: Assist public buildings and institutions in converting asphalt to greenspace to address the heat island effect.
- Multipurpose Open Space Element, Policy OS 16.7: Promote purchasing of energy-efficient equipment based on a fair return on investment, and use energy-savings estimates as one basis for purchasing decisions for major energy-using devices. (AI 68, 69)
- Multipurpose Open Space Element, Policy OS 16.8: Promote coordination of new public facilities with mass transit service and other alternative transportation services, including bicycles, and design structures to enhance mass transit, bicycle, and pedestrian use.
- Multipurpose Open Space Element, Policy OS 16.9: Encourage increased use of passive, solar design and day-lighting in existing and new structures. (AI 62, 63, 64, 65, 70)
- Multipurpose Open Space Element, Policy OS 16.10: Encourage installation and use of cogenerating systems where they are cost-effective and appropriate. (AI 62, 70)
- Multipurpose Open Space Element, Policy OS 16.11: Provide incentives, such as transfer of development rights and clustering, to private developments that provide energy efficient site design.
- Multipurpose Open Space Element, Policy OS 16.12: Consider energy efficient site design and construction techniques in renovation, construction or procurement of leased spaces.
- Multipurpose Open Space Element, Policy OS 16.13: Encourage installation and use of new technology at existing facilities or the establishment of new waste-reduction facilities, where cost-effective and appropriate, to ensure that optimum energy conservation is achieved.
- Multipurpose Open Space Element, Policy OS 16.14: Coordinate energy conservation activities with the County Climate Action Plan (CAP) as decreasing energy usage also helps reduce carbon emissions.
- Air Quality Element, Policy AQ 4.1: Require the use of all feasible building materials/methods which reduce emissions.

- Air Quality Element, Policy AQ 4.2: Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.
- Air Quality Element, Policy AQ 4.3: Require centrally heated facilities to utilize automated time clocks or occupant sensors to control heating where feasible.
- Air Quality Element, Policy AQ 4.4: Require residential building construction to comply with energy use guidelines detailed in Part 6 (California Energy Code) and/or Part 11 (California Green Building Standards Code) of Title 24 of the California Code of Regulations.
- Air Quality Element, Policy AQ 5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.
- Air Quality Element, Policy AQ 5.2: Adopt incentives and/or regulations to enact energy conservation requirements for private and public developments. (AI 62)
- Air Quality Element, Policy AQ 5.4: Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.
- Air Quality Element, Policy AQ 20.10: Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design. (AI 147)
- Air Quality Element, Policy AQ 20.11: Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment. (AI 147)
- Air Quality Element, Policy AQ 20.12: Support programs to assist in the energy-efficient retrofitting of older affordable housing units to improve their energy efficiency, particularly residential units built prior to 1978 when CCR Title 24 energy efficiency requirements went into effect. (AI 147)

2. Riverside County Climate Action Plan

The County of Riverside's most current Climate Action Plan (CAP), most recently updated in November 2019, is intended to promote energy efficiency and a reduction in GHG emissions associated with development projects within unincorporated Riverside County. The GHG reduction measures focus on different sectors including transportation, energy efficiency, clean energy, water efficiency, advanced measures, and solid waste. Specifically, Subsection 4.3 of the CAP identifies the following measures related to energy efficiency:

- ***R1 Energy Efficiency Measures:***
    - *R1-EE1: California Building Code Title 24. California's building efficiency standards are updated regularly to incorporate new energy efficiency technologies. The code was most recently updated in 2016 and went into effect for new development in 2017. For projects implemented after January 1, 2017, the California Energy Commission estimates that the*

2016 Title 24 energy efficiency standards will reduce consumption by an estimated 28 percent for residential buildings and 5 percent for commercial buildings, relative to the 2013 standards. These percentage savings relate to heating, cooling, lighting, and water heating only; therefore, these percentage savings were applied to the estimated percentage of energy use by Title 24.

- ***R2 Energy Efficiency Measures:***
    - *R2-EE1: Energy Efficiency Training, Education, and Recognition in the Residential Sector. Opportunities for residents to improve energy efficiency in their homes include changes to their behaviors and physical modifications or improvements to their homes. Education of the public is at the core of attaining energy efficiency goals. While most of the measures include an outreach component, creating a specific education measure would emphasize the critical role of education in achieving energy efficiency. An education measure would also provide County staff with a framework to educate community members about behavioral and technological changes that can increase energy efficiency. This is an enhancement of Measure R3-E2 proposed in the 2015 CAP. Potential actions for this measure include:*
        - *Post energy efficiency information or links on websites and/or social media and provide materials at public events.*
        - *Set up an email list for blasts of new information or training sessions.*
        - *Encourage homeowners to use the SCE Energy Education Centers for energy-efficiency resources.*
        - *Promote and manage energy-efficiency programs which are not already in the purview of Energy Service Providers.*
        - *Require building inspectors to hold trainings semi-annually on energy efficiency and Title 24 requirements.*
    - *R2-EE2: Increase Community Participation in Existing Energy-Efficiency Programs. There are many energy efficiency opportunities that are low-cost for residents to initiate and would result in cost savings over time. These opportunities are generally from existing programs, such as SCE and SoCalGas, which offer rebates and incentives to purchase energy-efficient appliances and lights. Through this measure, the County would work to increase residents' participation in existing energy efficiency programs that are low-cost and would provide a financial benefit to the residents. As programs change over time, continued and up-to-date outreach would be necessary. This is an enhancement of Measure R3-E4 proposed in the 2015 CAP. Potential action for this measure includes:*
        - *Partner with the Southern California Association of Governments (SCAG), Western Riverside Council of Governments (WRCOG), SCE, and SoCalGas for outreach events, such as annual energy-efficiency fair.*

- *R2-EE3: Home Energy Evaluations. Home energy evaluations are necessary to identify cost-effective opportunities for energy savings and for residents to take practical actions to achieve energy efficiency. Home energy evaluations can be established or promoted by a variety of existing programs. This is a new measure for the County's consideration. Potential action for this measure includes:*
  - *Promote SCE energy audits program for residents within the SCE service area and the Home Energy Saver Do It Yourself online energy audits for the IID service area.*
- *R2-EE4: Residential Home Energy Renovations. Approximately 31 percent of the residential buildings in the unincorporated area of Riverside County were constructed before the adoption of Title 24 (SCAG 2017). Renovations to buildings constructed before the adoption of Title 24 would evidently improve energy efficiency. Many federal and State programs and incentives support home energy renovations, including County-supervised funding, permit process improvements, and County ordinances. This is an enhancement of Measures R1-E4, R1-E5, R2-E3, and R2-E4 proposed in the 2015 CAP. Potential actions for this measure include:*
  - *Review Title 24 code compliance for existing residential buildings during code enforcement inspections of residential properties.*
  - *Promote existing home energy-renovation programs.*
  - *Promote participation in green building programs, such as Leadership in Energy and Environmental Design (LEED) and Energy Upgrade California.*
  - *Promote financing programs for home upgrades, such as Home Energy Renovation Opportunity (HERO) program sponsored by the Western Riverside County Council of Governments (WRCOG) and other Property Assessed Clean Energy (PACE) programs in the IID service area.*
  - *Establish online permitting to facilitate upgrades.*
- *R2-EE5: Exceed Energy Efficiency Standards in New Residential Units. County planners have a unique opportunity to encourage or inform developers of new energy efficiency opportunities for new development. This measure would educate County staff to encourage and implement energy efficiency measures beyond those required in current Title 24 standards. This measure would also ensure that as Title 24 standards are updated, County staff are well informed and can implement updates quickly and effectively. This is an enhancement of Measures R2-E1 and R2-E2 proposed in the 2015 CAP. Potential actions for this measure include:*
  - *Educate County staff and developers on future Title 24 updates and new energy efficiency opportunities for new residential development.*
  - *Promote Tier 1 and Tier 2 green building ratings such as LEED, Build It Green, or Energy Star®-certified buildings.*

- *Establish online permitting to facilitate new residential building energy-efficiency programs.*
- *Comply with State Title 24 energy efficiency requirements on new residential buildings, such as zero net energy homes that require all new residential construction projects to achieve zero net-energy use by 2020.*

- *R2-EE6: Energy Efficiency Training, Education and Recognition in the Commercial Sector. Education is at the core of attaining energy efficiency goals. A specific education measure would emphasize the critical role of education in achieving energy efficiency. This measure would provide County staff with a framework to interact with and educate the community about behavioral and technological changes that can increase energy efficiency in commercial buildings. This is an enhancement of Measure R3-E2 proposed in the 2015 CAP. Potential actions for this measure include:*
  - *Post energy-efficiency information or links on websites and/or social media and provide materials at public events*
  - *Set up an email list for blasts of new information or training sessions.*
  - *Encourage business owners to visit SCE Energy Education Centers for energy efficiency resources.*
  - *Promote and manage energy efficiency programs which are not already in the purview of Energy Service Providers.*
  - *Invite building inspectors to hold trainings semi-annually on energy efficiency and Title 24.*

- *R2-EE7: Increase Business Participation in Existing Energy Efficiency Programs. There are many energy efficiency opportunities that are low-cost for businesses to initiate that would result in cost-savings over time. SCE and SoCalGas offer many rebates and incentives to purchasing energy-efficient appliances and lights. As many business owners may be unaware that the opportunities exist, this measure would allow for the County to increase the participation of businesses in existing energy-efficiency programs that are low-cost and would provide financial benefits. This is an enhancement of Measure R3-E4 proposed in the 2015 CAP. Potential action for this measure includes:*
  - *Partner with SCAG, WRCOG, SCE, and SoCalGas for outreach events.*

- *R2-EE8: Non-Residential Building Energy Audits. Commercial energy audits are necessary to identify cost-effective opportunities for energy savings and for business owners to take practical actions to increase energy efficiency. The audits can be established or promoted by various existing programs. This is a new measure for the County's consideration. The potential action for this measure is:*
  - *Promote the SCE energy audit program for residents within the SCE service area and the Home Energy Saver Do It Yourself online energy audits for the IID service area.*

- *R2-EE9: Non-Residential Building Retrofits. As many of commercial buildings in unincorporated area of Riverside County were constructed before the adoption of Title 24, their facilities and equipment are not considered energy efficient. Therefore, retrofits are necessary to achieve higher energy efficiency. Many federal and State programs and incentives support nonresidential building energy retrofits, including County-supervised funding, permit process improvements, and County ordinances. This is an enhancement of Measures R1-E4, R1-E5, and R2-E7 proposed in the 2015 CAP. Potential actions for this measure include:*
  - *Review Title 24 code compliance for existing non-residential buildings during code enforcement inspections.*
  - *Promote existing non-residential building retrofits programs.*
  - *Promote participation in green building programs, such as California Solar Initiative.*
  - *Promote energy efficiency retrofit financing programs for non-residential buildings such as Property*
  - *Assessed Clean Energy (PACE).*
  - *Establish online permitting to facilitate retrofits.*
- *R2-EE10: Energy Efficiency Enhancement of Existing and New Infrastructure. Enhancing energy efficiency of existing and new infrastructure presents an opportunity for energy and cost savings for the County. The County could achieve energy savings by deploying high-efficiency lighting in new traffic signals and retrofitting existing traffic signals with energy-efficient lighting. Conventional traffic signals employ incandescent lamps. They are not energy-efficient and the on-going energy charge contributes a high proportion of the recurrent cost. Comparing with the conventional traffic signals, high-efficiency traffic signals consume much less electricity (about one-third or less) and have longer design life (over 10 years). The Settlement Agreement26 calls for consideration of a policy to require the use of high-efficiency bulbs at all new traffic signal lights and converting 100 percent existing traffic signal lights to high-efficiency bulbs by 2020. Per the Settlement Agreement, caution should be exercised while retrofitting the signals in the Mt. Palomar area to ensure the high-efficiency bulbs do not cause any interference with the night sky viewing at Palomar Observatory. The potential actions for this measure include:*
  - *Retrofit existing traffic signals with high-efficiency Light Emitting diodes (LEDs).*
  - *Use high-efficiency LEDs for all new traffic signals.*
- *R2-EE11: Exceed Energy Efficiency Standards in New Commercial Units. County planners have a unique opportunity to inform and encourage developers to apply new energy efficiency opportunities in new development. This measure would educate County staff to encourage and implement energy efficiency beyond that required by current Title 24 standards. This measure would also ensure that as Title 24 standards are updated, County*

staff would be well informed and could implement updates quickly and effectively. This is an enhancement of Measures R2-E5 and R2-E6 proposed in the 2015 CAP. Potential actions for this measure include:

- *Educate County staff and developers on future Title 24 updates and additional energy efficiency opportunities for new non-residential development.*
- *Promote Tier 1 and Tier 2 Green Building Ratings such as LEED, Build It Green, or Energy Star®-certified buildings.*
- *Establish online permitting to facilitate new non-residential building energy efficiency programs.*
- *Comply with State requirements on new non-residential buildings, such as Net-Zero Energy Buildings for all new non-residential development meeting zero net-energy use by 2030.*

4.5.3 Basis for Determining Significance

A. Thresholds of Significance

Section VI of Appendix G to the California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") addresses typical adverse effects due to energy consumption and includes the following threshold questions to evaluate a project's impacts on energy resources.

- *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- *Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

In addition, Appendix F of the State CEQA Guidelines states that the means of achieving the goal of energy conservation includes the following:

- *Decreasing overall per capita energy consumption;*
- *Decreasing reliance on fossil fuels such as coal, natural gas, and oil; and*
- *Increasing reliance on renewable energy sources.*

Accordingly, the following thresholds are derived directly from Section VI of Appendix G to the State CEQA Guidelines and the County's Environmental Assessment form. The proposed Project would have a significant impact on energy resources if construction and/or operation of the Project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.5.4 Methodology

A. Overview

The analyses of potential energy impacts are based on the nature and degree of energy consumption that would be brought about by the Project, along with how such consumption would affect the efficient use of energy resources within the region. The analysis of potential impacts to energy resources is based on a review of applicable federal, State, and local regulations and plans, as well as Project-specific energy demand calculations and published energy consumption data. Specific information sources consulted in the preparation of this analysis include: the CEC energy consumption data and forecasts, including the 2023 IEPR; the CPUC's regulations governing investor-owned utilities; the 2025 Building Energy Efficiency Standards (Title 24, Part 6) and the California Green Building Standards Code (CALGreen) (Title 24, Part 11); the RPS and Senate Bill 100 requirements for electricity supply; service area and resource planning information from SCE, which provides electrical service to the Project site, and from the propane providers servicing the Project site (in lieu of natural gas, which is not available in the Project area); construction equipment, transportation, and facility energy demand estimates derived from the CalEEMod outputs prepared as part of the Project's AQIA (EIR *Technical Appendix B1*); fuel consumption estimates derived from the CARB EMission FACtor (EMFAC) model; the Riverside County General Plan and SWAP; the Riverside County CAP; and the Riverside County General Plan Amendment 960 Final EIR (EIR No. 521), which provides regional context for energy resources in western Riverside County. The methodology used to evaluate the Project's potential impacts to energy resources is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County, within the Temecula Valley Wine Country Policy Area. The site includes a wide range of existing physical features and uses that consume electrical energy under baseline conditions, including a horse racetrack, polo fields, stables, barns, arenas, training tracks, retail and restaurant/dining buildings, office space, an existing clock tower house, grooms quarters, recreational vehicle uses with associated club house, various storage structures, permanent and temporary parking areas with associated lighting, and existing permanent and temporary lighting that supports daily operations and special events.

Electrical service to the Project site is provided by SCE under existing conditions, with electrical service connections, transformers, and distribution infrastructure already in place to serve the existing facility, as described in EIR subsection 4.5.1.A. Natural gas service is not currently available to the Project site, and accordingly, the existing facility relies on delivered propane for those uses requiring combustion fuel, as described in EIR subsection 4.5.1.B.

Transportation energy consumption under baseline conditions reflects the existing pattern of daily and event-related vehicular trips associated with ongoing operations at the facility, including peak operational days documented in 2023 during which the facility accommodated up to 5,757 one-way vehicular trips. The

operational characteristics of the Galway Downs facility that would be permitted by proposed CUP 02303R1 would be the same as what occurs under existing conditions, and the maximum number of attendees at the facility on a daily basis would be restricted by the maximum amount of available parking. Under the proposed Project, peak operations at the facility when multiple events are occurring would be limited to a maximum of 4,639 parking spaces, which is less than the 5,757 one-way vehicular trips documented during 2023 baseline conditions. Accordingly, the proposed Project would not result in an increase in peak daily traffic-related vehicle trips beyond what already occurs under existing conditions, and the analysis of transportation energy demand herein focuses on the limited and short-term construction-related vehicle trips that would occur during the Project's construction phase rather than on long-term operational vehicle trips. Mobile equipment energy consumption under baseline conditions reflects the use of vehicles, equipment, and machinery associated with the routine operation and maintenance of the facility, including event setup and teardown activities.

Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential impacts to energy resources evaluates the incremental change in energy consumption attributable to the proposed Project relative to the energy consumption associated with the existing baseline conditions described above, taking into account the Project's limited new physical improvements, the future construction and operation of up to 36 park model lodging units and 18 employee modular housing units, and the addition of a metal solar structure designed to support rooftop solar panels.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with minimal new physical construction and no new operational uses beyond those already occurring under existing conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to convert previously undeveloped land to a new energy-consuming use. The primary analytical questions addressed herein are therefore:

1. Whether the energy consumed during the short-term construction of the Project's limited physical improvements, consisting of the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure, additional area for equestrian RV park use, an off-site sewer line, and future areas for up to 36 park model lodging units and 18 employee modular housing units, would represent wasteful, inefficient, or unnecessary consumption of energy resources, taking into consideration the short duration of construction, the limited equipment fleet required, and the applicable State and federal energy efficiency standards governing construction equipment and vehicles;
2. Whether the long-term operational energy demands incrementally associated with the proposed Project, including electricity and propane consumption associated with the new and future structures to be installed on site, would represent wasteful, inefficient, or unnecessary consumption of energy resources, taking into consideration the Project's compliance with the Title 24, Part 6 Building Energy Efficiency Standards, the Title 24, Part 11 CALGreen Building Standards Code, and

the on-site renewable energy generation that would be supported by the metal solar structure proposed to be installed over the existing arena;

3. Whether transportation energy demands associated with the Project would represent wasteful, inefficient, or unnecessary consumption of energy resources, recognizing that, as discussed in further detail in EIR subsection 3.7.2.A, the proposed Project would not result in an increase in peak daily traffic-related vehicle trips beyond what already occurs under existing conditions, such that the transportation energy analysis herein focuses on the limited and short-term construction-related vehicle trips that would occur during the Project's construction phase rather than on long-term operational vehicle trips; and
4. Whether the proposed Project would conflict with or obstruct any applicable State or local plan for renewable energy or energy efficiency, including ISTEA, TEA-21, 2023 IEPR, the State of California Energy Plan, the Title 24, Part 6 Building Energy Efficiency Standards, the Title 24, Part 11 CALGreen Building Standards Code, AB 1493 (Pavley) vehicle GHG emission standards, the RPS, Senate Bill 350 (SB 350), and Senate Bill 100 (SB 100).

In evaluating these analytical questions, the analysis quantifies the Project's anticipated short-term and long-term energy consumption using the CalEEMod and EMFAC modeling tools described below, and compares the Project's energy consumption to the applicable regulatory standards and to baseline conditions at the existing Galway Downs facility.

D. Criteria for Evaluating Wasteful, Inefficient, or Unnecessary Energy Consumption

State CEQA Guidelines Appendix G does not establish numerical thresholds for evaluating whether a project's energy consumption would be wasteful, inefficient, or unnecessary. Rather, the determination of whether a project's energy consumption is wasteful, inefficient, or unnecessary is informed by Appendix F of the State CEQA Guidelines, which identifies as the means of achieving the goal of energy conservation: decreasing overall per capita energy consumption; decreasing reliance on fossil fuels such as coal, natural gas, and oil; and increasing reliance on renewable energy sources. For purposes of the analysis herein, the Project's construction-related and operational energy consumption is considered to be wasteful, inefficient, or unnecessary if the Project's energy use would not be consistent with one or more of the following established regulatory standards, design requirements, and policies that collectively define efficient energy consumption in California:

- The Project's new and future structures, including the proposed restroom building, the future park model lodging units, and the future employee modular housing units, would be required to comply with the 2025 Building Energy Efficiency Standards (Title 24, Part 6), which establish minimum energy efficiency requirements for residential and nonresidential buildings in California, and the California Green Building Standards Code (Title 24, Part 11), which establishes mandatory and voluntary green building standards including measures to reduce energy use, water use, and material use. Compliance with these standards is enforced through the Riverside County building permit process and would be verified prior to issuance of certificates of occupancy.

- Construction equipment and on-road vehicles used during construction of the Project would be subject to applicable federal and State emission and fuel efficiency standards, including the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation, the Statewide Average Annual Offroad Equipment Emission Factors (which reflect ongoing improvements in equipment efficiency over time), the Pavley vehicle GHG emission standards established by AB 1493, the Advanced Clean Cars Program, and the Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Measure, each of which establishes minimum efficiency requirements for the construction equipment fleet and on-road vehicle fleet.

- Long-term operational energy consumption attributable to the Project would be consistent with State energy efficiency and renewable energy policies, including the Renewables Portfolio Standard (RPS), which requires that 60 percent of retail electricity sold in California come from eligible renewable energy resources by 2030 (with 100 percent of retail electricity sales coming from renewable and zero-carbon resources by 2045 pursuant to Senate Bill 100); Senate Bill 350 (the Clean Energy and Pollution Reduction Act of 2015), which requires a doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030; the State of California Energy Plan; and the Riverside County Climate Action Plan (CAP). In addition, the Project includes a metal solar structure designed to support rooftop solar panels over an existing arena, which would contribute on-site renewable energy generation consistent with the State's renewable energy goals.

In addition to these regulatory standards, the analysis also considers whether the Project's incremental energy consumption is reasonable in light of the limited and incremental nature of the proposed physical improvements, the fact that the proposed Project would not result in any increase in peak daily traffic-related vehicle trips beyond what already occurs under existing conditions (as established in EIR subsection 3.7.2.A), and the Project's overall consistency with the energy-related policies of the Riverside County General Plan and SWAP. If the Project would comply with the foregoing regulatory standards and would be consistent with applicable State and local energy policies, the Project's energy consumption is considered not to be wasteful, inefficient, or unnecessary, and the impact under Threshold a. is determined to be less than significant.

E. Energy Demand Modeling Methods

Information from the CalEEMod Version 2022.1 outputs for the Project's AQIA (EIR *Technical Appendix B1*) was utilized in this analysis, detailing Project-related construction equipment, transportation energy demands, and facility energy demands (Urban Crossroads, 2026c, p. 13).

1. CalEEMod

The California Air Pollution Control Officers Association in conjunction with other California air districts, including the South Coast Air Quality Management District (SCAQMD), released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, and as such the latest version available (version 2022.1) has been utilized in the analyses herein. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources as well as energy

usage. Accordingly, the latest version of CalEEMod has been used to determine the proposed Project's anticipated transportation and facility energy demands. Outputs from the annual model runs are provided in Appendices 4.1 and 4.2 to the Project's EA (*Technical Appendix E*). (Urban Crossroads, 2026c, p. 13)

2. Emissions Factor Model

On May 2, 2022, the Environmental Protection Agency approved the 2021 version of the EMissions FACtor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. This analysis herein utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of analysis, the 2026 analysis year was utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Output from the EMFAC2021 model run is provided in Appendix 4.3 to the Project's EA (*Technical Appendix E*). (Urban Crossroads, 2026c, pp. 13-14)

4.5.5 Impact Analysis

Threshold a.:	**Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

A. Construction Energy Demands

The focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project (Urban Crossroads, 2026c, p. 14).

1. Construction Power Cost

The total Project construction power cost is the summation of the products of the area (square feet [s.f.]) by the construction duration and the typical power cost. For purposes of analysis, Project construction would begin in January 2026 and would last through October 2026. The construction schedule utilized in the analysis, previously shown in EIR Table 3-3 within EIR Section 3.0, represents a "worst-case" analysis scenario. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. (Urban Crossroads, 2026c, p. 14)

The 2025 National Construction Estimator identifies a typical power cost per 1,000 s.f. of construction per month of $2.85, which was used to calculate the Project's total construction power cost. The majority of the new structures on site would consist of either pre-manufactured or steel container units, which would be transported to and installed within the Project site. These structures include a new restroom building, a grand pavilion tent, and an office trailer, along with a metal solar structure that currently is being installed over an existing arena to support rooftop solar panels. The Project also includes an awards/ceremony area

and additional area for equestrian recreational vehicle park use. Existing structures that would be permitted with the Project include an existing 1,513 s.f. barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future; the design of these areas would be subject to future County review and approvals. For the purposes of this analysis, only the new buildings that would be constructed are considered. As shown in Table 4.5-3, *Construction Power Cost*, the total power cost of on-site electricity usage during the building construction of the Project is estimated to be approximately $1,578.22. (Urban Crossroads, 2026c, p. 14)

Table 4.5-3 Construction Power Cost

Land Use	Power Cost	Total Building Size (1,000 SF)	Construction Duration (months)	Total Project Construction Power Cost
Non-Residential Structures	$2.85	12.065	9	$309.47
Model Lodging Units	$2.85	26.064	9	$668.54
Employee Modular Housing	$2.85	23.400	9	$600.21
			Total Project Construction Cost:	**$1,578.22**

Source: (Urban Crossroads, 2026c, Table 4-2)

2. Construction Electricity Cost and Usage

The total Project construction electricity usage is the summation of the products of the power cost (estimated in Table 4.5-3) by the utility provider cost per kWh of electricity. The SCE's general service rate schedule was used to determine the Project's electrical usage. As of October 1, 2025, SCE's general service rate was $0.19 per kWh of electricity. As shown in Table 4.5-4, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 8,515 kWh. (Urban Crossroads, 2026c, p. 15)

Table 4.5-4 Construction Electricity Usage

Land Use	Cost per kWh	Total Project Construction Electricity Usage
Non-Residential Structures	$0.19	1,670
Model Lodging Units	$0.19	3,607
Employee Modular Housing	$0.19	3,238
Total Project Construction Electricity Usage (kWh):		**8,515**

Source: (Urban Crossroads, 2026c, Table 4-3)

3. Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. A summary of construction equipment assumptions by phase previously was provided in EIR Table 3-4 within EIR Section 3.0. Consistent with industry standards and typical construction practices, each piece of equipment listed in EIR Table 3-4 will operate up to a total of eight hours per day, or

more than two-thirds of the period during which construction activities are allowed pursuant to Riverside County Ordinance No. 847 (Regulating Noise). (Urban Crossroads, 2026c, p. 15)

Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.5-5, *Construction Equipment Fuel Consumption Estimate*. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer Guidelines. For the purposes of analysis, the calculations are based on all construction equipment being diesel-powered which is consistent with industry standards. Diesel fuel would be supplied by existing residential fuel providers serving the Project area and region.[1] As presented in Table 4.5-5, Project construction activities would consume an estimated 47,711 gallons of diesel fuel. Project construction would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2026c, p. 16)

Table 4.5-5 Construction Equipment Fuel Consumption Estimate

Activity	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption
Removal of Existing Structures	10	Other Construction Equipment	82	1	8	0.42	276	149
Fine Grading	80	Excavators	36	2	8	0.38	219	947
		Graders	148	1	8	0.41	485	2,099
		Rubber Tired Dozers	367	1	8	0.4	1,174	5,078
		Crawler Tractors	87	2	8	0.43	599	2,588
		Scrapers	423	2	8	0.48	3,249	14,048
Site Development	120	Cranes	367	1	8	0.29	851	5,523
		Forklifts	82	3	8	0.2	394	2,553
		Generator Sets	14	1	8	0.74	83	538
		Tractors/Loaders/Backhoes	84	3	8	0.37	746	4,838
		Welders	46	1	8	0.45	166	1,074
Paving	120	Pavers	81	2	8	0.42	544	3,531
		Paving Equipment	89	2	8	0.36	513	3,325
		Rollers	36	2	8	0.38	219	1,420
Total Construction Fuel Demand (gallons of fuel):								**47,711**

Source: (Urban Crossroads, 2026c, Table 4-5)

4. Construction Trips and Vehicle Miles Traveled

Construction generates on-road vehicle emissions from vehicle usage for workers, hauling, and vendors commuting to and from the Project site. The number of workers, hauling, and vendor trips are presented below in Table 4.5-6, *Construction Trips and VMT*. It should be noted that for Vendor Trips specifically, CalEEMod only assigns Vendor Trips to the Building Construction phase. Vendor trips would likely occur

[1] Based on Appendix A of the CalEEMod User's Guide, construction consists of several types of off-road equipment. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod assumes all of the equipment operates on diesel fuel. (Urban Crossroads, 2026c, p. 16)

during all phases of construction. As such, the CalEEMod defaults for Vendor Trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. (Urban Crossroads, 2026c, p. 18)

Table 4.5-6 Construction Trips and VMT

Construction Activity	Worker Trips	Vendor Trips	Hauling Trips
Removal of Existing Structures	3	1	2
Fine Grading	20	4	0
Site Development	44	5	0
Paving	15	0	0

Source: (Urban Crossroads, 2026c, Table 4-6)

5. Construction Worker Fuel Estimates

With respect to estimated VMT for the Project, the construction worker trips would generate an estimated 163,540 VMT during the 9 months of construction. Based on CalEEMod methodology, it is assumed that 50% of all worker trips are from light-duty-auto vehicles (LDA), 25% are from light-duty-trucks (LDT1[2]), and 25% are from light-duty-trucks (LDT2[3]). Data regarding Project related construction worker trips were based on CalEEMod defaults utilized within the Project's AQIA (*Technical Appendix B1*). (Urban Crossroads, 2026c, p. 18)

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within the 2021 version of the EMFAC developed by CARB. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EMFAC2021 was run for the LDA, LDT1, and LDT2 vehicle class within the California sub-area for the 2026 calendar year. Data from EMFAC2021 is shown in Appendix 4.3 to the Project's EA (*Technical Appendix E*). (Urban Crossroads, 2026c, p. 18)

Table 4.5-7, *Construction Worker Fuel Consumption Estimates*, provides an estimated annual fuel consumption resulting from Project construction worker trips. Based on Table 4.5-7, it is estimated that 5,608 gallons of fuel would be consumed related to construction worker trips during full construction of the Project. For a conservative analysis, two-way worker trips are estimated in Table 4.5-7 to account for the annual fuel consumption. It should be noted that construction worker trips would represent a "single-event" gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose. (Urban Crossroads, 2026c, p. 18)

[2] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.
[3] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

Table 4.5-7 Construction Worker Fuel Consumption Estimates

Year	Construction Activity	Duration (Days)	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption
2026	LDA						
	Removal of Existing Structures	10	2	18.5	370	33.43	11
	Fine Grading	80	10	18.5	14,800	33.43	443
	Site Development	120	22	18.5	48,840	33.43	1,461
	Paving	120	8	18.5	17,760	33.43	531
	LDT1						
	Removal of Existing Structures	10	1	18.5	185	25.70	7
	Fine Grading	80	5	18.5	7,400	25.70	288
	Site Development	120	11	18.5	24,420	25.70	950
	Paving	120	4	18.5	8,880	25.70	345
	LDT2						
	Removal of Existing Structures	10	11	18.5	185	26.01	7
	Fine Grading	80	5	18.5	7,400	26.01	285
	Site Development	120	11	18.5	24,420	26.01	939
	Paving	120	4	18.5	8,880	26.01	341
Off-Site Construction Worker Fuel Consumption (Gallons):							**5,608**

Source: (Urban Crossroads, 2026c, Table 4-7)

6. *Construction Vendor/Hauling Fuel Estimates*

With respect to estimated VMT, the construction vendor/hauling trips (vehicles that deliver materials to the site during construction) would generate an estimated 11,212 VMT along area roadways for the Project over the duration of construction activity. It is assumed that 50% of all vendor trips would be from medium-heavy duty trucks (MHDT), 50% of vendor trips would be from heavy-heavy duty trucks (HHDT), and 100% of hauling trips would be from HHDT. These assumptions are consistent with the CalEEMod defaults utilized within the within the Project's AQIA (*Technical Appendix B1*). Vehicle fuel efficiencies for MHDTs and HHDTs were estimated using information generated within EMFAC2021. EMFAC2021 was run for the MHDT and HHDT vehicle classes within the California sub-area for the 2026 calendar year. Data from EMFAC2021 is shown in Appendix 4.3 to the Project's EA (*Technical Appendix E*). (Urban Crossroads, 2026c, p. 20)

As shown in Table 4.5-8, *Construction Vendor/Hauling Fuel Consumption Estimates*, it is estimated that 1,539 gallons of fuel would be consumed related to construction vendor/hauling trips during full construction of the Project. For a conservative analysis, two-way vendor/hauling trips are estimated in Table 4.5-8 to account for the annual fuel consumption. It should be noted that Project construction vendor/hauling trips would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2026c, p. 20)

Table 4.5-8 Construction Vendor/Hauling Fuel Consumption Estimates

Year	Construction Activity	Duration (days)	Vendor/Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption
2026	MHDT						
	Removal of Existing Structures	10	1	10.2	102	8.71	12
	Fine Grading	80	2	10.2	1,632	8.71	187
	Site Development	120	3	10.2	3,672	8.71	422
	HHDT (Vendor)						
	Removal of Existing Structures	10	1	10.2	102	6.33	16
	Fine Grading	80	2	10.2	1,632	6.33	258
	Site Development	120	3	10.2	3,672	6.33	580
	HHDT (Hauling)						
	Removal of Existing Structures	10	2	20.0	400	6.33	63
Off-Site Construction Worker Fuel Consumption (Gallons):							**1,539**

Source: (Urban Crossroads, 2026c, Table 4-8)

7. Construction Energy Efficiency/Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in the construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2026c, p. 22)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2026c, p. 22)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures. For example, CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) also requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that

construction workers need to shut off engines at or before five minutes of idling." In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2026c, p. 22)

A full analysis related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared. (Urban Crossroads, 2026c, p. 22)

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2026c, p. 22)

B. Operational Energy Demands

Energy consumption in support of or related to Project operations would include facilities energy demands (energy consumed by building operations and site maintenance activities) (Urban Crossroads, 2026c, p. 23).

1. Transportation Energy Demands

Transportation energy demands were estimated based on the net increase in vehicle trips associated with the Project above the established environmental baseline. The County of Riverside has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for Galway Downs' operational conditions based on actual facility operations as documented in a full year of operational data from 2023. The 2023 operational dataset captures the full range of activities currently occurring at Galway Downs, including equestrian events, sports events, and special occasion events, and the energy demands associated with those activities constitute existing baseline conditions. Under baseline conditions, the Galway Downs facility experienced a total of 179,619 one-way vehicle trips (or 359,238 two-way trips). (Urban Crossroads, 2026c, p. 23)

Weekday trip generation is unchanged from existing conditions; accordingly, no change in weekday transportation energy demand is anticipated. For weekend trips, peak operations are assumed to occur every weekend throughout the year, or 104 weekend days per year. Although peak daily vehicular trips under the Project would not exceed those observed during peak days in 2023, the assumed increase in the frequency of peak-level events would result in greater annual vehicle trips to the facility and, therefore, increased annual transportation energy demands. The Project's annualized peak weekend trip generation of 1,197,456 two-way trips (11,514 two-way trips per peak weekend day × 104 weekend days/year) exceeds

baseline annual weekend trips by 838,218 net new two-way weekend trips, which forms the basis for the energy demand analysis below. (Urban Crossroads, 2026c, p. 23)

Energy consumed by Project-generated traffic is a function of total vehicle miles traveled (VMT) and estimated vehicle fuel economies for vehicles accessing the Project site. Net new annual VMT was calculated by applying the average trip length of 39.2 miles per trip, derived from available Streetlight data, to the 838,218 net new annual two-way weekend trips, resulting in approximately 32,857,946 net new annual VMT. Vehicle fuel efficiencies by vehicle class were estimated using data from EMFAC2021, developed by CARB and run for the Riverside (SC) area for the 2026 calendar year. (Urban Crossroads, 2026c, p. 23)

As summarized in Table 4.5-9, *Total Project-Generated Traffic-Related Annual Fuel Consumption*, the net new Project-generated weekend traffic would result in approximately 32,857,946 net new annual VMT and an estimated annual net increase in fuel consumption of approximately 1,327,219 gallons of fuel. (Urban Crossroads, 2026c, p. 23)

Table 4.5-9 Total Project-Generated Traffic-Related Annual Fuel Consumption

Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual VMT	Estimated Annual Fuel Consumption (gallons)
HHD	6.33	529,883	83,763
LDA	33.43	16,302,896	487,616
LDT1	25.70	1,248,018	48,557
LDT2	26.01	6,733,277	258,887
LHD1	16.89	1,033,089	61,152
LHD2	16.01	294,526	18,399
MCY	42.07	759,650	18,057
MDV	20.88	5,200,980	249,093
MH	5.86	197,787	33,773
MHD	8.71	481,599	55,321
OBUS	6.63	19,787	2,983
SBUS	6.43	43,949	6,831
UBUS	4.56	12,706	2,789
Total Annual Fuel Consumption (All Vehicles):			**1,327,219**

(Urban Crossroads, 2026c, Table 4-9)

2. Facility Energy Demands

Project building operations activities would result in the consumption of electricity, which would be supplied to the Project by SCE. Natural gas service is not available in the Project area, and accordingly the existing facility relies on delivered propane. None of the uses that would be permitted as part of the Project would require or result in an increase in natural gas consumption as compared to existing (baseline) conditions, and no new natural gas lines or connections are proposed as part of the Project. In addition, the only existing use on site that utilizes propane is the existing barn/restaurant (also referred to as the "Carriage House"), and there are no components of the proposed Project that would result in increased natural gas

consumption in association with the Carriage House. It also should be noted that the Project would include installation of solar photovoltaic system with an annual generation capacity of 747,539 kWh. As summarized in Table 4.5-10, *Project Annual Operational Energy Demand Increase Summary*, the Project would result in 5,502,430 kWh/year of electricity demand. (Urban Crossroads, 2026c, p. 24)

Table 4.5-10 Project Annual Operational Energy Demand Increase Summary

Energy Type	Electricity (kWh/year)
Non-Residential Structures	423,661
Model Lodging Units	246,168
Employee Modular Housing	123,084
Non-Residential Structures	4,709,517
Total Energy Usage	**5,502,430**

Source: (Urban Crossroads, 2026c, Table 4-10)

3. Stationary Sources

The proposed Project was conservatively assumed to include installation of a 300 hp diesel-powered fire pump. The fire pump was estimated to operate for up to 0.5 hour per day for up to 50 hours per year for maintenance and testing purposes. In addition, four gasoline-powered generators were assumed to operate for 10 hours per day during peak weekend events, occurring up to 104 peak event days per year. Emissions associated with the stationary diesel-powered fire pump and the gasoline-powered generators were calculated using CalEEMod. (Urban Crossroads, 2026c, p. 24)

Annual fuel consumption for each equipment type was estimated in accordance with the South Coast Air Quality Management District (SCAQMD) *Guidelines for Calculating Emissions from Internal Combustion Engines* (March 2023). Per Table 1 of that guidance, liquid fuel consumption was estimated using the following formula: (Urban Crossroads, 2026c, p. 24)

Fuel Consumption (gallons) = Operation Time (hours) × Engine Rating (bhp) × Fuel Consumption Factor × 1,000

The SCAQMD guidance provides fuel consumption factors of 0.0000511 thousand gallons (Mgal) per brake horsepower (bhp)-hour for diesel engines and 0.0000538 Mgal/bhp-hour for gasoline engines, derived from U.S. EPA AP-42 Table 3.3-1 average brake-specific fuel consumption values. (Urban Crossroads, 2026c, p. 24)

Based on these factors, the 300 hp diesel-powered fire pump was estimated to consume approximately 766.5 gallons of diesel fuel per year. The four gasoline-powered generators were estimated to consume approximately 3,133.31 gallons of gasoline per year, based on a 14 hp rated capacity per unit operating at a 74 percent load factor. Combined, the Project's stationary equipment fuel demand represents a conservative upper-bound estimate, as the fire pump is assumed to operate solely for maintenance and testing and the generators are assumed to operate at peak capacity on all 104 event days per year. (Urban Crossroads, 2026c, p. 24)

4. Project and Countywide Energy Consumption

The Project's electricity consumption shown in Table 4.5-11, *Project and Countywide Energy Consumption*, summarizes the estimated energy consumption for the Project compared to the County. It should be noted that these estimates represent gross consumption for the Project and do not include consumption estimates for non-transportation sources that are generated by current on-site uses, thereby providing a conservative analysis. As shown in Table 4.5-11, the Project's energy usage would constitute an approximate 0.03% increase over the County's typical annual electricity consumption. Thus, Project-related energy consumption would not be wasteful, inefficient, or unnecessary. (Urban Crossroads, 2026c, p. 25)

Table 4.5-11 Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption	Riverside County Annual Energy Consumption	Percentage Increase Countywide
Electricity	5,502,430 kWh	17,780,573,270 kWh	0.03%

Source: (Urban Crossroads, 2026c, Table 4-11)

5. Operational Energy Efficiency/Conservation Measures

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards, as well as enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). The Project also would not result in a substantial increase in demand for transmission service, and would not result in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure (other than site-adjacent and on-site connects to local utilities). (Urban Crossroads, 2026c, p. 25)

Project annual fuel consumption estimates presented previously in Table 4.5-9 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) likely would decrease future gasoline fuel demands per VMT. The Project's location near regional and local road networks helps decrease VMT in the area, which in turn reduces the overall energy demand for vehicles in the region. (Urban Crossroads, 2026c, p. 25)

C. Summary of Energy Demands

1. Construction

Based on CalEEMod estimations within the modeling output, construction-related vehicle trips would result in approximately 174,752 VMT and consume an estimated 7,147 gallons of gasoline and diesel combined during construction. Additionally, on-site construction equipment would consume an estimated 47,711

gallons of diesel fuel. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. CCR Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the CARB. Additionally, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. (Urban Crossroads, 2026c, p. 25)

Due to the temporary nature of construction, the limited nature of construction activities, and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed Project would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impacts related to electricity and fuel consumption would be less than significant. (Urban Crossroads, 2026c, pp. 25-26)

2. Operation

Operation of the proposed Project would consume energy as part of building operations. Building operations would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics. Based on CalEEMod energy use estimations, operations for the Project would result in approximately 5,502,430 kWh/year of electricity demand for the Project with no net increase in demand for natural gas or propane in comparison to existing conditions. It should be noted that an on-site solar photovoltaic (PV) system is currently being installed with an estimated annual generation capacity of 747,539 kilowatt-hours (kWh). The PV system is accounted for in this analysis and serves to offset a portion of the Project's baseline electricity demand. Based on the operational assumptions and SCAQMD fuel adjustment factors, the proposed Project's stationary equipment would consume approximately 766.5 gallons of diesel fuel annually for the fire pump and approximately 3,133.31 gallons of gasoline annually for the generators. These estimates represent a conservative upper-bound estimate based on maximum anticipated operating conditions. (Urban Crossroads, 2026c, p. 28)

The proposed Project would be designed and constructed in accordance with the County's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards are widely regarded as the most advanced energy efficiency standards and would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Accordingly, Project operations would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, and impacts would be less than significant. (Urban Crossroads, 2026c, pp. 28-29)

Operational energy also would be consumed during vehicle trips associated with the proposed Project. Fuel consumption would be primarily related to vehicle use by visitors and employees associated with the Project. Transportation energy demands were estimated based on the net new vehicle trips associated with the Project. Weekday trip generation is unchanged from existing conditions and therefore no change in

weekday transportation energy demand is anticipated. For weekend peak event days, the Project's peak weekend day trip generation was annualized assuming 104 peak event weekend days per year, resulting in 838,218 net new annual two-way weekend trips above existing conditions. This net increase accounts for the annual 359,238 weekend-related vehicular trips observed during the 2023 baseline period. (Urban Crossroads, 2026c, p. 29)

Net new annual VMT associated with the Project's weekend trip generation was calculated by applying the average trip length of 39.2 miles per trip, derived from available Streetlight data, to the 838,218 net new annual two-way weekend trips. Based on this calculation, Project-related vehicle trips would result in approximately 32,857,946 net new annual VMT and an estimated annual net increase in fuel consumption of 1,327,219 gallons of fuel. As noted above, this fuel demand reflects only the net increase above the established 2023 baseline conditions and is attributable solely to the incremental increase in event attendance associated with the proposed Project above what already occurs at the facility. (Urban Crossroads, 2026c, p. 29)

The Project vehicle trips are event-driven and directly tied to the Project's purpose of hosting equestrian and special events concentrated on peak weekend event days. In addition, improved fuel economies and the transition of vehicle fleet towards zero-emission and high-efficiency vehicles, mandated under federal Corporate Average Fuel Economy (CAFE) standards and California's Advanced Clean Cars II regulations, are expected to reduce fuel consumption associated with the Project's VMT over time. Furthermore, the Project would intensify existing event operations at an established venue rather than introduce a new traffic-generating land use, which would be proportional to and consistent with the scale of the proposed operational intensification. For these reasons, operational-related transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the operational impact related to vehicle fuel consumption would be less than significant. (Urban Crossroads, 2026c, p. 29)

D. Conclusion

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would be required to comply with the applicable Title 24 standards. As such, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other uses of similar scale and intensity that are constructed and operating in California. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State. Accordingly, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Threshold b.: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

A. Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.

B. Consistency with the Transportation Equity Act for the 21st Century (TEA-21)

The Project site is located in an area with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

C. Consistency with 2023 Integrative Energy Policy Report (IEPR)

Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway white paper builds on existing State programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2023 IEPR. Additionally, the Project would comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2023 IEPR.

D. Consistency with State of California Energy Plan

The Project site is located in an area with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

E. Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

The 2025 version of Title 24 was adopted by the CEC and became effective on January 1, 2026. As the Project building construction conservatively is anticipated in 2026, it is presumed that the Project would be required to comply with the Title 24 standards in place at that time. Therefore, the Project would not result in a significant impact on energy resources and would have no potential to conflict with the energy efficiency standards required by the 2025 version of Title 24.

F. Consistency with California Code Title 24, Part 11, CALGreen

CCR Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2025 California Green Building Code Standards that became effective on January 1, 2026. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. Thus, the Project would not conflict with the provisions of CALGreen.

G. Consistency with AB 1493

AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.

H. Consistency with Renewable Portfolio Standard (RPS)

California's RPS is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.

I. Consistency with Senate Bill 350 (SB 350) and Senate Bill 100 (SB 100)

The proposed Project would use energy from SCE, which has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350 and SB 100. Additionally, the Project would be designed and constructed to implement energy efficiency measures for new residential developments and would include several measures designed to reduce energy consumption in accordance with Title 24.

J. Conclusion

As indicated above, the Project would not conflict with any State or local plans adopted for the purpose of promoting renewable energy or energy efficiency. As such, impacts would be less than significant.

4.5.6 Cumulative Impact Analysis

As indicated under the analysis of Threshold a., there are no components of the proposed Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Although it is possible other cumulative developments could result in the wasteful, inefficient, or unnecessary consumption of energy resources, the Project's projected energy demand during operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

4.5.7 Significance of Impacts Before Mitigation

Threshold a: Less-than-Significant Impact. Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would, therefore, not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

Threshold b.: Less-than-Significant Impact. Energy consumed by the Project's operation is calculated to be comparable to or less than energy consumed by other uses of similar scale and intensity that are constructed and operating in California, as the Project would be subject to current regulatory requirements, such as the 2025 version of Title 24, which was not in effect when most existing residential developments were constructed. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

4.5.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- CCR Title 13, Motor Vehicles, Section 2449(d)(3): *Idling*. Grading plans shall reference the requirement that a sign shall be posted on site stating that construction workers need to shut off engines at or before five minutes of idling.

Design Features

The following Project Design Feature has been included as part of the Project in order to reduce the Project's anticipated operational-related demands for electricity resources:

- As a component of future building permit applications, the Project shall accommodate on-site solar photovoltaic systems with an annual generation capacity of at least 747,539 kWh.

Mitigation

Project impacts due to energy consumption would be less than significant; therefore, mitigation is not required.

4.5.9 References

Cited As	Reference
CPUC, n.d.	California Public Utilities Commission, n.d. *Natural Gas and California* (web page). No date. Accessed December 19, 2025. Available online at: https://www.cpuc.ca.gov/industries-and-topics/natural-gas/natural-gas-and-california
Urban Crossroads, 2026c	Urban Crossroads, 2026. *Galway Downs (CUP02303R1) Energy Analysis*. June 15, 2026. Included as EIR *Technical Appendix E*.

4.6 GREENHOUSE GAS EMISSIONS

The analysis in this EIR Subsection 4.6 is based in part on a technical report prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), titled, "Galway Downs (CUP02303R1) Greenhouse Gas Analysis" (herein, "GHGA"), dated June 15, 2026, and included as *Technical Appendix F* to this EIR (UXR, 2026d). Refer to EIR Section 7.0, *References*, for a complete list of reference sources.

4.6.1 Existing Conditions

A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of Greenhouse Gases (GHGs) in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (UXR, 2026d, p. 7)

An individual project, like the Project evaluated herein, cannot generate enough GHG emissions to affect a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. (UXR, 2026d, p. 7)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (UXR, 2026d, p. 7)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature. (UXR, 2026d, p. 7)

B. Greenhouse Gases

1. Greenhouse Gases and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties as discussed below. For the purposes of analysis, emissions of

CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (UXR, 2026d, p. 7)

Water

Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration primarily are considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. (UXR, 2026d, Table 2-1)

As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up). (UXR, 2026d, Table 2-1)

The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves. (UXR, 2026d, Table 2-1)

There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor. (UXR, 2026d, Table 2-1)

Carbon Dioxide (CO_2)

Carbon Dioxide (CO_2) is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. Prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by the year 2100 as a direct result of anthropogenic sources. (UXR, 2026d, Table 2-1)

CO_2 is emitted from natural and man-made sources. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks. (UXR, 2026d, Table 2-1)

Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of CO_2 can result in health effects such as headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. While current concentrations of CO_2 in the Earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour work week and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period. (UXR, 2026d, Table 2-1)

Methane (CH_4)

Methane (CH_4) is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10 to 12 years) compared to other GHGs. CH_4 has both natural and anthropogenic sources. It is released as part of animal digestion and the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropocentric sources include fossil-fuel combustion and biomass burning. (UXR, 2026d, Table 2-1)

CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH_4 can cause asphyxiation, loss of consciousness, headache, dizziness, nausea, vomiting, weakness, loss of coordination, and an increased breathing rate. (UXR, 2026d, Table 2-1)

Nitrous Oxide (N_2O)

Nitrous oxide (N_2O), also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant (i.e., in whipped cream bottles), in potato chip bags to keep chips fresh, and in rocket engines and race cars. N_2O can be transported into the stratosphere, be deposited on Earth's surface, or be converted to other compounds by chemical reaction. (UXR, 2026d, Table 2-1)

N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage). (UXR, 2026d, Table 2-1)

Chlorofluorocarbons (CFCs)

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of CFCs will remain in the atmosphere for over 100 years. (UXR, 2026d, Table 2-1)

In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation. (UXR, 2026d, Table 2-1)

Hydrofluorocarbons (HFCs)

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential ("GWP," described below). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF_3), 1,1,1,2-tetrafluoroethane (CH_2FCF), and 1,1-difluoroethane (CH_3CF_2). Prior to 1990, the only significant emissions were of CHF_3. CH_2FCF emissions are increasing due to its use as a refrigerant. HFCs are man-made for applications such as automobile air conditioners and refrigerants. No health effects are known to result from exposure to HFCs. (UXR, 2026d, Table 2-1)

Perfluorocarbons (PFCs)

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The United States Environmental Protection Agency (USEPA) estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt). The two main sources of PFCs are primary aluminum production and semiconductor manufacture. No health effects are known to result from exposure to PFCs. (UXR, 2026d, Table 2-1)

Sulfur Hexafluoride (SF_6)

Sulfur Hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The USEPA indicates that concentrations in the 1990s were about 4 ppt. SF_6 is used for insulation in electric power transmission and distribution equipment, in the

magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. (UXR, 2026d, Table 2-1)

Nitrogen Trifluoride (NF_3)

Nitrogen Trifluoride (NF_3) is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200. NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis. (UXR, 2026d, Table 2-1)

2. Potential Global Warming Effects

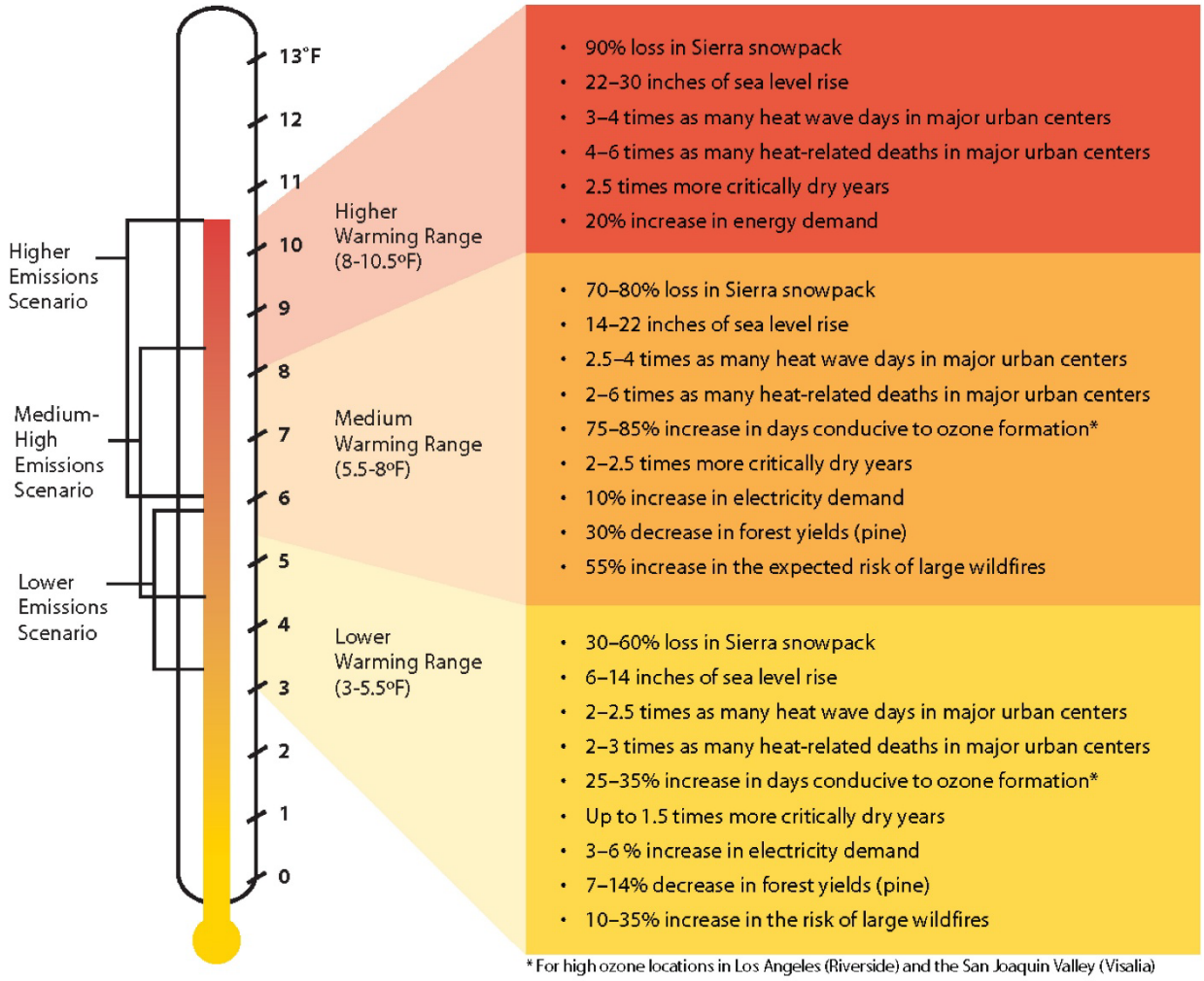
The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects, such as the Project, are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Figure 4.6-1, *Summary of Projected Global Warming Impact, 2070-2099 (as Compared with 1961-1990)*, presents the potential impacts of global warming. (UXR, 2026d, p. 13)

3. Global Warming Potential

GHGs have varying GWP values. The GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP and thus has a GWP of 1. CO_2 equivalent (CO_2e) is a term used for describing the different GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP. (UXR, 2026d, p. 14)

The Intergovernmental Panel on Climate Change (IPCC) is the international body for assessing the science related to climate change. IPCC Assessment Reports cover the full scientific, technical, and socioeconomic assessment of climate change. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.6-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.6-1, the GWP for the 2nd Assessment Report ranges from 1 for CO_2 to 23,900 for SF_6 and the GWP for the 6th Assessment Report ranges from 1 for CO_2 to 25,200 for SF_6. (UXR, 2026d, p. 14)

Figure 4.6-1 Summary of Projected Global Warming Impact, 2070-2099 (as Compared with 1961-1990)



Source: Barbara H. Allen-Diaz. "Climate change affects us all." *University of California, Agriculture and Natural Resources*, 2009.

Source: (UXR, 2026d, Exhibit 2-1)

Table 4.6-1 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2nd Assessment Report	6th Assessment Report
CO_2	Multiple	1	1
CH_4	11.8	21	28
N_2O	109	310	273
HFC-23	228	11,700	14,600
HFC-134a	14	1,300	1,526
HFC-152a	1.6	140	164
SF_6	3,200	23,900	25,200

Source: (UXR, 2026d, Table 2-2)

C. GHG Emissions Inventories

1. Global

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,940 gigagram (Gg) CO_2e[1], as summarized in Table 4.6-2, *Top GHG Producing Countries and the European Union*. (UXR, 2026d, p. 15)

Table 4.6-2 Top GHG Producing Countries and the European Union

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	6,340,228
European Union (27-member countries)	3,468,394
India	2,839,425
Russian Federation	2,156,599
Japan	1,168,094
Total	**28,272,940**

Source: (UXR, 2026d, Table 2-3)

2. United States

As noted in Table 4.6-2, the United States (U.S.), as a single country, was the number two producer of GHG emissions in 2021 (UXR, 2026d, p. 15).

3. State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the U.S. emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000 to 2022 GHG emissions period, California emitted an average 371.1 million metric tons of CO_2e per year ($MMTCO_2e/yr$) or 371,100 Gg CO_2e (5.85% of the total U.S. GHG emissions). Based on data published by the U.S. Energy Information Administration, California's per capita GHG emissions (9.12 metric tons) are much less than the nationwide per capita average (15.8 metric ton). (UXR, 2026d, p. 15)

[1] The global emissions represent the sum of Annex I and non-Annex I countries, excluding Land Use, Land-Use Change, and Forestry (LULUCF). For countries without data for 2021, data from the United Nations Framework Convention on Climate Change (UNFCCC) for the most recent available year were used. The most recent GHG emissions data for China and India are from 2014 and 2016, respectively. For Annex I countries, GHG emissions were taken from the "GHG emissions without LULUCF" category. For Non-Annex I countries, GHG emissions were taken from the "GHG emissions without LULUCF/LUCF" category. (UXR, 2026d, p. 15)

D. Effects of Climate Change in California

1. Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on the California Climate Change Center publication, *Our Changing Climate Assessing the Risks to California*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (UXR, 2026d, p. 16)

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat. (UXR, 2026d, p. 16)

2. Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. (UXR, 2026d, p. 16)

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding. (UXR, 2026d, pp. 16-17)

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta, a major fresh water supply. (UXR, 2026d, p. 17)

3. Agriculture

Increased temperatures could cause widespread changes to the agriculture industry, reducing the quantity and quality of agricultural products Statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. (UXR, 2026d, p. 17)

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts. (UXR, 2026d, p. 17)

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates. (UXR, 2026d, p. 17)

4. Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the State. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation. (UXR, 2026d, p. 17)

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the State. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the State's forests has the potential to decrease as a result of GCC. (UXR, 2026d, p. 17)

5. Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the State's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12 to 14 inches. (UXR, 2026d, p. 18)

4.6.2 Applicable Regulatory Requirements

The following is a brief description of the international, federal, State, and local environmental laws and related regulations related to GHG emissions.

A. International Regulations

1. Kyoto Protocol

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Kyoto Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997, and entered into force on February 16, 2005. The detailed rules for the implementation of the Protocol were adopted in 2001 at the Conference of the Parties 7 in Marrakesh, Morocco, and are referred to as the "Marrakesh Accords." Its first commitment period started in 2008 and ended in 2012.

On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of GHGs to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

On December 21, 2012, the amendment was circulated by the Secretary-General of the United Nations, acting in his capacity as Depositary, to all Parties to the Kyoto Protocol in accordance with Articles 20 and 21 of the Kyoto Protocol.

During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of 5% against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18% below 1990 levels in the 8-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first.

2. The Paris Agreement

The Paris Agreement builds upon the Convention and, for the first time, brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. The Paris Agreement requires all Parties to put forward their best efforts through "nationally determined contributions" (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts. The Paris Agreement entered into force on November 4, 2016, 30 days after the date on which at least 55 Parties to the Convention, accounting in total for at least an estimated 55% of the total global GHG emissions, have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary.

On June 1, 2017, President Trump announced he would begin the process of withdrawing the U.S. from the Paris Agreement. In accordance with articles within the Paris Agreement, the earliest effective date for the U.S. withdrawal from the Agreement was November 4, 2020, at which time the withdraw became official. On January 20, 2021, President Biden signed the executive order for the U.S. to rejoin the Paris Agreement, which became official on February 19, 2021. However, on January 20, 2025, President Trump signed an executive order initiating the withdrawal of the United States from the Paris Agreement for the second time. As a result, the United States is no longer a participating party to the Agreement. Notwithstanding the federal withdrawal, California and numerous subnational governments have reaffirmed their commitment to pursuing the Paris Agreement's GHG reduction goals through state and local action.

B. Federal Regulations

1. Clean Air Act

Coinciding with the 2009 meeting of international leaders in Copenhagen, on December 7, 2009, the USEPA issued an Endangerment Finding under Section 202(a) of the Clean Air Act (CAA), introducing federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the USEPA has not promulgated regulations on GHG emissions, but it has begun to develop them. Previously the USEPA had not regulated GHGs under the CAA because it asserted that the CAA did not authorize it to issue mandatory regulations to address GCC and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 [2007]), however, the US Supreme Court held that GHGs are pollutants under the CAA and directed the USEPA to decide whether the gases endangered public health or welfare. The USEPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. The USEPA proposed in July/August 2025 to reverse the finding that GHGs endangered public health or welfare, stating it no longer has the

statutory authority or record basis to maintain it. If this finding is reversed, GHG emission standards for new motor vehicles and engines would be eliminated, removing regulatory obligations for manufacturers.

2. Federal GHG Endangerment Finding

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the federal Clean Air Act (CAA). The Supreme Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA: (UXR, 2026d, p. 20)

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs – CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 – in the atmosphere threaten the public health and welfare of current and future generations. (UXR, 2026d, p. 20)
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare. (UXR, 2026d, p. 20)

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings. (UXR, 2026d, p. 20)

On March 12, 2026, the EPA under the Trump Administration signed a final rule rescinding the 2009 GHG Endangerment Finding (91 FR 17568). The rescission removes the federal regulatory basis for EPA to regulate GHG emissions from motor vehicles under Section 202(a) of the CAA, and may affect the legal foundation for numerous downstream federal GHG rules. The rescission is expected to face legal challenge. Regardless of the ultimate federal outcome, the analytical framework, significance thresholds, and GHG reduction requirements arise under California law – including CEQA, AB 32, SB 32, and the 2022 CARB Scoping Plan – which are independent of the federal Endangerment Finding. (UXR, 2026d, p. 20)

California's authority to enforce its own GHG emission standards for motor vehicles has also been subject to recent federal action. On June 12, 2025, President Trump signed three Congressional Review Act (CRA) resolutions – H.J. Res. 87, H.J. Res. 88, and H.J. Res. 89 – revoking California's CAA waivers for the Advanced Clean Cars II (ACC II) rule, the Advanced Clean Trucks (ACT) rule, and heavy-duty vehicle emission regulations, respectively. These resolutions eliminate the federal authorization under which California enforced its zero-emission vehicle mandates for passenger cars and trucks. California and several other states have filed legal challenges to the CRA resolutions. (UXR, 2026d, pp. 20-21)

C. State Regulations

1. Title 24 Building Energy Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR] Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2025 version of Title 24 was adopted by the CEC became effective on January 1, 2026. While the 2022 version introduced the first "electric-ready" requirements and expanded solar mandates, the 2025 update shifts the baseline for compliance to favor dual electric systems and more stringent efficiency metrics. The 2025 Title 24 standards require solar photovoltaic (PV) systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings. The CEC estimates that the 2025 code will save $4.8 billion in energy costs and reduce GHG emissions by 4 million metric tons (MMT) over its lifetime.

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen). The purpose of the CALGreen is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: 1) Planning and design; 2) Energy efficiency; 3) Water efficiency and conservation; 4) Material conservation and resource efficiency; and 5) Environmental air quality." CALGreen is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject to the requirements of CALGreen.

2. Assembly Bill 1493 (AB 1493)

Assembly Bill (AB) 1493 required the CARB to adopt the nation's first GHG emission standards for automobiles. On September 24, 2009, the CARB adopted amendments to the "Pavley" regulations that reduce GHG emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nationwide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September amendments cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles.

The USEPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the USEPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the CAA requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions."

CARB originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation AB 1493 (Pavley).

The regulations had been threatened by automaker lawsuits and were stalled by the USEPA's delay in reviewing and then initially denying California's waiver request. The parties involved entered a May 19, 2009, agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs.

CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and GHGs into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California.

3. Executive Order S-3-05

Executive Order S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California Environmental Protection Agency to coordinate efforts with meeting the GHG reduction targets with the heads of other State agencies. The executive order requires the Secretary to report back to the Governor and Legislature biannually: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. Executive Order S-3-05 goals for GHG emissions reductions include reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80% below 1990 levels by 2050.

4. Assembly Bill 32 (AB 32) – Global Warming Solutions Act of 2006

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Climate Solutions Act of 2006. AB 32 required California to reduce its GHG emissions to 1990 levels by 2020, which represented a reduction of approximately 15% below emissions expected under a "business as usual" (BAU) scenario. Pursuant to AB 32, CARB must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 was estimated to help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste.

AB 32 specifically required that CARB do the following:

- Prepare and approve a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020 and update the Scoping Plan every five years.
- Maintain and continue reductions in emissions of GHG beyond 2020.
- Identify the Statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020.

- Identify and adopt regulations for discrete early actions that could be enforceable on or before January 1, 2010.
- Adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions.
- Convene an Environmental Justice Advisory Committee to advise the Board in developing and updating the Scoping Plan and any other pertinent matter in implementing AB 32.
- Appoint an Economic and Technology Advancement Advisory Committee to provide recommendations for technologies, research, and GHG emission reduction measures.

In November 2007, CARB completed its estimated calculations of Statewide 1990 GHG levels. Net emission 1990 levels were estimated at 427 million metric tons (MMTs) (emission sources by sector were: transportation – 35%; electricity generation – 26%; industrial – 24%; residential – 7%; agriculture – 5%; and commercial – 3%). Accordingly, 427 $MMTCO_2e$ was established as the emissions limit for 2020. For comparison, CARB's estimate for baseline GHG emissions was 473 $MMTCO_2e$ for 2000 and without emissions reduction measures 2010 emissions were projected to be 532 $MMTCO_2e$. BAU conditions (without the reductions to be implemented by CARB regulations) for 2020 were projected to be 596 $MMTCO_2e$.

5. Senate Bill 1368 (SB 1368)

In 2006, the State Legislature adopted Senate Bill 1368 (SB 1368) (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand.

6. Executive Order S-01-07, Low Carbon Fuel Standard (LCFS)

Executive Order S-01-07 is effectively known as the Low Carbon Fuel Standard (LCFS). Executive Order S-01-07 seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10% by 2020. The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meets, on average, a declining standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold.

7. Senate Bill 1078 (SB 1078)

Senate Bill 1078 (SB 1078) establishes the California Renewable Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the CPUC to meet 20% of their renewable power by December 31, 2017, for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix.

8. Senate Bill 107 (SB 107)

Senate Bill 107 (SB 107) directed CPUC's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010.

9. Executive Order S-14-08

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020. In order to meet this new goal, a substantial increase in the development of wind, solar, geothermal, and other "Renewable Portfolio Standard eligible" energy projects will be needed. Executive Order S-14-08 seeks to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, Executive Order S-14-08 issues two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the CEC and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed Renewable Portfolio Standard eligible renewable energy projects.

10. Senate Bill 97 (SB 97)

By enacting Senate Bill 97 (SB 97) in 2007, California's lawmakers expressly recognized the need to analyze GHGs as a part of the California Environmental Quality Act (CEQA) process. SB 97 required the Governor's Office of Planning and Research, now known as the Governor's Office of Land Use and Climate Innovation (LCI), to develop, and the California Natural Resources Agency (CNRA) to adopt, amendments to the CEQA Guidelines ("State CEQA Guidelines") addressing the analysis and mitigation of GHG emissions. Those amendments to the State CEQA Guidelines clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions. (See State CEQA Guidelines Section 15064.4.)
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See State CEQA Guidelines Section 15126.4[c].)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See State CEQA Guidelines Section 15126.2[a].)
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See State CEQA Guidelines Section 15183.5[b].)
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See State CEQA Guidelines, Appendix F.)

As part of the administrative rulemaking process, the CNRA developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the State CEQA Guidelines amendments. The amendments to the State CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance-based standards. Pursuant to State CEQA Guidelines Section 15064.4(a), "[a] lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) [u]se a model or methodology to quantify GHGs resulting from a project, and which model or methodology to use; or (2) [r]ely on a qualitative analysis or performance-based standards."

CEQA emphasizes that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (See State CEQA Guidelines Section 15130(f)).

State CEQA Guidelines Section 15064.4(b) provides direction to lead agencies for assessing the significance of impacts of GHG emissions:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The State CEQA Guideline amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate, or estimate the amount of GHG emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

11. Senate Bill 375 (SB 375)

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, Senate Bill 375 (SB 375), Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce GHG

emissions through coordinated transportation and land use planning with the goal of more sustainable communities.

Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPOs). CARB will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets. The APS is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets (see Public Resources Code Sections 21155, 21155.1, 21155.2, and 21159.28).

12. Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which sets a goal to reduce GHG emissions in California to 40% below 1990 levels by 2030. The 2030 target serves as a benchmark goal on the way to achieving the GHG reduction goal set by former Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80% below 1990 greenhouse gas emissions levels by 2050).

13. Senate Bill 32 (SB 32)

On September 8, 2016, Governor Brown signed Senate Bill 32 (SB 32) and its companion bill, Assembly Bill 197 (AB 197). SB 32 requires the State to reduce Statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving Executive Order S-3-05, which sets a Statewide greenhouse gas reduction target of 80% below 1990 levels by 2050.

14. CARB Scoping Plan

AB 32 required CARB to develop a Scoping Plan which identified California's strategy for meeting the AB 32 reduction goals for 2020. The Scoping Plan must be updated every five years. In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions to achieve the AB 32 GHG reduction target.

In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (Update), which built upon the initial Scoping Plan with new strategies and recommendations. The Update highlighted California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlighted the latest climate change science, and provided direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. The Update recalculated 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 $MTCO_2e$ 1990 emissions level and 2020 GHG emissions limit identified in the 2008 Scoping Plan would be slightly higher, at 431 $MTCO_2e$. Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 $MTCO_2e$ (down from 509 $MTCO_2e$), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition.

In November 2017, CARB released the Final 2017 Scoping Plan Update, which identified the State's post-2020 reduction strategy. The Final 2017 Scoping Plan Update reflected the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update built upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes.

The Final 2017 Scoping Plan Update established a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the Final 2017 Scoping Plan Update framework included:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero-emission vehicles (ZEV) trucks.

- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH_4 and hydrofluorocarbon emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Note, however, that the Final 2017 Scoping Plan Update acknowledged that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."*

In addition to the Statewide strategies listed above, the Final 2017 Scoping Plan Update also identified local governments as essential partners in achieving the State's long-term GHG reduction goals and identified local actions to reduce GHG emissions. As part of the recommended actions, CARB recommended that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO_2e ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB stated that lead agencies may develop evidenced-based bright-line numeric thresholds – consistent with the Scoping Plan and the State's long-term GHG goals – and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$ per year, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory

objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with State CEQA Guidelines Section 15183.5.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects and, as CARB states in Appendix D (page 4), "focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

15. California Climate Crisis Act (AB 1279)

AB 1279, also known as the California Climate Crisis Act, declares that it is the policy of the State to achieve net zero GHG emissions as soon as possible, but no later than 2045; to achieve and maintain net negative GHG emissions thereafter; and to ensure that by 2045, Statewide anthropogenic GHG emissions are reduced to at least 85% below the 1990 levels. The bill requires CARB to work with relevant State agencies to ensure that updates to the CARB Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California. AB 1279 also requires CARB to submit an annual report evaluating progress towards these policies.

16. Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, revised State policy to include interim targets requiring that eligible renewable energy resources and zero-carbon resources supply 90% of all retail sales of electricity to California end-use customers by December 31, 2035; 95% of all retail sales of electricity to California end-use customers by December 31, 2040; 100% of all retail sales of electricity to

California end-use customers by December 31, 2045; and 100% of electricity procured to serve all State agencies by December 31, 2035. SB 1020 also requires each State agency to ensure that zero-carbon resources and eligible renewable energy resources supply 100% of electricity procured to serve their agency by December 31, 2035. In addition, SB 1020 requires the State Water Project (SWP) to procure eligible renewable energy and zero-carbon resources as necessary to meet the clean energy requirements specified for all State agencies. Finally, SB 1020 requires the CPUC to develop utility affordability metrics for both electricity and gas service.

17. Carbon sequestration: Carbon Capture, Removal, Utilization, and Storage Program (Senate Bill 905)

SB 905 requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage (CCRUS) Program and adopt regulations for a model unified permit program for the construction and operation of CCRUS projects. SB 905 is intended to accelerate the deployment of carbon management technologies and ensure they are deployed in a safe and equitable way. SB 905 requires the CCRUS Program to ensure that carbon dioxide capture, removal, and sequestration projects include specified components including, among others, certain monitoring activities. In addition, SB 905 requires that by January 1, 2025, CARB shall adopt regulations for a unified permit application for the construction and operation of carbon dioxide capture, removal, or sequestration projects to expedite the issuance of permits or other authorizations for the construction and operation of those projects. SB 905 also requires the establishment of a centralized public database to track the deployment of carbon capture, utilization, or storage (CCUS) technologies and carbon dioxide removal (CDR) technologies.

18. Assembly Bill 1757

AB 1757 directs the CNRA to determine an ambitious range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions for 2030, 2038, and 2045 to support State goals to achieve carbon neutrality and foster climate adaptation and resilience. Additionally, AB 1757 requires these targets to be integrated into the CARB Scoping Plan and other State policies. It also includes provisions to avoid double counting emission reductions, updates the Natural and Working Lands Climate Smart Strategy, develops GHG tracking protocols, and biennially post progress made in achieving the targets on CNRA's internet website. In addition, AB 1757 requires CARB to develop standard methods for State agencies to consistently track GHG emissions and reductions, carbon sequestration, and, where feasible, additional benefits from natural and working lands over time.

D. Regional Regulations

1. Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. In April 2024,

SCAG adopted the *2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* ("RTP/SCS"); also referred to herein as "Connect SoCal" with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect, and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by CARB; these objectives were provided in a direct response to SB 375 which was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

2. South Coast Air Quality Management District (SCAQMD)

To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, South Coast Air Quality Management District (SCAQMD) staff is convening an on-going GHG CEQA Significance Threshold Working Group. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff on developing the significance thresholds. On October 8, 2008, the SCAQMD released the Draft AQMD Staff CEQA GHG Significance Thresholds. These thresholds have not been finalized and continue to be developed through the working group.

The Draft AQMD Staff CEQA GHG Significance Thresholds guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions and was described as a "work in progress" of efforts to date. However, the draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. In December 2008, the SCAQMD adopted an interim 10,000 metric tons of CO_2e per year ($MTCO_2e/yr$) screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, used the following tiered approach to evaluate potential GHG impacts from various uses.

- Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

- Tier 2: Consider whether or not the proposed project is consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 $MTCO_2e$/yr threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e$/yr), commercial projects (1,400 $MTCO_2e$/yr), and mixed-use projects (3,000 $MTCO_2e$/yr). Under option 2, a single numerical screening threshold of 3,000 $MTCO_2e$/yr would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce Statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 $MTCO_2e$/yr per service population for project level analyses and 6.6 $MTCO_2e$/yr per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The SCAQMD has not announced when staff is expecting to present a finalized version of its GHG thresholds to the governing board. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including LCI, CARB, the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin (SCAB), various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. These thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners with regard to determining whether GHG emissions from a proposed land use project are significant.

E. Local Regulations

1. Riverside County Climate Action Plan (CAP)

The Riverside County CAP, which was adopted in December 2015 and most recently updated in November 2019 ("CAP Update") was designed under the premise that Riverside County and the community it represents is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside County's emission reduction efforts should coordinate with the State strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner.

The 2019 CAP Update establishes GHG emission reduction programs and regulations that correlate with and support evolving State GHG emissions reduction goals and strategies. The CAP Update includes reduction targets for year 2030 and year 2050. These reduction targets require the County to reduce emissions by at least 525,511 $MTCO_2e$/yr below the Adjusted Business as Usual (ABAU) scenario by 2030 and at least 2,982,947 $MTCO_2e$/yr below the ABAU scenario by 2050. (Riverside County, 2019, pp. ES-2 and ES-3)

The CAP identifies a development review process for evaluating GHG impacts and determining significance by first applying an emissions level that is determined to be less than significant for small projects, and by utilizing Screening Tables to mitigate project-level GHG emissions that exceed that threshold level. The 2019 CAP establishes a threshold level above 3,000 $MTCO_2e$ per year that is be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions. (Riverside County, 2019, Appendix D, pp. 5-6)

For projects exceeding the 3,000 $MTCO_2e$ threshold, the County has implemented CAP Update Screening Tables (Screening Tables) to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. To this end, the Screening Tables establish categories of GHG Implementation Measures. Under each Implementation Measure category, mitigation or project design features (collectively "features") are assigned point values that correspond to the minimum GHG emissions reduction that would result from each feature. Projects that yield at least 100 points are considered to be consistent with the GHG emissions reduction quantities anticipated in the County's GHG Technical Report and support the GHG emissions reduction targets established under the CAP Update. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG would be considered less than significant. (Riverside County, 2019, Appendix D, pp. 6-20)

4.6.3 Basis for Determining Significance

A. Thresholds of Significance

While estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to GCC in a cumulatively-considerable way.

Section VIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to greenhouse gas emissions, and includes the following threshold questions:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment: or
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, LCI's amendments to Section 15064.7(c) of the State CEQA Guidelines state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (UXR, 2026d, p. 36)

State CEQA Guidelines Section 15064.4(a) further states, "...[a] lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) [u]se a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use...; or (2) [r]ely on a qualitative analysis or performance-based standards." (UXR, 2026d, p. 36)

The following thresholds are derived directly from Section VIII of Appendix G to the State CEQA Guidelines and the County's Environmental Assessment form, and address typical adverse effects associated with GHG emissions. The proposed Project would have a significant cumulatively-considerable impact due to GHG emissions if the Project or any Project-related component would:

a. *Generate GHGs, either directly or indirectly, that may have a significant impact on the environment; or*
b. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*

4.6.4 Methodology

A. Method for Determining Significance

The proposed Project's GHG emissions impacts are considered quantitatively and based upon compliance with the County's CAP. The thresholds of significance do not prescribe specific methodologies for performing an assessment of GHG emissions. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, State CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." A lead

agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change." (UXR, 2026d, p. 36)

CEQA Guidelines Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

- The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.

- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

In addition, CEQA Guidelines Section 15064.7(c) specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The State CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Per State CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.

The significance of the proposed Project's GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The Riverside County 2019 CAP Update aims to reduce GHG emissions from development projects under County jurisdiction. The CAP Update builds on State and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and statewide post-2030 reduction goals. (Riverside County, 2019, pp. ES-1 through ES-4). As such, the methodology for determining significance of the Project's GHG emissions is based upon compliance with Riverside County's 2019 CAP Update.

The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO2e/yr is used to determine if additional analysis is required. Projects that exceed 3,000

MTCO2e/yr are required to quantify and disclose the anticipated GHG emissions then either (1) demonstrate GHG emissions at project buildout achieve at least a 25% reduction compared to a 2011-year efficiency, or (2) garner 100 points through the CAP Update Screening Tables. (UXR, 2026d, pp. 37-43)

B. Environmental Baseline

Under baseline conditions, the Project site is fully developed and has operated continuously as an equestrian-oriented events facility since 1968. Given the developed nature of the site and the extensive existing documentation of on-site physical conditions provided in EIR Section 2.0, the analysis of GHG emissions relies on a comparison between established operating characteristics at the facility and any changes to operational activities that would occur with approval of the proposed Project. The site includes a wide range of existing physical features and associated operational activities that emit GHGs under baseline conditions, including a horse racetrack, polo fields, stables, barns, arenas, training tracks, retail and restaurant/dining buildings, office space, an existing clock tower house, grooms quarters, recreational vehicle uses with associated club house, various storage structures, and permanent and temporary parking areas with associated lighting.

GHGs are also emitted from vehicles traveling to and from Galway Downs. As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, rather than solely on the activities expressly authorized under the existing CUPs. The 2023 operational dataset captures the full range of activities occurring at Galway Downs under baseline conditions, including equestrian events, sports events, and special occasion events. Consistent with that framework, the Project Applicant's 2023 data, which forms the Project's operational baseline for purposes of analyses in this EIR, peak weekday activities occurred on five occasions (April 21, April 28, June 2, June 9, and May 26, 2023), with approximately 4,458 two-way vehicle trips per day (2,229 one-way trips x 2 = 4,458 two-way trips). The peak weekend day occurred on May 28, 2023, with approximately 11,514 two-way vehicle trips (5,757 one-way trips x 2 = 11,514 two-way trips). Using the full dataset collected by the Project Applicant in 2023 to document the number of vehicles accessing the site on each operational day over the full 2023 calendar year, Galway Downs attracted an annual average of 632 daily vehicle trips on weekdays and 2,500 daily vehicle trips on weekends. Table 4.10-2 in EIR Subsection 4.10, *Transportation*, shows that the Project site's existing baseline annual vehicle miles traveled (VMT) is 15,223,036 miles (UXR, 2026f, p. 4).

C. Analysis Methodology

The Project's GHG emissions are based upon the net increase in GHG emissions above baseline conditions. As discussed in EIR Sections 2.0, *Environmental Baseline,* and 3.0, *Project Description*, the *Neighbors for Smart Rail* baseline framework means that the Project's GHG impact is measured as the net increase in emissions above the 2023 operational baseline, not as the gross emissions of the Project standing alone. Two distinct levels of analysis are relevant. At the daily operational level, the Project would not increase peak daily vehicle trips above the established 2023 maximum of 5,757 one-way trips, and the parking

management plan for Galway Downs required as a condition of CUP 02303R1 would constrain peak operations below that maximum, meaning the Project would not increase the maximum localized traffic-related GHG emissions above baseline conditions. At the annualized level, however, weekend events could occur more frequently than they occurred in 2023. For purposes of providing a conservative worst-case GHG analysis, a peak event is assumed to occur every Saturday and Sunday of the year (104 peak event weekend days). This conservative assumption produces a larger net new annual VMT figure than would reflect actual anticipated operations, and therefore overstates the Project's annual GHG emissions. These two levels of analysis are complementary and not contradictory: the no-net-increase-in-peak-daily-trips finding informs the localized impact analyses for the environmental topics of air quality and noise, for example, that are based upon daily thresholds, while the conservative worst-case annualization informs the Project's contribution to regional VMT and GHG emissions.

Under the proposed Project, programming for equestrian events would be similar to baseline conditions, and no changes are anticipated to equestrian-related programming other than a higher level of competitive activities. Sports events and special occasion events also would continue to occur in a manner substantially similar to baseline conditions, except that these activities would be fully permitted to occur on the site in designated zones with approval of CUP 02303R1. New sources of GHG emissions would be associated with the construction, installation, and operation of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar canopy structure, additional area for equestrian RV park use, and an off-site sewer line and roadway intersection improvements; the future construction and operation of up to 36 park model lodging units and 18 additional employee modular housing units; and an additional 32,857,946 net new annual VMT above the 2023 average annual weekend VMT baseline.

The additional annual VMT is based upon a conservative worst-case assumption that a peak event attracting 11,514 two-way vehicle trips (the maximum peak day documented in 2023) would occur every weekend of the year (104 days of the year), rather than the 22 weekend days with more than 2,500 one-way vehicle trips actually documented in 2023. This results in 1,197,456 projected annual two-way weekend trips based on 11,514 two-way trips per peak weekend day multiplied by 104 weekend days. Existing condition annual weekend trips were derived from available data on existing daily trip generation that occurred in 2023 and totaled 359,238 annual two-way weekend trips, representing actual 2023 average weekend conditions across all weekend days including non-event days. The difference between the Project's annualized peak weekend trip generation and the existing condition annual weekend trips results in 838,218 net new annual two-way weekend trips. This is a deliberately conservative comparison because the existing condition figure reflects actual average annual conditions while the Project figure reflects peak event conditions assumed to occur every weekend, which is not expected to occur in actuality. The average weekend trip length applied to these net new trips, 39.2 miles per trip, was derived from available StreetLight data. Based on this calculation, Project-related vehicle trips would result in approximately 32,857,946 net new annual VMT, as shown in Table 4.10-4 in EIR Subsection 4.10, *Transportation*. It should be emphasized that this total VMT value assumes a peak event every weekend of the year, which is not anticipated to occur, and thus overstates the Project's anticipated VMT since Galway Downs would not realistically host a peak event every weekend of the year. (UXR, 2026f, pp. 4-5)

D. GHG Emissions Modeling Methodology

GHG emissions were modeled using the California Emissions Estimator Model (CalEEMod) 2022, as described below.

1. California Emissions Estimator Model

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available has been utilized in the analysis presented herein. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Outputs from the model runs for construction and operational activity for the proposed Project are provided in Appendices 3.1 and 3.2 to the Project's GHGA (*Technical Appendix F*). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants sources. (UXR, 2026d, p. 37)

2. Construction and Operational Life-Cycle Analysis Not Required

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time. Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared for the Project (see State CEQA Guidelines Section 15145). (UXR, 2026d, p. 37)

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood or documented, and would be challenging to mitigate. Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, the SCAQMD has not recommended, and is not requiring, lifecycle emissions analysis. (UXR, 2026d, p. 37)

4.6.5 Impact Analysis

Threshold a.:	**Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

A. Construction Emissions

Project construction activities would generate CO_2 and CH_4 emissions. The Project's Air Quality Impact Analysis ("AQIA"; EIR *Technical Appendix B1*) contains detailed information regarding Project construction activities, which also is summarized in EIR subsection 3.7.1. As discussed in the AQIA and in EIR subsection

3.7.1, construction-related emissions are expected from the following activities: removal of existing structures; fine grading; site development; and paving. Refer to EIR subsection 3.7.1 for a discussion of construction durations and anticipated construction equipment needed to implement the Project. (UXR, 2026d, p. 38)

For construction phase Project emissions, GHG emissions are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life, then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.6-3, *Amortized Annual Construction Emissions*. (UXR, 2026d, p. 39)

Table 4.6-3 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
2026	527.00	0.02	0.01	0.08	529.00
Total	**527.00**	**0.02**	**0.01**	**0.08**	**529.00**
Amortized	**17.57**	**6.67E-04**	**3.33E-04**	**2.67E-03**	**17.63**

Note: Totals reflect rounding.
Source: (UXR, 2026d, Table 3-3)

B. Operational Emissions

Operational activities associated with the Project would result in emissions of CO_2, CH_4, N_2O, and refrigerants from the following primary sources: mobile source emissions[2]; area source emissions; energy source emissions; water supply, treatment, and distribution; solid waste; refrigeration; and stationary source emissions (UXR, 2026d, pp. 39-40).

The County of Riverside has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for Galway Downs' operational conditions based on actual facility operations at Galway Downs as documented in a full year of operational data from 2023. The 2023 operational dataset captures the full range of activities currently occurring at Galway Downs, including equestrian events, sports events, and special occasion events, and the GHG emissions associated with those activities constitute existing baseline conditions. For this analysis, GHG emissions are evaluated based upon the net increase in GHG emissions above the established environmental baseline, which represents the incremental difference between the Project's total emissions and the emissions already occurring under baseline conditions. Specifically, under baseline (2023)

[2] Although peak daily vehicular trips under the Project would not exceed those observed during peak days in 2023 (as discussed in subsection 4.2.4 of Subsection 4.3, *Air Quality*), for purposes of this EIR it is assumed that there would be up to 104 peak weekend days (or peak activities during every weekend throughout the year). While peak daily trips would not increase relative to baseline conditions, the assumed increase in the frequency of peak-level events would result in greater annual vehicle trips to the facility and, therefore, increased annual vehicle-related GHG emissions.

conditions, the Galway Downs facility experienced a total of 179,619 one-way vehicle trips at the facility (or 359,238 two-way trips), and emissions associated with these baseline vehicular trips were subtracted from the Project's calculated GHG emissions assuming peak weekend operations 104 days per year.

1. Mobile Source Emissions

Mobile source emissions were estimated based on net new vehicle trips associated with the Project. Weekday traffic is not expected to increase compared to baseline (2023) conditions, as the majority of events at the facility are scheduled on weekends. For purposes of this EIR, however, it is assumed that peak weekend events would occur more frequently than under baseline conditions; specifically, that peak weekend activities would occur during all 52 weekends of the year, resulting in a total of 104 peak weekend days. (UXR, 2026d, p. 40)

The Project's peak weekend day trip generation (with traffic control) was obtained from Table 4-4 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix I*) and annualized assuming 104 peak event weekend days per year, resulting in 1,197,456 projected annual two-way weekend trips (11,514 two-way trips per peak weekend day x 104 weekend days/year = 1,197,456 annual two-way weekend trips). Existing condition annual weekend trips (359,238 two-way trips annually) were derived from available data on existing daily trip generation that occurred in 2023. The difference between the Project's annualized peak weekend trip generation and the existing condition annual weekend trips results in 838,218 net new annual two-way weekend trips. The average trip length applied to these net new trips, 39.2 miles per trip, was derived from available Streetlight data. Weekday trip generation is unchanged from existing conditions and therefore was not modeled. (UXR, 2026d, p. 40)

2. Area Source Emissions

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Newsom signed AB 1346, which aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines) by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod, and do not incorporate the emissions reductions that would be realized from implementation of AB 1346. (UXR, 2026d, p. 40)

3. Energy Source Emissions

Combustion Emissions Associated with Electricity and Building Energy Sources

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere. These emissions are considered direct emissions associated with a building, although

emissions from the use of building energy do not include street lighting.[3] GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. (UXR, 2026d, p. 40)

For the Project's 36 park model lodging units and 18 additional employee modular housing units, CalEEMod default parameters were used to estimate building energy demand, including natural gas consumption for cooking and water heating typical of residential land uses. The Project would not result in a net increase in natural gas consumption as compared to existing (baseline) conditions; the CalEEMod default approach is used to provide a conservative estimate of potential energy-source GHG emissions, as it captures combustion-related emissions that would not occur if the units were assumed to be fully electrified. Electricity usage associated with the Project also was calculated by CalEEMod using default parameters. (UXR, 2026d, p. 40)

On-Site Solar

The Project would include installation of solar PV systems with an annual generation capacity of 747,539 kWh (UXR, 2026d, p. 41).

4. Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. (UXR, 2026d, p. 41)

5. Solid Waste

The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. In addition, peak weekend events were conservatively assumed to generate 20 cubic yards of additional wet/bulky trash per event (at a conversion rate of 1.0 ton per cubic yard), resulting in an additional 2,080 tons of solid waste per year (20 cubic yards x 104 peak weekend events x 1.0 ton/cubic yard), which was added to the CalEEMod default solid waste estimate. (UXR, 2026d, p. 41)

6. Refrigerants

Air conditioning (A/C) and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for

[3] The CalEEMod emissions inventory model does not include indirect emissions related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of streetlights that would occur. (UXR, 2026d, p. 40)

each project land use subtype based on industry data from USEPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per CCR Title 17, Section 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new A/C equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters. (UXR, 2026d, p. 41)

7. Stationary Source Emissions

The proposed Project was conservatively assumed to include installation of a 300 horsepower diesel-powered fire pump. The fire pump was estimated to operate for up to 0.5 hour per day for up to 50 hours per year for maintenance and testing purposes. In addition, four gas-powered generators were assumed to operate for 10 hours per day during peak weekend events, occurring up to 104 peak event days per year. Emissions associated with the stationary diesel-powered fire pump and the gas-powered generators were calculated using CalEEMod. (UXR, 2026d, p. 41)

C. GHG Emissions Summary and Evaluation of Project Impacts

The estimated Project-related GHG emissions are summarized in Table 4.6-4, *Project Annual GHG Emissions*. Detailed operation model outputs for the Project are presented in Appendix 3.2 to the Project's GHGA (*Technical Appendix F*). As shown in Table 4.6-4, construction and operation of the Project would generate approximately 13,210.05 $MTCO_2e$/yr of GHG emissions. (UXR, 2026d, p. 42)

Table 4.6-4 Project Annual GHG Emissions

Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction emissions amortized over 30 years	17.57	6.67E-04	3.33E-04	2.67E-03	17.63
Mobile	11.576.4	0.35	0.50	18.60	11,751
Area	14.07	0.00	0.00	0.00	14.08
Energy	1,010.88	0.10	0.01	0.00	1,016.32
Water	8.12	0.19	0.00	0.00	14.27
Waste	108.8	10.87	0.00	0.00	380.60
Refrigerants	0.00	0.00	0.00	1.13	1.13
Stationary	14.97	0.00	0.00	0.00	15.02
Total CO_2e (All Sources)	**13,210.05**				

Note: Totals reflect rounding.
Source: (UXR, 2026d, Table 3-4)

As previously noted, Riverside County approved the CAP Update in December 2019, which identified a two-step approach for evaluating GHG emissions. First, a screening threshold of 3,000 $MTCO_2e$/yr is used to determine if additional analysis is required. Projects that exceed this threshold must demonstrate either a

25% reduction in GHG emissions from a 2011-year level of efficiency compared to the mitigated Project buildout year, or demonstrate at least 100 points (equivalent to an approximate 15% reduction in GHG emissions) through the CAP Screening Tables. (Riverside County, 2019, Appendix D, p. 5)

As indicated in Table 4.6-4, the Project's GHG emissions increase over the established baseline is calculated at approximately 13,210.05 MTCO2e/yr, reflecting the incremental difference between the Project's total emissions and the emissions already occurring under baseline conditions. Because the Project's GHG emissions of approximately 13,210.05 $MTCO_2e$/yr would exceed the County's CAP screening threshold of 3,000 $MTCO_2e$/yr, the Project's impacts due to GHG emissions would represent a significant impact prior to the implementation of mitigation measures. (UXR, 2026d, p. 43)

Threshold b.: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Pursuant to Section 15064.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with AB 32, SB 32, and the County's CAP Update are discussed below. It should be noted that the Project's consistency with SB 32 (as identified through compliance with the 2022 Scoping Plan) also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32. Project consistency with the 2022 Scoping Plan and County's CAP Update is evaluated in the following discussion. (UXR, 2026d, p. 36)

A. Project Consistency with the 2022 CARB Scoping Plan

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Additionally, and as shown in Table 4.6-5, *Project Compliance with 2022 Scoping Plan Actions and Strategies*, the proposed Project would be consistent with or otherwise would not conflict with any of the Scoping Plan actions or strategies. As such, the Project would be consistent with the 2022 Scoping Plan, and no impact would occur. (UXR, 2026d, pp. 43-44)

B. Project Consistency with the Riverside County CAP Update

As previously discussed, the County of Riverside approved an Updated CAP in December 2019. The CAP Update identified a screening level of 3,000 $MTCO_2e$/yr to be used to determine if a development would be too small to be able to provide the level of GHG emission reductions expected from the CAP Update (Riverside County, 2019, Appendix D, pp. 5-6). To do this the County of Riverside determined the GHG emissions allowed by a project such that 90% of the emissions on average from all projects would exceed that level and be "captured" by the CAP Update, as previously discussed under the analysis of Threshold a. As previously shown in Table 4.6-4, the Project would result in 13,210.05 $MTCO_2e$/yr of GHG emissions; accordingly, because Project-related emissions would exceed the CAP screening threshold of 3,000 $MTCO_2e$/yr, the Project would be inconsistent with the CAP in the absence of mitigation measures.

Table 4.6-5 Project Compliance with 2022 Scoping Plan Actions and Strategies

Actions and Strategies	Potential to Conflict
Increase in Renewable Energy and Decrease in Oil and Gas Use Actions	No Conflict. The Project supports their strategy by incorporating on-site PV systems that offset a portion of operational electricity demand and reduce reliance on fossil fuel-based energy sources. The Project does not involve oil and gas production, refining, or related activities and would not conflict with Statewide efforts to reduce oil and gas use.
Low Carbon Fuels Actions	No Conflict. The Project does not include fuel production, refining, or distribution infrastructure. Project operations would occur within the Statewide regulatory framework that advances low-carbon fuels, and the Project would not impede implementation of these actions.
Expansion of Electrical Infrastructure Actions	No Conflict. The Project's on-site PV supports distributed energy strategies that can reduce grid demand. Any needed electrical service improvements would occur consistent with applicable codes and utility requirements, and the Project would not impede electrical infrastructure expansion.
Climate Ready and Climate-Friendly Buildings	No Conflict. New structures would comply with applicable building code and Title 24 energy efficiency requirements, supporting reduced building energy demand. The Project would not interfere with Statewide building electrification and efficiency objectives.
Expanded Use of Zero-Emission Mobile Source Technology Actions	No Conflict. The Project does not include vehicle manufacturing or large fleet operations. As such, the Project would not impede implementation of these actions.
Mechanical Carbon Removal and Carbon Capture and Sequestration Actions	No Conflict. The Project does not include industrial stationary sources of CO_2 capture/ sequestration infrastructure. This action is not applicable to the Project, and the Project would not preclude Statewide carbon removal/carbon capture and sequestration implementation.
Improvements to Oil and Gas Facilities Actions	No Conflict. The Project does not include oil and gas facilities or related infrastructure. This action is not applicable, and the Project would not interfere with Statewide efforts to improve or decommission oil and gas facilities.
Manure Management Actions	No Conflict. The Project would continue to operate as an equestrian facility and does not include dairy or large-scale livestock manure management systems addressed by this action. Standard manure handling practices would continue consistent with local requirements, and the Project would not impede Statewide manure management actions.
Reduced High-GWP Fluorinated Gases Actions	No Conflict. For any new conditioned spaces, the Project would be subject to applicable State/federal refrigerant and heating, ventilation, and air conditioning equipment requirements, supporting reductions in high-GWP refrigerants. The Project would not impede implementation of this action.
Forest, Shrubland, and Grassland Management Actions	No Conflict. The Project does not include forest/shrubland/grassland management actions of the type addressed by this strategy. This action is not applicable, and the Project would not interfere with Statewide land management programs.
Agricultural Actions	No Conflict. The Project does not include commercial agricultural operations that are addressed by the climate-smart agriculture actions. This action is not applicable, and the Project would not impede Statewide agricultural emissions reduction strategies.
Organic Waste Diversion and Composing Actions	No Conflict. The Project would comply with the applicable state and local solid waste and organic waste diversion requirements, supporting CH_4 reduction goals. The Project would not conflict with organic waste diversion and composting actions.
Afforestation, Urban Forestry Expansion, Urban Greening, Avoided Natural and Working Land Use Conversion, and Wetland Restoration Actions	No Conflict. The Project does not include afforestation of wetland restoration components. Any landscaping would be limited in scale and would not interfere with Statewide sequestration and restoration strategies.
Offshore Wind Actions	No Conflict. The Project does not involve marine development energy generation infrastructure or transmission facilities. Therefore, this action is not applicable, and the Project would not conflict with implementation of offshore wind development strategies.
Reduced VMT Actions	No Conflict. The Project does not involve land use changes of a type or scale that would impede regional Vehicle Miles Traveled (VMT) reduction programs. The Project would not conflict with implementation of reduced VMT actions.

Source: (UXR, 2026d, Table 3-5)

Accordingly, Project impacts due to a conflict with the Riverside County CAP Update would represent a significant impact of the proposed Project. (UXR, 2026d, p. 43)

Conclusion

The Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan. However, because the Project's emissions of 13,210.05 $MTCO_2e$/yr would exceed the Riverside County CAP Update screening threshold of 3,000 $MTCO_2e$/yr, Project impacts due to a conflict with the Riverside County CAP would represent a significant impact prior to mitigation. Furthermore, because the County's CAP is intended to address the County's obligations pursuant to AB 32 and SB 32, the Project's potential conflict with the County's CAP also represents a significant impact due to potential conflicts with AB 32 and SB 32. (UXR, 2026d, pp. 43-44)

4.6.6 Cumulative Impact Analysis

As discussed in EIR subsection 4.6.3.A, there is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature with respect to Threshold a. With respect to Threshold b., however, the Project's conflict with an applicable GHG reduction plan constitutes a significant impact on both a direct (Project-level) and cumulatively-considerable basis, because the Project would have the potential to individually conflict with the 2022 Scoping Plan, Riverside County CAP Update, AB 32, and/or SB 32, independent of consideration of other cumulative developments.

As discussed under the analysis of Threshold a., construction and long-term operation of the Project would result in approximately 13,210.05 $MTCO_2e$/yr of GHG emissions, which would exceed the County's screening threshold of 3,000 $MTCO_2e$/yr. As other cumulative development projects within the region similarly would have the potential to result in significant impacts due to GHG emissions, the Project's GHG emissions would be significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold b., the Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan. However, because the Project would result in 13,210.05 $MTCO_2e$/yr of GHG emissions and would exceed the CAP screening threshold of 3,000 $MTCO_2e$/yr, the Project would have the potential to conflict with the CAP in the absence of mitigation measures. Furthermore, because the County's CAP is intended to address the County's obligations pursuant to AB 32 and SB 32, the Project's potential conflict with the County's CAP also represents a significant impact due to potential conflicts with AB 32 and SB 32. As other cumulative developments also would have the potential to result in conflicts with the Riverside County CAP Update, AB 32, and/or SB 32, Project impacts due to a conflict with the Riverside County CAP Update would represent a significant cumulatively-considerable impact of the proposed Project.

4.6.7 Significance of Impacts Before Mitigation

Threshold a.: Significant Cumulatively-Considerable Impact. Construction and long-term operation of the Project would result in approximately 13,210.05 MTCO2e/yr, reflecting the incremental difference between

the Project's total emissions and the emissions already occurring under baseline conditions. Because the Project's GHG emissions of approximately 13,210.05 $MTCO_2e$/yr would exceed the County's CAP screening threshold of 3,000 $MTCO_2e$/yr, the Project's impacts due to GHG emissions would represent a significant impact prior to the implementation of mitigation measures.

Thresholds b.: Significant Direct and Cumulatively-Considerable Impact. The Project would be consistent with or otherwise would not conflict with the CARB 2022 Scoping Plan. However, because the Project would result in 13,210.05 $MTCO_2e$/yr of GHG emissions and would exceed the CAP screening threshold of 3,000 $MTCO_2e$/yr, the Project would have the potential to conflict with the CAP in the absence of mitigation measures. Furthermore, because the County's CAP is intended to address the County's obligations pursuant to AB 32 and SB 32, the Project's potential conflict with the County's CAP also represents a significant impact due to potential conflicts with AB 32 and SB 32. As other cumulative developments also would have the potential to result in conflicts with the Riverside County CAP Update, AB 32, and/or SB 32, Project impacts due to a conflict with the Riverside County CAP Update would represent a significant cumulatively-considerable impact of the proposed Project.

4.6.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

- All new buildings and improvements are required to be designed and constructed in accordance with the applicable provisions of the California Building Standards Code (Title 24 of the California Code of Regulations). Compliance is verified by Riverside County through plan review, permitting, and inspection.

Design Features

The following Project Design Feature has been included as part of the Project in order to reduce the Project's anticipated operational-related demands for electricity resources:

- The Project includes installation of a metal solar canopy structure over the Grand Prix Arena to provide on-site renewable energy generation, reducing reliance on grid electricity and associated GHG emissions. The annual generation capacity is estimated at 747,539 kWh.

Mitigation

❑ **Project-Specific Mitigation**

A good-faith evaluation of whether the Project can achieve the requisite efficiency-based reductions or point threshold under the Riverside County CAP Update has been conducted. The screening tables and associated point system identified in Appendix D to the Riverside County CAP Update are structured around standardized residential and commercial development categories and the GHG-reducing features applicable to those uses. The Project involves the continued operation of an existing 241.6-acre multi-use equestrian facility, consistent with the established environmental baseline, combined with new physical

improvements including a restroom building, awards/ceremony area, grand pavilion tent, office trailer, metal solar canopy structure, additional equestrian RV park area, and future park model lodging and employee modular housing areas. Also, peak attendance events are analytically assumed to occur every weekend day of the year. This combination of uses, operational characteristics, and site-specific conditions does not correspond to the residential or commercial development types contemplated by the CAP's screening tables. The specific features and measures comprising the CAP's point-based system were not designed for an equestrian events facility of this type and complexity. As a result, the Project cannot feasibly achieve the 100-point threshold or demonstrate the requisite 25% efficiency-based reduction required to demonstrate CAP consistency, and the CAP Update's screening tables and efficiency metrics do not provide a meaningful mechanism for evaluating the Project's GHG impact against those standards.

The following items were considered evaluated for their potential to reduce the Project's GHG emissions:

- Renewable Energy and On-Site Solar Generation. The Project's metal solar canopy structure over the Grand Prix Arena would provide on-site renewable energy generation, reducing reliance on grid electricity and associated GHG emissions. However, the solar canopy structure is a design feature of the Project and not a mitigation measure. As such, the on-site solar generation feasible within the Project's footprint is insufficient to offset GHG emissions associated with the Project's GHG emissions to the extent necessary to achieve CAP consistency. This measure is incorporated as a Project Design Feature but is insufficient standing alone to reduce the GHG impact to a less-than-significant level.
- Operational Efficiency Measures. The Project is required to comply with Title 24 Building Energy Standards for all new structures, which would reduce energy consumption and associated GHG emissions. Electric vehicle charging infrastructure and Light Emitting Diode (LED) lighting would further reduce operational emissions. However, the combination of mandatory Title 24 compliance and feasible operational efficiency measures would not reduce the Project's emissions below the 3,000 $MTCO_2e$/yr threshold.
- Transportation Demand Management. Shuttle service or rideshare coordination for large events could reduce vehicle trips and associated mobile-source GHG emissions. However, Transportation Demand Management (TDM) measures are not feasible for this Project because the nature and composition of the Galway Downs event attendance makes organized TDM impracticable at the scale necessary to achieve meaningful GHG reductions. The facility hosts equestrian events, sports events, and special occasions whose attendees, including event participants, competitors, trainers, equine handlers, and spectators, arrive from dispersed origins throughout the region at varying times, often transporting horses, specialized equipment, trailers, and supplies that cannot be accommodated on shared transit or shuttle vehicles. Unlike a fixed-schedule commute population or a concentrated urban event venue served by existing transit infrastructure, Galway Downs event attendees have no common origin point, no fixed arrival or departure schedule, and highly variable transportation needs determined by the nature of their participation in each event.
- Limiting Weekend Event Frequency. Peak attendance events were analytically assumed to occur every weekend of the year. Reducing the frequency of peak weekend events at Galway Downs would

reduce GHG emissions. However, the event-related operations that generate the Project's GHG emissions are directly tied to the primary objectives of the proposed Project. Restricting those operations to achieve CAP consistency would be fundamentally inconsistent with the basic objectives of the Project and would not constitute feasible mitigation under CEQA Guidelines Section 15126.4.

For the forgoing reasons, it has been determined that feasible mitigation measures are not available to mitigate the Project's cumulatively-considerable impacts due to the annual emissions of 13,210.05 $MTCO_2e$/yr to below a level of significance.

❑ **Applicable Mitigation Measures from the Temecula Wine Country Community Plan Program Environmental Impact Report**

The following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to reduce the Project's GHG emissions during construction activities. Refer also to EIR *Technical Appendix K*, which includes an analysis demonstrating why WCCP PEIR mitigation measures not listed below either are not applicable to the proposed Project, or includes an explanation that the required measures already have been addressed either as part of the Project's application materials or through the analysis conducted as part of this EIR for the Galway Downs Project.

WCCP PEIR MM GHG-1: All implementing projects shall use the following mitigation measures to reduce impacts from construction activities as related to construction equipment and vehicle exhaust emissions:

- The County shall require implementing projects to use low-emission and high energy efficiency construction equipment on site. Examples of low-emission and high energy efficiency equipment include use of EPA Tier 2 (or better) emission compliant construction equipment and use of alternative-fuel construction equipment (natural gas), if available.
- The County shall require implementing projects to include a statement on grading plans that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications.
- The County shall require implementing project to utilize electric- or diesel-powered equipment, in lieu of gasoline-powered engines, where feasible.
- The County shall require implementing projects to include a statement on grading plans that work crews shall shut off equipment when not in use. During smog season (May through October), the overall length of the construction period shall be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time.

- The County shall require implementing projects to time construction activities so as to not interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flag person shall be retained to maintain safety adjacent to existing roadways.
- The County shall require implementing projects to use EPA-rated engines of Tier 3 or better for construction equipment.
- As soon as electric utilities are available at construction sites, the County shall require implementing projects to supply the construction site with electricity from the local utility and all equipment that can be electrically operated shall use the electric utility rather than portable generators.

4.6.9 Significance of Impacts After Mitigation

Threshold a.: Significant and Unavoidable Cumulatively-Considerable Impact. As shown in Table 4.6-4, the Project's GHG emissions increase over the established baseline is calculated at approximately 13,210.05 $MTCO_2e$/yr, reflecting the incremental difference between the Project's total emissions and the emissions already occurring under baseline conditions. Because the Project's GHG emissions would exceed the CAP Update screening threshold of 3,000 $MTCO_2e$/yr, the Project's impacts due to GHG emissions would represent a cumulatively-considerable impact of the proposed Project. As discussed in subsection 4.6.7, the screening tables and associated point system identified in Appendix D to the Riverside County CAP Update are structured around standardized residential and commercial development categories and the GHG-reducing features applicable to those uses. The Project's combination of uses, operational characteristics, and site-specific conditions does not correspond to the residential or commercial development types contemplated by the CAP Update's screening tables. Thus, compliance with the CAP Update's screening tables was determined to be infeasible for the proposed Project. Mitigation measures beyond CAP Update compliance were considered to address the Project's significant impacts due to GHG emissions, including on-site solar energy generation, operational efficiency measures, TDM measures, and limited weekend event frequency. However, these measures were determined to comprise Project design features and compliance with existing State regulations, or otherwise would be infeasible as they would conflict with the Project's primary objectives. The Project's primary source of GHG emissions would be associated with vehicular trips to and from the Project site, and neither the Project Applicant nor Riverside county have the authority to regulate tail pipe emissions, which instead are regulated at the State and federal levels. Accordingly, because mitigation measures are not available to reduce the Project's GHG emissions to below the CAP Update screening threshold of 3,000 $MTCO_2e$/yr or to reduce the Project's GHG emissions by the requisite 25% efficiency-based reduction pursuant to the CAP Update, Project impacts due to GHG emissions would represent a significant and unavoidable cumulatively-considerable impact of the proposed Project for which mitigation measures are not available.

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project would result in 13,210.05 $MTCO_2e$/yr of GHG emissions and would exceed the CAP screening threshold of 3,000 $MTCO_2e$/yr. Therefore, the Project would have the potential to conflict with the CAP in the absence of

mitigation measures. As discussed above, mitigation measures to reduce the Project's GHG emissions have been determined to be infeasible. Although the CAP Update includes screening tables to address significant impacts due to GHG emissions, these measures were designed to address residential and commercial developments and are not applicable to the proposed Project. Furthermore, mitigation measures are not available to reduce the Project's GHG emissions to below the CAP Update screening threshold of 3,000 $MTCO_2e$/yr or to reduce the Project's GHG emissions by the requisite 25% efficiency-based reduction pursuant to the CAP Update. Therefore, Project impacts due to a conflict with the Riverside County CAP Update would represent a significant and unavoidable impact of the proposed Project on both a direct and cumulatively-considerable basis. Furthermore, because the County's CAP is intended to address the County's obligations pursuant to AB 32 and SB 32, the Project's significant and unavoidable impacts due to a conflict with the County's CAP also represents a significant and unavoidable impact due to potential conflicts with AB 32 and SB 32.

4.6.10 References

Cited As	Reference
Riverside County, 2019	Riverside County, 2019. *County of Riverside Climate Action Plan Update*. November 2019. Accessed December 20, 2025. Available online at: https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-2019-CAP-Update-Full.pdf
Urban Crossroads, 2026d	Urban Crossroads, Inc., 2026d. *Galway Downs (CUP02303R1) Greenhouse Gas Analysis*. June 15, 2026. Included as EIR *Technical Appendix F*.
UXR, 2026f	Urban Crossroads, Inc., 2026f. Galway Downs (CUP02303R1) Vehicle Miles Traveled (VMT) Assessment. June 19, 2026. Included as EIR Technical Appendix J.

4.7 HYDROLOGY AND WATER QUALITY

The analysis in this EIR Subsection 4.7 is based in part on a technical report prepared by Kolibrien Corp. (herein, "Kolibrien"), titled, "County Project Specific Water Quality Management Plan, Galway Downs," dated May 5, 2026, and included as EIR *Technical Appendix G* (Kolibrien, 2026). Refer to EIR Section 7.0, *References*, for a complete list of reference sources.

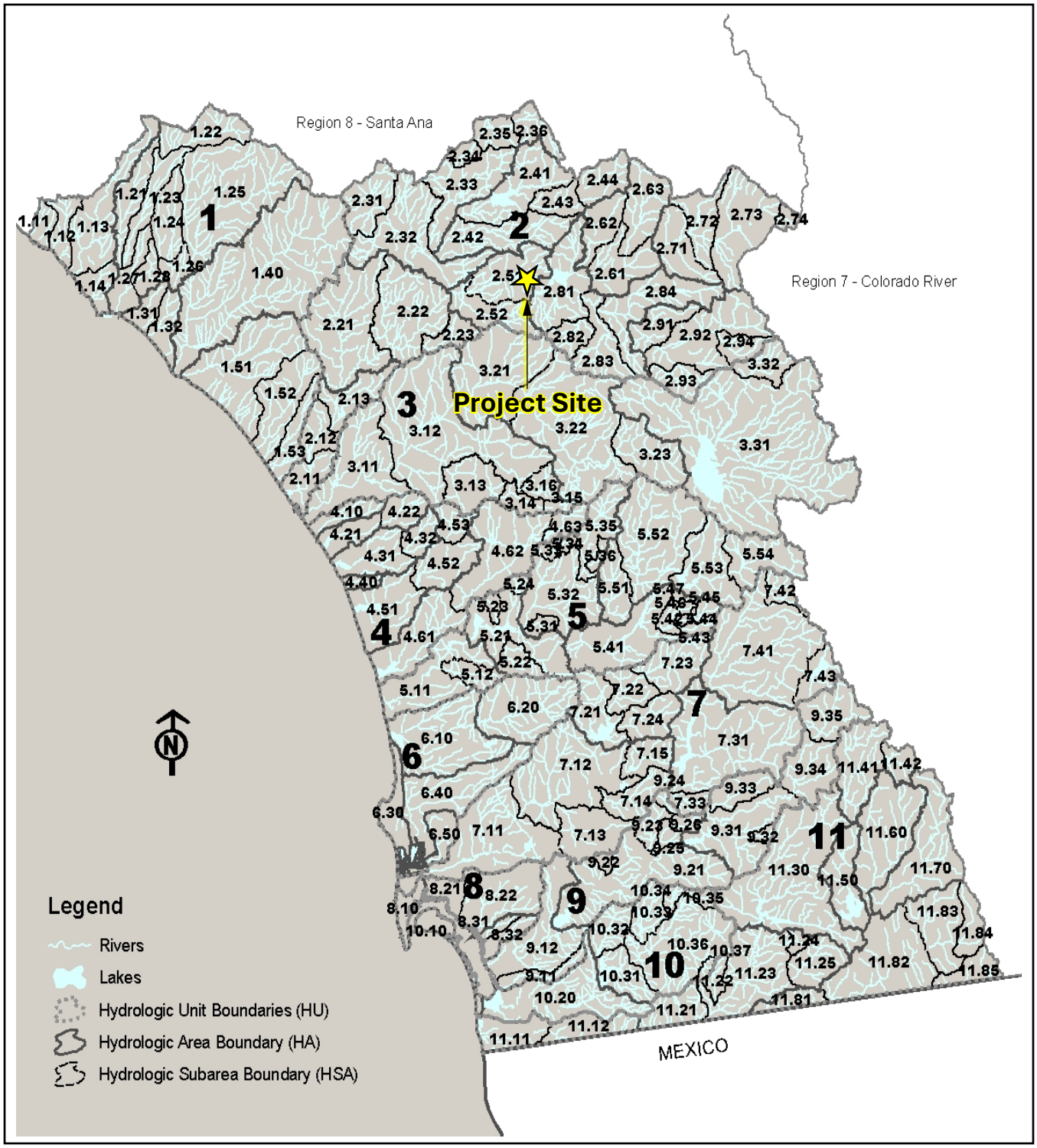
4.7.1 Existing Conditions

A. Regional Hydrology

According to mapping information available from the San Diego Regional Water Quality Control Board (RWQCB), the Project site occurs within the Pauba Hydrologic Subarea (HSA) of the Pechanga Hydrologic Area (HA) of the Santa Margarita Hydrologic Unit (HU). The Project site's location within the Santa Margarita HU is depicted on Figure 4.7-1, *San Diego Region Hydrologic Units, Areas, and Subareas*. As shown, the Santa Margarita HU comprises approximately 750 square miles and encompasses a portion of Camp Pendleton in San Diego County as well as the southwestern portion of Riverside County. The HU largely is drained by the Santa Margarita River, Murrieta Creek, and Temecula Creek. The major surface water storage areas are Vail Lake and O'Neill Lake. Annual precipitation ranges from less than 12 inches near the coast to more than 45 inches inland near Palomar Mountain. The only coastal lagoon of the HU is the Santa Margarita Lagoon, which lies within the Camp Pendleton Marine Base. The Santa Margarita HU is composed of the following nine HAs: Ysidora, Deluz, Murrieta, Auld, Pechanga, Wilson, Cave Rocks, Aguanga, and Oak Grove. (RWQCB, 2021, p. 1-8)

B. Site Hydrology

Under existing conditions, the Project site is relatively flat, with elevations on site ranging from approximately 1,313 feet above mean sea level (amsl) at the southern portion of the Project site to approximately 1,196 feet amsl near the northwest corner of the site. Runoff on the Project site is conveyed by a natural drainage system that primarily directs stormwater runoff through a combination of sheet flow, earthen channels, and culverts. Runoff generated within the southeastern portion of the Project site drains to an existing culvert beneath Pauba Road, where it is conveyed to an improved storm drain channel that runs along the east side of Pauba Road, and ultimately is conveyed beneath a separate culvert where flows are directed into Temecula Creek located to the north of the Project site. Flows from the majority of the remainder of the site sheet flow towards Los Corralitos Road and northerly toward an existing on-site retention basin located just northwest of the existing racetrack. In addition, a well-defined ephemeral drainage enters the northeast region of the Project site and drains in a western direction toward the on-site retention basin. Flows within this retention basin partially infiltrate into the groundwater table. During peak rain events, runoff from the retention basin is conveyed northerly by an existing culvert located beneath Los Caballos Road, where it discharges into an existing drainage swale and ultimately is conveyed to Temecula Creek.



Source(s): California State Water Control Board (October 2004)

Figure 4.7-1

San Diego Region Hydrologic Units, Areas, and Subareas

C. Flood Hazards

According to mapping information available from the Federal Emergency Management Agency (FEMA), and as shown on Figure 4.7-2, *FEMA FIRM No*. 06065C3310G, the majority of the Project site is located within "Flood Zone X (unshaded)," while the northernmost portions of the Project site (generally, areas north of the existing racetrack) are mapped within "Flood Zone A." "Flood Zone X (unshaded)" indicates "areas determined to be outside the 0.2% annual chance floodplain," while "Flood Zone A" indicates that the northern portions of the Project site are subject to the 1% annual chance flood (100-year flood), where "No Base [Flood] Elevations [have been] determined." (FEMA, 2008, FIRM No. 06065C3310G)

D. Water Quality

The Project site is located within the jurisdiction of the San Diego RWQCB. As indicated in the Project's Water Quality Management Plan (WQMP) (EIR *Technical Appendix G*), and as summarized in Table 4.7-1, *Identification of Receiving Waters*, receiving waters for the Project site include Temecula Creek, Santa Margarita River (Upper), and Santa Margarita River (Lower).

Table 4.7-1 Identification of Receiving Waters

Receiving Waters	EPA Approved 303(d) List Impairments	Designated Beneficial Uses	Proximity to RARE Beneficial Use
Temecula Creek	Benthic Community Effects, Bifenthrin, Chlorpyrifos, Copper, Cyhalothrin, Lambda, Indicator Bacteria, Iron, Manganese, Mercury, Nitrogen, Oxygen (Dissolved), Phosphorus, Pyrethroids, Toxicity, Turbidity, Sulphates, Total Dissolved Solids	AGR, GWR, IND, MUN, REC1, REC2, PROC, WARM, WILD	Not classified as a RARE waterbody.
Santa Margarita River (Upper)	Benthic Community Effects, Bifenthrin, Chlorpyrifos, Cyhalothrin, Lambda, Indicator Bacteria, Iron, Manganese, Nitrogen, Phosphorus, Pyrethroids, Total Dissolved Solids, Toxicity, Turbidity	AGR, COLD, IND, MUN, RARE, REC1, REC2, WILD, WARM	+15 Miles
Santa Margarita River (Lower)	Benthic Community Effects, Chlorpyrifos, Indicator Bacteria, Nitrogen, Phosphorus, Toxicity	AGR, COLD, IND, MUN, RARE, PROC, REC1, REC2, WILD, WARM	+25 Miles

Notes: AGR = Agricultural Supply; GWR = Groundwater Recharge; IND = Industrial Service Supply; MUN = Municipal and Domestic Supply; REC1 = Water Contact Recreation; REC2 = Non-contact Water Recreation; PROC = Industrial Process Supply; WARM = Warm Freshwater Habitat; WILD = Wildlife Habitat; COLD = Cold Freshwater Habitat; RARE = Rare, Threatened or Endangered Species.
Source: (Kolibrien, 2026, Table A-1)

In accordance with the Clean Water Act (CWA) Section 303(d) list regulations, Temecula Creek is listed as being impaired due to benthic community effects, bifenthrin, chlorpyrifos, copper, cyhalothrin, lambda, indicator bacteria, iron, manganese, mercury, nitrogen, oxygen (dissolved), phosphorus, pyrethroids, toxicity, turbidity, sulphates, and total dissolved solids. The Santa Margarita River (Upper) is listed as being

NFIP

NATIONAL FLOOD INSURANCE PROGRAM

PANEL 3310G

FIRM

FLOOD INSURANCE RATE MAP

RIVERSIDE COUNTY, CALIFORNIA
AND INCORPORATED AREAS

PANEL 3310 OF 3805
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

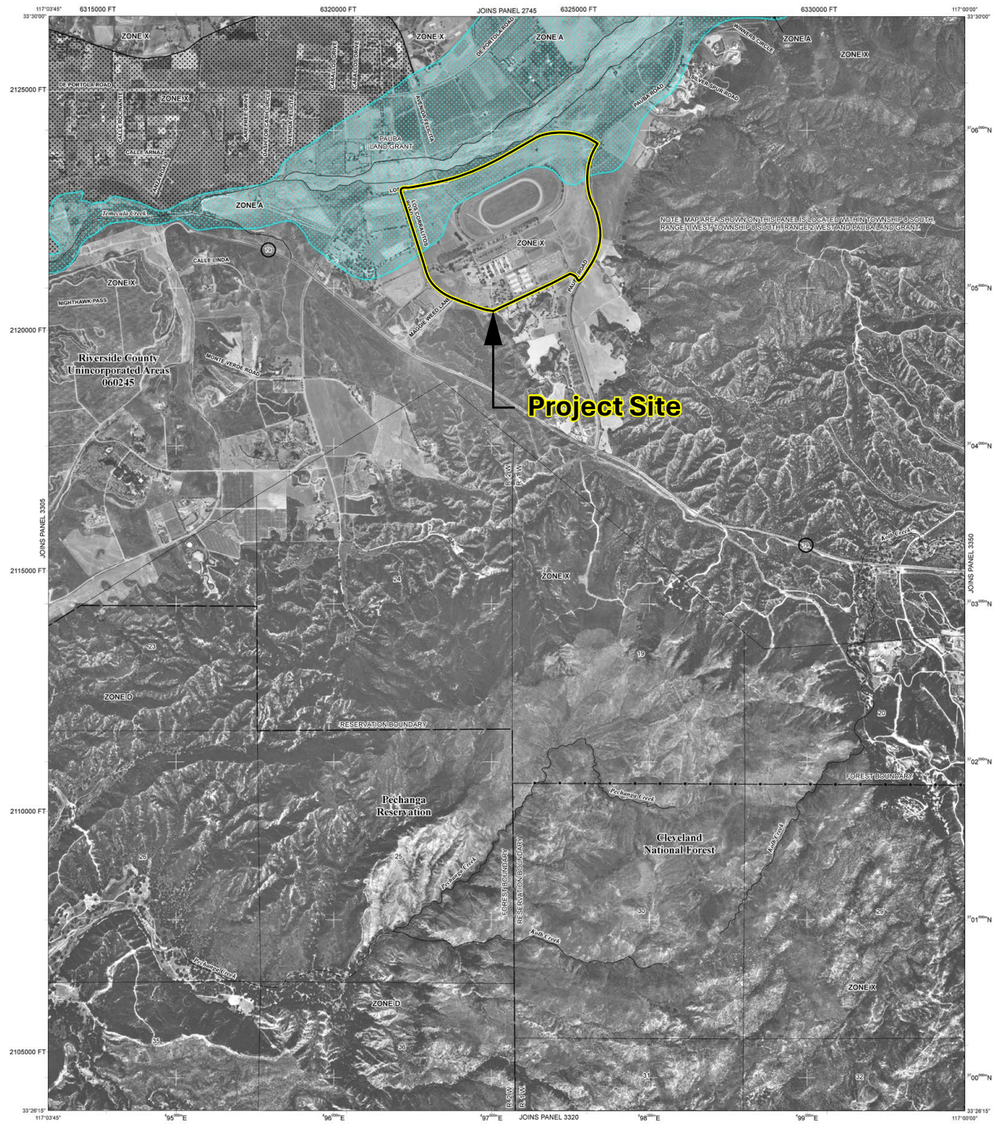
COMMUNITY	NUMBER	PANEL	SUFFIX
RIVERSIDE COUNTY	060245	3310	G

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.

MAP NUMBER
06065C3310G

EFFECTIVE DATE
AUGUST 28, 2008

Federal Emergency Management Agency



LEGEND

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

The 1% annual flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

ZONE A	No Base Flood Elevations determined.
ZONE AE	Base Flood Elevations determined.
ZONE AH	Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
ZONE AO	Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
ZONE AR	Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
ZONE A99	Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
ZONE V	Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
ZONE VE	Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X	Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X	Areas determined to be outside the 0.2% annual chance floodplain.
ZONE D	Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

	1% annual chance floodplain boundary
	0.2% annual chance floodplain boundary
	Floodway boundary
	Zone D boundary
	CBRS and OPA boundary
	Boundary dividing Special Flood Hazard Area Zones and boundary dividing Special Flood Hazard Areas of different Base Flood Elevations, flood depths or flood velocities.
513	Base Flood Elevation line and value; elevation in feet*
(EL 987)	Base Flood Elevation value where uniform within zone; elevation in feet*

* Referenced to the North American Vertical Datum of 1988

A — A	Cross section line
23 — 23	Transect line
87°07'45", 32°22'30"	Geographic coordinates referenced to the North American Datum of 1983 (NAD 83), Western Hemisphere
4276000mN	1000-meter Universal Transverse Mercator grid values, zone 11N
600000 FT	5000-foot grid ticks: California State Plane coordinate system, zone VI (FIPSZONE 0406), Lambert Conformal Conic projection
DX5510 ×	Bench mark (see explanation in Notes to Users section of this FIRM panel)
●M1.5	River Mile

Source(s): FEMA (08-28-2008)

Figure 4.7-2

Not to Scale

FEMA FIRM No. 06065C3310G

impaired by benthic community effects, bifenthrin, chlorpyrifos, cyhalothrin, lambda, indicator bacteria, iron, manganese, nitrogen, phosphorus, pyrethroids, total dissolved solids, toxicity, and turbidity. The Santa Margarita River (Lower) is listed as being impaired by benthic community effects, chlorpyrifos, indicator bacteria, nitrogen, phosphorus, and toxicity. (Kolibrien, 2026, Table A-1)

E. Groundwater

According to the Rancho California Water District (RCWD) Urban Water Management Plan (UWMP), the Project site is located within the Temecula Valley Groundwater Basin (TVGB), which is identified as a "low priority" basin pursuant to the Sustainable Groundwater Management Act (SGMA) and is considered "Adjudicated," meaning that water rights within the TVGB have been established through a court decree. The TVGB is managed as a series of nine hydrologic subunits with different pumping volumes. The Project site is located over the Pauba Valley Subunit, which has been the subject of a number of studies over the years. The Pauba aquifer covers approximately 18 square miles and is composed of younger alluvial sediments that occur along the principal streams of the watershed. Unconfined groundwater occurs within the sediments of the highly porous Pauba aquifer and well yields typically range from 500 to 2,000 gallons per minute (gpm). The Pauba aquifer reaches depths of up to 500 feet. The Pauba aquifer is underlain by the confined Temecula aquifer. The Temecula aquifer, encompassing approximately 100 square miles, consists of unconsolidated sediments that extend from 500 feet in depth to depths exceeding 2,000 feet. The TVGB has been governed under court jurisdiction since 1928 as part of the Santa Margarita River Watershed system. To further manage water in the region, a Watermaster was assigned by the court to oversee all uses within the Santa Margarita River Watershed, which include three groundwater basins: the Santa Margarita Groundwater Basin, the Anza Groundwater Basin, and the Temecula Valley Groundwater Basin. (RCWD, 2021, pp. 3-11 to 3-12) Groundwater recharge is the managed and intentional replenishment of natural groundwater supplies using man-made conveyances such as infiltration basins or injection wells. If all, or a portion of, the groundwater recharge water is subsequently pumped out of the basin in the same year, that water will be reported by the pumping agency as a supply from groundwater. The RCWD stores local runoff and imported water in Vail Lake for the purposes of groundwater recharge. (RWQCB, 2021, pp. 3-11 to 3-13)

4.7.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and regulations related to hydrology and water quality.

A. Federal Regulations

1. Clean Water Act

The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States (U.S.) and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the U.S. Environmental Protection Agency (USEPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants

in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. USEPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

2. Federal Flood Insurance Program

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the Federal Emergency Management Agency (FEMA) is responsible for administering the NFIP and administering programs that provide assistance for mitigating future damages from natural hazards.

3. Executive Order 11988 – Floodplain Management

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities" for the following actions:

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and
- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

B. State Regulations

4. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and groundwater and to both point and nonpoint sources of pollution.

Pursuant to the Porter-Cologne Act (California Water Code Section 13000 et seq.), the policy of the State is as follows:

- That the quality of all waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine RWQCBs (based on hydrogeologic barriers) and the State Water Resources Control Board (SWRCB), which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews the RWQCBs decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCBs have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The RWQCBs regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the CWA, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. The Project site is located in the Santa Margarita HU, which is within the purview of the San Diego RWQCB. The *Water Quality Control Plan for the San Diego Basin* is the governing water quality plan for the region (RWQCB, 2021).

5. California Water Code

The California Water Code is the principal State law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic

substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the California Fish and Game Code (Sections 1601-1603), is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW.

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water.

6. California Toxics Rule (CTR)

The California Toxics Rule (CTR) fills gaps in California's water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that USEPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.

7. Watershed Management Initiative

The SWRCB and the RWQCBs are focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement, and restoration while balancing economic and environmental impacts. The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.

- Better coordinate local, State, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups.

8. Sustainable Groundwater Management Act (SGMA)

The Sustainable Groundwater Management Act (SGMA), enacted in 2014, requires local agencies to form groundwater sustainability agencies (GSAs) for high- and medium-priority basins and to develop and implement groundwater sustainability plans (GSPs), or submit an alternative to a GSP (Alternative GSPs). GSPs are detailed road maps for how groundwater basins will reach long-term sustainability, halt overdraft, and bring groundwater basins into balanced levels of pumping and recharge. Alternative GSPs demonstrate how water managers have already achieved, or will achieve, sustainable groundwater management.

Under SGMA, high- and medium-priority basins should reach sustainability within 20 years of implementing their sustainability plans. The California Department of Water Resources (DWR) categorizes the priority of groundwater basins. For critically over-drafted basins, 2040 is the sustainability deadline, and for the remaining high- and medium-priority basins, 2042 is the deadline.

9. SWRCB Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to control trash that applies to the Water Quality Control Plan for Ocean Waters of California and the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California. They are collectively referred to as the "Trash Amendments." The Trash Amendments do the following: (a) establish a narrative water quality objective for trash, (b) define its corresponding applicability, (c) establish a prohibition on the discharge of trash, (d) provide implementation requirements for permitted stormwater and other discharges, (e) set a time schedule for compliance, and (f) provide a framework for monitoring and reporting requirements. The Trash Amendments apply to all surface waters of California and include a land-use-based compliance approach to focus trash controls on areas with high trash-generation rates. Areas such as high density residential, industrial, commercial, mixed urban, and public transportation stations are considered priority land uses. The San Diego RWQCB implements Statewide Trash Amendments through Water Code Section 13383 Orders that contain region-specific requirements. There are two compliance tracks:

- Track 1. Permittees must install, operate, and maintain a network of certified full capture systems in storm drains that capture runoff from priority land uses.
- Track 2. Permittees must implement a plan with a combination of full capture systems, multi-benefit projects, institutional controls, and/or other treatment methods that have the same effectiveness as Track 1 methods.

The Project would be required to comply with the latest State Trash Amendments and the Municipal Separate Storm Sewer System (MS4) Permit by installing the appropriate Full Capture System or equivalent.

C. Regional and Local Regulations

1. Water Quality Control Plan for the San Diego Basin

The California Porter-Cologne Water Quality Control Act (Section 13000 [“Water Quality”] *et seq.* of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the CWA) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the San Diego RWQCB. Water quality information for the San Diego Region is contained in the *Water Quality Control Plan for the San Diego Basin* (Basin Plan), which was most recently updated in September 2021 (RWQCB, 2021). This document is herein incorporated by reference and is available for public review at the San Diego RWQCB office located at 2375 Northside Drive, Suite 100, San Diego, CA 92108, or online at the following web address:

https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/

The purpose of the Basin Plan is to: (i) identify beneficial uses for surface and ground waters, (ii) include narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (iii) describe implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan.

2. Riverside County Ordinance No. 458 (Regulating Flood Hazard Areas and Implementing the National Flood Insurance Program)

This ordinance was adopted pursuant to the requirements of the National Flood Insurance Program (NFIP) (Title 42, U.S. Code, Section 4001 *et seq.*, as amended). Its purpose is to protect the public’s health, safety, and welfare from flooding hazards. It does so by regulating development within flood hazard areas and establishing a variety of land use and construction standards for such development. The ordinance includes construction standards that apply to all new structures and substantial improvements to existing structures within Riverside County’s mapped Special Flood Hazard Areas and floodplains. Among other requirements, these types of construction are required to: use materials resistant to flood damage; be anchored to prevent flotation, collapse, or lateral movement of the structure resulting from water movement or loading, including the effects of buoyancy; use construction methods and practices that minimize flood damage; and have electrical, heating, ventilation, plumbing, and air conditioning equipment appropriately elevated or protected. Pursuant to Riverside County Ordinance No. 458, no structure shall be constructed, located, or substantially improved and no land shall be graded, filled, or developed in the areas designated as floodways, except upon approval of a plan which provides that the proposed development will not result in any increase in flood levels during the occurrence of the base flood discharge. If a proposed permit qualifies for approval in the floodway, it shall then meet all the requirements necessary for approval of a permit in a Special Flood Hazard Area or floodplain. For proposed alterations within a watercourse or mapped floodplain, the flood carrying capacity of the altered or relocated portion of the watercourse or mapped floodplain shall be maintained. In summary, the specifications, standards, and requirements contained in Riverside County Ordinance No. 458 establish and implement measures that mitigate potential flood hazards within Riverside County. Collectively, these serve to ensure that flooding risks, water flows, and runoff are managed appropriately to prevent hazards and undue risk of damage or harm to people, property,

structures, and facilities within Riverside County. By requiring specific standards for development and establishing a program for the approval, implementation, and verification of such measures, this ordinance mitigates potential hazards that could arise from flooding hazards and their effects on people, property, and structures. (Riverside County, 2015a, pp. 4.11-38 and -40)

3. Riverside County Ordinance No. 754 (Stormwater / Urban Runoff Management and Discharge Controls)

Among other things, this ordinance requires that all discharges to storm drain systems be confined to stormwater runoff discharged pursuant to a NPDES permit or as otherwise authorized by the Santa Ana, San Diego, or Colorado River Basin RWQCB or the SWRCB in compliance with the CWA. This ordinance also establishes a variety of standards and Best Management Practices (BMPs) associated with controlling stormwater runoff. Although focusing on the pollution-control aspects of the NPDES program, in conjunction with Riverside County Ordinance Nos. 457 and 460, Riverside County Ordinance No. 754 establishes a range of standards and permit requirements that collectively serve to ensure that stormwater flows and runoff in developed areas are managed appropriately to prevent hazards or undue risk of damage or harm to people, property, structures, and facilities within Riverside County. By requiring specific standards for development and establishing a program for the approval, implementation, and verification of such measures, this ordinance mitigates potential hazards that could arise from stormwater flows and runoff, including flooding and erosion, and their effects on people, property, and structures. (Riverside County, 2015a, p. 4.11-41)

4.7.3 Basis for Determining Significance

Section X of Appendix G to the State CEQA Guidelines addresses typical adverse effects to hydrology and water quality, and includes the following threshold questions to evaluate a project's impacts:

- *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*
- *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
    - *Result in substantial erosion or siltation on or off site?*
    - *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site? or*
    - *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

- *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*
- *Would the project conflict with or otherwise obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section X of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to hydrology and water quality if construction and/or operation of the Project would:

a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;*
b. *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;*
c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces;*
d. *Result in substantial erosion or siltation on-site or off-site;*
e. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site;*
f. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;*
g. *Impede or redirect flood flows;*
h. *In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation; or*
i. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on hydrology and water quality.

4.7.4 Methodology

A. Overview

The analyses of potential hydrology and water quality impacts are based on the nature and degree of changes to drainage patterns, surface water and groundwater resources, and water quality conditions that would be brought about by the Project along with how such changes, if any, affect the long-term integrity of these resources within the region. The analysis of potential impacts to hydrology and water quality is based on a review of applicable federal, State, and local regulations and plans, as well as spatial data and mapping resources pertaining to the Project site and surrounding watershed, and is supported in part by the Project-

specific WQMP (EIR *Technical Appendix G*), which evaluates the Project's potential to affect downstream water quality and identifies the design features and best management practices that would be incorporated into the Project to address potential water quality impacts. Specific information sources consulted in the preparation of this analysis include: the Project's WQMP; the CWA and associated NPDES permitting requirements administered by the USEPA and the SWRCB; the Porter-Cologne Water Quality Control Act and the Water Quality Control Plan for the San Diego Basin (Basin Plan) adopted by the San Diego RWQCB; FEMA's FIRMs and National Flood Hazard Layer; the SGMA and applicable groundwater sustainability plans; the RCWD UWMP and associated groundwater management documentation for the Temecula Valley Groundwater Basin; floodplain, watershed, and drainage data available through the RCIT Map My County GIS mapping program; the Riverside County Flood Control and Water Conservation District's (RCFCWCD) design manuals and master drainage plans; Riverside County Ordinance Nos. 458 (Regulating Flood Hazard Areas and Implementing the National Flood Insurance Program) and 754 (Stormwater/Urban Runoff Management and Discharge Controls); the Riverside County General Plan and Southwest Area Plan (SWAP); and the Riverside County General Plan Amendment 960 Final EIR (EIR No. 521), which provides regional context for hydrology and water quality conditions in western Riverside County.

B. Environmental Baseline

Under baseline conditions, the Project site is fully developed and has operated continuously as an equestrian-oriented events facility since 1968. Because the Project site is an existing, operating equestrian and special events facility, the baseline includes the site's existing developed footprint and the existing drainage infrastructure that currently conveys, retains, and treats runoff generated on site. Specifically, the baseline conditions include the existing topography and grading of the site; the existing ephemeral drainage entering the northeast portion of the site; the network of sheet flow patterns, earthen channels, culverts, and the on-site retention basin located in the northwest portion of the site that collectively convey runoff from the majority of the site northerly toward Temecula Creek; the existing culvert beneath Pauba Road that conveys runoff from the southeastern portion of the site to an improved storm drain channel; the existing impervious surfaces, driveways, racetrack, and previously constructed buildings (including existing structures being permitted as part of CUP 02303R1); and the existing wastewater treatment provided by on-site septic holding tanks pending future connection to the Eastern Municipal Water District's (EMWD) Northern Wine Country Phase II sewer system.

The regulatory baseline includes the existing jurisdictional framework applicable to the site, including the Project site's location within the Pauba HSA of the Pechanga HA of the Santa Margarita HU under the jurisdiction of the San Diego RWQCB, and within the service area of the RCWD. The baseline also includes the receiving waters identified for the Project site (Temecula Creek, Santa Margarita River [Upper], and Santa Margarita River [Lower]) and their associated CWA Section 303(d) impairment listings, as summarized in Table 4.7-1; the FEMA-mapped flood hazard areas depicted on Figure 4.7-2, which identify the majority of the Project site as being within Flood Zone X (unshaded), with the northernmost portions of the Project site mapped within Flood Zone A; and the Project site's location within the adjudicated TVGB, specifically over the Pauba Valley Subunit, which is classified as a "low priority" basin under SGMA and is managed under a court-appointed Watermaster.

Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential hydrology and water quality impacts evaluates the incremental effects of the proposed Project relative to the physical and regulatory baseline conditions described above, as they existed at the Project site at the time the Notice of Preparation for this EIR was published (January 14, 2025).

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with minimal new physical construction and no new operational uses beyond those already occurring under existing conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to convert previously undeveloped land to a new use. The primary analytical questions addressed herein are therefore:

1. Whether the limited physical improvements proposed as part of the Project, consisting of the reconfiguration and paving of four visitor access driveways with adjacent self-retaining water quality treatment areas; the construction of a small number of new structures (including a new restroom building, a grand pavilion tent, an office trailer, and a metal solar structure placed over an existing arena); the addition of an awards/ceremony area and an equestrian recreational vehicle park area; the permitting of several previously installed structures; the installation of a new fire pump along the southern side of the existing race track; the placement of four shade trees within the existing western parking lot; interim on-site sewer improvements (including new sewer lines, laterals, and holding tanks) that would result in near-term construction-related disturbances; a future off-site sewer connection to the EMWD system that would cross beneath an existing ephemeral drainage via a jack and bore technique to avoid surface disturbance; and the future placement of up to 36 Equestrian Park Model Lodging units and up to 18 employee modular housing units (each subject to future Plot Plan approval), would result in adverse impacts to surface water or groundwater quality during construction or long-term operation, or would conflict with the San Diego Basin Plan or interfere with sustainable groundwater management of the Temecula Valley Groundwater Basin;
2. Whether the limited new impervious surfaces associated with the Project (approximately 1.8 acres, or 78,489 square feet, primarily associated with the reconfigured driveways and new proposed structures) would substantially alter the site's existing drainage patterns, result in substantial erosion or siltation on-site or off-site, substantially increase the rate or amount of surface runoff in a manner that would result in flooding, or exceed the capacity of existing or planned stormwater drainage systems;
3. Whether the Project's location within FEMA-mapped flood hazard areas, including the portions of the Project site within Flood Zone A and the portions of the Project site subject to inundation in the event of a failure of the dam at Vail Lake, would result in the Project impeding or redirecting flood flows or risking the release of pollutants due to Project inundation; and
4. Whether the Project would conflict with or obstruct implementation of the Water Quality Control Plan for the San Diego Basin or any applicable sustainable groundwater management plan governing the TVGB.

Because the limited improvements proposed as part of the Project would not substantially modify the site's existing drainage patterns or stormwater infrastructure, the analysis evaluates the potential for incremental changes from these proposed improvements relative to the existing baseline conditions described above.

4.7.5 Impact Analysis

Threshold a.:	**Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**
Threshold b.:	**Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**
Threshold i.:	**Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

Potable water service to the Project site currently is provided by the Rancho California Water District (RCWD), and the RCWD would continue to provide potable water service to the proposed Project. As such, the Project would not involve the direct extraction of groundwater via existing or proposed groundwater wells. Additionally, the Project would result in the introduction of impervious surfaces associated with the driveway access points and the new proposed structures, which include a new restroom building, a grand pavilion tent, an office trailer, and a metal solar structure, which combined would result in approximately 78,489 s.f. (1.8 acres) of new impervious areas on site. Additional areas of impervious surfaces are anticipated in the future in association with the future installation of up to 36 park model lodging units and 18 additional employee modular housing units, although these uses would be separately permitted in the future through discretionary Plot Plans. Areas of impervious surface area associated with these additional uses are not known at this time; however, drainage is required to be addressed per the requirements of the RCFCWCD's Hydraulic Design Manual. In addition, several existing structures on site would be permitted as part of CUP 02303R1, including an existing 1,513 s.f. barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. However, similar to existing conditions, under the proposed Project all runoff that is generated on site would continue to be conveyed either to the on-site retention basin or to downstream areas where Project-related runoff would infiltrate into the groundwater table, and would continue to contribute flows to the TVGB. Accordingly, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

The Project site is located within the jurisdiction of the San Diego RWQCB. Water quality information for the San Diego Region is contained in the Water Quality Control Plan for the San Diego Basin (Basin Plan), as most recently updated in September 2021. Additionally, the Project site is located within the RCWD service area, which manages groundwater resources in the local area. However, as previously indicated, the RCWD conducts groundwater replenishment in the local area using man-made conveyances such as infiltration basins or injection wells. If all, or a portion of, the groundwater recharge water is subsequently pumped out of the Basin in the same year, that water will be reported by the pumping agency as a supply from

groundwater. The RCWD stores local runoff and imported water in Vail Lake for the purposes of groundwater recharge. As such, there is no sustainable groundwater management plan in effect for the Project area. Because all runoff tributary to or generated on the Project site would be subject to retention and water quality treatment prior to infiltration into the groundwater basin, and because the Project's proposed driveway improvements would include self-treating areas for water quality purposes, the Project has no potential to adversely affect groundwater supplies or groundwater quality, and has no potential to conflict with a sustainable groundwater management plan. No impact to groundwater quality or supplies would occur with implementation of the Project. (RCWD, 2021, pp. 3-11 to 3-12)

The California Porter-Cologne Water Quality Control Act (Section 13000 ("Water Quality") et seq., of the California Water Code), and the federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the Pauba Hydrologic Subarea (HSA) of the Pechanga Hydrologic Area (HA) of the Santa Margarita Hydrologic Unit (HU) of the Water Quality Control Plan for the San Diego Basin, which is under the jurisdiction of the San Diego RWQCB. Water quality information for the San Diego region is contained in the Water Quality Control Plan for the San Diego Basin (Basin Plan), as most recently updated in September 2021 (RWQCB, 2021). This document is herein incorporated by reference and is available for public review at the San Diego RWQCB office located at 2375 Northside Drive, Suite 100, San Diego, CA 92108, or on-line at the following web address:

https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. Impairments for Temecula Creek, Santa Margarita River (Upper), and Santa Margarita River (Lower) are discussed in EIR Subsection 4.7.1D and listed in Table 4.7-1.

The specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project's potential to conflict with the Basin Plan during both construction and long-term operation.

Construction-Related Water Quality

Construction of the proposed Project would involve minor amounts of fine grading activities and trenching for the Project's off-site sewer line, along with paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such,

short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the San Diego RWQCB and Riverside County, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB's Basin Plan. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or WDRs during construction activities. Therefore, with mandatory adherence to the future required SWPPP, runoff associated with Project-related construction activities would not conflict with the Basin Plan requirements, and impacts would be less than significant.

Operational-Related Water Quality

As noted above, receiving waters for the Project site include Temecula Creek, Santa Margarita River (Upper), and Santa Margarita River (Lower). In accordance with the Clean Water Act (CWA) Section 303(d) list regulations, Temecula Creek is listed as being impaired due to benthic community effects, bifenthrin, chlorpyrifos, copper, cyhalothrin, lambda, indicator bacteria, iron, manganese, mercury, nitrogen, oxygen (dissolved), phosphorus, pyrethroids, toxicity, turbidity, sulphates, and total dissolved solids. The Santa Margarita River (Upper) is listed as being impaired by benthic community effects, bifenthrin, chlorpyrifos, cyhalothrin, lambda, indicator bacteria, iron, manganese, nitrogen, phosphorus, pyrethroids, total dissolved solids, toxicity, and turbidity. The Santa Margarita River (Lower) is listed as being impaired by benthic community effects, chlorpyrifos, indicator bacteria, nitrogen, phosphorus, and toxicity. (Kolibrien, 2026, Table A-1) To assess the Project's potential for water quality impacts, a Project-specific Water Quality Management Plan (WQMP) was prepared for the Project and is included in *Technical Appendix G* to this EIR.

As previously described, to meet NPDES requirements, drainage and water quality improvements proposed as part of the Project would be limited to the Project's reconfigured driveways, as runoff from the remaining portions of the site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin per the requirements of the RCFCWCD's Hydraulic Design Manual. As previously shown on EIR Figure 3-14, each of the proposed reconfigured driveways would be paved with asphalt or cement, and each of the proposed driveways have been designed to convey runoff generated by the driveways to adjacent self-retaining areas. The self-retaining areas would be improved to include an amended soil configuration, as also depicted on EIR Figure 3-14, which would accommodate a total ponding depth of 6 inches and would include 8 inches of amended soil covered by three inches of mulch to provide water quality treatment for runoff from each driveway. The proposed self-treatment areas would ensure that the Project's proposed driveway improvements would not violate any water quality standards or WDRs or otherwise substantially

degrade surface or ground water quality, and also would ensure that the proposed Project would not conflict with or obstruct implementation of the San Diego Region Basin Plan. Accordingly, Project impacts would be less than significant.

Threshold c.:	**Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?**
Threshold f.:	**Would the Project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

The Project is designed to comply with California Drainage Law, which requires that water that flows onto or is generated on the site be discharged from the site in the same location(s) and at no greater amount than occurs under existing conditions. The proposed Project would result in the introduction of impervious surfaces associated with the driveway access points and the new proposed structures, which include a new restroom building, a grand pavilion tent, an office trailer, and a metal solar structure, which combined would result in approximately 78,489 s.f. (1.8 acres) of new impervious areas on site. Additionally, areas are proposed where 36 park model lodging units could be placed and where 18 additional employee modular housing units could be placed; the design of these areas would be subject to future County discretionary Plot Plan approvals, and would require the preparation and RCFCWCD approval of site-specific WQMPs to demonstrate that water quality within the areas proposed for park model lodging units and additional employee modular housing units have been adequately addressed as part of the implementing Plot Plan. Stormwater drainage design would be per the requirements of the RCFCWCD's Hydraulic Design Manual. In addition, several structures that were installed on the site without permits would be permitted as part of CUP 02303R1, including an existing 1,513 s.f. barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. The Project also would require the construction of an off-site sewer line between the northwest corner of the site and De Portola Road.

The improvements proposed on-site as part of the Project, including fine grading activities associated with the new proposed buildings as well as improvements to the site access driveways, are limited and would have no potential to result in a substantial alteration to the existing drainage pattern of the Project site. Although the Project would result in new impervious surfaces on site encompassing approximately 78,489 s.f. (1.8 acres), the site's existing retention basin in the northwest portion of the Project site is sufficiently sized per the requirements of the RCFCWCD Hydraulic Design Manual to accommodate the slight increase in runoff due to the addition of 1.8 acres of impervious surfaces; thus, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Additionally, and as more fully discussed in EIR Subsection 4.3, *Biological Resources*, although the Project's off-site sewer alignment would traverse an approximate 0.01-acre portion of the Temecula Creek to the north of the Project site, the grading for this off-site sewer line would be designed so as to avoid impacts to the Temecula Creek by utilizing directional drilling (e.g., jack and bore technique) beneath the drainage such that there would be no surface impacts to the Temecula Creek (refer also to EIR Mitigation

Measure 4.3-2, which has been imposed to ensure there would be no surface impacts to the Temecula Creek in association with the Project's off-site sewer connection). Accordingly, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, and impacts would be less than significant.

As previously described, drainage and water quality improvements proposed as part of the Project would be limited to the Project's reconfigured driveways, as runoff from the remaining portions of the site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin per the requirements of the RCFCWCD's Hydraulic Design Manual. As previously shown on EIR Figure 3-14, each of the proposed reconfigured driveways would be paved with asphalt or cement, and each of the proposed driveways have been designed to convey runoff generated by the driveways to adjacent self-retaining areas. The self-retaining areas would be improved to include an amended soil configuration, as also depicted on EIR Figure 3-14, which would accommodate a total ponding depth of 6 inches and would include 8 inches of amended soil covered by three inches of mulch to provide water quality treatment for runoff from each driveway. Additionally, the self-treatment areas for the Project's driveways have been designed to treat the Project's pollutants of concern, including nutrients, metals, toxicity, bacteria/ pathogens, pesticides/herbicides, and total dissolved solids, thereby ensuring that the Project does not provide substantial additional sources of polluted runoff. Accordingly, the proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

Threshold d.: Would the Project result in substantial erosion or siltation on-site or off-site?

Construction-Related Erosion Impacts

The Project has been designed to generally maintain the existing topographic sloping direction of the site, with only fine grading anticipated to be needed in order to accommodate the reconfigured driveways and new proposed buildings. Nonetheless, construction activities associated with the proposed Project would involve modest ground disturbance during clearing and fine grading activities at the site. In addition, the Project does not include any areas of major slopes that could be subject to increased rates of erosion or siltation. The proposed fine grading activities would generate minor amounts of silt which could be carried off-site during a heavy rainfall or wind event. Should such an event occur in the absence of any preventative measures to contain silt and other soils on-site, erosion and/or siltation downstream could result.

Pursuant to requirements of the SWRCB and the San Diego Region Basin Plan, the Project Applicant would be required to obtain a NPDES permit for construction activities on the site. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction related activities. The SWPPP would specify BMPs to minimize the potential for erosion and siltation to occur and would include specific Project site measures to address the potential for the caving in of temporary excavations. Typical BMPs that are implemented at construction sites to protect water quality include the implementation of straw bale barriers, plastic sheeting/erosion

control blankets, and outlet protection measures. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance.

Post-Development Erosion Impacts

Implementation of the proposed Project would result in the introduction of impervious surfaces associated with the driveway access points and the new proposed structures, which include a new restroom building, a grand pavilion tent, an office trailer, and a metal solar structure. Additionally, areas are proposed where 36 park model lodging units could be placed and where 18 additional employee modular housing units could be placed; the design of these areas would be subject to future County discretionary Plot Plan approvals. In addition, several structures that were installed on the site without permits would be permitted as part of CUP 02303R1, including an existing 1,513 s.f. barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. The Project also would require the construction of an off-site sewer line between the northwest corner of the site and De Portola Road. Thus, with development of the site as proposed, the Project site's potential to result in erosion would be slightly reduced. Furthermore, and similar to existing conditions, runoff from the Project site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin, which is designed to retain water and reduce sediments in site runoff per the requirements of the RCFCWCD's Hydraulic Design Manual. Furthermore, because the vast majority of runoff generated on the Project site would be conveyed to the on-site retention basin and ultimately to Temecula Creek and would be allowed to infiltrate into the groundwater table, the Project has no potential to result in an increase in runoff from the Project site that could cause or contribute to erosion hazards downstream. Therefore, long-term impacts due to erosion on and off site would be less than significant with implementation of the proposed Project.

Threshold e.:	**Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?**
Threshold g.:	**Would the Project impede or redirect flood flows?**

As previously noted and as depicted on Figure 4.7-2, the majority of the Project site is located within "Flood Zone X (unshaded)," while the northernmost portions of the Project site are mapped within "Flood Zone A." "Flood Zone X (unshaded)" indicates "areas determined to be outside the 0.2% annual chance floodplain," while "Flood Zone A" indicates that the northern portions of the Project site are subject to the 1% annual chance flood (100-year flood), where "No Base [Flood] Elevations [have been] determined." (FEMA, 2008, FIRM No. 06065C3310G)

Although the Project would result in new impervious surfaces on site encompassing approximately 78,489 s.f. (1.8 acres), the site's existing retention basin in the northwest portion of the Project site is sufficiently sized per the requirements of the RCFCWCD's Hydraulic Design Manual to accommodate the slight increase in runoff due to the addition of 1.8 acres of impervious surfaces. Any runoff that exceeds the capacity of the existing retention basin would be conveyed northerly via a culvert beneath Los Caballos Road to an existing swale, with flows ultimately being conveyed to Temecula Creek located north of the Project

site. Additionally, the minor increase in impervious surfaces associated with the proposed driveway improvements would be attenuated by self-retaining areas improved to include an amended soil configuration, as discussed in more detail above under the analysis of Thresholds c. and f. As such, there are no components of the proposed Project that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, and impacts would be less than significant.

Although the northern portions of the Project site are subject to flood hazards under existing conditions, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This minor addition of impervious surface would not substantially affect any flood flows in the area, as the driveway has been designed to include self-retaining areas that would attenuate any minor increase in flows. Accordingly, the proposed Project would not impede or redirect flood flows, and impacts would be less than significant.

Threshold h.: In flood hazard, tsunami, or seiche zones, would the Project risk the release of pollutants due to project inundation?

As previously noted and as depicted on Figure 4.7-2, the majority of the Project site is located within "Flood Zone X (unshaded)," while the northernmost portions of the Project site are mapped within "Flood Zone A." "Flood Zone X (unshaded)" indicates "areas determined to be outside the 0.2% annual chance floodplain," while "Flood Zone A" indicates that the northern portions of the Project site are subject to the 1% annual chance flood (100-year flood), where "No Base [Flood] Elevations [have been] determined" (FEMA, 2008, FIRM No. 06065C3310G). Although the northern portions of the Project site are subject to inundation during heavy rain events, the only improvements proposed as part of the Project within the areas subject to the existing floodplain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This minor addition of impervious surface would not materially affect the mapped floodplain, and would not result in the release of any pollutants due to Project site inundation. Accordingly, impacts due to inundation from flood hazards would be less than significant.

According to Figure 4.11.2 (Dam Failure Inundation Zones) of Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 comprehensive update to its General Plan, the northern portions of the Project site are subject to inundation in the event of a failure of the dam at Vail Lake, which is considered to have a "high" susceptibility to failure. However, as noted above, the only improvement proposed as part of the Project in the portions of the site subject to inundation due to dam failure is the reconfiguration of the existing site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. No portions of the Project site subject to inundation due to dam failure would include any new uses that would be associated with the storage or use of pollutants, and as such Project impacts due to the release of pollutants due to site inundation would be less than significant. (Riverside County, 2015a, Section 4.11)

The Project site is located approximately 28 miles from the Pacific Ocean and, as such, there is no potential for the Project site to be inundated with tsunamis. No impact would occur.

4.7.6 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within the vicinity of the Project site and from full buildout of the portion of the Riverside County General Plan located within the Santa Margarita watershed as well as from full buildout of the general plans of other local jurisdictions located within the Santa Margarita watershed.

As discussed under the analysis of Thresholds a., b., and i., the Project would result in less-than-significant impacts to surface and groundwater quality during construction because the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Other cumulative developments within the cumulative study area also would be required to comply with the NPDES Municipal Stormwater Permit and would be required to implement BMPs during construction activities to preclude water quality impacts that could impair downstream waters or groundwater. As such, construction-related water quality impacts, as well as impacts due to a conflict with the Basin Plan, would be less-than-cumulatively considerable. With respect to long-term impacts to water quality, drainage and water quality improvements proposed as part of the Project would be limited to the Project's reconfigured driveways, as runoff from the remaining portions of the site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin per the requirements of the RCFCWCD's Hydraulic Design Manual. As previously shown on EIR Figure 3-14, each of the proposed reconfigured driveways would be paved with asphalt or cement, and each of the proposed driveways have been designed to convey runoff generated by the driveways to adjacent self-retaining areas. The self-retaining areas would be improved to include an amended soil configuration, as also depicted on EIR Figure 3-14, which would accommodate a total ponding depth of 6 inches and would include 8 inches of amended soil covered by 3 inches of mulch to provide water quality treatment for runoff from each driveway. The self-retaining areas have been designed to provide water quality treatment, and would reduce pollutants of concern in runoff leaving the Project site, including nutrients, metals, toxicity, bacteria/pathogens, pesticides/herbicides, and total dissolved solids (Kolibrien, 2026, Table A-1). Other cumulative developments would similarly be required to incorporate BMPs to treat water quality pollutants of concern. Accordingly, the Project's impacts due to a conflict with the Basin Plan would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Thresholds c. and f., the proposed Project would result in approximately 78,489 s.f. (1.8 acres) of new impervious areas on site, which would require only fine grading on-site and would not substantially alter the site's existing drainage pattern. Additionally, and as more fully discussed in EIR Subsection 4.3, *Biological Resources*, although the Project's off-site sewer alignment would traverse

an approximate 0.01-acre portion of the Temecula Creek to the north of the Project site, the grading for this off-site sewer line would be designed so as to avoid impacts to the Temecula Creek by utilizing directional drilling (e.g., jack and bore technique) beneath the drainage such that there would be no surface impacts to the Temecula Creek (refer also to EIR Mitigation Measure 4.3-2, which has been imposed to ensure there would be no surface impacts to the Temecula Creek in association with the Project's off-site sewer connection). Accordingly, the Project would not substantially alter the existing drainage pattern of the site or area, and cumulatively-considerable impacts would not occur. Additionally, the self-retaining areas associated with the Project's driveway improvements have been designed to provide water quality treatment, and would reduce pollutants of concern in runoff leaving the Project site, such as including nutrients, metals, toxicity, bacteria/pathogens, pesticides/herbicides, and total dissolved solids (Kolibrien, 2026, Table A-1). Other cumulative developments similarly would be required to demonstrate that there would be no substantial alteration to drainage patterns and would be required to incorporate measures to address potential sources of additional polluted runoff. Accordingly, Project impacts would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments would similarly be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. Additionally, implementation of the proposed Project would result in approximately 78,489 s.f. (1.8 acres) of new impervious areas on site. Thus, with development of the site as proposed, the Project site's potential to result in erosion would be slightly reduced as areas covered with impervious surfaces are not subject to erosion or siltation. Furthermore, and similar to existing conditions, runoff from the Project site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin, which is designed to retain water and reduce sediments in site runoff per the requirements of the RCFCWCD's Hydraulic Design Manual. Furthermore, because the vast majority of runoff generated on the Project site would be conveyed to the on-site retention basin and ultimately to Temecula Creek and would be allowed to infiltrate into the groundwater table, the Project has no potential to result in an increase in runoff from the Project site that could cause or contribute to erosion hazards downstream. As such, long-term erosion impacts would be less than significant on a cumulatively-considerable basis.

Although the northern portions of the Project site are located within a FEMA-mapped floodplain, no new improvements are proposed as part of the Project within the portions of the Project site that are subject to inundation, with exception of the reconfigured driveway along Los Corralitos Road, which would only result in the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This addition of impervious surface would not substantially affect any flood flows in the area, as this driveway has been designed to include self-retaining areas that would treat runoff from the driveways before ultimately being discharged from the Project site. Accordingly, cumulatively-considerable impacts due to substantial erosion or siltation on- or off-site would be less than significant.

As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments similarly would be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. Additionally, implementation of the proposed Project would result in approximately 78,489 s.f. (1.8 acres) of new impervious areas on site. Thus, with development of the site as proposed, the Project site's potential to result in erosion would be slightly reduced. As such, there are no components of the proposed Project that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site,and impacts would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Thresholds e. and g., the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This addition of impervious surface would not materially affect the mapped floodplain, and would not result in the release of any pollutants due to Project site inundation. Other cumulative developments that include development within mapped floodplains similarly would be required to demonstrate that the design would not impede or redirect flood flows. Accordingly, Project impacts due to impeding or redirecting flood flows would be less than significant on a cumulatively-considerable basis.

As indicated under the discussion and analysis of Threshold h., although the northern portions of the Project site are subject to inundation during heavy rain events, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This addition of impervious surface would not materially affect the mapped floodplain, and would not result in the release of any pollutants due to Project site inundation. Other cumulative developments similarly would be required to demonstrate that any proposed improvements within areas subject to inundation by floods have been appropriately designed to ensure that flows within the mapped floodplains meet all water quality requirements. Accordingly, Project impacts due to inundation by floods would be less than significant on a cumulatively-considerable basis. Similarly, although the northern portions of the Project site are subject to inundation in the event of a failure at the Vail Lake dam, the Project only would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement, and no portions of the Project site subject to inundation due to dam failure would include any new uses that would be associated with the storage or use of pollutants, and as such Project impacts due to the release of pollutants due to site inundation would be less than significant on a cumulatively-considerable basis. The Project site is located approximately 28 miles from the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis. Cumulatively-considerable impacts due to tsunamis would not occur.

4.7.7 Significance of Impacts Before Mitigation

Thresholds a., b., and i.: Less-than-Significant Impact. Under the proposed Project all runoff that is generated on site would continue to be conveyed to downstream areas where Project-related runoff would

infiltrate into the groundwater table, and would continue to contribute flows to the TVGB. Accordingly, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the San Diego Region Basin Plan and potential impacts to groundwater quality, would be less than significant. In addition, with implementation of the proposed Project, all runoff generated on site would continue to be appropriately treated by the existing retention basin on site, while runoff generated by the proposed driveway improvements would be routed to self-treatment areas for retention and water quality purposes prior to ultimate discharge from the site. Thus, the Project would not adversely affect surface or groundwater quality. Accordingly, the proposed Project would not violate any water quality standards or WDRs or otherwise substantially degrade surface or ground water quality; would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; and would not conflict with the San Diego Region Basin Plan or result in adverse groundwater quality impacts. Impacts would be less than significant.

Thresholds c. and f.: Less-than-Significant Impact. Similar to existing conditions, with implementation of the proposed Project all runoff generated on site would continue to be appropriately treated by the existing retention basin on site, while runoff generated by the proposed driveway improvements would be routed to self-treatment areas for retention and water quality purposes prior to ultimate discharge from the site. Thus, the Project would not adversely affect surface or groundwater quality. Additionally, the existing retention basin and proposed driveway self-treatment areas have been designed to treat the Project's pollutants of concern, including nutrients, metals, toxicity, bacteria/pathogens, pesticides/herbicides, and total dissolved solids, thereby ensuring that the Project does not provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance. Under long-term conditions, implementation of the proposed Project would result in the introduction of impervious surfaces associated with the driveway access points and the new proposed structures. Thus, with development of the site as proposed, the Project site's potential to result in erosion would be slightly reduced. Furthermore, runoff from the Project site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin, which is designed to retain water and reduce sediments in site runoff per the requirements of the RCFCWCD's Hydraulic Design Manual. Additionally, because the vast majority of runoff generated on the Project site would be conveyed to the on-site retention basin and ultimately to Temecula Creek and would be allowed to infiltrate into the groundwater table, the Project has no potential to result in an increase in runoff from the Project site that could cause or contribute to erosion hazards downstream. Therefore, long-term impacts due to erosion on and off site would be less than significant with implementation of the proposed Project.

Thresholds e. and g.: Less-than-Significant Impact. Although the Project would result in new impervious surfaces on site encompassing approximately 78,489 s.f. (1.8 acres), the site's existing retention basin in the northwest portion of the Project site is sufficiently sized per the requirements of the RCFCWCD's Hydraulic Design Manual to accommodate the slight increase in runoff due to the addition of 1.8 acres of impervious surfaces. Any runoff that exceeds the capacity of the existing retention basin would be conveyed northerly via a culvert beneath Los Caballos Road to an existing swale, with flows ultimately being conveyed to Temecula Creek located north of the Project site. Additionally, the increase in impervious surfaces associated with the proposed driveway improvements would be attenuated by self-retaining areas improved to include an amended soil configuration. As such, there are no components of the proposed Project that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and impacts would be less than significant. Additionally, although the northern portions of the Project site are subject to flood hazards under existing conditions, the only improvements proposed as part of the Project within the areas subject to the existing floodplain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This addition of impervious surface would not substantially affect any flood flows in the area, as the driveway has been designed to include self-retaining areas that would attenuate any increase in flows. Accordingly, the proposed Project would not impede or redirect flood flows, and impacts would be less than significant.

Threshold h.: Less-than-Significant Impact. Although the northern portions of the Project site are subject to inundation during heavy rain events, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would not materially affect the mapped floodplain, and would not result in the release of any pollutants due to Project site inundation. Accordingly, impacts due to inundation from flood hazards would be less than significant. Similarly, although the northern portions of the Project site are subject to inundation in the event of a failure of the dam at Vail Lake, which is considered to have a "high" susceptibility to failure, no portions of the Project site subject to inundation due to dam failure would include any new uses that would be associated with the storage or use of pollutants, and as such Project impacts due to the release of pollutants due to site inundation would be less than significant. Additionally, the Project site is located approximately 28 miles from the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis, and no impact would occur.

4.7.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- State Water Board Order WQ 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit): All construction activities disturbing one or more acres of soil are required to comply with the Statewide General NPDES Permit for Stormwater Discharges Associated with

Construction and Land Disturbance Activities (Construction General Permit), State Water Board Order WQ 2022-0057-DWQ, NPDES No. CAS000002. Prior to commencement of construction activities, the Project Applicant shall obtain a Waste Discharge Identification (WDID) number by electronically certifying and submitting required Permit Registration Documents through the State Water Board Stormwater Multiple Application and Report Tracking System (SMARTS), including a project-specific Stormwater Pollution Prevention Plan (SWPPP). Construction activities associated with the Project shall be considered to have General Permit regulatory coverage and may commence upon receipt of a WDID number generated by SMARTS. The Project Applicant shall post the site-specific WDID number in a location that is viewable to the public, or shall make it readily available upon request if public posting is not feasible. The approved SWPPP shall be implemented for the duration of construction activities. At the conclusion of construction, a Notice of Termination shall be certified in SMARTS and submitted to the State Water Board for approval.

- San Diego RWQCB Order No. R9-2013-0001 (as amended), NPDES No. CAS0109266 (MS4 Permit): In compliance with the San Diego Regional Water Quality Control Board's Municipal Separate Storm Sewer System (MS4) Permit (Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2016-0005, NPDES No. CAS0109266), to which the County of Riverside is a co-permittee, a project-specific Water Quality Management Plan (WQMP) is required to be prepared and approved in association with building permit issuance. The WQMP shall identify the post-construction water quality measures required to be incorporated into the site design to address the Project's pollutants of concern and to prevent the discharge of pollutants to downstream water bodies, including Temecula Creek, Santa Margarita River (Upper), and Santa Margarita River (Lower), all of which are listed as impaired under CWA Section 303(d). The WQMP shall prioritize Low Impact Development (LID) strategies such as infiltration, evapotranspiration, harvest and use, or biotreatment to capture and treat the design capture volume of stormwater before it leaves the Project site. The WQMP shall also include Source Control BMPs to prevent pollutants including nutrients, metals, toxicity, bacteria/pathogens, pesticides/herbicides, and total dissolved solids from contacting stormwater, and shall provide a long-term operation and maintenance plan to ensure that all post-construction BMPs remain effective for the life of the Project. The Project's WQMP has been prepared by Kolibrien Corp. and is included as EIR *Technical Appendix G*. Riverside County shall review and approve any future WQMP amendments in association with building permit issuance for future implementing developments, including the future park model lodging units and employee modular housing units subject to future Plot Plan approval.

- Riverside County Hydraulic Design Manual Compliance: Prior to the issuance of any grading or building permit and in accordance with the Riverside County Hydraulic Design Manual prepared by the Riverside County Flood Control and Water Conservation District (RCFCWCD), the Applicant shall prepare calculations of pre- and post-development runoff rates using the methodologies and criteria identified in Subsection 10.4 of the Hydraulic Design Manual. Specifically, the required calculations shall demonstrate that the combination of swales,

landscaped areas, and/or detention/water quality basins associated with each implementing development have been designed such that the post-development runoff rates during the 1-hour, 3-hour, 6-hour, and 24-hour duration events for the 2-year, 5-year, and 10-year storm return frequencies do not increase in comparison to pre-development conditions.

- Runoff control measures are required if peak flow rates would increase on downstream properties that lack a continually engineered drainage system or where the existing downstream system may not have adequate capacity to accommodate the increase in runoff. Runoff hydrographs for both pre- and post-development conditions are required to be prepared in accordance with the Hydraulic Design Manual. All runoff detention basins are required to be designed with positive drainage. Where feasible, onsite flows are required to not exceed pre-development flow rates prior to combining with offsite flows. If offsite and onsite flows must be combined, the Hydraulic Design Manual requires the evaluation of two separate conditions for each storm duration and return period: (1) the total tributary area (onsite plus offsite), and (2) the onsite area only. The evaluation must demonstrate no increase in peak flow rates under either condition.

- Detention basin designs are required to comply with the following: (1) Outlet structures are required to be designed with no outlet pipe less than 18 inches in diameter; where a smaller conveyance is needed to control discharge rates, an orifice plate shall be used. (2) Trash racks shall be provided for all outlets less than 48 inches in diameter and may be required for larger outlets as well; (3) Basin outlet structures must be capable of passing the 100-year storm event without damage to the facility; (4) Interior basin side slopes shall be no steeper than 4:1, and basin depths shall be minimized in areas of unrestricted public access; and (5) A viable long-term maintenance mechanism must be established for all increased runoff detention facilities prior to approval.

Design Features

The following features are inherent in the Project's design and are specifically included to reduce or avoid impacts to hydrology and water quality:

- The Project's four reconfigured visitor access driveways would be paved with asphalt or concrete and designed to convey driveway runoff to adjacent self-retaining treatment areas. Each self-retaining area would be improved to include an amended soil configuration accommodating a total ponding depth of 6 inches, with 8 inches of amended soil covered by 3 inches of mulch, providing water quality treatment for runoff from each driveway prior to discharge from the Project site.

- The self-retaining driveway treatment areas have been specifically designed to address the Project's pollutants of concern for the receiving waters, including nutrients, metals, toxicity, bacteria/pathogens, pesticides/herbicides, and total dissolved solids, consistent with the requirements of the San Diego RWQCB Basin Plan and the Project's WQMP (EIR *Technical Appendix G*).

- The Project's off-site sewer line alignment has been designed to cross beneath the ephemeral drainage feature within APN 927-690-005 using a directional drilling (jack and bore) technique, thereby avoiding any surface disturbance to the drainage feature and preventing construction-related impacts to water quality within the drainage corridor.
- The Project has been designed to generally maintain the existing topographic sloping direction of the site, with only fine grading anticipated to accommodate the reconfigured driveways and new proposed buildings, thereby minimizing alteration to the site's existing drainage patterns and reducing the potential for construction-related erosion and siltation.
- Runoff from new building areas and the remainder of the Project site would continue to be conveyed to the existing on-site retention basin located in the northwest portion of the site, which is sized to accommodate the increase in runoff associated with approximately 1.8 acres of new impervious surfaces, and which provides infiltration of retained runoff into the Temecula Valley Groundwater Basin.
- The reconfigured driveway along Los Corralitos Road, located within the FEMA-mapped Flood Zone A, has been designed to include self-retaining areas that attenuate any increase in runoff flows, ensuring that the improvement does not impede or redirect flood flows within the mapped floodplain.

Mitigation

Impacts to hydrology and water quality would be less than significant; therefore, mitigation measures are not required.

4.7.9 References

Cited As	Reference
FEMA, 2008	Federal Emergency Management Agency, 2008. *Flood Insurance Rate Map (FIRM) Map No. 06065C3310G*. August 28, 2008. Available online at: https://msc.fema.gov/portal/downloadProduct?productTypeID=FINAL_PRODUCT&productSubTypeID=FIRM_PANEL&productID=06065C3310G
Kolibrien, 2026	Kolibrien Corp., 2026. *County Project Specific Water Quality Management Plan*. May 5, 2026. Included as EIR *Technical Appendix G*.
RCWD, 2021	Rancho California Water District, 2021. *2020 Urban Water Management Plan*. June 10, 2021. Accessed August 21, 2025. Available online at: https://www.ranchowater.com/DocumentCenter/View/6144/2020-Urban-Water-Management-Plan
Riverside County, 2015c	Riverside County, 2015c. *Volume 1: Draft Program EIR No. 521, State Clearinghouse No. 2009041065, Part 1 of 2*. February 2015. Accessed August 21,

Cited As	Reference
	2025. Available online at: https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf
RWQCB, 2021	California Regional Water Quality Control Board, San Diego Region. *Water Quality Control Plan for the San Diego Basin*. September 1, 2021. Accessed August 21, 2025. Available online at: https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/

4.8 LAND USE AND PLANNING

This EIR Subsection 4.8 discusses consistency of the proposed Project with applicable land use and planning policies adopted by Riverside County and other governing agencies for the purpose of reducing adverse effects on the physical environment. This subsection also addresses present and future land uses, zoning, and the physical arrangement of uses on the land. Information used to support the analysis in this subsection was also obtained in part from the Riverside County General Plan (Riverside County, 2024a), the Southwest Area Plan (SWAP) (Riverside County, 2021b), and the Riverside County GIS database (RCIT, n.d.).

4.8.1 Existing Conditions

A. Existing On-Site and Adjacent Land Uses

Under existing conditions, the 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 during the weekends and holiday weekends. Galway Downs includes a variety of existing recreational- and event-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; a recreational vehicle (RV) park with club house; grooms quarters; office space; a clock tower house; and storage spaces.

Land uses in the immediate vicinity of the Project site previously were depicted on EIR Figure 2-3. As shown, to the north of the Project site is Los Caballos Road, beyond which is vacant, undeveloped land as well as rural residential and agriculture-oriented uses. To the east of the Project site lies Pauba Road, beyond which is a winery and vacant, undeveloped land. To the south of the Project site lies Los Corralitos Road, beyond which are rural residential homes, Temeku Equine (a business providing veterinary care for horses and livestock), and Sweet Oaks Ranch (a farmstay), beyond which are undeveloped lands/open space and State Route (SR) 79. To the west of the Project site lies Los Corralitos Road, beyond which is Kingsway Farm along with rural residential uses, agricultural uses, and vacant undeveloped land.

B. Existing On-Site and Surrounding Land Use Designations

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the SWAP portion of the Riverside County General Plan. As previously depicted on EIR Figure 2-4, the County's General Plan and SWAP designate the Project site as "Rural Residential (RR)" land uses, which allows for single-family residences with a minimum lot size of 5 acres, and allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses and governmental uses. The Project site also occurs within the Temecula Valley Wine Country Policy Area (TVWCPA) – Equestrian District, which restricts residential uses to 10-acre minimum lot sizes. (RCIT, n.d.; Riverside County, 2024'b)

As also shown on EIR Figure 2-4, the County's General Plan and SWAP designate lands to the north, west, south, and northeast for RR land uses. Lands to the southeast are designated for "Agriculture (AG)." The AG land use designation allows for agricultural land including row crops, groves, nurseries, dairies, poultry

farms, processing plants, and other related uses, and also allows for one single-family residence allowed per 10 acres.

C. Existing On-Site and Surrounding Zoning Classifications

As previously shown on EIR Figure 2-5, under existing conditions the Project site is zoned for "Wine Country – Equestrian (WC-E)" uses. The WC-E zone generally allows for equestrian facilities, limited agricultural uses, cottage industry uses, retail uses, Class I and II wineries, and Class II equestrian establishments, and also conditionally permits employee housing. (RCIT, n.d.; Riverside County, 2023a)

As also shown on EIR Figure 2-5, lands to the west, southeast, and northeast of the site also are zoned for WC-E uses. Lands to the southeast are zoned for "Light Agriculture, 10-acre minimum lot size (A-1-10)," lands to the northwest and northeast are zoned for "Rural Residential (R-R)" land uses, while lands to the north of the Project site are zoned for "Residential Agricultural, 10-acre minimum lot size (R-A-10)." The A-1-10 zoning classification generally allows for one-family dwellings, water works facilities, and a variety of agricultural-related uses on minimum 10-acre lot sizes. The R-R zoning classification generally allows for one-family dwellings along with less intensive agricultural uses. The R-A-10 zoning classification allows for one-family dwellings and limited agricultural uses on minimum 10-acre lot sizes. (Riverside County, 2023a)

D. Applicable Land Use and Planning Policies

1. Riverside County General Plan

The Riverside County General Plan is a policy document that reflects Riverside County's vision for the future. The General Plan was comprehensively revised in 2003 and most recently updated in 2021. The General Plan is organized into nine separate elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities (including Environmental Justice), and Administration. Each General Plan Element is instrumental to achieving the County's long-term development goals. Each element contains a series of policies that guide the course of action the County must take to achieve the County's vision for future development. (Riverside County, 2021a)

In addition, the General Plan divides the County into 19 Area Plans. The purpose of these Area Plans is to provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. The Project site is located within the SWAP portion of the General Plan. The SWAP was most recently updated on September 28, 2021. The following subsection provides a summary of each General Plan Element, while the SWAP is discussed below in subsection 4.8.1.D.2.

Land Use Element

The General Plan Land Use Element functions as a guide to planners, the general public, and decision makers as to the ultimate pattern of development. The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. These designations are reflected on the General Plan Land Use Map, which categorizes individual parcels of land into five basic categories

known as "Foundation Components": Rural, Rural Community, Community Development, Agriculture, and Open Space. As reflected on the General Plan Land Use Map, the Land Use Element provides for a balanced mixture of land uses, including commercial, office, industrial, agriculture, and open space. For each of the various land use designations, the General Plan provides standards for residential density and non-residential intensity, and provides specific policies intended to ensure that product types, densities, and intensities respond to a multitude of market segments. The Land Use Element governs how land is to be utilized; therefore, many of the issues and policies contained in other plan elements are linked in some degree to this element. As noted above, the Project site is designated by the General Plan Land Use Plan for RR land uses. (Riverside County, 2021a, p. LU-1)

Circulation Element

The purpose of the Circulation Element is to provide for the movement of goods and people, including pedestrians, bicycles, transit, train, air, and automobile traffic flows within and through the community. Efficient traffic circulation is important to economic viability and the creation and preservation of a quality living environment (Riverside County, 2021a, p. C-1). The Circulation Element designates future road improvements and extensions; addresses non-motorized transportation alternatives; and identifies funding options. The various roadway improvements and extensions contemplated by the Circulation Element are reflected on the General Plan Circulation Plan. The various roadway classifications depicted on the Circulation Plan correspond to specific roadway cross-sections, which provide specific standards for right-of-way (ROW) widths, lane configurations, medians, and landscaping requirements. As shown on SWAP Figure 7 (Southwest Area Plan Circulation), the Riverside County General Plan and SWAP classify Pauba Road as a "Mountain Arterial 2-Lane (110-foot Right-of-Way [ROW])," and classify Los Caballos Road as a "Collector (74-foot ROW)." (Riverside County, 2021b, Figure 7)

Multipurpose Open Space Element

The Multipurpose Open Space Element addresses forms of open space in the County, including scenic, habitat, and recreation. This element has the purpose of addressing the protection and preservation of natural resources, agriculture, and open space areas; managing mineral resources; preserving and enhancing cultural resources; and providing recreational opportunities for the residents of Riverside County. The Multipurpose Open Space Element also contains figures that detail the locations of water resources, vegetation communities, parks, forests, recreation areas, mineral resources, and cultural resources within the County. Together with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), the Multipurpose Open Space Element seeks to preserve and protect identified open space areas in order to maintain or improve environmental quality. (Riverside County, 2021a, p. OS-1)

Safety Element

The Safety Element has the primary objective of reducing death, injuries, property damage, and economic and social impact of potential hazards within the County. The Safety Element serves to develop a framework by which safety considerations are introduced into the land use planning process; facilitate the identification and mitigation of hazards for new development; strengthen existing codes, project review, and permitting processes; present policies directed at identifying and reducing hazards in existing development;

and strengthen earthquake, flood, inundation, and wildland fire preparedness planning and post-disaster reconstruction policies. Within the Safety Element, policies are presented which pertain to seismic, slope, and soil instability; flood and inundation; fire safety; hazardous waste and materials; and disaster preparedness, response, and recovery hazards. (Riverside County, 2021a, pp. S-1 - S-2)

Noise Element

The purpose of the Noise Element is to identify sources of noise generation in the County and provide policies to ensure development does not expose people to unacceptable noise levels. The establishment of desirable maximum noise levels and implementation of noise regulations are also included as part of the Noise Element. The Noise Element provides a systematic approach to identifying and managing noise problems in the community; quantifies existing and projected noise levels; addresses excessive noise exposure; and directs community planning for regulation of noise. The Noise Element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to the protection of public health and welfare with respect to noise. (Riverside County, 2021a, p. N-3)

Housing Element

The 2021-2029 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and sets forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement, and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2024c, p. H-3)

Air Quality Element

The intent of the Air Quality Element is to provide background information on the physical and regulatory environment affecting air quality in the County. This element also identifies goals, policies, and programs that are meant to balance the County's actions regarding land use, circulation, and other issues potentially affecting air quality. This element works in conjunction with local and regional air quality planning efforts to address ambient air quality standards set forth by the United States (U.S.) Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB). The Air Quality Element sets ambient air quality standards for various air pollutants based on State and federal standards. The Element also contains policies regarding sensitive receptors, mobile and stationary pollution sources, energy efficiency and conservation, jobs and housing, and transportation. (Riverside County, 2021a, pp. AQ-3 - AQ-31)

Healthy Communities Element

The Healthy Communities Element provides a framework for translating the General Plan vision for a healthy Riverside County into reality by identifying policies aimed at achieving that vision. The Healthy Communities Element addresses areas where public health and planning intersect, including transportation and active living; access to nutritious foods; access to health care; mental health; quality of life; and environmental health. This Element addresses overall health; land uses and community design; transportation system (with an emphasis on non-motorized transportation); arts and culture; social capital; complete communities; parks, trails, and open space; access to healthy foods and nutrition; healthcare and mental healthcare; schools, recreational centers, and daycare centers; and environmental health. The County of Riverside incorporated environmental justice policies into the General Plan Healthy Communities Element in September 2021. The environmental justice policies apply to the Environmental Justice Communities identified in Land Use Element Figure LU-4.1. The Project site is not within an Environmental Justice Community boundary. (Riverside County, 2021a, pp. HC-1 - HC-12)

Administration Element

The Administration Element focuses on the administration of the General Plan, which is the sole responsibility of Riverside County, under the authority of the Board of Supervisors. Administration of the General Plan policies includes establishing, maintaining, and applying tools and procedures for interpreting the intent of the General Plan and applying the interpretation to a variety of circumstances. This element details the vision for Riverside County, General Planning Principles, Countywide Elements and Planning Policies/Area Plan, Appendices of the General Plan, and other administrative topics. (Riverside County, 2021a, pp. A-1 - A-20)

2. Southwest Area Plan (SWAP)

As noted above, the Project site is located within the SWAP portion of the Riverside County General Plan. The SWAP guides the evolving character of the area and uses the Riverside County General Plan vision to establish policies for development and conservation within the specific area of Riverside County. The SWAP provides a description of the location, physical characteristic, and special features, in addition to a Land Use Plan, policies, and exhibits to better understand the physical, environmental, and regulatory characteristics that comprise the area. Each section of the SWAP addresses critical issues facing the local community. The SWAP includes sections detailing the features, policy areas, land use, circulation, multipurpose open space, and hazards. (Riverside County, 2021b)

As shown on SWAP Figure 4 (Southwest Area Plan Overlays and Policy Areas), the Project site is located within the TVWCPA, but is not located within any other overlays or policy areas. As shown on SWAP Figure 4B (Temecula Valley Wine Country Policy Area with Districts), the Project site is located within the Equestrian District of the TVWCPA. Projects within the TVWCPA Equestrian District are subject to compliance with Policies SWAP 1.1 through SWAP 1.8 and Policies SWAP 1.17 and SWAP 1.18, which are cited below: (Riverside County, 2021b, pp. 28-31)

- *SWAP 1.1 Require boundary changes to the Temecula Valley Wine Country Policy Area to be subject to the Foundation Component Amendment process unless county-initiated amendment.*
- *SWAP 1.2 Maintain distinct characters of the Winery, Equestrian, and Residential Districts through implementing zones to promote harmonious coexistence of these uses.*
- *SWAP 1.3 Permit Class I Wineries on 5 acres or more provided that at least:*
    - *75% of the project site is planted in vineyards;*
    - *75% of the grapes utilized in wine production are grown or raised within the county; and*
    - *The winery facility shall be less than 1,500 square feet.*
- *SWAP 1.4 Permit Class II Wineries with limited commercial uses such as sampling rooms and retail wine sales establishments on a minimum lot size of ten (10) acres to promote viticulture potential of this region provided that at least:*
    - *75% of the project site is planted in vineyards;*
    - *75% of the grapes utilized in wine production are grown or raised within the county; and*
    - *The winery facility shall at least produce 3,500 gallons of wine annually.*
- *SWAP 1.5 Require a density of ten (10) acres minimum for tentative approval of residential tract and parcel maps after (March 11, 2014) regardless of the underlying land use designation except in the Wine Country – Residential District where a density of five (5) acres minimum shall apply.*
- *SWAP 1.6 Allow small-scale cottage inns or cottage industries. Encourage agricultural operations, equestrian activities and vineyard planting with such uses to reflect the unique character of this Policy Area.*
- *SWAP 1.7 Develop and implement an integrated trails network that carefully considers all trail users, and includes, but is not limited to, regional open space trails, wine country roadside trails, wine country connector trails, bike paths, historic trails, etc. as shown in SWAP Figure 8. SWAP Figure 8 Trails and Bikeway System is a conceptual Trails Plan that shows ideal trail alignments with various trail classifications to support a multi-use trails network.*

  There are three multi-use trail types shown on SWAP Figure 8 that are unique to the Wine Country Policy Area:

  <u>Regional Open Space Trail</u>: Trails along Rancho California Road, Anza Road, De Portola Road, Pauba Road, and La Serena Way are intended to serve as backbone trails for the Wine Country Trails Network and are to be built within the road right-of-way (ROW). The trails along Rancho California Road and Anza Road can support combination trails as described in the Temecula Valley Wine Country Design Guidelines. The combination trails includes a Class I Bike Path and Regional Trail split on either side of the road. The Class I Bike Path will comply with the most current Caltrans Standards. The Regional Trail path will be 10' to 12' in width. The trail paths along De Portola Road, Pauba Road and La Serena Way will be 4' to 8' in width. The widths of the trails may be modified due to road conditions including ROW availability as

determined by the Riverside County Transportation Department. Trails along De Portola Road shall be considered as part of all future road improvement plans.

There are a few smaller trail segments that are also classified as Regional Open Space Trails located between properties. These trails are single track paths having earthen base and will be no wider than 4' with an ideal width of 2'. These trails would require an 8' easement. The Regional Open Space Trail segments will become an integral part of the regional trail program of the County's Regional Park and Open-Space District. The actual construction and operation of these trails are reliant on securing trail easements and funding sources for continual trail maintenance.

Wine Country Roadside Trail: These trails are also located along road ROW. Wine Country Roadside Trails would be 4' to 8' in width along one side of the road, consisting of unimproved or decomposed granite material.

Funding sources would be sought for the development and maintenance of Wine Country Roadside Trails (e.g. Landscape District, County Service Area (CSA), and Transportation District).

Wine Country Connector Trail: Wine Country Connector Trails provide additional connection routes, through private property. Thus, trail construction would require consent of the property owner and the establishment of access easements. Trail design would vary per site conditions. Partnerships between a local entity and private property owner would be required to develop and maintain trails, as well as define the acceptable use of the trails. The use of such trails is prohibited unless proper permission from the current property owners is granted or easements secured.

Class 2 and Class 3 Bikeways are not specifically shown on SWAP Figure 8 within the Temecula Valley Wine Country Policy Area; however, these bikeways may be located along roads that would safely support it. All trails within the Wine Country Policy Area would consist of unimproved or decomposed granite materials, or material approved for use by the Riverside County Parks and Open Space District and the Riverside County Transportation Department. The trail paths require a 2' buffer on both sides of the path. The trails would include a fence or landscaped buffer from the roadway and private property.

The actual development and ultimate location of each trail segments are dependent on various funding sources, prioritizing needs, user safety, adequate road ROW, contiguous trail easements, the agency or entity that assumes responsibility for the trails' operation including maintenance, and in some cases, property owners' permission. The County will work with the community to identify segments that can be developed first as land use development and road improvement occurs and funding becomes available.

- *SWAP 1.8 Pending adoption of an updated Air Quality Element and Climate Action Plan (CAP), ensure that new development selects greenhouse gas (GHG) reduction measures from the Option Tables to achieve the County's GHG emission reduction thresholds as set forth in the Greenhouse Gas*

Reduction Workbook (workbook). Alternatively, new developments may utilize other reduction mechanisms to achieve reduction thresholds as prescribe in the workbook.

- *SWAP 1.17 Encourage equestrian establishments that promote the equestrian lifestyle as described in the Wine Country – Equestrian (WC-E) Zone.*
- *SWAP 1.18 Permit incidental commercial uses such as western style stores, polo-grounds, or horse racing tracks, petting zoos, event grounds, horse show facilities, animal hospitals, restaurants, delicatessens, and special occasion facilities in conjunction with commercial equestrian establishments on lots larger than 10 acres to encourage equestrian tourism in this community.*

Additionally, SWAP Figure 6 (Southwest Area Plan Mt. Palomar Night Time Lighting Policy Area) shows that the Project site is located within Zone A of the Mt. Palomar Night Time Lighting Policy Area, indicating that land uses in the Project area are subject to compliance with Riverside County Ordinance No. 655 (Regulating Light Pollution). (Riverside County, 2021b)

3. Riverside County Land Use Ordinance

The Riverside County Land Use Ordinance is intended to implement the Riverside County General Plan's Land Use Plan. Under existing conditions, the Project site is zoned WC-E. Refer to EIR subsection 4.8.1.C for a more thorough discussion of the site's existing zoning classification.

4. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

Riverside County has adopted an MSHCP, which is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP). The MSHCP promotes conservation of species and their associated habitats in Riverside County through implementation of several HCPs that affect lands within the County. The Western Riverside County MSHCP and the Coachella Valley MSHCP are the two dominant plans that impact the largest portions of the County. These plans coordinate multi-jurisdictional habitat planning and conservation efforts in the region to promote biological and ecological diversity while accommodating the appropriate construction of new development and infrastructure projects. Riverside County catalogs acquisitions and conservation of lands with respect to the HCPs and periodically updates the General Plan Land Use maps accordingly. (Riverside County, 2015, p. 4.2-27)

The Project site is located within the Western Riverside County MSHCP. As previously shown on EIR Figure 2-6, the northern portions of the Project site occur within MSHCP Criteria Cells 7134 and 7185, which are independent cells not located within any Cell Groups. According to the MSHCP, conservation within Criteria Cell 7134 is intended to include 5% to 15% of the Cell focusing on the southeastern portion of the Cell, while conservation within Criteria Cell 7185 is intended to include 20% to 30% of the Cell focusing in the southern portion of the Cell (Riverside County, 2003, Table 3-16). While northern portions of the site occur within Criteria Cells 7134 and 7185, a Joint Project Review (JPR) was approved by the County and Wildlife Agencies in 2011, which did not require any on-site conservation. In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements that apply to the Project area. Refer to EIR Subsection 4.3,

Biological Resources, for a more thorough discussion of the MSHCP and the Project site's relationship thereto.

5. Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015a, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' Kangaroo Rat HCP on May 6, 1996. To date, more than $50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015a, p. 4.8-52)

The Project site is not targeted for conservation as part of the SKR HCP, and the Project site is located just outside of the Fee Area Boundary identified on Figure 21 of the SKR HCP, and as such the Project is not located in an area where the payment of fees is required pursuant to Riverside County Ordinance No. 663.

6. Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans (RTPs) including a sustainable communities strategy (SCS) and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, n.d.)

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. In April 2024,

SCAG's Regional Council adopted *Connect SoCal (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy*) (herein, "RTP/SCS"). The RTP/SCS includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. The RTP/SCS also provides objectives for meeting emissions reduction targets set forth by CARB; these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. (SCAG, 2024) The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

7. South Coast Air Quality Management District Air Quality Management Plan (SCAQMD AQMP)

California Health and Safety Code Section 40702 *et seq.*, the California Clean Air Act (CCAA), requires that an Air Quality Management Plan (AQMP) be developed and then updated every three years for air basins with non-attainment status. As discussed in EIR Subsection 4.2, *Air Quality*, the Project site is located in the South Coast Air Basin (SCAB). The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. Air quality within the SCAB is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD's 2022 AQMP. Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet National Ambient Air Quality Standards (NAAQS) attainment status for ozone (O_3) and particulate matter less than 2.5 microns ($PM_{2.5}$). The SCAB currently is considered non-attainment under the California Ambient Air Quality Standards (CAAQS) due to levels of ozone (O_3), $PM_{2.5}$, and particulate matter less than 10 microns (PM_{10}). (SCAQMD, 2022)

The SCAQMD 2022 AQMP is a plan for the regional improvement of air quality. Projects such as the proposed Project relate to the air quality planning process through the growth forecasts that were used as inputs into the regional transportation model. If a proposed project is consistent with these growth forecasts, and if all available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is consistent with the AQMP. Refer to EIR Subsection 4.2, *Air Quality*, for additional discussion of the SCAQMD 2022 AQMP and for a discussion of the Project's consistency with the 2022 AQMP.

4.8.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to land use and planning.

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the U.S. and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but this act was significantly reorganized and

expanded in 1972. "Clean Water Act" became the CWA's common name with amendments in 1972. Under the CWA, USEPA has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. USEPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

2. Federal Aviation Regulations Part 77

Federal Aviation Regulation (FAR) Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for:

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA.

- Any construction or alteration exceeding 200 feet above ground level.
- Any construction or alteration:
  - within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
  - within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
  - within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location.

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S. Code Section 46301(a).

B. State Regulations

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code Section 13000 *et seq.*), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Quality Control Boards (RWQCBs), based on hydrogeologic barriers, and the State Water Resources Control Board (SWRCB), which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCBs decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCBs have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The RWQCBs regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the CWA, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs which are updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water

quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans.

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the California Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the California Fish and Game Code (Sections 1601-1603), is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW.

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water.

3. California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, Sections 65000 through 66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the California Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

4. Subdivision Map Act

The Subdivision Map Act (“Map Act”) vests in the cities and counties the power to regulate and control the design and improvement of subdivisions within its boundaries. Each city must adopt an ordinance regulating and controlling subdivisions for which the Map Act requires a tentative and final or parcel map. The authority for a city or county to regulate land use, including subdivisions, flows from the general police power. However, the Map Act sets forth certain mandates that must be followed for subdivision processing. A city can impose conditions on the subdivision process when the Map Act is silent, but it cannot regulate contrary to specific provisions contained in the Map Act. The Map Act's primary goals are:

- To encourage orderly community development by providing for the regulation and control of the design and improvement of the subdivision, with a proper consideration of its relation to adjoining areas;
- To ensure that the areas within the subdivision that are dedicated for public purposes will be properly improved by the subdivider so that they will not become an undue burden on the community; and
- To protect the public and individual transferees from fraud and exploitation.4

The Map Act is applied in conjunction with other state land use laws such as the general plan, specific plans, zoning, California Environmental Quality Act (CEQA), and the Permit Streamlining Act. The Map Act provides for regulation of land divisions by a city or county and is interpreted and enforced by the city or county.

5. Office of Land Use and Climate Innovation General Plan Guidelines

Each city and county in California must prepare a comprehensive, long term general plan to guide its future. To assist local governments in meeting this responsibility, the Governor's Office of Planning and Research, recently renamed the Governor's Office of Land Use and Climate Innovation, is required to adopt and periodically revise guidelines for the preparation and content of local general plans pursuant to California Government Code, Section 65040.2. The General Plan Guidelines is advisory, not mandatory. Nevertheless, it is the State's only official document explaining California's legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice.

6. State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics ("Division"), and was later amended by statute to be renamed the State Aeronautics Act ("Aeronautics Act") in 1961. As a result of this legislation, the Division's first priorities are those mandated by the Aeronautics Act, then California Department of Transportation (Caltrans) guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that "protect the public interest in aeronautics and aeronautical progress." (Aeronautics Act, Section 21002)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature's intent for a State aviation program. Chapter two explains Caltrans' role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from FAA regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions. Chapter five covers the investigations and hearings on

matters covered in the Aeronautics Act. Finally, chapter six introduces airport planning and specifically introduces the intent of the California Aviation System Plan (CASP) and how it can be used to support California aviation.

7. Senate Bill 375 (SB 375)

SB 375 contains five major components. The first is regional GHG emissions targets: CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50% residential, (2) meet density requirements, and (3) are within 0.5-mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

C. Local Regulations

1. Riverside County Ordinances

These existing Riverside County ordinances implement and guide various aspects of land use development, while protecting existing uses, people, and property within Riverside County from conflict. (Riverside County, 2015, pp. 4.2-25)

> **Ordinance No. 348 - Zoning and Land Use Ordinance:** Establishes allowable uses of land and sets standards for what and how land may be developed. Protects the people and property of Riverside County from development of unsuitable land uses and ensures built areas are developed safely and with minimal conflict with surrounding lands. (Riverside County, 2015, pp. 4.2-25)

Ordinance No. 448 - Airport Approaches Zoning: This ordinance was adopted pursuant to the Airport Approaches Zoning Law (California Government Code, Sections 50485-50485.14) and shall be liberally construed in support of the purposes and provisions within Sections 50485 through 50485.14. Any proceedings for additions or amendments to the official plan of airports are required to conform to this ordinance. (Riverside County, 2015, pp. 4.2-25)

Ordinance No. 460 - Subdivision Regulations: This ordinance regulates subdivisions pursuant to the Subdivision Map Act. All land divisions throughout unincorporated Riverside County are subject to all of the applicable provisions of the Subdivision Map Act and this ordinance. (Riverside County, 2015, pp. 4.2-25)

Ordinance No. 461 - Road Improvement Standards and Specifications: This ordinance establishes proper standards, specifications, and directions for the design and construction of any road or other land division improvements required to be constructed in the unincorporated territory of Riverside County. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 509 - Agricultural Preserves: This ordinance establishes uniform rules for the agricultural and compatible uses allowed within an agricultural preserve. The ordinance ensures that incompatible uses are not allowed within established agricultural preserves and sets forth the powers of the County of Riverside in establishing and administering agricultural preserves pursuant to the California Land Conservation Act of 1965 (California Government Code, Section 51200, *et seq.*), which are to be devoted to agricultural and compatible uses. Land uses not covered in the ordinance are prohibited within agricultural preserves. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 576 - Regulating County Airports: The purpose of this ordinance is to provide minimum standards to safeguard life, limb, property, and public welfare by regulating and controlling the various activities on airports, heliports or STOL (short takeoff and landing) ports owned or operated, or both, by the County of Riverside. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 659 - Development Mitigation Fee for Residential Development: This ordinance establishes an impact mitigation fee to help mitigate the impacts caused by new developments on public facilities within Riverside County. The fees will be used to help establish new County of Riverside facilities that are necessary to meet the increased demand that will come about due to new development. These facilities include new fire and police stations, courts, libraries, regional parks, and other facilities necessary to provide services to the residents of Riverside County. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 671 - Consolidated Fees for Land Use and Related Functions: The purpose of this ordinance is to provide for the consolidation of certain schedules of fees related to the land use matters as provided for in the separate ordinances, resolutions, and rules of the County of Riverside. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 673 - Establishing the Coachella Valley Transportation Uniform Mitigation Fee: This ordinance establishes a mitigation fee program for funding the engineering, purchase of right-of-way and construction of transportation improvements required of land developments within the Coachella Valley. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 726 - Transportation Management Requirements - New Development Projects: This ordinance is intended to meet the requirements of the Riverside County Congestion Management Program and the Air Quality Management Plan as well as to promote consideration of transportation demand management objectives early in the development review process. Often, conventional land development promotes reliance on the single occupancy vehicle. This ordinance establishes policies and procedures to encourage and promote the use of alternative transportation modes through project design and facility planning. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 748 - Traffic Signal Mitigation Program: This ordinance establishes a means of equitably assessing the costs of traffic signal installations needed to mitigate the cumulative environmental impacts resulting from the additional traffic generated by new development projects. (Riverside County, 2015, pp. 4.2-26)

Ordinance No. 824 - Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: This ordinance establishes fees to fund the mitigation of cumulative regional transportation impacts resulting from future development. The mitigation fees collected through the TUMF program will be utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current levels of traffic. (Riverside County, 2015, pp. 4.2-26)

2. Riverside County Ordinance No. 810 – Establishing an Interim Open Space Mitigation Fee

This ordinance implements the Western Riverside County MSHCP and mitigates impacts of new development in western Riverside County. It establishes a development mitigation fee in order to help finance the acquisition of lands containing species protected by the MSHCP. By preserving these habitats and assessing a fee to develop in these open space areas, the ordinance helps to limit sprawl and encourage concentrated development, thereby reducing greenhouse gas emissions that would arise from trips between wider-flung land uses.

4.8.3 Basis for Determining Significance

Section XI of Appendix G to the CEQA Guidelines ("State CEQA Guidelines"), as updated in December 2018, addresses typical adverse effects on land use and planning, and includes the following threshold questions to evaluate the Project's impacts on land use and planning:

- *Would the project physically divide an established community?*
- *Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist and have been updated to reflect the 2018 updates to Section XI of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the proposed Project would have a significant impact on land use and planning if construction and/or operation of the Project would:

a. *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; or*

b. *Disrupt or divide the physical arrangement of an established community (including a low-income or minority community).*

Based on the results of the Project's Initial Study (EIR *Technical Appendix A*), it was determined that the proposed Project would not have any potential to disrupt or divide the physical arrangement of an established community, as the Project site is fully surrounded by existing improved roadways, including Los Caballos Road to the north, Pauba Road to the east, and Los Corralitos Road to the west and southwest. These roadways would continue to serve existing uses in the surrounding area. Accordingly, the focus of the analysis in this EIR Subsection 4.8 is on the Project's potential to cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Refer to EIR Subsection 5.4 for a summary of the Initial Study findings with respect to Land Use and Planning Threshold b.

In addition, it should be noted that the Project's consistency with the Western Riverside County MSHCP and the SKR HCP, which are the only habitat conservation plans or natural community conservation plans applicable to the Project area, is evaluated in EIR Subsection 4.3, *Biological Resources*, under the analysis of Threshold a., and the analysis concludes that: 1) impacts due to a conflict with the MSHCP would be less than significant with mitigation and 2) the Project site is not targeted for conservation under the SKR HCP and is not subject to the payment of fees to the SKR HCP pursuant to Riverside County Ordinance No. 663. In addition, the Project's consistency with Riverside County's CAP is addressed in EIR Subsection 4.6, *Greenhouse Gas Emissions*, and the Project's consistency with the SCAQMD AQMP is addressed under EIR Subsection 4.2, *Air Quality*. Project consistency with the MSHCP, SKR HCP, Riverside County's CAP, and the SCAQMD AQMP is not further discussed in this EIR Subsection 4.8.

4.8.4 Methodology

A. Overview

The analyses of potential land use and planning impacts are based on the nature and degree of any conflict between the proposed Project and applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, along with the proposed Project's potential to disrupt or divide the physical arrangement of an established community. The analysis of potential impacts to land use and planning is based on a review of applicable State, regional, and local land use plans, policies, and regulations governing development at the Project site. Specific information sources consulted in the preparation of this analysis include: the Riverside County General Plan, including the Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration

Elements; the SWAP and its land use designations, policies, and overlays applicable to the Project site; applicable Temecula Valley Wine Country Community Plan (TVWCCP) policies; the SCAG Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy; and the Project's Initial Study (EIR *Technical Appendix A*).

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County, within the TVWCPA. The site is designated by the Riverside County General Plan and the SWAP for Rural Residential (RR) land uses and is zoned for WC-E uses under Ordinance No. 348. The existing facility operates under four previously approved Conditional Use Permits (CUP 001127, CUP 00966, CUP 01615, and CUP 02303), which collectively authorize the equestrian, special occasion, and ancillary uses occurring on the property under baseline conditions. The Project site is bounded by Los Corralitos Road to the west and southwest, Pauba Road to the east, and Los Caballos Road to the north, and is fully surrounded by existing improved roadways, such that the site does not occupy any portion of an existing community or otherwise contribute to the physical connectivity of any adjacent residential, commercial, or other established community. The Project's surrounding land uses consist primarily of equestrian uses, winery uses, rural residential uses, and open space.

As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth*. (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, rather than solely on the activities expressly authorized under the existing CUPs. The 2023 operational dataset captures the full range of activities occurring at Galway Downs under baseline conditions, including equestrian events, sports events, and special occasion events. Accordingly, for purposes of the land use and planning analysis in this EIR Subsection 4.8, sports events and other activities reflected in the 2023 operational baseline are treated as existing uses, not as new uses, and the Project's consistency with the RR land use designation, the WC-E zone, and applicable SWAP and TVWCCP policies is evaluated based on the incremental changes that the proposed Project would introduce relative to that established baseline. Because the full range of activities occurring at the facility under baseline conditions has coexisted continuously with the surrounding RR, WC-E, A-1-10, and R-A-10 designated and zoned lands since 1968, the land use compatibility analysis herein focuses on whether the limited physical improvements and operational authorizations proposed as part of the Project would introduce any new incompatibility with surrounding land uses beyond those that already exist under baseline conditions.

Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential land use and planning impacts evaluates the incremental effects of the proposed Project relative to the physical and regulatory baseline conditions described above, as they existed at the Project site at the time the NOP for this EIR was published (January 14, 2025).

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with limited new physical construction, and because the proposed Project's primary land use objective is to formalize and align past and current uses occurring at the Galway Downs facility under the framework of Ordinance No. 348, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to convert previously undeveloped land to a new use.

The analysis addresses two primary questions: (1) whether the proposed CUP 02303R1, Exception No. 9 to Ordinance No. 847, and CZ 22000010, considered together with the limited physical improvements proposed as part of the Project, would conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the Riverside County General Plan, the SWAP, the TVWCCP, and the SCAG RTP/SCS; and (2) whether the proposed Project would be compatible with surrounding land uses.

As established in EIR subsection 4.8.3, based on the results of the Project's Initial Study (EIR *Technical Appendix A*), it was determined that the proposed Project would not have any potential to disrupt or divide the physical arrangement of an established community, and accordingly that threshold was disposed of at the Initial Study stage and is not analyzed further herein.

In addition, the Project's consistency with the MSHCP and the SKR HCP is evaluated in EIR Subsection 4.3, *Biological Resources*, and the Project's consistency with the SCAQMD AQMP is evaluated in EIR Subsection 4.2, *Air Quality*; the conclusions of those evaluations are summarized herein for completeness, but the reader is directed to those subsections for the underlying analyses.

The consistency analysis compares the proposed CUP 02303R1, Exception No. 9 to Ordinance No. 847, and CZ 22000010, together with the associated physical improvements, against the relevant land use designations, zoning classifications, development standards, and policies identified in EIR subsection 4.8.1.D. A determination of inconsistency is made only where the Project would conflict with a specific provision adopted for the purpose of avoiding or mitigating an environmental effect, consistent with the threshold language in Section XI of Appendix G to the State CEQA Guidelines. Minor inconsistencies with provisions that were not adopted for the purpose of avoiding or mitigating an environmental effect are not considered significant impacts under CEQA.

4.8.5 Impact Analysis

Threshold a.:	**Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

The proposed Project has the potential to conflict with the Riverside County General Plan and SWAP, as well as Connect SoCal. Additionally, the Project's consistency with the SCAQMD AQMP is addressed under EIR

Subsection 4.2, *Air Quality*. Similarly, the Project's consistency with the Western Riverside County MSHCP and the SKR HCP are addressed in EIR Subsection 4.3, *Biological Resources*. In addition, the Project's consistency with Riverside County's CAP Update is addressed in EIR Subsection 4.6, *Greenhouse Gas Emissions*. As discussed in EIR Subsection 4.2, the Project would be consistent with the 2022 SCAQMD AQMP. As indicated in EIR Subsection 4.3, the Project would not conflict with the MSHCP with the implementation of mitigation measures and would not conflict with the SKR HCP as the Project site is not targeted for conservation under the SKR HCP and the Project is not located in areas subject to payment of fees pursuant to the SKR HCP and Riverside County Ordinance No. 663. As indicated in EIR Subsection 4.6, construction and long-term operation of the Project would result in approximately 13,210.05 $MTCO_2e$/yr of GHG emissions, which would exceed the County's screening threshold of 3,000 $MTCO_2e$/yr; thus, the Project would result in significant and unavoidable impacts due to a conflict with the Riverside County CAP Update. Therefore, impacts due to a conflict with the MSHCP, SKR HCP, and 2022 AQMP would be less than significant or would be reduced to less-than-significant levels with the application of mitigation measures, while Project impacts due to a conflict with the CAP would be significant and unavoidable. The Project's consistency with the SCAQMD AQMP, MSHCP, SKR HCP, 2022 AQMP, and the County's CAP is not further discussed below.

A. Project Consistency with the Riverside County General Plan and SWAP

1. General Plan and SWAP Land Use Consistency

Under existing conditions, the General Plan and SWAP designate the Project site for RR land uses. The RR land use designation allows one single family residence per five acres, as well as limited animal-keeping and agricultural activities. Limited recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses, and governmental uses are allowed within this designation. Neighborhood-serving small-scale commercial uses that are compatible with the surrounding uses are allowed (RCIT, n.d.; Riverside County, 2024'b, p. LU-48). New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed Conditional Use Permit (CUP) 02303R1 include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure that would be placed over an existing arena, and additional area for equestrian RV park use. Additionally, areas are proposed where 36 park model lodging units could be placed and where 18 additional employee modular housing units could be placed; the design of these areas would be subject to future County approvals. Any subsequent County approval of the design of the park model lodging and modular housing areas will be subject to further CEQA review. In addition, several structures that were installed on the site without permits would be permitted as part of CUP 02303R1, including an existing 1,513 square foot (s.f.) barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. All of the Project's existing and proposed uses would be compatible with the site's adopted RR land use designation, as the new and expanded uses represent both equestrian activities as well as limited commercial uses on site that are compatible with surrounding land uses. Accordingly, the proposed Project would not result in a conflict with the site's adopted General Plan land use designation of RR, and a less-than-significant impact would occur.

2. General Plan, SWAP, and Temecula Valley Wine Country Community Plan Policy Consistency

The proposed Project does not include any proposal for a General Plan Amendment, as the Project is consistent with the site's adopted RR land use designation (as discussed above). Additionally, as part of their review of the proposed Project, Riverside County reviewed the Project for compliance with all applicable goals and policies of the Riverside County General Plan, and determined that the Project would not conflict with any General Plan policy adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, Project impacts due to a conflict with the General Plan goals and policies would be less than significant.

The proposed Project is located within the SWAP portion of the Riverside County General Plan, and is located within the Wine Country – Equestrian District portion of the TVWCCP. The TVWCCP refers to the policies, figures, and design guidelines adopted by the Riverside County Board of Supervisors through General Plan Amendment No. 1077 and Zoning Ordinance Amendment No. 348.4729 on March 11, 2014. The TVWCPA is the 17,910-acre geographic policy area, located easterly of the City of Temecula and westerly of Vail Lake, to which the TVWCCP policies apply. Table 4.8-1, *Project Consistency with SWAP and Temecula Valley Wine Country Community Plan Policies*, provides a list of all of the policies contained in the SWAP and/or TVWCCP, and provides an analysis of the Project's consistency with each policy. As indicated in Table 4.8-1, the proposed Project would be consistent with or otherwise would not conflict with the policies contained in the SWAP and the TVWCCP. Accordingly, the Project would not result in any impacts due to a conflict with SWAP and/or TVWCCP policies that were adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.8-1 Project Consistency with SWAP and Temecula Valley Wine Country Community Plan Policies

SWAP/Wine Country Community Plan Policy	Project Consistency
Project Consistency with SWAP Policies	
SWAP 1.1: Require boundary changes to the Temecula Valley Wine Country Policy Area to be subject to the Foundation Component Amendment process unless county-initiated amendment.	Not Applicable. The proposed Project does not include any proposal to change the boundary of the TVWCPA; thus, Policy SWAP 1.1 is not applicable to the proposed Project.
SWAP 1.2: Maintain distinct characters of the Winery, Equestrian, and Residential Districts through implementing zones to promote harmonious coexistence of these uses.	Consistent. The proposed Project is consistent with the site's underlying General Plan land use designation of RR, and as demonstrated herein the Project would be consistent with all policies applicable to the TVWCPA. Moreover, the equestrian, sports-oriented, and special occasion events proposed as part of the Project would be consistent with the character of existing land uses within the Wine Country area. Thus, the Project would be consistent with Policy SWAP 1.2.
SWAP 1.3: Permit Class I Wineries on 5 acres or more provided that at least: ○ 75% of the project site is planted in vineyards;	Not Applicable. The Project does not include any proposal for a Class I Winery; thus, Policy SWAP 1.3 is not applicable to the proposed Project.

SWAP/Wine Country Community Plan Policy	Project Consistency
○ 75% of the grapes utilized in wine production are grown or raised within the county; and ○ The winery facility shall be less than 1,500 square feet.	
SWAP 1.4: Permit Class II Wineries with limited commercial uses such as sampling rooms and retail wine sales establishments on a minimum lot size of ten (10) acres to promote viticulture potential of this region provided that at least: ○ 75% of the project site is planted in vineyards; ○ 75% of the grapes utilized in wine production are grown or raised within the county; and ○ The winery facility shall at least produce 3,500 gallons of wine annually.	Not Applicable. The Project does not include any proposal for a Class II Winery; thus, Policy SWAP 1.4 is not applicable to the proposed Project.
SWAP 1.5: Require a density of ten (10) acres minimum for tentative approval of residential tract and parcel maps after (March 11, 2014) regardless of the underlying land use designation except in the Wine Country – Residential District where a density of five (5) acres minimum shall apply.	Not Applicable. The Project does not include any proposal for a residential tract or parcel map; thus, Policy SWAP 1.5 is not applicable to the proposed Project.
SWAP 1.6: Allow small-scale cottage inns or cottage industries. Encourage agricultural operations, equestrian activities and vineyard planting with such uses to reflect the unique character of this Policy Area.	Not Applicable. Policy SWAP 1.6 provides direction to County staff and decision makers, and there are no components of the Project that would conflict with this policy.
SWAP 1.7: Develop and implement an integrated trails network that carefully considers all trail users, and includes, but is not limited to, regional open space trails, wine country roadside trails, wine country connector trails, bike paths, historic trails, etc. as shown in SWAP Figure 8. SWAP Figure 8 Trails and Bikeway System is a conceptual Trails Plan that shows ideal trail alignments with various trail classifications to support a multi-use trails network. There are three multi-use trail types shown on SWAP Figure 8 that are unique to the Wine Country Policy Area: Regional Open Space Trail: Trails along Rancho California Road, Anza Road, De Portola Road, Pauba Road, and La Serena Way are intended to serve as backbone trails for the Wine Country Trails Network and are to be built within the road	Consistent. In conformance with Figure 8 (Southwest Area Plan Trails and Bikeway System) of the SWAP, several trails are designated in the area surrounding the Galway Downs property. Specifically, pursuant to Riverside County General Plan Amendment No. 1216, a Regional Open Space Trail is required on Pauba Road and a Wine Country Roadside Trail is required on Los Caballos Road and Los Corralitos Road. Each of these trails is required to be 4 to 8 feet in width. Based on a review conducted for the surrounding area by County staff, the County Transportation Department determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Therefore, the Project would be consistent with Policy SWAP 1.7.

SWAP/Wine Country Community Plan Policy	Project Consistency
right-of-way (ROW). The trails along Rancho California Road and Anza Road can support combination trails as described in the Temecula Valley Wine Country Design Guidelines. The combination trails includes a Class I Bike Path and Regional Trail split on either side of the road. The Class I Bike Path will comply with the most current Caltrans Standards. The Regional Trail path will be 10' to 12' in width. The trail paths along De Portola Road, Pauba Road and La Serena Way will be 4' to 8' in width. The widths of the trails may be modified due to road conditions including ROW availability as determined by the Riverside County Transportation Department. Trails along De Portola Road shall be considered as part of all future road improvement plans. There are a few smaller trail segments that are also classified as Regional Open Space Trails located between properties. These trails are single track paths having earthen base and will be no wider than 4' with an ideal width of 2'. These trails would require an 8' easement. The Regional Open Space Trail segments will become an integral part of the regional trail program of the County's Regional Park and Open-Space District. The actual construction and operation of these trails are reliant on securing trail easements and funding sources for continual trail maintenance. Wine Country Roadside Trail: These trails are also located along road ROW. Wine Country Roadside Trails would be 4' to 8' in width along one side of the road, consisting of unimproved or decomposed granite material. Funding sources would be sought for the development and maintenance of Wine Country Roadside Trails (e.g. Landscape District, County Service Area (CSA), and Transportation District). Wine Country Connector Trail: Wine Country Connector Trails provide additional connection	

SWAP/Wine Country Community Plan Policy	Project Consistency
routes, through private property. Thus, trail construction would require consent of the property owner and the establishment of access easements. Trail design would vary per site conditions. Partnerships between a local entity and private property owner would be required to develop and maintain trails, as well as define the acceptable use of the trails. The use of such trails is prohibited unless proper permission from the current property owners is granted or easements secured. Class 2 and Class 3 Bikeways are not specifically shown on SWAP Figure 8 within the Temecula Valley Wine Country Policy Area; however, these bikeways may be located along roads that would safely support it. All trails within the Wine Country Policy Area would consist of unimproved or decomposed granite materials, or material approved for use by the Riverside County Parks and Open Space District and the Riverside County Transportation Department. The trail paths require a 2' buffer on both sides of the path. The trails would include a fence or landscaped buffer from the roadway and private property. The actual development and ultimate location of each trail segments are dependent on various funding sources, prioritizing needs, user safety, adequate road ROW, contiguous trail easements, the agency or entity that assumes responsibility for the trails' operation including maintenance, and in some cases, property owners' permission. The County will work with the community to identify segments that can be developed first as land use development and road improvement occurs and funding becomes available.	
SWAP 1.8: Pending adoption of an updated Air Quality Element and Climate Action Plan (CAP), ensure that new development selects greenhouse gas (GHG) reduction measures from the Option Tables to achieve the County's GHG emission reduction thresholds as set forth in the Greenhouse Gas Reduction Workbook (workbook). Alternatively, new developments may utilize other	Infeasible. As discussed in further detail in EIR Subsection 4.6, *Greenhouse Gas Emissions*, mitigation measures are not available to reduce the Project's estimated annual increase in GHG emissions of approximately 13,210.05 $MTCO_2e$/yr. The Project's combination of uses, operational characteristics, and site-specific conditions does not correspond to the residential or commercial development types contemplated by the CAP Update's screening tables.

SWAP/Wine Country Community Plan Policy	Project Consistency
reduction mechanisms to achieve reduction thresholds as prescribe in the workbook.	Thus, compliance with the CAP Update's screening tables was determined to be infeasible for the proposed Project. Although this represents a potential conflict with Policy SWAP 1.8, because the Project's significant and unavoidable impacts due to GHG emissions and due to a conflict with a plan, policy, or regulation adopted for the purpose of addressing GHG emissions already is disclosed herein in EIR Section 4.6, no separate impact is identified.
SWAP 1.9 through SWAP 1.16: Wine Country – Winery District	Not Applicable. Policies SWAP 1.9 through SWAP 1.16 apply to the Wine Country – Winery District and Winery District Overlay, while the Project site is located within the Wine Country – Equestrian District. Thus, Policies SWAP 1.9 through SWAP 1.16 are not applicable to the proposed Project.
SWAP 1.17/Temecula Valley Wine Country Community Plan Policy SWAP 1.17: Encourage equestrian establishments that promote the equestrian lifestyle as described in the Wine Country – Equestrian (WC-E) Zone.	Consistent. The proposed Project would continue to operate primarily as an equestrian-oriented events center that would feature a variety of recreational-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with club house; grooms quarters; office space; a clock tower house; and storage spaces. All of the uses proposed as part of the Project are fully compatible with the equestrian lifestyle as described for the WC-E zone, in conformance with this policy.
SWAP 1.18/Temecula Valley Wine Country Community Plan Policy SWAP 1.18: Permit incidental commercial uses such as western style stores, polo-grounds, or horse racing tracks, petting zoos, event grounds, horse show facilities, animal hospitals, restaurants, delicatessens, and special occasion facilities in conjunction with commercial equestrian establishments on lots larger than 10 acres to encourage equestrian tourism in this community.	Consistent. The proposed Project would continue to operate primarily as an equestrian-oriented events center that would feature a variety of recreational-related amenities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; an RV park with club house; grooms quarters; office space; a clock tower house; and storage spaces. The Project's incidental commercial uses are fully compatible with equestrian tourism in the local community, and the range of uses accommodated on site are consistent with the range of uses identified by this policy. Thus, the Project would be consistent with Policy SWAP 1.18.
SWAP 1.19 and SWAP 1.20: Wine Country - Residential District	Not Applicable. Policies SWAP 1.19 and SWAP 1.20 apply to the Wine Country - Residential District and the Project site is not located within the Wine Country - Residential District. Thus, Policies SWAP 1.19 and SWAP 1.20 are not applicable to the proposed Project.
SWAP 3.1: North Skinner Policy Area	Not Applicable. Policy SWAP 3.1 applies to the North Skinner Policy Area and the Project site is not located within the

SWAP/Wine Country Community Plan Policy	Project Consistency
	North Skinner Policy Area. Thus, Policy SWAP 3.1 is not applicable to the proposed Project.
SWAP 4.1: Vail Lake Policy Area	Not Applicable. Policy SWAP 4.1 applies to the Vail Lake Policy Area and the Project site is not located within the Vail Lake Policy Area. Thus, Policy SWAP 4.1 is not applicable to the proposed Project.
SWAP 5.1 and SWAP 5.2: Santa Rosa Plateau/De Luz Policy Area	Not Applicable. Policies SWAP 5.1 and SWAP 5.2 apply to the Santa Rosa Plateau/De Luz Policy Area and the Project site is not located within Santa Rosa Plateau/De Luz Policy Area. Thus, Policies SWAP 5.1 and SWAP 5.2 are not applicable to the proposed Project.
SWAP 6.1 through SWAP 6.5: Walker Basin Policy Area	Not Applicable. Policies SWAP 6.1 through SWAP 6.5 apply to the Walker Basin Policy Area and the Project site is not located within the Walker Basin Policy Area. Thus, Policies SWAP 6.1 through SWAP 6.5 are not applicable to the proposed Project.
SWAP 7.1: Sections 25/36 Policy Area	Not Applicable. Policy SWAP 7.1 applies to the Sections 25/36 Policy Area and the Project site is not located within the Sections 25/36 Policy Area. Thus, Policy SWAP 7.1 is not applicable to the proposed Project.
SWAP 8.1: Keller Road South Side Policy Area	Not Applicable. Policy SWAP 8.1 applies to the Keller Road South Side Policy Area and the Project site is not located within the Keller Road South Side Policy Area. Thus, Policy SWAP 8.1 is not applicable to the proposed Project.
SWAP 9.1: Highway 79 Policy Area: Accelerate the construction of transportation infrastructure in the Highway 79 Policy Area corridor between Temecula, Hemet, San Jacinto and Banning. The County of Riverside shall require that all new development projects demonstrate adequate transportation infrastructure capacity to accommodate the added traffic growth. The County of Riverside shall coordinate with cities in the Highway 79 corridor to accelerate the usable revenue flow of existing funding programs, thus expediting the development of the transportation infrastructure.	Not Applicable. Policy SWAP 9.1 applies to the Highway 79 Policy Area and the Project site is not located within the Highway 79 Policy Area. Thus, Policy SWAP 9.1 is not applicable to the proposed Project.
SWAP 9.2: Highway 79 Policy Area: Maintain a program in the Highway 79 Policy Area to ensure that overall trip generation does not exceed system capacity and that the system operation continues to meet Level of Service standards. In general, the program would establish guidelines to be incorporated into individual Traffic Impact Analysis that would monitor overall trip generation from	Not Applicable. Policy SWAP 9.2 applies to the Highway 79 Policy Area and the Project site is not located within the Highway 79 Policy Area. Thus, Policy SWAP 9.2 is not applicable to the proposed Project.

SWAP/Wine Country Community Plan Policy	Project Consistency
residential development to ensure that overall within the Highway 79 Policy Area development projects produce traffic generation at a level that is 9% less than the trips projected from the General Plan traffic model residential land use designations. Individually, projects could exceed the General Plan traffic model trip generation level, provided it can be demonstrated that sufficient reductions have occurred on other projects in order to meet Level of Service standards.	
SWAP 9.3: Highway 79 Policy Area: To ensure that Riverside County's traffic volume range breaks for the various facility types used to determine LOS stay current, review and update the thresholds periodically	Not Applicable. Policy SWAP 9.3 applies to the Highway 79 Policy Area and the Project site is not located within the Highway 79 Policy Area. Thus, Policy SWAP 9.3 is not applicable to the proposed Project.
SWAP 10.1 through SWAP 10.4: Diamond Valley Lake Policy Area	Not Applicable. Policies SWAP 10.1 through SWAP 10.4 apply to the Diamond Valley Lake Policy Area and the Project site is not located within the Diamond Valley Lake Policy Area. Thus, Policies SWAP 10.1 through SWAP 10.4 are not applicable to the proposed Project.
SWAP 11.1: French Valley Airport Influence Area: To provide for the orderly development of French Valley Airport and the surrounding areas, comply with the Airport Land Use Compatibility Plan for French Valley Airport as fully set forth in Appendix L-1 and as summarized in Table 4, as well as any applicable policies related to airports in the Land Use, Circulation, Safety and Noise Elements of the Riverside County General Plan.	Consistent: As discussed in EIR Subsection 4.9, *Hazards and Hazardous Materials*, the Project site is not located within the Airport Influence Area (AIA) of any public or private airports, and the Project has no potential to conflict with any airport land use compatibility plans. The French Valley Airport is located 7.4 miles northwest of the Project site.
SWAP 12.1 through SWAP 12.3: Community Centers	Not Applicable. The Project is not designated for "Community Center" land uses by the SWAP. Thus, Policies SWAP 12.1 through SWAP 12.3 are not applicable to the proposed Project.
SWAP 13.1: Mount Palomar Nighttime Lighting Requirements: Adhere to the lighting requirements of county ordinances for standards that are intended to limit light leakage and spillage that may interfere with the operations of the Palomar Observatory.	Consistent. The Project is located in Zone A of the Mount Palomar Nighttime Lighting Policy Area, and would be conditioned to comply with Riverside County Ordinance No. 655. Additionally, Project lighting has been designed to preclude the potential for spillage of lighting onto the public rights-of-way and adjacent properties, and would be appropriately shielded and directed downward to prevent leakage and spillage that could adversely affect the Observatory. Thus, the proposed Project would be consistent with Policy SWAP 13.1.
SWAP 14.1: Third and Fifth Supervisorial District Design Standards and Guidelines.	Consistent. Riverside County has reviewed the proposed Project and has determined the Project would be consistent

SWAP/Wine Country Community Plan Policy	Project Consistency
	with or otherwise would not conflict with the Design Standards and Guidelines for Development in the Third and Fifth Supervisorial Districts.
SWAP 15.1: Protect farmland and agricultural resources in the Southwest planning area through adherence to the Agricultural Resources section of the General Plan Multipurpose Open Space Element and the Agriculture section of the General Plan Land Use Element, as well as the provisions of the Citrus/Vineyard Policy Area	Consistent. The County of Riverside has reviewed the proposed Project for consistency with the General Plan and determined that the Project would not conflict with applicable policies which includes those in the Multipurpose Open Space Element and Land Use Element. The Project site is not located within the Citrus/Vineyard Policy Area. Thus, the Project would be consistent with Policy SWAP 15.1.
SWAP 16.1: Building sites shall not be permitted on the Western Ridgeline as identified on the Area Plan Land Use map. Projects proposed within the area of the Western Ridgeline shall be evaluated on a case by case basis to ensure that building pad sites are located so that buildings and roof tops do not project above the Ridgeline as viewed from the Temecula Basin. All projects within one-half mile of the Western Ridgeline shall also be evaluated on a case-by-case basis to determine if the building site will have an adverse impact to the ridgeline as viewed from the basin.	Not Applicable. The Project site does not occur on the Western Ridgeline as identified on the Area Plan Land Use map. Thus, Policy SWAP 16.1 is not applicable to the proposed Project.
SWAP 17.1: Design and develop the vehicular roadway system per Figure 7, Circulation, and in accordance with the functional classifications and standards specified in the General Plan Circulation Element.	Consistent. Roadway improvements proposed as part of the Project would be limited to the construction of acceleration/deceleration lanes at the Project's main access driveways, and no improvements are proposed or required by the Circulation Element for roadways abutting the Project site. Accordingly, the Project would be consistent with Policy SWAP 17.1.
SWAP 17.2: Maintain Riverside County's roadway Level of Service standards as described in the Level of Service section of the General Plan Circulation Element.	Consistent. As discussed in the Project's Traffic Impact Analysis (EIR *Technical Appendix I*), the proposed Project would be conditioned to require improvements, fee contributions, and/or payment of development impact fees (DIF) and/or TUMF fees which would ensure that all study area facilities would operate at acceptable levels. Thus, the Project would be consistent with Policy SWAP 17.2.
SWAP 17.3: Support the implementation of a new interchange on Interstate 15, southerly of the State Highway 79 South interchange.	Not Applicable. Policy SWAP 17.3 provides direction to County staff and decision makers and is not applicable to the proposed Project.
SWAP 18.1: Implement the Trails and Bikeway System, Figure 8, as discussed in the Non-Motorized Transportation section of the General Plan Circulation Element.	Consistent. In conformance with Figure 8 (Southwest Area Plan Trails and Bikeway System) of the SWAP, several trails are designated in the area surrounding the Galway Downs property. Specifically, pursuant to Riverside County General Plan Amendment No. 1216, a Regional Open Space Trail is required on Pauba Road and a Wine Country Roadside Trail

SWAP/Wine Country Community Plan Policy	Project Consistency
	is required on Los Caballos Road and Los Corralitos Road. Each of these trails is required to be 4 to 8 feet in width. Based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Therefore, the Project would be consistent with Policy SWAP 18.1.
SWAP 19.1: Protect the scenic highways in the Southwest planning area from change that would diminish the aesthetic value of adjacent properties in accordance with the Scenic Corridors sections of the General Plan Land Use, Multipurpose Open Space, and Circulation Elements.	Consistent. Three highways within the SWAP have been nominated for Scenic Highway status, including the portions of Interstate 215 and SR-79 South that pass through the SWAP, which are designated as Eligible Scenic Highways, and Interstate 15, which is designated as an Eligible State Scenic Highway. The improvements proposed as part of the Project would not be visible from any of these highways, and as such the Project has no potential to result in adverse effects on views from scenic highways. Accordingly, the Project would be consistent with Policy SWAP 19.1.
SWAP 20.1: Accommodate the Winchester to Temecula CETAP Corridor in accordance with the Community Environmental Transportation Acceptability Process section of the General Plan Circulation Element.	Not Applicable. Due to distance between the Project site and the Winchester to Temecula CETAP Corridor, SWAP 20.1 is not applicable to the Project.
SWAP 21.1: Protect the Santa Margarita watershed and habitat, and provide recreational opportunities and flood protection through adherence to the applicable policies found within the Multiple Species Habitat Conservation Plans, Wetlands and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element, as well as use of Best Management Practice policies.	Consistent. As indicated in EIR Subsections 4.3, *Biological Resources*, and 4.7, *Hydrology and Water Quality*, Project impacts due to water quality and other habitats would be reduced to less-than-significant levels with mitigation. The Project would be consistent with or otherwise would not conflict with the Floodplain and Riparian Area Management, Wetlands, Multiple Species Habitat Conservation Plans, and Environmentally Sensitive Lands sections of the General Plan Multipurpose Open Space Element. Thus, the Project would be consistent with Policy SWAP 21.1.
SWAP 22.1: Protect viable oak woodlands through adherence to the Oak Tree Management Guidelines adopted by Riverside County.	Consistent. Although the Project site contains approximately 0.18-acre of Coast Live Oak habitat and contains several mature regulated coast live oak trees within in the northeastern portion of the Project site, the Project has been designed to fully avoid these oak trees. As such, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines, and the Project would be consistent with Policy SWAP 22.1.
SWAP 23.1: Provide stepping-stone habitat linkages for the California gnatcatcher as well as	Consistent. As indicated in EIR Subsection 4.3, *Biological Resources*, the Project would be consistent with the MSHCP

SWAP/Wine Country Community Plan Policy	Project Consistency
other species through the preservation of land from the Santa Rosa Plateau to the Santa Margarita Reserve in San Diego County.	with the implementation of mitigation measures. The California gnatcatcher and other sensitive species are covered under the MSHCP. Thus, the proposed Project would be consistent with Policy SWAP 23.1
SWAP 23.2: Conserve the Tenaja corridor, which promotes large mammal movement between the Cleveland National Forest and the Santa Rosa Plateau	Not Applicable. Due to distance between the Project site and the Tenaja corridor, Policy SWAP 23.2 is not applicable to the Project.
SWAP 23.3: Maintain habitat connectivity within Murrieta Creek, Temecula Creek, Lower Tucalota Creek, Lower Warm Springs Creek, and Pechanga Creek to facilitate wildlife movement and dispersal, (especially for the California gnatcatcher and Quino checkerspot butterfly) and conservation of wetland species.	Consistent. As indicated in EIR Subsection 4.3, *Biological Resources*, the Project would be consistent with the MSHCP with the implementation of mitigation measures, and the MSHCP has been designed to implement these requirements. There are no components of the proposed Project that would adversely affect habitat connectivity in the local area. Thus, the Project would be consistent with Policy SWAP 23.3.
SWAP 23.4: Conserve habitat connections to the Agua Tibia Wilderness, Arroyo Seco, and Wilson Valley.	Consistent. As indicated in EIR Subsection 4.3, *Biological Resources*, with mitigation the Project would be consistent with the MSHCP, which implements these requirements. Thus, the Project would be consistent with Policy SWAP 23.4.
SWAP 23.5: Conserve the large block of habitat containing clay soils east of Interstate 215 and south of Scott Road for the Quino checkerspot butterfly and other narrow endemic species such as Munz's onion, California Orcutt grass and spreading navarretia.	Consistent. As indicated in EIR Subsection 4.3, *Biological Resources*, with mitigation the Project would be consistent with the MSHCP, which implements these requirements. Thus, the Project would be consistent with Policy SWAP 23.5.
SWAP 23.6: Incorporate a watershed management program into the preservation of wildlife movement and dispersal of wetland species within Pechanga Creek.	Not Applicable. Policy SWAP 23.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
SWAP 23.7: Consider the movement of larger mammals such as the mountain lion, bobcat, and mule deer between the Santa Ana and Mount Palomar Mountains.	Not Applicable. Due to distance between the Project site and the Santa Ana and Mount Palomar Mountain, Policy SWAP 23.7 is not applicable to the Project.
SWAP 23.8: Protect sensitive biological resources in SWAP through adherence to policies found in the Multiple Species Habitat Conservation Plans, Environmentally Sensitive Lands, Wetlands, and Floodplain and Riparian Area Management sections of the General Plan Multipurpose Open Space Element	Consistent. As demonstrated in EIR Subsection 4.3, *Biological Resources*, the Project would be consistent with or otherwise would not conflict with the MSHCP, and would result in less-than-significant impacts to Environmentally Sensitive Lands, Wetlands, or Floodplain and Riparian Area Management as managed by the General Plan Multipurpose Open Space Element with implementation of EIR Mitigation Measures MM 4.3-1 and MM 4.3-2. Thus, the Project would be consistent with Policy SWAP 23.8.
SWAP 24.1: Protect life and property from the	Consistent. As demonstrated in EIR Subsection 4.7,

SWAP/Wine Country Community Plan Policy	Project Consistency
hazards of potential dam failures and flood events through adherence to the Flood and Inundation Hazards section of the General Plan Safety Element.	*Hydrology and Water Quality*, the only improvement proposed as part of the Project in the portions of the site subject to inundation due to dam failure is the reconfiguration of the existing site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. No permanent structures are proposed within areas subject to inundation due to failure of the Vail Lake Dam. Accordingly, the Project would be consistent with Policy SWAP 24.1.
SWAP 24.2: Reduce flooding damage through adherence to design and density standards contained in the Master Drainage Plan for Murrieta Creek Area and the Murrieta Creek Drainage Plan	Consistent. As discussed in EIR Subsection 4.7, *Hydrology and Water Quality*, although the northern portions of the Project site are located within a 100-year flood zone, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This minor addition of impervious surface would not materially affect the mapped floodplain. There are no components of the Project with the potential to conflict with the standards contained in the Master Drainage Plan for Murrieta Creek Area and the Murrieta Creek Drainage Plan. Thus, the Project would be consistent with Policy SWAP 24.2.
SWAP 24.3: Adhere to the flood proofing, flood protection requirements, and flood management review requirements of Riverside County Ordinance No. 458 regulating flood hazards.	Consistent. As discussed in EIR Subsection 4.7, *Hydrology and Water Quality*, although the northern portions of the Project site are located within a 100-year flood zone, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of approximately 6,046 s.f. (0.14-acre) of additional pavement. This minor addition of impervious surface would not materially affect the mapped floodplain. There are no components of the Project with the potential to conflict with the provisions of Riverside County Ordinance No. 458. Thus, the Project would be consistent with Policy SWAP 24.3.
SWAP 24.4: Require proposed development projects that are subject to flood hazards, surface ponding, high erosion potential or sheet flow to be submitted to the Riverside County Flood Control and Water Conservation District for review.	Consistent. As discussed in EIR Subsection 4.7, *Hydrology and Water Quality*, although the northern portions of the Project site are located within a 100-year flood zone, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, which would include the installation of

SWAP/Wine Country Community Plan Policy	Project Consistency
	approximately 6,046 s.f. (0.14-acre) of additional pavement. This minor addition of impervious surface would not materially affect the mapped floodplain. Notwithstanding, the Project was subject to review by the Riverside County Flood Control and Water Conservation District, which determined that the Project's proposed drainage plan would be consistent with this policy.
SWAP 25.1: Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the Safety Element of the General Plan	Consistent. As discussed in EIR Subsection 4.13, *Wildfire*, all of the new structures on site are proposed in the interior portions of the Project site and are not located at the edges of the Project site that could be affected by wildfires originating in off-site locations. Thus, there are no components of the Project with the potential to conflict with the Fire Hazards section of the Safety Element of the General Plan, and as such the Project would be consistent with Policy SWAP 25.1.
SWAP 26.1: Protect life and property from seismic-related incidents through adherence to the Seismic Hazards section of the General Plan Safety Element.	Consistent. There are no components of the proposed Project that would have the potential to conflict with the Seismic Hazards section of the General Plan Safety Element, due to the limited nature of new buildings on site and because all future buildings would be required to adhere to the County's building regulations; thus, the Project would be consistent with Policy SWAP 26.1.
SWAP 27.2: Protect life and property and maintain the character of the Southwest planning area through adherence to the Hillside Development and Slope section of the General Plan Land Use Element, the policies within the Rural Mountainous and Open Space land use designations of the General Plan Land Use Element, and policies in the Slope and Soil Instability Hazards section of the General Plan Safety Element.	Consistent. The Project would be consistent with or otherwise would not conflict with the Hillside Development and Slope policies of the General Plan Land Use Element, the Slope and Soil Instability Hazards policies of the General Plan Safety Element, and the policies within the Rural Mountainous and Open Space Land Use Designations of the Land Use Element. Thus, the Project would be consistent with Policy SWAP 27.2.
Project Consistency with Wine Country Community Plan Policies	
Wine Country Community Plan Policies SWAP 1.1 through SWAP 1.20	Consistent/Not Applicable. Temecula Valley Wine Country Community Plan Policies SWAP 1.1 through SWAP 1.20 have been incorporated into the SWAP and are listed above. As discussed above, the Project would be consistent with or otherwise would not conflict with these policies.
Wine Country Community Plan Policy C 15.1: Implement a two-tiered system of trails, and later expand it into an effective non-motorized transportation system.	Not Applicable. Policy C 15.1 provides direction to County staff and decision makers and is not applicable to the proposed Project.
Wine Country Community Plan Policy C 15.2: Seek financing to implement an effective non-motorized transportation system. This funding can include	Not Applicable. Policy C 15.2 provides direction to County staff and decision makers and is not applicable to the proposed Project.

SWAP/Wine Country Community Plan Policy	Project Consistency
such potential sources as state and federal grants, County transportation funds, "in lieu" fees, special assessments, redevelopment agency funds, parking meter revenues, other public and non-profit organization funds, developer contributions, and other sources. (AI 36)	
Wine Country Community Plan Policy C 15.3: Develop a trail system which connects County parks and recreation areas while providing links to open space areas, equestrian communities, local municipalities, and regional recreational facilities (including other regional trail systems), and ensure that the system contains a variety of trail loops of varying classifications and degrees of difficulty and length.	Consistent. In conformance with Figure 8 (Southwest Area Plan Trails and Bikeway System) of the SWAP, several trails are designated in the area surrounding the Galway Downs property. Specifically, pursuant to Riverside County General Plan Amendment No. 1216, a Regional Open Space Trail is required on Pauba Road and a Wine Country Roadside Trail is required on Los Caballos Road and Los Corralitos Road. Each of these trails is required to be 4 to 8 feet in width. Based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Therefore, the Project would be consistent with Policy C 15.3.
Wine Country Community Plan Policy C 15.4: Periodically review and update the Trails and Bikeways Plan (Figure C-7) in accordance with the review procedures and schedule of the General Plan, in order to ensure its compatibility with the other components of the County General Plan, and with the similar plans of agencies such as Western Riverside County Council of Governments, Coachella Valley Association of Governments, Riverside County Transportation Commission, Regional Conservation Authority, Riverside County Habitat Conservation Authority and all jurisdictions within and abutting Riverside County.	Not Applicable. Policy C 15.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
Wine Country Community Plan Policy C 15.5: Compliance with the Americans with Disabilities Act (ADA) standards will be assured so as to make trails user-friendly, where feasible.	Consistent. As discussed in EIR Subsection 3.6.1.E, the Project has been designed to accommodate ADA accessible pathways between each parking area and the activity zones they are intended to serve. Thus, the Project would be consistent with Policy C 15.5.
Wine Country Community Plan Policy C 15.6: Provide, where feasible, the construction of overpasses or undercrossings where trails intersect arterials, urban arterials, expressways, or freeways.	Not Applicable. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used

SWAP/Wine Country Community Plan Policy	Project Consistency
	under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Thus, Policy C 15.6 is not applicable to the proposed Project.
Wine Country Community Plan Policy C 16.1: Implement the County trail system as depicted in the Bikeways and Trails Plan, Figure C-7. (AI 3, 33)	Not Applicable. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Thus, Policy C 16.1 is not applicable to the proposed Project.
Wine Country Community Plan Policy C 16.2: Develop a multi-purpose trail network with support facilities which provide a linkage with regional facilities, and require trailheads and staging areas that are equipped with adequate parking, equestrian trailer parking (as appropriate), bicycle parking, restrooms, informative signage, interpretive displays, maps, and rules of appropriate usage and conduct on trails accessed from such facilities. (AI 35)	Not Applicable. Temecula Valley Wine Country Community Plan Policy C 16.2 provides direction to County staff and decision makers and is not applicable to the proposed Project.
Wine Country Community Plan Policy C 16.3: Require that trail alignments provide access to or link scenic corridors, schools, parks, bus stops, transit terminals, park and ride commuter lots, and other areas of concentrated public activity, where feasible.	Not Applicable. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Thus, Policy C 16.3 is not applicable to the proposed Project.
Wine Country Community Plan Policy C 16.4: Require that all development proposals located along a planned trail or trails provide access to, dedicate trail easements or right-of-way, and construct their fair share portion of the trails system. Evaluate the locations of existing and proposed trails within and adjacent to each development proposal and ensure that the appropriate easements are established to preserve planned trail alignments and trail heads. (AI 3, 33) a. Require that all specific plans and other large-scale development proposals include trail	Consistent. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Additionally, there are no components of the proposed Project that would affect these existing trails, and the Project has been designed to provide safe and efficient access to these trails. Thus, the proposed Project would be consistent with Temecula Valley Wine Country Community Plan Policy C 16.4.

SWAP/Wine Country Community Plan Policy	Project Consistency
networks as part of their circulation systems. b. Ensure that new gated communities, and where appropriate, existing gated communities, do not preclude trails accessible to the general public from traversing through their boundaries. c. Provide buffers between streets and trails, and between adjacent residences and trails. d. Make use of already available or already disturbed land where possible for trail alignments. e. Require that existing and proposed trails within Riverside County connect with those in other neighboring city, county, state, and federal jurisdictional areas.	
Wine Country Community Plan Policy C 16.5: Identify all existing rights-of-way which have been obtained for trail purposes through the land development process. (AI 34) a. Once the above task has been accomplished, analyze the existing rights of-way and determine the most expedient method for connecting the parts.	Not Applicable. Temecula Valley Wine Country Community Plan Policy C 16.5 provides direction to County staff and decision makers and is not applicable to the proposed Project.
Wine Country Community Plan Policy C 16.6: Examine the use of public access utility easements for trail linkages to the regional trails system and/or other open space areas. These potential corridors include, but are not limited to, the rights-of-way for: (AI 35, 36, 42) a. water mains; b. water storage project aqueducts; c. irrigation canals; d. flood control; e. sewer lines; f. fiber optic cable lines, g. gas lines, h. electrical lines, and i. fire roads, railroads, and bridges.	Not Applicable. Temecula Valley Wine Country Community Plan Policy C 16.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
Wine Country Community Plan Policy C 16.7: Adhere to the following trail-development guidelines when siting a trail (note: sub-provisions a. through v. have been omitted as this policy is not applicable to the Project).	Not Applicable. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Thus, Policy C 16.7 is not applicable to the proposed Project.

SWAP/Wine Country Community Plan Policy	Project Consistency
Wine Country Community Plan Policy C 16.8: Require the installation (where appropriate and pursuant to County standards) of the appropriate styles of fencing along trail alignments that separate trails from road right-of-ways (ROWs), or where trails are located within road ROWs, that provide adequate separation from road traffic, in order to adequately provide for public safety. Examples of such fence types include simulated wood post and rail fencing constructed of PVC material, wood round post and rail, and wood-textured concrete post and rail fencing. (AI 3)	Not Applicable. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Thus, Policy C 16.8 is not applicable to the proposed Project.
Wine Country Community Plan Policy C 17.1: Develop Class I Bike Paths, Class II Bike Lanes and Class I Bike Paths/Regional Trails (Combo Trails) as shown in the Trails Plan (Figure C-7), to the design standards as outlined in the California Department of Transportation Highway Design Manual, adopted County Design Guidelines (for communities that have them), the Riverside County Regional Park and Open Space Trails Standards Manual, and other County Guidelines. (AI 34, 41)	Not Applicable. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, no new trails improvements are required or proposed as part of the Project. Thus, Policy C 17.1 is not applicable to the proposed Project.
Wine Country Community Plan Policy C 17.2: Require bicycle access between proposed developments and other parts of the County trail system through dedication of easements and construction of bicycle access ways.	Consistent. As noted above, based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Additionally, there are no components of the proposed Project that would affect these existing trails, and the Project has been designed to provide safe and efficient access to these trails, including for bicycle users. Thus, the proposed Project would be fully consistent with Temecula Valley Wine Country Community Plan Policy C 17.2.
Wine Country Community Plan Policy C 17.3: Ensure that the bikeway system incorporates the following: a. Interconnection throughout and between of cities and unincorporated communities; b. Provision of lanes to specific destinations such as state or county parks; c. Provision for recreational bicycle riding and bicycle touring; and d. Encouragement of bicycle commuting. e. Encouragement of golf cart commuting within a	Not Applicable. Temecula Valley Wine Country Community Plan Policy C 17.3 provides direction to County staff and decision makers and is not applicable to the proposed Project.

SWAP/Wine Country Community Plan Policy	Project Consistency
community. f. Connect bikeways to all urban transit centers and systems (bus stops and Metrolink stations). g. Provide bicycle parking at transit stops and park-and-ride lots.	
Wine Country Community Plan Policy C 17.4: Ensure that alternative modes of motorized transportation, such as buses, trains, taxi cabs, etc., plan and provide for transportation of recreational and commuting bicyclists and bicycles on public transportation systems. Coordinate with all transit operators to ensure that bicycle facilities are provided along and/or near all transit routes, whenever feasible. New land developments shall be required to provide bicycle facilities due to existing or future planned transit routes.	Not Applicable. Temecula Valley Wine Country Community Plan Policy C 17.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
Wine Country Community Plan Policies C 18.1 through 18.3: Acquisition, Maintenance, and Funding of Multipurpose Trails and Bikeways	Not Applicable. Temecula Valley Wine Country Community Plan Policies C 18.1 through 18.3 provide direction to County staff and decision makers and are not applicable to the proposed Project.

B. Project Consistency with Connect SoCal

In April 2024, SCAG adopted the 2024-2050 RTP/SCS, also referred to as "Connect SoCal." The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in the RTP/SCS are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project's consistency with the relevant goals of Connect SoCal is presented below in Table 4.8-2, *Analysis of Consistency with Connect SoCal Goals*. As indicated, the Project would not conflict with any Connect SoCal goals, and a less-than-significant impact would occur.

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
Mobility	
System Preservation and Resilience	
01. Prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets, following a "Fix-It-First" principle	Not Applicable. RTP/SCS Policy 01 provides direction to County and regional staff and decision makers and is not applicable to the proposed Project.
02. Promote transportation investments that advance progress toward the achievement of asset management	Not Applicable. RTP/SCS Policy 02 provides direction to County and regional agency staff and decision makers

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
targets, including the condition of the National Highway System pavement and bridges and transit assets (rolling stock, equipment, facilities and infrastructure)	and is not applicable to the proposed Project.
Complete Streets	
03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	Consistent. Several trails are designated in the area surrounding the Galway Downs property. Specifically, pursuant to Riverside County General Plan Amendment No. 1216, a Regional Open Space Trail is required on Pauba Road and a Wine Country Roadside Trail is required on Los Caballos Road and Los Corralitos Road. Each of these trails is required to be 4 to 8 feet in width. Based on an analysis conducted for the surrounding area, it was determined that soft surface areas wider than the required minimum 4 to 8 feet already are accommodated along each of these roadways, and these soft surface areas already are used under existing conditions as trails. Accordingly, the existing trails provide for a safe, multimodal network with flexible use of public rights-of-way for a variety of trail users, and no new trails improvements are required or proposed as part of the Project.
04. Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking)	Not Applicable. RTP/SCS Policy 04 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
05. Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery	Not Applicable. RTP/SCS Policy 05 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project would not affect any existing connections to transit in the local area.
06. Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities	Not Applicable. RTP/SCS Policy 06 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Transit and Multimodal Integration	
07. Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety	Not Applicable. RTP/SCS Policy 07 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
08. Support connections across the public, private and	Not Applicable. RTP/SCS Policy 08 provides direction to

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
nonprofit sectors to develop transportation projects and programs that result in improved connectivity	County and regional agency staff and decision makers and is not applicable to the proposed Project.
09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations	Not Applicable. The Project site occurs in a rural portion of unincorporated Riverside County, and transit and rail service are not available in the local area. Notwithstanding, the Project would result in only a nominal increase in employees, while the 36 proposed park model lodging units and 18 proposed employee modular housing units would serve to reduce the amount of traffic generated by the existing facility.
10. Support the implementation of transportation projects in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety and access to opportunities	Not Applicable. RTP/SCS Policy 10 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
11. Create a resilient transportation system by preparing for emergencies and the impacts of climate change	Not Applicable. RTP/SCS Policy 11 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Transportation System Management	
12. Pursue efficient use of the transportation system using a set of operational improvement strategies that maintain the performance of the existing transportation system instead of adding roadway capacity, where possible	Not Applicable. RTP/SCS Policy 12 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
13. Prioritize transportation investments that increase travel time reliability, including build-out of the regional express lanes network	Not Applicable. RTP/SCS Policy 13 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Transportation Demand Management	
14. Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc.)	Not Applicable. RTP/SCS Policy 14 provides direction to County and regional agency staff and decision makers and relates to transportation projects and is not applicable to the proposed Project.
15. Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors	Not Applicable. RTP/SCS Policy 15 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
16. Encourage municipalities to update existing (legacy) TDM ordinances by incorporating new travel modes and new technology and by incorporating employment and residential sites of certain populations – for example, employers who have less than 250 employees (below the 250 or more employees threshold identified in AQMD's Rule 2202)	Not Applicable. RTP/SCS Policy 16 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Technology Integration	

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
17. Support the implementation of technology designed to provide equal access to mobility, employment, economic opportunity, education, health and other quality-of-life opportunities for all residents within the SCAG region	Not Applicable. RTP/SCS Policy 17 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
18. Advocate for data sharing between the public and private sectors to effectively evaluate the services' benefits and impacts on communities while protecting data security and privacy	Not Applicable. RTP/SCS Policy 18 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
19. Advocate for technology that is adaptive and responsive to ensure it remains up to date and meets the evolving needs of users and stakeholders	Not Applicable. RTP/SCS Policy 19 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
20. Promote technology that has the capacity to facilitate economic growth, improve workforce development opportunities, and enhance safety and security	Not Applicable. RTP/SCS Policy 20 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
21. Proactively monitor and plan for the development, deployment and commercialization of new technology as it relates to integration with transportation infrastructure	Not Applicable. RTP/SCS Policy 21 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Safety	
22. Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system	Not Applicable. RTP/SCS Policy 22 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
23. Integrate the assessment of equity into the regional transportation safety and security planning process, focusing on the analysis and mitigation of disproportionate impacts on disadvantaged communities	Not Applicable. RTP/SCS Policy 23 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project does not include any components related to regional transportation safety or security.
24. Support innovative approaches for addressing transit safety and security issues so that impacts to transit employees and the public are minimized and those experiencing issues (e.g., unhoused persons) are supported	Not Applicable. RTP/SCS Policy 24 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
25. Support the use of transportation safety and system security data in investment decision-making, including consideration of new highway and transit/rail investments that would address safety and security needs	Not Applicable. RTP/SCS Policy 25 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Funding the System/Users Fees	

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
26. Promote stability and sustainability for core state and federal transportation funding sources	Not Applicable. RTP/SCS Policy 26 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
27. Establish a user fee–based system that better reflects the true cost of transportation, provides firewall protection for new and existing transportation funds, and represents equitable distribution of costs and benefits	Not Applicable. RTP/SCS Policy 27 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project's Traffic Study (EIR *Technical Appendix I*) identifies improvements, fair share contributions, and fee contributions to the County's DIF and/or TUMF programs, which would ensure that all study area intersections would operate at an acceptable Level of Service (LOS).
28. Pursue funding tools that promote access to opportunity and support economic development through innovative mobility programs	Not Applicable. RTP/SCS Policy 28 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
29. Promote national and state programs that include return-to-source guarantees while maintaining the flexibility to reward regions that continue to commit substantial local resources	Not Applicable. RTP/SCS Policy 29 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
30. Leverage locally available funding with innovative financing tools to attract private capital and accelerate project delivery	Not Applicable. RTP/SCS Policy 30 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
31. Promote local funding strategies that maximize the value of public assets while improving mobility, sustainability and resilience	Not Applicable. RTP/SCS Policy 31 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Communities	
Priority Development Areas	
32. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities	Not Applicable. RTP/SCS Policy 32 provides direction to County and regional agency staff and decision makers and is not applicable to the Project, which comprises a minor expansion to an existing rural equestrian-oriented land use that is located in a portion of unincorporated Riverside County that is planned for such uses.
33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled	Not Applicable. RTP/SCS Policy 33 provides direction to County and regional agency staff and decision makers and is not applicable to the Project, which comprises a minor expansion to an existing rural equestrian-oriented land use that is located in a portion of unincorporated Riverside County that is planned for such uses.
34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles	Not Applicable. RTP/SCS Policy 34 provides direction to County and regional agency staff and decision makers and is not applicable to the Project, which comprises a minor expansion to an existing rural equestrian-oriented

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
traveled	land use that is located in a portion of unincorporated Riverside County that is planned for such uses.
Housing the Region	
35. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region	Not Applicable. RTP/SCS Policy 35 provides direction to County and regional agency staff and decision makers and is not applicable to the Project, which comprises a minor expansion to an existing rural equestrian-oriented land use that is located in a portion of unincorporated Riverside County that is planned for such uses.
36. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities	Not Applicable. RTP/SCS Policy 36 provides direction to County and regional agency staff and decision makers and is not applicable to the Project, which comprises a minor expansion to an existing rural equestrian-oriented land use that is located in a portion of unincorporated Riverside County that is planned for such uses.
37. Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region	Not Applicable. RTP/SCS Policy 37 provides direction to County and regional agency staff and decision makers and is not applicable to the Project, which comprises a minor expansion to an existing rural equestrian-oriented land use that is located in a portion of unincorporated Riverside County that is planned for such uses. Notwithstanding, the Project would accommodate 18 proposed employee modular housing units, which would provide for affordable housing opportunities for site employees.
38. Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region	Consistent. The Project would accommodate 18 proposed employee modular housing units, which would provide for affordable housing opportunities for site employees and would contribute to meeting the housing needs within the region.
39. Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities that have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups	Not Applicable. RTP/SCS Policy 39 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
40. Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the communities with the greatest needs and vulnerabilities	Not Applicable. RTP/SCS Policy 40 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
41. Support efforts to increase housing and services for people experiencing homelessness across the region	Not Applicable. RTP/SCS Policy 41 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
15-Minute Communities	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses	Not Applicable. RTP/SCS Policy 42 is intended to promote a diversity of land uses within urban areas in order to reduce vehicular trips. The Project site is located in a rural portion of unincorporated Riverside County and does not include the types of urban land uses addressed by this policy. Accordingly, Policy 42 is not applicable to the proposed Project.
43. Support communities across the region to realize 15-minute communities through incremental changes that improve equity, quality of life, public health, mobility, sustainability, resilience and economic vitality	Not Applicable. RTP/SCS Policy 43 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
44. Encourage efforts that elevate innovative approaches to increasing access to neighborhood destinations and amenities through an array of people-centered mobility options	Not Applicable. RTP/SCS Policy 44 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Equitable Engagement and Decision-Making	
45. Advance community-centered interventions, resources and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long-term	Not Applicable. RTP/SCS Policy 45 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
46. Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice	Not Applicable. RTP/SCS Policy 46 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
47. Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in planning processes	Not Applicable. RTP/SCS Policy 47 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Environment	
Sustainable Development	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience	Consistent. As presented throughout this EIR, the Project's impacts to the environment would be less than significant or would be reduced to less-than-significant levels with the implementation of mitigation measures. Additionally, the analysis presented in EIR Subsection 4.5, *Energy*, with mandatory compliance with applicable federal and State regulations and requirements, including the provisions of the Title 24 Building Energy Standards, Project construction and operation would not result in the inefficient, wasteful, or unnecessary consumption of energy.

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
49. Support communities across the region to advance innovative sustainable development practices	Not Applicable. RTP/SCS Policy 49 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
50. Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability	Not Applicable. RTP/SCS Policy 50 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Air Quality	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts	Consistent. As evaluated herein and in EIR Subsections 4.2, *Air Quality*, and 4.6, *Greenhouse Gas Emissions*, applicable regulations and design requirements have been imposed on the Project to reduce the Project's air quality emissions, and the Project's air quality and GHG emissions impacts were determined to be less than significant.
52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions	Not Applicable. RTP/SCS Policy 52 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
53. Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities	Not Applicable. RTP/SCS Policy 53 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Clean Transportation	
54. Accelerate the deployment of a zero-emission transportation system and use near-zero-emission technology to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable	Not Applicable. RTP/SCS Policy 54 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
55. Promote equitable use of and access to clean transportation technologies so that all may benefit from them	Not Applicable. RTP/SCS Policy 55 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
56. Consider the full environmental life cycle of clean transportation technologies, including upstream production and end of life as an important part of meeting SCAG's objectives in economic development and recovery, resilience planning and achievement of equity	Not Applicable. RTP/SCS Policy 56 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
57. Maintain a technology-neutral approach in the study of, advancement of and investment in clean transportation technology	Not Applicable. RTP/SCS Policy 57 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Natural and Agricultural Lands Preservation	
58. Prioritize the climate mitigation, adaptation,	Not Applicable. RTP/SCS Policy 58 provides direction to

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
resilience and economic benefits of natural and agricultural lands in the region	County and regional agency staff and decision makers and is not applicable to the proposed Project.
59. Support conservation of habitats that are prone to hazards exacerbated by climate change, such as wildfires and flooding	Not Applicable. RTP/SCS Policy 59 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
60. Support regional conservation planning and collaboration across the region	Not Applicable. RTP/SCS Policy 60 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
61. Encourage the protection and restoration of natural habitat and wildlife corridors	Not Applicable. RTP/SCS Policy 61 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. Additionally, the Project site is not targeted for conservation under the MSHCP (as discussed in detail in EIR Subsection 4.3, *Biological Resources*), as documented in the previously-approved Habitat Acquisition and Negotiation Strategy (HANS) No. 2039 and JPR 10-12-27-01.
62. Encourage the conservation and viability of agricultural lands to protect the regional and local food supply and ensure the sustainability of local agriculture as a vital part of the region's economy	Not Applicable. RTP/SCS Policy 62 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project. In addition, the Project site is located in an area that is planned for future development, and the Project site contains no active agricultural uses under existing conditions.
63. Encourage policy development of the link between natural and agricultural conservation with public health	Not Applicable. RTP/SCS Policy 63 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Climate Resilience	
64. Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened	Not Applicable. RTP/SCS Policy 64 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
65. Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors	Not Applicable. RTP/SCS Policy 65 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
66. Support nature-based solutions to increase regional resilience of the natural and built environment	Not Applicable. RTP/SCS Policy 66 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
67. Promote sustainable water use planning, practices and storage that improve regional water security and resilience in a drier environment	Not Applicable. RTP/SCS Policy 67 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
68. Support an integrated planning approach to help	Not Applicable. RTP/SCS Policy 68 provides direction to

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
local jurisdictions meet housing production needs in a drier environment	County and regional agency staff and decision makers and is not applicable to the proposed Project.
Economy	
Goods Movement	
69. Leverage and prioritize investments, particularly where there are mutual co-benefits to both freight and passenger/commuter rail	Not Applicable. RTP/SCS Policy 69 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
70. Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly around deployment of zero-emission and clean technologies and their supporting infrastructure	Not Applicable. RTP/SCS Policy 70 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
71. Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable	Not Applicable. RTP/SCS Policy 71 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
72. Advance comprehensive, systems-level planning of corridor/supply chain operational strategies that is integrated with road and rail infrastructure and inland port concepts	Not Applicable. RTP/SCS Policy 72 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
73. Ensure continued, significant investment in a safe, secure, clean and efficient transportation system – including both highways and rail – to support the intermodal movement of goods across the region	Not Applicable. RTP/SCS Policy 73 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Broadband	
74. Support ubiquitous regional broadband deployment and access to provide the necessary infrastructure and capability for Smart Cities strategies—to ensure the benefits of these strategies improve safety and are distributed equitably	Not Applicable. RTP/SCS Policy 74 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
75. Develop networks that are efficient, scalable, resilient and sustainable to support transportation systems management, operations services and "tele-everything" strategies that reduce vehicle miles traveled, optimize efficiency and accommodate future growth of regional economies	Not Applicable. RTP/SCS Policy 75 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
76. Encourage investments that provide access to digital activities that support educational, financial and economic growth	Not Applicable. RTP/SCS Policy 76 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
77. Advocate for current, accurate data to identify opportunity zones and solutions that support the development of broadband services to community anchor institutions and local businesses	Not Applicable. RTP/SCS Policy 77 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
78. Promote an atmosphere that allows for healthy	Not Applicable. RTP/SCS Policy 78 provides direction to

Table 4.8-2 Analysis of Consistency with Connect SoCal Goals

2024-2050 RTP/SCS Regional Planning Policies	Project Consistency
competition and speed-driven innovative solutions while remaining technologically neutral	County and regional agency staff and decision makers and is not applicable to the proposed Project.
79. Use a bottom-up approach to identify and support a community's broadband needs	Not Applicable. RTP/SCS Policy 79 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Universal Basic Mobility	
80. Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education and basic services	Not Applicable. RTP/SCS Policy 80 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
81. Promote increased payment credentials for disadvantaged community members and the transition of cash users to digital payment technologies to address payment barriers	Not Applicable. RTP/SCS Policy 81 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Workforce Development	
82. Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions and employers	Not Applicable. RTP/SCS Policy 82 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
83. Encourage inclusive workforce development that promotes upward economic mobility	Not Applicable. RTP/SCS Policy 83 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
84. Support entrepreneurial growth with a focus on underrepresented communities	Not Applicable. RTP/SCS Policy 84 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
85. Foster a resilient workforce that is poised to effectively respond to changing economic conditions (e.g., market dynamics, technological advances and climate change)	Not Applicable. RTP/SCS Policy 85 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
86. Inform and facilitate data-driven decision-making about the region's workforce	Not Applicable. RTP/SCS Policy 86 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
Tourism	
87. Consult and collaborate with state, county and local agencies within the region that are charged with promoting tourism and transportation	Not Applicable. RTP/SCS Policy 87 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.
88. Encourage the reduced use of cars by visitors to the region by working with state, county and local agencies (e.g., park services, transportation agencies) to highlight and increase access to alternative options, including transit, passenger rail and active transportation	Not Applicable. RTP/SCS Policy 88 provides direction to County and regional agency staff and decision makers and is not applicable to the proposed Project.

C. Land Use Compatibility

The Project as evaluated herein consists 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, approval of which would permit an expansion of the permitted activities at the existing facility. New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed CUP 02303R1 would include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, and a metal solar shade structure placed over an existing arena, in addition to additional area for equestrian RV park use. Existing structures that would be permitted with the Project include an existing 1,513 s.f. barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. Additionally, areas are proposed where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future; the design of these areas would be subject to future County review and approvals. Exception No. 9 to Riverside County Noise Ordinance No. 847 is required pursuant to Section 7.a.3 of Riverside County Ordinance No. 847 in order to allow exterior sound amplification to 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. CZ 22000010 is a proposal to amend Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348 to modify the definitions of certain use types; modify the list of conditionally permitted uses within the WC-E zone; slightly modify the General Standards applicable to the WC zone to prohibit parking on public streets during special occasions; modify the development standards for Class II equestrian establishments; and add new development standards for Lodging Facilities, Wine Country Equestrian Park Model Lodging, and Equestrian Recreation Vehicle Parks.

California Government Code Section 65860 requires that a county zoning ordinance be consistent with the county's adopted general plan. A zoning ordinance is consistent with a general plan if it furthers the objectives and policies of the general plan and does not obstruct their attainment. The proposed CZ 22000010 is a text amendment to Ordinance No. 348 affecting the WC-E zone and does not alter the Project site's General Plan land use designation of RR or its location within the TVWCPA – Equestrian District. The following analysis demonstrates that the proposed zone text amendment is consistent with the Riverside County General Plan and SWAP.

First, the WC-E zone exists expressly to implement the TVWCPA, the Equestrian District policies of the SWAP, and in particular SWAP Policies 1.2, 1.17, and 1.18, which encourage equestrian establishments that promote the equestrian lifestyle, permit incidental commercial uses such as horse racing tracks, polo grounds, event grounds, and special occasion facilities in conjunction with commercial equestrian establishments, and promote harmonious coexistence of the Winery, Equestrian, and Residential Districts through implementing zones. CZ 22000010 directly advances these policies by refining the WC-E zone's development standards to more precisely define and regulate the equestrian, lodging, and recreational vehicle park uses that SWAP Policies 1.17 and 1.18 anticipate. Rather than expanding the range of uses permitted in the WC-E zone beyond what the SWAP authorizes, CZ 22000010 provides the specific standards necessary to implement those authorized uses in an orderly manner consistent with the equestrian character of the TVWCPA.

Second, the proposed modifications to the WC-E zone's development standards, including the addition of standards for Lodging Facilities, Wine Country Equestrian Park Model Lodging, and Equestrian Recreation Vehicle Parks, are consistent with the General Plan Land Use Element's authorization of "limited recreational uses" and "neighborhood-serving small-scale commercial uses" within the RR land use designation. The lodging and recreational vehicle park uses addressed by CZ 22000010 are ancillary to and supportive of the primary equestrian use of the property and are directly tied to equestrian events at the facility. These uses do not alter the rural, equestrian-oriented character of the RR designation and the TVWCPA – Equestrian District.

Third, the proposed modification to the General Standards for the WC zone to prohibit parking on public streets during special occasions directly advances the Circulation Element's policy of maintaining roadway levels of service and the SWAP's Circulation policies, including SWAP Policies 17.1 and 17.2, by reducing potential conflicts between event-related traffic and public roadways in the Wine Country area.

Fourth, Riverside County reviewed the proposed CZ 22000010 as part of its comprehensive review of the proposed Project for compliance with all applicable goals and policies of the General Plan, and determined that the proposed zone text amendment would not conflict with any General Plan policy adopted for the purpose of avoiding or mitigating an environmental effect. This determination is consistent with the analysis above. Accordingly, the proposed CZ 22000010 is consistent with the Riverside County General Plan and SWAP pursuant to Government Code Section 65860. The Board of Supervisors may make the required consistency finding upon approval of the Project.

The Project's proposed land uses would be fully compatible with all existing and planned land uses in the surrounding area, as the equestrian and events-oriented land uses that would be accommodated by the Project are consistent with the intent of the Wine Country – Equestrian District portion of the SWAP. In addition, impacts associated with the Project's potential land use compatibility with surrounding uses have been evaluated throughout this EIR under the appropriate subject headings. For example, EIR Subsection 4.2, *Air Quality*, includes an assessment of potential localized air quality impacts that could result from Project implementation. As concluded in EIR Subsection 4.2, the Project's localized air quality impacts affecting surrounding sensitive receptors would be less than significant. EIR Subsection 4.9, *Noise*, includes an assessment of potential noise impacts associated with the Project, including noise that would be generated by loudspeakers during events at the facility (i.e., announcements, music, etc.), and concludes that Project impacts would be less than significant at all sensitive receptor locations, including at nearby properties that consist of noise-sensitive equestrian-oriented uses. There are no environmental effects to surrounding existing or planned land uses that have not already been evaluated throughout this EIR, and where necessary mitigation measures have been imposed on the Project to reduce potential impacts to less-than-significant levels. As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the full range of activities occurring at Galway Downs under the 2023 operational baseline, including equestrian events, sports events, and special occasion events, has coexisted with the surrounding RR, WC-E, A-1-10, and R-A-10 designated and zoned lands continuously since 1968, and the Project would not introduce any operational activities beyond that established baseline. Therefore, the Project's potential impacts due to land use compatibility would be less than significant.

4.8.6 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within the TVWCPA. This cumulative study area was selected because the Temecula Valley Wine Country area comprises a unique community within unincorporated Riverside County that includes similar existing and planned land uses, as well as similar environmental conditions such as climate, topography, etc.

As discussed under the analysis of Threshold a., the proposed Project would be consistent with or otherwise would not conflict with the Riverside County General Plan, SWAP, Temecula Valley Wine Country Community Plan, and Connect SoCal, and the land uses proposed as part of the Project are fully consistent with the range of land uses that occur within the Temecula Valley Wine Country area. Other cumulative developments similarly would be required to demonstrate consistency with applicable plans and policies, and also would be required to demonstrate consistency with surrounding land uses. Thus, the Project's impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-cumulatively considerable.

4.8.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project would not conflict with the General Plan, SWAP, Temecula Valley Wine Country Community Plan, Connect SoCal, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

4.8.8 Regulatory Requirements, Design Features, and Mitigation

Impacts to land use and planning would be less than significant; therefore, mitigation measures are not required. In addition, there are no regulatory requirements or design features specifically relied upon in this subsection to address the Project's less-than-significant impacts to land use and planning.

4.8.9 References

Cited As	Reference
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4.9 NOISE

This EIR Subsection 4.9 addresses the environmental issue of noise. The information in this subsection is based in part on a technical report prepared by Urban Crossroads, Inc. (herein, "Urban Crossroads"), titled "Galway Downs (CUP 2303R1) Noise and Vibration Analysis" (herein, "NIA"), dated March 4, 2026, and included as *Technical Appendix H* to this EIR (UXR, 2026e). Refer to EIR Section 7.0, *References*, for a complete list of reference sources.

4.9.1 Noise Fundamentals

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to a broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies that are audible to the human ear. Table 4.9-1, *Typical Noise Levels*, presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below. (UXR, 2026e, p. 15)

Table 4.9-1 Typical Noise Levels

Common Outdoor Activities	Common Indoor Activities	A-Weighted Sound Level (dBA)	Subjective Loudness	Effects of Noise
Threshold of Pain		140	INTOLERABLE OR DEAFENING	HEARING LOSS
Near Jet Engine		130		
		120		
Jet Fly-Over at 300 m (1,000 ft)	Rock Band	110		
Loud Auto Horn		100	VERY NOISY	
Gas Lawn Mower at 1 m (3 ft)		90		
Diesel Truck at 15 m (50 ft), at 80 km/hr (50 mph)	Food Blender at 1m (3 ft)	80		SPEECH INTERFERENCE
Noisy Urban Area, Daytime	Vacuum Cleaner at 3 m (10 ft)	70	LOUD	
Heavy Traffic at 90 m (300 ft)	Normal Speech at 1 m (3 ft) Large Business Office	60		
Quiet Urban Daytime	Large Business Office	50	MODERATE	
Quiet Urban Nighttime	Theater, Large Conference Room (Background)	40		SLEEP DISTURBANCE
Quiet Suburban Nighttime	Library	30	FAINT	NO EFFECT
Quiet Rural Nighttime	Bedroom at Night, Concert Hall (Background)	20		
	Broadcast/Recording Studio	10	VERY FAINT	
Lowest Threshold of Human Hearing	Lowest Threshold of Human Hearing	0		

Source: Environmental Protection Agency Office of Noise Abatement and Control, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA/ONAC 550/9-74-004) March 1974.Source: (UXR, 2026e, Exhibit 2-1)

A. Range of Noise

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 1,000 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time. (UXR, 2026e, p. 15)

B. Noise Descriptors

Environmental noise descriptors typically are based on average noise levels over time, rather than instantaneous measurements. The most commonly used metric is the equivalent continuous sound level (Leq). Rather than being measured directly, Leq is calculated from A-weighted sound pressure levels (dBA) recorded over a specified period. The Leq represents the constant sound level that, over a given time, would contain the same acoustic energy as the actual fluctuating sound levels. As such, it is widely used to describe average environmental noise exposure. Importantly, while sound pressure levels (e.g., Leq) express the intensity of sound at a specific location and are affected by distance and environmental conditions, sound power levels (Lw) are intrinsic properties of the sound source itself. Unlike sound pressure, sound power is independent of distance and unaffected by obstacles, air absorption, or weather conditions. In contrast, sound pressure levels decrease with distance due to factors such as geometric spreading, absorption by air and surfaces, intervening barriers or obstacles, and meteorological conditions (e.g., wind, humidity). (UXR, 2026e, p. 16)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA Leq sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise-sensitive time periods during the evening and night hours when noise can become more intrusive. CNEL does not represent the actual sound level heard at any time but rather represents the total sound exposure. The County of Riverside relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources. (UXR, 2026e, p. 16)

C. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the factors described below. (UXR, 2026e, p. 16)

1. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (UXR, 2026e, p. 16)

2. Ground Absorption

The propagation path of noise from a highway to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (UXR, 2026e, pp. 16-17)

3. Atmospheric Effects

Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects. (UXR, 2026e, p. 17)

4. Shielding

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an "out of sight, out of mind" effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide, and dense enough to completely obstruct the line-of-sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure. (UXR, 2026e, p. 17)

D. Noise Control

Noise control is the process of obtaining an acceptable noise environment for an observation point or receiver by controlling the noise source, transmission path, receiver, or all three. This concept is known as the source-path-receiver concept. In general, noise control measures can be applied to these three elements. (UXR, 2026e, p. 17)

E. Noise Barrier Attenuation

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however, do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source. (UXR, 2026e, p. 17)

F. Land Use Compatibility with Noise

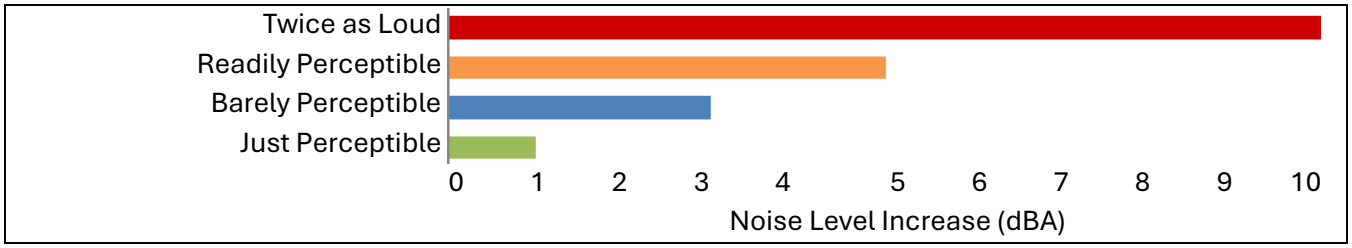
Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. (UXR, 2026e, pp. 17-18)

G. Community Response to Noise

Approximately 16% of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints may occur. Twenty (20) to 30% of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. (UXR, 2026e, p. 18)

Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing. According to research originally published in the *Noise Effects Handbook* published by the United State Department of Transportation (USDOT), the percentage of high annoyance ranges from approximately 0% at 45 dB or less, 10% are highly annoyed around 60 dB, and increases rapidly to approximately 70% being highly annoyed at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels as shown on Figure 4.9-1, *Noise Level Increase Perception*. A change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible. (UXR, 2026e, p. 18)

Figure 4.9-1 Noise Level Increase Perception



Source: (UXR, 2026e)

H. Vibration

Per the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. (UXR, 2026e, p. 18)

Additionally, in contrast to airborne noise, ground-borne vibration outdoors is not a common environmental problem, and annoyance from ground-borne vibration is almost exclusively an indoor phenomenon. Therefore, the effects of vibrations should only be evaluated at a structure, and the effects of the building structure on the vibration should be considered. Wood-frame buildings, such as typical residential structures, are more easily excited by ground vibration than heavier buildings. In contrast, large masonry buildings with spread footings have a low response to ground vibration. In general, the heavier a building is, the lower the response will be to the incident vibration energy. However, all structures reduce vibration levels due to the coupling of the building to the soil. (UXR, 2026e, p. 19)

There are several methods used to quantify vibration levels. Peak Particle Velocity (PPV) is defined as the maximum instantaneous peak of a vibration signal and is most commonly used to evaluate the impact of vibration on buildings. However, PPV is not always suitable for assessing human response (e.g., annoyance), as the human body does not respond instantly to vibration signals. Instead, it responds to the average amplitude, more accurately represented by the Root Mean Square (RMS) value of the vibration. (UXR, 2026e, p. 19)

RMS is defined as the square root of the average of the squared signal amplitude and is commonly used to evaluate human exposure to vibration. RMS and PPV are mathematically related: RMS is typically about 70% of the PPV for certain waveforms. However, deriving RMS from PPV requires knowing the full waveform or making assumptions (e.g., sinusoidal or steady-state signals). Without this information, converting PPV to RMS introduces uncertainty and provides limited insight, especially in cases involving transient or impact vibrations. (UXR, 2026e, p. 19)

This distinction is important because human annoyance to vibration is often triggered by abrupt, intermittent events, rather than sustained energy levels. Construction-related vibrations are typically impulsive and broadband, in contrast to the continuous, tonal vibrations associated with transit systems. The FTA's RMS-based criteria were developed with train activity in mind and are not well-suited for construction vibration, where perception is driven by factors like suddenness, impact, and repetition. In essence, RMS tends to average out short-duration, high-intensity events – the very events that people find most disturbing. Therefore, for construction activities, PPV-based thresholds, such as those recommended by Caltrans, are more appropriate for assessing potential human annoyance and structural impact. (UXR, 2026e, p. 19)

While not universally accepted, vibration decibel notation (VdB) is another RMS-based vibration notation developed and used by the FTA in their guidance manual to describe vibration levels and provide a background of common vibration levels and set vibration limits. Decibel notation (VdB) serves to reduce the range of numbers used to describe vibration levels and is used in this report to describe vibration levels. (UXR, 2026e, p. 19)

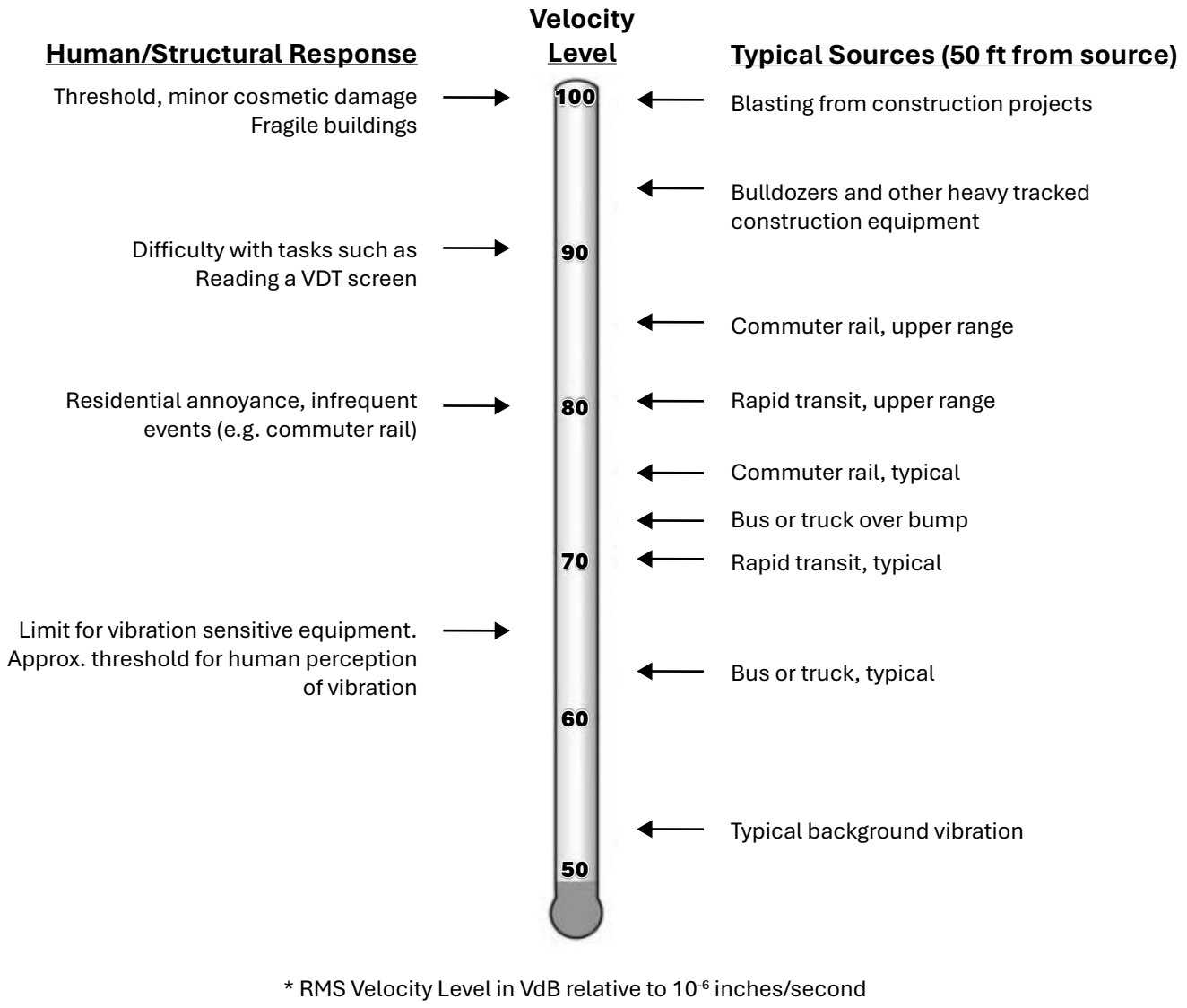
As stated in the FTA guidance manual, the background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Figure 4.9-2, *Typical Levels of Ground-Borne Vibration*, illustrates common vibration sources and the human and structural response to ground-borne vibration. (UXR, 2026e, p. 19)

4.9.2 Existing Conditions

To assess the existing noise level environment, 24-hour noise level measurements were taken at five locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area at the nearest noise-sensitive receivers. Figure 4.9-3, *Noise Measurement Locations*, provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, long-term noise level measurements were collected by Urban Crossroads, Inc. on Wednesday, April 16, 2025. Appendix 5.1 to the Project's NIA (*Technical Appendix H*) includes study area photos. (UXR, 2026e, p. 33)

A. Measurement Procedure and Criteria

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the equivalent daytime and nighttime hourly noise levels. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in



Source(s): UXR, 2026e

Figure 4.9-2

Not to Scale

Typical Levels of Ground-Borne Vibration



Source(s): UXR, 2026e

Figure 4.9-3

Not to Scale

Noise Measurement Locations

"slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (UXR, 2026e, p. 33)

B. Noise Measurement Results

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing equivalent hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that sites must be free of noise contamination by sources other than sources of interest. The guidance indicates to avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources. Further, FTA guidance states that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community. (UXR, 2026e, p. 33)

Based on the recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise-sensitive areas and are used to estimate the future noise level impacts. Collecting noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise increase due to the Project's contribution to the ambient noise levels. This approach is necessary to calculate the temporary or permanent increase in ambient noise levels as required by the California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") Environmental Checklist (Appendix G). (UXR, 2026e, pp. 33, 35)

The noise measurements presented below focus on the equivalent or the hourly energy average sound levels (Leq) to describe the existing ambient conditions. Table 4.9-2, *Ambient Noise Level Measurements*, provides the (energy average) noise levels used to describe the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location depicted on Figure 4.9-3. The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time-varying signal over a given sample period. The daytime and nighttime equivalent noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. (UXR, 2026e, p. 35)

Table 4.9-2 provides the equivalent noise levels used to describe the daytime and nighttime ambient conditions for each of the measurements. Appendix 5.2 to the Project's NIA (*Technical Appendix H*) provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L1, L2, L5, L8,

L25, L50, L90, L95, and L99 percentile noise levels observed during the daytime and nighttime periods. (UXR, 2026e, p. 35)

Table 4.9-2 Ambient Noise Level Measurements

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]		CNEL
		Daytime	Nighttime	
L1	Located southwest of the site near the residence at 44130 Maggie Weed Ln.	47.0	53.7	59.6
L2	Located southeast of the site near the building at 43240 Los Corralitos Rd.	59.0	51.5	60.3
L3	Located east of the site near the 1968 Cellars Winery and Distillery	58.0	51.8	60.0
L4	Located north of the site near the residence at 35879 Belle Chaine Loop	49.4	42.3	51.4
L5	Located northwest of the site near the residence at 43453 Avenida Felicita	60.3	54.6	62.9

1. See Figure 4.9-3 for the noise level measurement locations.
2. Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 of the NIA (EIR *Technical Appendix H*).

Source: (UXR, 2026e, Table 5-1)

4.9.3 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to noise.

A. Federal Regulations

1. Noise Control Act of 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Noise Control Act also serves to (1) establish a means for effective coordination of federal research and activities in noise control; (2) authorize the establishment of federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products.

While primary responsibility for control of noise rests with State and local governments, federal action is essential to deal with major noise sources in commerce, control of which requires national uniformity of treatment. The United States (U.S.) Environmental Protection Agency (USEPA) is directed by Congress to coordinate the programs of all federal agencies relating to noise research and noise control.

2. Federal Transit Administration

The FTA has published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact.

The NVIA also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of RMS velocity levels in decibels, and the criteria for acceptable ground-borne noise expressed in terms of A-weighted sound levels. As shown in Table 4.9-3, *Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use.

Table 4.9-3 Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch /sec)			GBN Impact Levels (dB re 20 micro Pascals)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[4]	65 VdB[4]	65 VdB[4]	N/A[4]	N/A[4]	N/A[4]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
2. “Occasional Events” is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
3. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
5. Vibration-sensitive equipment is generally not sensitive to ground-borne noise.
Source: (FTA, 2006, Table 8-1)

3. Federal Highway Administration (FHWA)

The FHWA is the agency responsible for administering the federal-aid highway program in accordance with federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The Code of Federal Regulations (CFR) Title 23 Part 772 (23 CFR 772), *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a state department of transportation has requested federal funding for participation in a project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design.

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in 23 CFR 772. The regulations require the following during the planning and design of a highway project:

- Identification of traffic noise impacts;
- Examination of potential mitigation measures;
- The incorporation of reasonable and feasible noise mitigation measures into the highway project; and
- Coordination with local officials to provide helpful information on compatible land use planning and control.

The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require that highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of federally aided highway funds for construction or reconstruction of a highway.

4. Construction-Related Hearing Conservation

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels.

This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements and instead evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short

duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.

B. State Regulations

1. Building Standards Code

The State of California's noise insulation standards are codified in the California Code of Regulations (CCR) Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

2. California Noise Insulation Standards

The California Noise Insulation Standards (CCR Title 25 Section 1092) establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, CCR Title 25 specifies that interior noise levels attributable to exterior sources shall not exceed 45 dBA Ldn/CNEL (i.e., the same levels that the USEPA recommends for residential interiors) in any habitable room of a new dwelling. An acoustical study must be prepared for proposed multiple unit residential and hotel/motel structures where outdoor Ldn/CNEL is 60 dBA or greater. The study must demonstrate that the design of the building would reduce interior noise to 45 dBA Ldn/CNEL or lower. Because noise levels can increase over time in developing areas, CCR Title 25 also specifies that dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application.

3. Governor's Office of Land Use and Climate Innovation General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor's Office of Planning and Research (recently renamed the Governor's Office of Land Use and Climate Innovation), provides guidance for local agencies in preparing or updating general plans. The General Plan Guidelines provide direction on the required noise element portion of the general plans. The purpose of the noise element is to limit the exposure of the community to excessive noise levels. Local governments must "analyze and quantify" noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that "minimizes the exposure of community residents to excessive noise." Noise level contours must be mapped, and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards

must be sufficient to serve as a guideline for compliance with sound transmission control requirements. A general plan's noise element directly correlates to the land use, circulation, and housing elements. The noise element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses.

C. Local Regulations

1. Riverside County General Plan

The Riverside County General Plan Noise Element was adopted to control and abate environmental noise, and to protect the citizens of Riverside County from excessive exposure to noise. The Noise Element specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several polices to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. To protect Riverside County residents from excessive noise, the Noise Element contains the following policies related to the Project: (UXR, 2026e, pp. 21-22)

N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or block walls shall be used.

N 1.3 Consider the following uses noise sensitive and discourage these uses in areas in excess of 65 CNEL:

- *Schools*
- *Hospitals*
- *Rest Homes*
- *Long Term Care Facilities*
- *Mental Care Facilities*
- *Residential Uses*
- *Libraries*
- *Passive Recreation Uses*
- *Places of Worship*

N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County.

N 4.1 Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:

a. 45 dBA 9-minute L_{eq} between 10:00 p.m. and 7:00 a.m.;

b. 65 dBA 9-minute L_{eq} between 7:00 a.m. and 10:00 p.m.

N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable standards.

N 13.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse impacts on surrounding areas.

N 13.3 Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the [County] for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as:

i. Temporary noise attenuation fences;

ii. Preferential location and equipment; and

iii. Use of current noise suppression technology and equipment.

N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.

N 16.3 Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.

To ensure noise-sensitive land uses are protected from high levels of noise (N 1.1), Table N-1 of the Noise Element identifies guidelines to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Noise Element identifies residential use as a noise-sensitive land use (N 1.3) and discourages new development in areas with transportation-related levels of 65 dBA CNEL or greater existing ambient noise levels. To prevent and mitigate noise impacts for its residents (N 1.5), Riverside County requires exterior noise attenuation measures for sensitive land use exposed to transportation-related noise levels higher than 65 dBA CNEL. In addition, Riverside County has adopted an interior noise level limit of 45 dBA CNEL. (UXR, 2026e, p. 22)

Policy N 4.1 of the Noise Element sets a stationary-source exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. To prevent high levels of construction noise from impacting noise-sensitive land uses, Policies N 13.1 through N 13.3 identify construction noise mitigation requirements for new development located near existing noise-sensitive land uses. (UXR, 2026e, p. 22)

2. Land Use Compatibility Guidelines

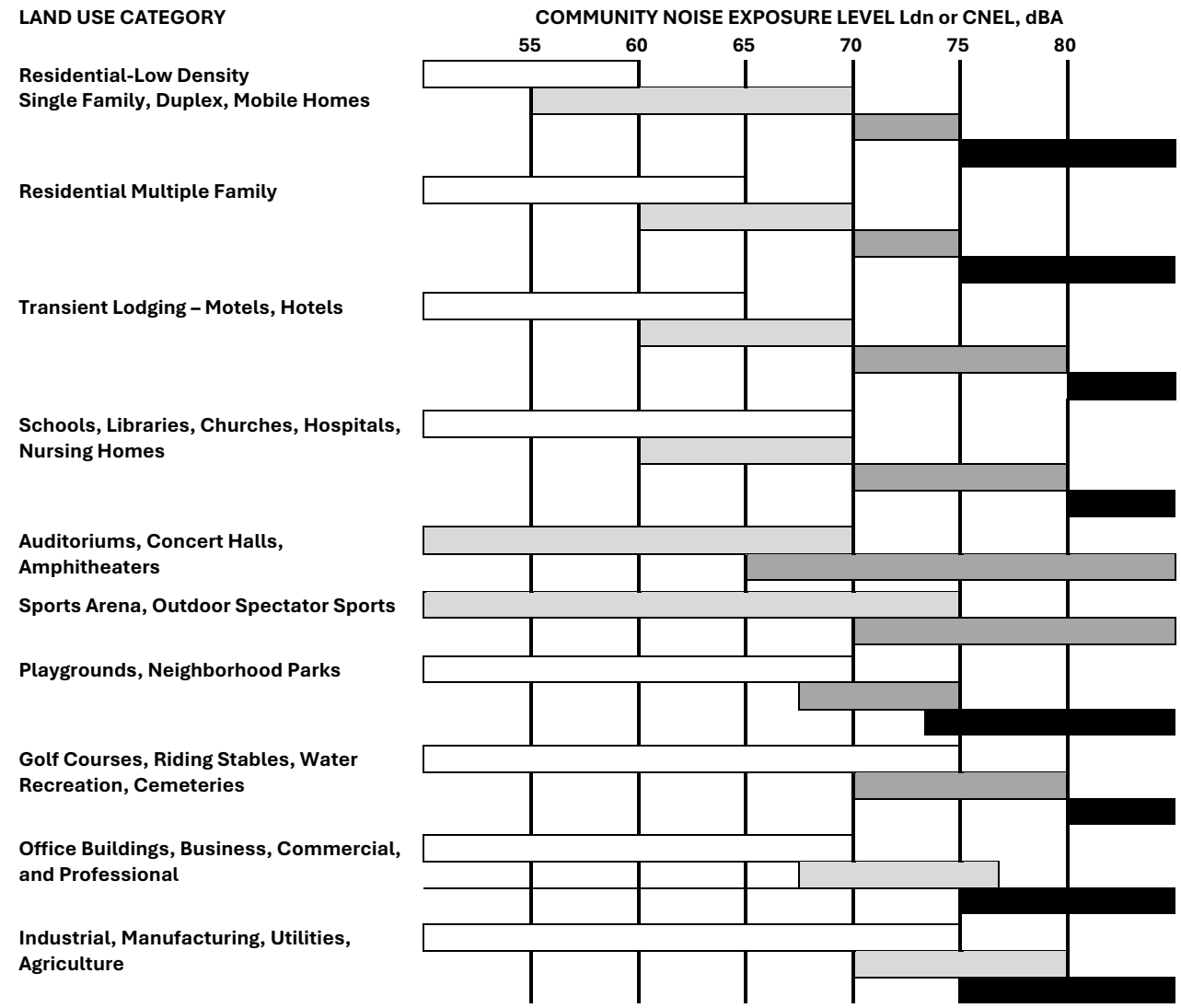
The noise criteria identified in the County of Riverside Noise Element (Table N-1) are guidelines to evaluate the land use compatibility of transportation-related noise. The compatibility criteria, shown on Figure 4.9-4, *Land Use Compatibility for Community Noise Exposure*, provides the County with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. The Land Use Compatibility for Community Noise Exposure matrix describes categories of compatibility and not specific noise standards. Outdoor Spectator Sports are considered conditionally acceptable with unmitigated exterior noise levels of less than 75 dBA CNEL based on the land use compatibility criteria shown on Figure 4.9-4. The proposed riding stables are considered normally acceptable with unmitigated exterior noise levels of less than 75 dBA CNEL. Noise-sensitive low-density residential designated land uses in the Project study area are considered normally acceptable with exterior noise levels below 60 dBA CNEL, and conditionally acceptable with exterior noise levels of up to 70 dBA CNEL. (UXR, 2026e, p. 23)

3. Riverside County Stationary Source Noise Standards

The County of Riverside General Plan Noise Element, Riverside County Ordinance No. 847, and the County of Riverside set generally applicable stationary-source hourly average Leq exterior noise limits that control equestrian activity, special occasion activity, award ceremony activity, wine country lodging, employee housing, parking lot vehicle movements, sports field activity, and announcement/music speakers associated with the development of the Project. The County considers noise generated using motor vehicles to be a stationary noise source when operated on private property, such as at a loading dock or maintenance bay. These facility-related noises, as projected to any portion of any surrounding property containing a habitable dwelling, hospital, school, library, or nursing home, must not exceed the following worst-case noise levels. (UXR, 2026e, p. 23)

Policy N 4.1 of the County of Riverside General Plan Noise Element sets a stationary-source average Leq exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. Section 4 (General Sound Level Standards) of Riverside County Ordinance No. 847 (provided in Appendix 3.1 to the Project's NIA, which is included as EIR *Technical Appendix H*) identifies lower, more restrictive exterior noise level standards, which for the purpose of analysis herein, are used to evaluate potential Project-related operational noise level limits instead of the higher General Plan exterior noise level standards previously identified. The County of Riverside County Code identifies residential exterior noise level limits of 55 dBA Leq during the daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m.; commercial exterior noise level limits of 65 dBA Leq during the daytime hours and 55 dBA Leq during the noise-sensitive nighttime hours; and public facility exterior noise level limits of 65 dBA Leq during the daytime hours and 45 dBA Leq during the noise-sensitive nighttime hours. (UXR, 2026e, p. 23)

Based on several discussions with the County of Riverside Department of Environmental Health (DEH), Office of Industrial Hygiene (OIH), it is important to recognize that the noise level standards set forth in



Legend:

Normally Acceptable: Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded.

Clearly Unacceptable: New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be useable.

Source(s): UXR, 2026e

Figure 4.9-4

Not to Scale

Land Use Compatibility for Community Noise Exposure

Riverside County Ordinance No. 847 incorrectly identify maximum noise level (Lmax) standards that should instead reflect the average Leq noise levels. Moreover, the County of Riverside DEH OIH's April 15, 2015, "Requirements for determining and mitigating, non-transportation noise source impacts to residential properties," also identifies operational (stationary-source) noise level limits using the Leq metric, consistent with the direction of the County of Riverside General Plan guidelines and standards provided in the Noise Element. Therefore, the analysis herein has been prepared consistent with the direction of the County of Riverside DEH OIH guidelines and standards using the average Leq noise level metric for stationary-source (operational) noise level evaluation. (UXR, 2026e, p. 25)

4. Riverside County Construction Noise Standards

The County of Riverside does not establish quantitative construction noise standards; instead, the County has established limits to the hours of construction activities. Section 2i of Riverside County Ordinance No. 847, *Regulating Noise*, indicates that noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. The County's General Plan and Ordinance No. 847 do not establish numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. (UXR, 2026e, p. 25)

Riverside County typically relies on a less restrictive 85 dBA Leq construction noise level threshold adopted from the *Criteria for Recommended Standard: Occupational Noise Exposure* prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction-related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3 dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. (UXR, 2026e, p. 25)

To prevent long periods of exposure to high noise levels, the Occupational Safety and Health Administration (OSHA) requires hearing protection to be provided by employers in workplaces where the noise levels may endanger the hearing of their employees, such as construction equipment operators. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. The analysis herein does not consider the noise exposure of construction workers within the Project site but rather evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels for short durations, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment. (UXR, 2026e, p. 25)

According to Caltrans guidance, which is often cited as reference in CEQA documents, construction noise impacts shall not exceed 86 dBA Lmax at 50 feet from the job site activities between the hours of 9:00 p.m. to 6:00 a.m. Equipment and operations are usually at or less than that level, except for blasting, pile drivers

(impact or vibratory), hoe rams, pavement breakers for crack-and-seat operations, and other impact equipment. The Caltrans guidance also suggests that detailed discussions of typical construction equipment noise levels are probably not necessary unless the project involves unusually sensitive receptors or nighttime work or if the project is controversial. Since this limitation is only associated with nighttime activities and does not address the noise level at the point of concern, e.g., a residence, Caltrans's construction criteria similarly were not considered as the appropriate threshold for environmental review. (UXR, 2026e, p. 26)

Further research indicated that the U.S. Department of Transportation guidance for construction published by the Federal Transit Administration (FTA) is appropriate and based on well-documented studies of the effects of construction noise. According to the FTA Transit Noise and Vibration Impact Assessment Manual, local noise ordinances are typically not very useful in evaluating construction noise impacts. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but generally are not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessments. The FTA identifies two types of construction noise assessment criteria: general and detailed. For general construction noise assessments, the analysis is limited to the two noisiest pieces of equipment with an hourly daytime exterior noise level threshold for residential land use of 90 dBA Leq(1hr). However, for long-term construction projects that would expose sensitive receivers to noise for extended periods of time, the FTA considers a daytime 8-hour average exterior construction noise level of 80 dBA Leq(8hr). The absolute FTA thresholds are intended to account for reasonable expectations regarding construction noise during the daytime hours and are intended to protect human health. (UXR, 2026e, p. 26)

5. Riverside County Construction Vibration Standards

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment, such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the Project, vibration-generating activities are appropriately evaluated against standards established under a local agency's Municipal Code, if such standards exist. The County of Riverside, however, does not identify specific construction vibration level limits. Accordingly, Table 19 of the Caltrans *Transportation and Construction Vibration Guidance Manual* indicates that vibration damage may occur to "older residential structures" when exposed to continuous vibration levels exceeding 0.3 PPV (in/sec). (UXR, 2026e, pp. 26-27)

4.9.4 Basis for Determining Significance

A. Significance Thresholds

Section XIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects to noise, and includes the following threshold questions to evaluate a project's impacts on noise:

- *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*
- *Would the project result in the generation of excessive ground-borne vibration or noise levels?*
- *For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

Additionally, the following thresholds are derived from Riverside County's Environmental Assessment Checklist and are used to evaluate the significance of the proposed Project's impacts due to noise. Thus, for purposes of analysis herein, significant impacts to noise would occur if the Project or any Project-related component would:

a. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels;*
b. *For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels;*
c. *Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies; or*
d. *Generate excessive ground-borne vibration or ground-borne noise levels.*

B. Construction-Related Noise and Vibration Limits

1. General Construction Noise Level Limits

As described above, due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessments. The FTA identifies two types of construction noise assessment criteria: general and detailed. For general construction noise assessments, the analysis is limited to the two noisiest pieces of equipment with an hourly daytime exterior noise level threshold for residential land use of 90 dBA Leq(1hr). However, for long-term construction projects that would expose sensitive receivers to noise for extended periods of time, the FTA considers a daytime 8-hour average exterior construction noise level of 80 dBA Leq(8hr). The absolute FTA thresholds are intended to account for reasonable expectations regarding construction noise during the daytime hours and are intended to protect human health. Therefore, to evaluate whether the Project would generate potentially significant short-term noise levels at nearby noise-sensitive residential receiver locations, a conservative daytime exterior construction noise level of 80 dBA Leq is used as a reasonable threshold to assess construction noise level impacts based on the FTA's detailed analysis of construction noise criteria. (UXR, 2026e, p. 26)

2. Construction Vibration Standards

As described above, the County of Riverside does not identify specific construction vibration level limits. Therefore, for analysis purposes, and based on Table 19 of the Caltrans *Transportation and Construction Vibration Guidance Manual*, vibration damage is used herein to assess potential temporary construction-related impacts at adjacent building locations. The nearest noise-sensitive buildings adjacent to the Project site can best be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec). Thus, Project-related construction activities would result in a significant impact if nearby sensitive receptor locations (i.e., structures) are exposed to vibration levels exceeding 0.3 PPV (in/sec). (UXR, 2026e, pp. 26-27)

C. Operational Noise Level Increases

Noise level increases resulting from the Project are evaluated at the closest sensitive receiver locations. For the evaluation of noise level increases resulting from the Project under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the "ambient environment". In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. (UXR, 2026e, p. 29)

Sensitive receivers generally are defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (UXR, 2026e, p. 39)

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (Leq). (UXR, 2026e, p. 29)

As previously stated, the approach used herein recognizes that there is no single noise increase that renders a noise impact significant, based on a 2008 California Court of Appeals ruling on *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for purposes of analysis herein, a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the without-project noise levels are below 60 dBA. Per the FICON recommendations, in areas where the without-project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without-project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use are exceeded, since it likely contributes to an existing noise exposure exceedance. (UXR, 2026e, p. 29)

The FICON guidance provides an established source of criteria to assess the impacts of a substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA, depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increase and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. (UXR, 2026e, p. 30)

D. Vibration

As described above, vibration impacts originating from the construction of the Project are appropriately evaluated using standards established by Table 19 of the Caltrans *Transportation and Construction Vibration Guidance Manual*. Caltrans' vibration thresholds for building damage are used in this noise study to assess potential operational and temporary construction-related impacts at adjacent building locations. A maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec) is used to describe the nearest residential buildings adjacent to the Project site. (UXR, 2026e, p. 30)

E. Summary of Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 4.9-4, *Noise Significance Criteria Summary*, shows the significance criteria summary matrix that includes the allowable criteria used to identify potentially significant incremental noise level increases. (UXR, 2026e, p. 31)

4.9.5 Methodology

A. Overview

The analyses of potential noise impacts are based on the nature and degree of noise and vibration that would be generated by the Project during construction and long-term operation, along with how such noise and

Table 4.9-4 Noise Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Operational	Noise-Sensitive	Residential Exterior Noise Level[1]	55 dBA Leq	45 dBA Leq
		If ambient is < 60 dBA Leq[2]	≥ 5 dBA Leq Project increase	
		If ambient is 60 - 65 dBA Leq[2]	≥ 3 dBA Leq Project increase	
		If ambient is > 65 dBA Leq[2]	≥ 1.5 dBA Leq Project increase	
Construction	Noise-Sensitive	Exterior Noise Level Threshold[3]	80 dBA Leq	
		Exterior Noise Level Increase[4]	20 dBA Leq	
		Vibration Level Threshold[5]	0.3 PPV (in/sec)	

1. County of Riverside General Plan Municipal Code, Section 9.52.040.
2. FICON, 1992.
3. Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
4. Reasonable daytime increase that can be tolerated without significant adverse effects.
5. Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
Source: (UXR, 2026e, Table 4-1)

vibration are likely to affect noise-sensitive receivers in the vicinity of the Project site. The analysis of potential noise impacts is based on a review of applicable federal, State, and local regulations and standards, ambient noise measurements collected in the vicinity of the Project site, reference noise level measurements collected at similar activities and equipment, and computer-based noise modeling. Specific information sources consulted in the preparation of this analysis include: the FTA Transit Noise and Vibration Impact Assessment Manual; the FHWA Roadway Construction Noise Model (RCNM); the Caltrans Transportation and Construction Vibration Guidance Manual; the FICON guidance for assessing project-generated increases in noise levels; the French Valley Airport Land Use Compatibility Plan (ALUCP); the Riverside County General Plan Noise Element and applicable Land Use Compatibility Guidelines, Stationary Source Noise Standards, Construction Noise Standards, and Construction Vibration Standards; the Project's NIA (EIR *Technical Appendix H*); reference noise level measurements collected by Urban Crossroads, Inc. at similar activities; ambient noise measurements collected at sensitive receiver locations in the vicinity of the Project site; and the CadnaA Computer Aided Noise Abatement modeling software, prepared in accordance with the ISO 9613-2 protocol. The methodology used to evaluate the Project's potential noise impacts is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County. The site includes existing physical features and uses that generate noise under baseline conditions, including a horse racetrack with associated equestrian activities and announcements, polo fields, stables, barns, arenas (including the Sycamore Arena, Grand Prix Arena, Clock Tower Arena, Derby Arena, Eucalyptus Arena, Oval Warm-Up Area, and Upper Pauba Arena), training tracks, lodging facilities, retail and restaurant/dining buildings, an existing clock tower house, an existing pavilion area in the southwest portion of the site, recreational vehicle uses

with associated club house, permanent and temporary parking areas, and existing sound amplification associated with the equestrian and clubhouse uses.

The baseline noise environment surrounding the Project site is characterized by a combination of vehicular traffic on Pauba Road, Los Caballos Road, Los Corralitos Road, and State Route 79; agricultural and equestrian operations at neighboring properties; winery operations and associated activities; and the noise generated by ongoing operations at the Galway Downs facility itself. Ambient noise measurements collected at five noise measurement locations in the vicinity of the Project site, as described in EIR subsection 4.9.2 and depicted on Figure 4.9-3, document baseline noise levels at the nearest noise-sensitive land uses and serve as the basis for evaluating noise levels at the eight off-site receiver locations identified in the subsections that follow.

Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential noise impacts evaluates the incremental change in noise and vibration attributable to the proposed Project relative to the baseline noise environment described above, as it existed at the Project site at the time the NOP for this EIR was published (January 14, 2025), taking into account that the operational characteristics of the Galway Downs facility that would be permitted by proposed CUP 02303R1 would be substantially the same as what occurs under existing conditions. The principal operational changes that would be authorized by the Project consist of the formalization, under proposed CUP 02303R1, of multi-use sports field activities that currently occur on the site on weekends and holiday weekends without prior CUP authorization; the formalization of sound amplification activities under Exception No. 9 to Ordinance No. 847, which would allow sound amplification within designated interior portions of the property between 8:00 a.m. and 10:00 p.m. without the need to obtain a separate exception for each event; and the future operation of up to 36 park model lodging units and 18 employee modular housing units.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with limited new physical construction and operational uses that are substantially similar to those already occurring under existing conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to introduce a new noise-generating use into an undeveloped area. The primary analytical questions addressed herein are therefore:

1. Whether the Project site's location relative to the French Valley Airport and the nearest private airstrips would expose people residing or working at the Project site to excessive noise levels;
2. Whether noise generated during the short-term construction of the Project's limited physical improvements would result in a substantial temporary increase in ambient noise levels at off-site noise-sensitive receivers in excess of the applicable Riverside County construction noise standards;
3. Whether long-term operational noise generated by the Project, including incremental noise associated with the formalization of multi-use sports field activities, the formalization of sound amplification activities, the operation of new on-site stationary noise sources (including air conditioning units associated with the new and future structures), and the future operation of up to

36 park model lodging units and 18 employee modular housing units, would result in a substantial permanent increase in ambient noise levels at off-site noise-sensitive receivers in excess of the applicable Riverside County stationary source noise standards or the FICON-based significance criteria; and

4. Whether construction and/or operational activities associated with the Project would generate excessive ground-borne vibration or ground-borne noise levels at off-site sensitive receivers, evaluated against the vibration limits set forth in Table 19 of the Caltrans Transportation and Construction Vibration Guidance Manual.

With respect to long-term traffic-related noise on off-site roadway segments, as discussed in further detail in EIR subsection 3.7.2.A, the maximum daily operational characteristics of the Galway Downs facility that would be permitted by proposed CUP 02303R1 would be the same as what occurs under existing conditions, and the maximum number of attendees at the facility on a daily basis would be restricted by the maximum amount of available parking. Under the proposed Project, peak operations at the facility when multiple events are occurring would be limited to a maximum of 4,639 parking spaces, which is less than the 5,757 one-way vehicular trips documented during 2023 baseline conditions. Accordingly, the proposed Project would not result in an increase in peak daily traffic-related vehicle trips beyond what already occurs under existing conditions, and the analysis of traffic-related noise herein focuses on the limited and short-term construction-related vehicle trips that would occur during the Project's construction phase rather than on long-term operational vehicle trips.

The technical methodology used to evaluate these analytical questions is described in further detail in the subsections that follow, which identify representative off-site noise-sensitive receivers in the vicinity of the Project site, describe the methods used to quantify the Project's anticipated short-term construction noise and vibration levels using the RCNM and Caltrans vibration source data, and describe the methods used to quantify the Project's anticipated long-term operational noise levels using reference noise level measurements collected by Urban Crossroads, Inc. and the CadnaA noise prediction model.

D. Methodology for Calculating Project-Related Noise Impacts

The subsections that follow identify the off-site sensitive receiver locations used to evaluate Project-related noise impacts, describe the methodology used to calculate construction-related noise and vibration levels, and describe the methodology used to calculate long-term operational noise levels.

1. Sensitive Receiver Locations

To assess the potential for long-term operational and short-term construction noise impacts, the following receiver locations, as shown on Figure 4.9-5, *Receiver Locations*, were identified as representative locations for analysis. The selection of receiver locations is based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA, as previously described. Sensitive receivers generally are defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools,



Source(s): UXR, 2026e

Figure 4.9-5

Not to Scale

Receiver Locations

hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (UXR, 2026e, p. 39)

To describe the potential off-site Project noise levels, eight receiver locations in the vicinity of the Project site were identified. Other sensitive land uses in the Project study area that are located at greater distances than those identified herein would experience lower noise levels than those presented herein due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location. (UXR, 2026e, pp. 39, 41)

- Receptor R1: Receptor R1 represents the existing residence at 43540 Avenida Felicita, approximately 1,215 feet northwest of the Project site. Receptor R1 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- Receptor R2: Receptor R2 represents the existing residence at 35328 De Portola Road, approximately 1,254 feet northwest of the Project site. Receptor R2 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- Receptor R3: Receptor R3 represents the existing residence at 35536 Belle Chaine Loop, approximately 1,470 feet northwest of the Project site. Receptor R3 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- Receptor R4: Receptor R4 represents the existing residence at 35897 Belle Chaine Loop, approximately 1,146 feet northwest of the Project site. Receptor R4 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- Receptor R5: Receptor R5 represents the existing residence at 36435 Mustang Circle, approximately 429 feet east of the Project site. Receptor R5 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.
- Receptor R6: Receptor R6 represents the existing residence at 38831 Pauba Road, approximately 187 feet south of the Project site. Receptor R6 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.

- Receptor R7: Receptor R7 represents the existing residence at 44130 Maggie Weed Lane, approximately 466 feet southwest of the Project site. Receptor R7 is placed in the private outdoor living area (backyard) nearest the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- Receptor R8: Receptor R8 represents the existing residence at 24020 Lawson Road, approximately 914 feet west of the Project site. Receptor R8 is placed in the private outdoor living area (backyard) nearest the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

2. Construction Noise and Vibration Methodology

Construction Noise Methodology

To describe construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the FHWA-published *Roadway Construction Noise Model* (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database provides a comprehensive list of the noise-generating characteristics of specific types of construction equipment. In addition, the database provides a usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. According to the USEPA, FTA, and FHWA, the overall construction noise level is governed primarily by the noisiest pieces of equipment. The quieter pieces do not affect the overall level, but they do reduce the magnitude of the fluctuations in the noise level. Therefore, a rough estimate of the noise level needs only include the noisiest pieces of equipment expected at the site. Consistent with FHWA and FTA guidance for detailed construction noise assessment, Table 4.9-5, *Construction Reference Noise Levels*, presents the combined noise levels for the loudest construction activities expected for each stage, assuming a conservative scenario with all equipment operating simultaneously. (UXR, 2026e, p. 55)

Construction Vibration Methodology

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.9-6, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using the vibration assessment methods defined by Caltrans as described in Subsection 9.6 of the Project's NIA (EIR *Technical Appendix H*). (UXR, 2026e, p. 58)

3. Operational Noise Methodology

Following is a summary of the methodology used to evaluate Project-related operational noise impacts. Refer to Section 8 of the Project's NIA (EIR *Technical Appendix H*) for a complete discussion of the methodology and modeling inputs and assumptions. The operational noise analysis presented herein is

Table 4.9-5 Construction Reference Noise Levels

Construction Stage	Reference Construction Equipment[1]	Reference Noise Level @ 50 Feet (dBA Leq)	Composite Reference Noise Level (dBA Leq)[2]	Reference Power Level (dBA Lw)[3]
Removal of Existing Structures	Front End Loader Backhoe Flat Bed Truck	75 74 70	78.2	109.9
Fine Grading	Scraper Grader Tractor	80 81 80	85.1	116.8
Site Development	Crane Tractor Welder/Torch	73 80 70	81.1	112.8
Paving	Paver Dump Truck Roller	74 72 73	77.8	109.5

1. FHWA Road Construction Noise Model.
2. Represents the combined noise level for all equipment assuming they operate at the same time.
3. Sound power level represents the total amount of acoustic energy (noise level) produced by a sound source independent of distance or surroundings.
Source: (UXR, 2026e, Table 9-1)

Table 4.9-6 Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

Source: (UXR, 2026e, Table 9-5)

intended to describe noise level impacts associated with the expected typical weekday and weekend activities at the Project site. The on-site Project-related noise sources are expected to include equestrian activity, special occasion activity, award ceremony activity, wine country lodging, employee housing, parking lot vehicle movements, sports field activity, and announcement/music speakers. (UXR, 2026e, p. 43)

Reference Noise Levels

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. This section provides a detailed description of the reference noise level measurements shown in Table 4.9-7, *Reference Operational Noise Level Measurements*, were used to estimate the Project's operational noise impacts. It is important to note that the projected noise levels assume the reasonable worst-case noise environment, where all noise source activities are operating simultaneously. This scenario

assumes all activities occur simultaneously including active equestrian uses with amplified announcements and music, a special occasion, a sporting event, and an awards ceremony with all parking lots in use as shown on Figure 4.9-6, *Operational Noise Source Locations*. (UXR, 2026e, p. 43)

Table 4.9-7 Reference Operational Noise Level Measurements

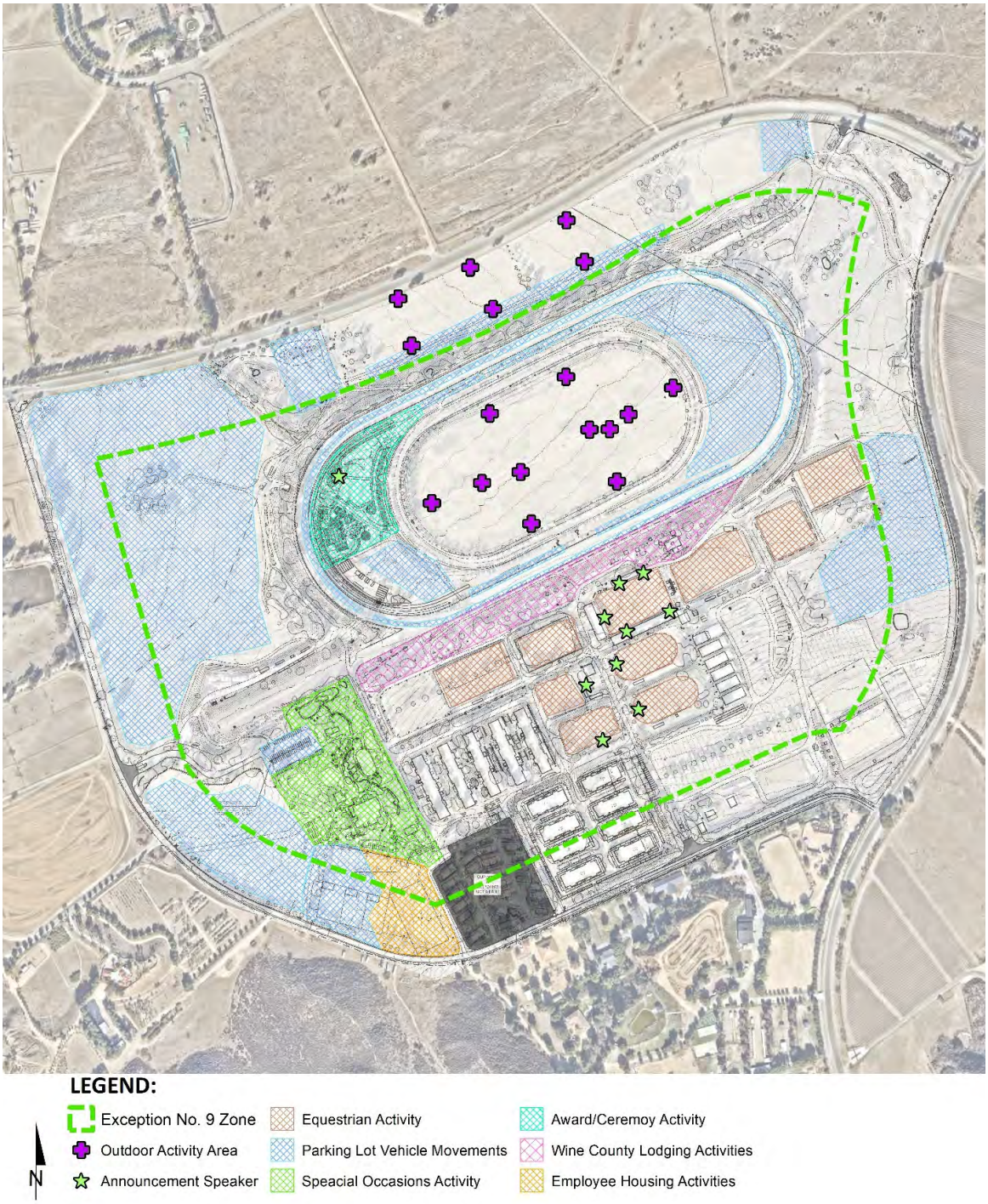
Reference Noise Source[1]	Noise Source Height (feet)	Min./Hour		Reference Noise Level at 50 Feet (dBA Leq)	Sound Power Level (dBA)[2]
		Day	Night		
Equestrian Activity	5'	60	0	66.4	98.0
Special Occasion Activity	5'	60	60	71.6	103.2
Award Ceremony Activity	5'	60	0	70.7	102.3
Wine Country Lodging	5'	45	30	44.4	76.0
Employee Housing	5'	45	30	44.4	76.0
Parking Lot Vehicle Movements	5'	60	60	49.5	81.1
Sports Field Activity	5'	60	0	69.8	101.4
Announcement/Music Speakers	8'	60	0	66.4	98.0

1. Source Level Measured by Urban Crossroads, Inc.
2. Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
3. Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.
Source: (UXR, 2026e, Table 8-1)

The reference noise level measurements presented in Table 4.9-7 were collected using a Larson Davis LxT Type 1 precisions sound level meter (serial number 01146). The LxT sound level meter was calibrated using a Larson-Davis calibrator, Model CAL 200, was programmed in "slow" mode to record noise levels in "A" weighted form and was located at approximately five feet above the ground elevation for each measurement. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (UXR, 2026e, p. 43)

Equestrian Activity

The reference equestrian activities are intended to describe the typical operational noise source levels associated with the Project. This includes dozens of spectators watching riders and talking, tractors sweeping the arena, announcements during events introducing participants, coaches calling out instructions and encouragement, maintenance crews driving by in golf carts, and background operations of other arenas. At a uniform reference distance of 50 feet, Urban Crossroads collected a reference noise level of 66.4 dBA Leq. The equestrian activity noise level measurement represents multiple contests and was taken over a 3-hour period, near the edge of the arena, approximately 100 feet from the center of the activity. Equestrian activities and events are expected to take place throughout the daytime hours with no nighttime activity anticipated. (UXR, 2026e, p. 45)



Source(s): UXR, 2026e

Figure 4.9-6

Not to Scale

Operational Noise Source Locations

Special Occasion Activity

The special occasion activity reference noise level measurement was collected over a period of one hour and 30 minutes and represents a large wedding event with approximately 250 people in attendance, talking in raised voices, and recorded music playing in the background. At a reference distance of 50 feet, Urban Crossroads measured a noise level of 71.6 dBA Leq. Based on current operations, special occasion activities are expected to take place throughout the daytime and nighttime hours within the designated special events area. (UXR, 2026e, p. 45)

Award Ceremony Activity

To describe the noise levels associated with an awards ceremony activity, Urban Crossroads collected a reference noise level measurement of an equestrian awards ceremony. The awards ceremony activity noise levels include several announcements and recognitions for all participants, followed by the announcement of the top three contestants, accompanied by louder celebration music and cheers for each successive winner until the first-place award. The measured reference noise level at the uniform 50-foot reference distance is 70.7 dBA Leq for the awards ceremony activity. Award ceremony activities and events could take place throughout the daytime hours but are not included as a nighttime activity. (UXR, 2026e, pp. 45-46)

Wine Country Lodging Activity

The primary noise source associated with the Wine Country lodging would be the associated mechanical air conditioning units. The reference noise level represents a Carrier Model 24SCA4, 1.5- to 5-ton air conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 44.4 dBA Leq. For modeling purposes, it is assumed that there will be a total of 36 air conditioners within the Wine Country Lodging Area. Based on the typical operating conditions, the air conditioning units are estimated to operate for an average of 45 minutes per hour during the daytime hours and 30 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements. For purposes of analysis, the air conditioning units are expected to be ground-mounted adjacent to the Project buildings. (UXR, 2026e, p. 46)

Employee Housing Activity

Similar to the Wine Country lodging, the primary noise source associated with the employee housing would be the associated mechanical air conditioning units. The reference noise level represents a Carrier Model 24SCA4, 1.5- to 5-ton air conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 44.4 dBA Leq. For modeling, it is assumed there would be a total of 18 air conditioners within the employee housing area. Based on the typical operating conditions, the air conditioning units are estimated to operate for an average of 45 minutes per hour during the daytime hours and 30 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements. For purposes of analysis herein, the air conditioning units are expected to be ground-mounted adjacent to the Project buildings. (UXR, 2026e, p. 46)

Parking Lot Vehicle Movements

To describe the on-site parking lot activity, a long-term reference noise level measurement was collected in the center of activity within the parking lot of a local rural community fair in San Diego County. The parking

lot noise levels are mainly due to cars pulling in and out of parking spaces in combination with car doors opening and closing. At 50 feet from the center of activity, the parking lot produced a reference noise level of 49.5 dBA Leq. Parking activities are expected to take place during the full hour (60 minutes) throughout the daytime. Except for the employee parking area and the special event parking, no nighttime activity is anticipated in the other identified parking areas. (UXR, 2026e, p. 46)

Sports Field Activity

To describe the sports field activity, a reference noise level measurement was collected at a park with four active soccer games being played with large groups of parents along both sides of each field. The noise levels at the soccer games were dominated by parents and coaches shouting encouragement or instructions, punctuated by loud whistle blasts from the referee. Background noise included people talking to each other and to players along the sidelines, as well as conversations on cell phones, and sounds from other nearby games. At 50 feet from the center of activity, the soccer game produced a reference noise level of 69.8 dBA Leq. Activities such as sports field activities are expected to take place during the full hour (60 minutes) throughout the daytime hours. No nighttime activity is anticipated. (UXR, 2026e, pp. 46-47)

Announcement/Music Speakers

To describe the announcement/music speakers that are used at each of the areas, a reference noise level measurement was collected at the edge of the main arena at Galway Downs during an equestrian event in April 2025. The speakers are used to announce riders and other information, such as when the next event will occur, and then music is played over the speakers between events. At 50 feet from the center of activity, the announcement/music speakers produced a reference noise level of 66.4 dBA Leq. The speakers are expected to be active throughout the daytime. The speakers would not be used during nighttime hours (i.e., after 10 p.m.). (UXR, 2026e, p. 47)

CadnaA Noise Prediction Model

To fully describe the exterior operational noise levels from the Project, Urban Crossroads, Inc. developed a noise prediction model using the Computer Aided Noise Abatement (CadnaA) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. Using the ISO 9613-2 protocol, CadnaA will calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source. (UXR, 2026e, p. 47)

Consistent with the ISO 9613-2 protocol, the CadnaA noise prediction model relies on the reference sound power level (Lw) to describe individual noise sources. While sound pressure levels (e.g., Leq) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (Lw) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The operational noise level calculations provided

herein account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used in the analysis to account for mixed ground representing a combination of hard and soft surfaces. This approach ensures a reasonable approximation in environments where both hard and soft surfaces exist, aligning with typical real-world conditions. Appendix 8.1 to the Project's NIA (EIR *Technical Appendix H*) includes the detailed noise dBA Leq model inputs used to estimate the Project operational noise levels. (UXR, 2026e, p. 47)

4.9.6 Impact Analysis

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

The nearest public airport to the Project site is the French Valley Airport, located approximately 7.4 miles northwest of the Project site (Google Earth, 2025). According to Map FV-3 of the French Valley Airport Land Use Compatibility Plan (ALUCP), the Project site is located approximately 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 dBA CNEL associated with the French Valley Airport (ALUC, 2012, Map FV-3). As previously shown in Figure 4.9-4, noise levels below 75 dBA CNEL are considered "Conditionally Acceptable" for outdoor spectator sports uses, "Normally Acceptable" for residential uses (i.e., employee housing), and "Normally Acceptable" for lodging uses. Accordingly, the Project would have no potential to expose people residing or working in the Project area to excessive public airport-related noise levels, and no impact would occur.

The nearest private airstrip to the Project site is Ernst Field, located approximately 10.6 miles northeast of the Project site (Google Earth, 2025). However, due to distance and the limited nature of airstrip operations at Ernst Field, the Project site is not subject to airstrip-related noise levels from Ernst Field. No impact would occur.

In addition, the Project does not include any airport- or airstrip-related components, and there are no components of the proposed Project with the potential to result in an increase in local airport operations. Accordingly, the proposed Project would not expose people residing or working in the Project area to excessive noise levels associated with public airports or private airstrips, and no impact would occur.

Threshold c.:	**Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?**

The Project has the potential to result in the generation of substantial noise levels associated with construction activities, site operations, and Project-related traffic. Each is discussed below.

A. Construction Noise Impacts

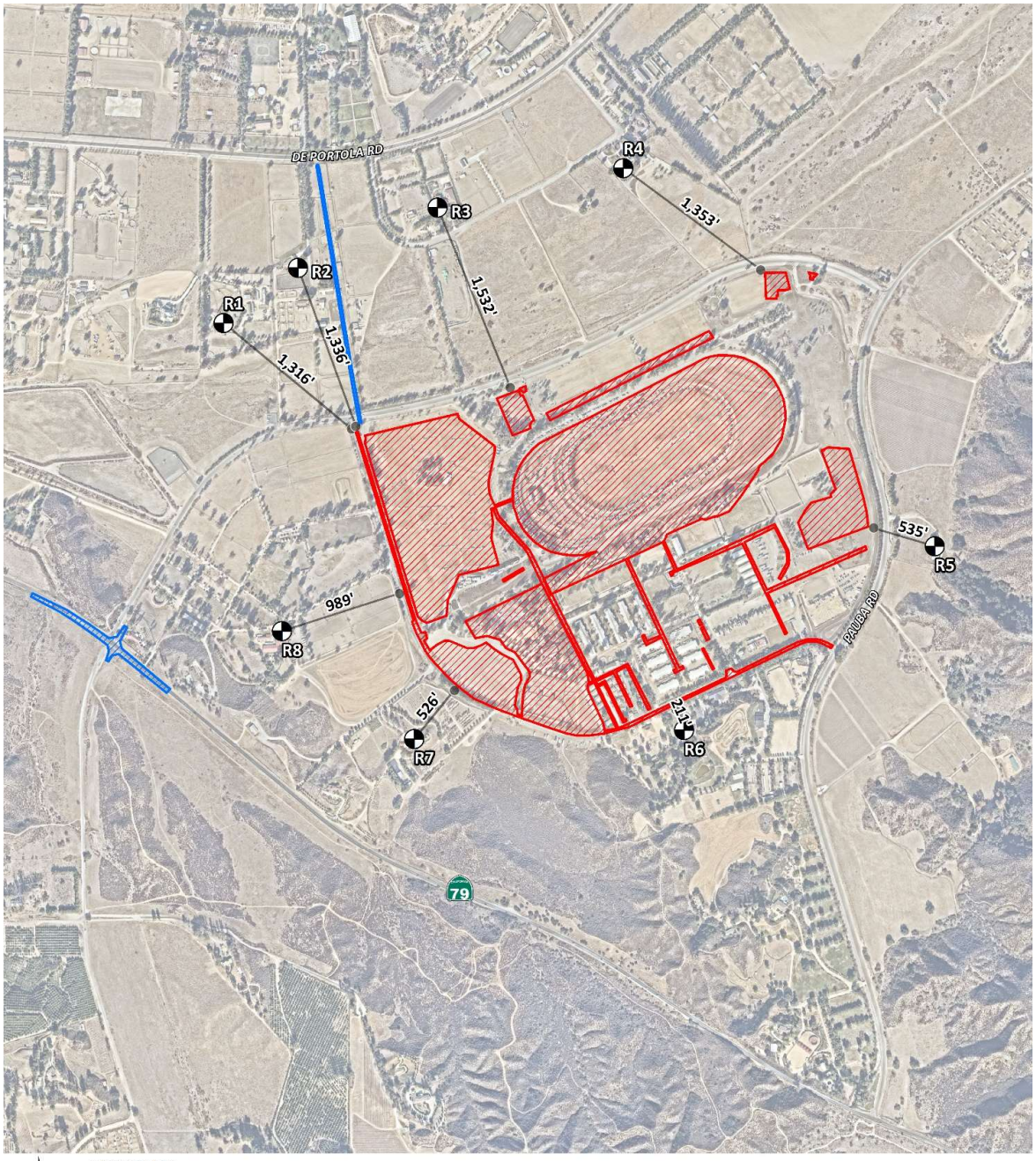
1. On-Site Construction Noise Impacts

Areas that would be physically disturbed with implementation of the Project are depicted on Figure 4.9-7, *Construction Noise Source Locations*, which shows the on-site construction noise source activity in relation to the nearest sensitive receiver locations previously described above in EIR subsection D.D.1 and depicted on Figure 4.9-5. Conservatively, areas that would be used for temporary parking are included although construction activities in temporary parking areas are not anticipated. New physical disturbances on site would occur due to the construction/installation of the proposed restroom building, an awards/ceremony area with podium, a grand pavilion tent, and an office trailer; the future construction of up to 36 park model lodging units and 18 additional employee modular housing units that would be subject to future County approvals; and the installation of new sewer lines throughout the property. As shown on Figure 4.9-7, physical disturbances associated with the proposed Project on-site construction would include approximately 94.49 acres, as well as an additional 5.27 acres off site. It should be noted that the 94.49 acres of physical impacts shown on Figure 4.9-7 conservatively includes any portions of the Project site that could be affected by the Project, including the Project frontages along Los Caballos Road, Los Corralitos Road, and Pauba Road; the proposed reconfigured driveway access locations; all areas on site that could serve as potential parking areas; all areas where new buildings and improvements are proposed; and all areas where minor improvements are proposed to meet Americans with Disabilities Act requirements. (UXR, 2026e, p. 53)

As previously noted, pursuant to Riverside County Ordinance No. 847 noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m. during the months of June through September, and 7:00 a.m. and 6:00 p.m. during the months of October through May. (UXR, 2026e, p. 47)

The FTA *Transit Noise and Vibration Impact Assessment Manual* recognize that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction. Each stage has a specific equipment mix, depending on the work to be completed during that stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project construction activities are expected to occur in the following stages: removal of existing structures; fine grading; site development; and paving. (UXR, 2026e, p. 47)

Construction projects involve various stages, and activities frequently shift from one location to another. For example, during site preparation and grading, noise-generating activities may concentrate in an area for a short period to remove an obstruction, while the majority of the grading involves the equipment moving back and forth in a predictable pattern throughout the site. Building construction and foundation work generally concentrate near the building footprint, while paving generally involves a predictable pattern of movement throughout the site. Therefore, construction activities are best evaluated as multiple moving point sources



Source(s): UXR, 2026e

Figure 4.9-7

Not to Scale

Construction Noise Source Locations

within the construction area since the speed and power of the equipment varies, and the equipment constantly changes position in terms of its distance and direction relative to the receivers. (UXR, 2026e, p. 50)

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts by phase at the nearby sensitive receiver locations were completed. To account for the dynamic nature of construction activities, the CadnaA construction noise analysis evaluates the noise source activities as multiple moving point sources, or construction crews, within the limits of construction. Construction impacts are based on the loudest activity and the highest noise level calculated at each receiver location. As shown in Table 4.9-8, *On-Site Construction Equipment Noise Level Summary*, the construction noise levels are expected to range from 55.4 to 67.6 dBA Leq at the nearby receiver locations. Appendix 9.1 to the Project's NIA (EIR *Technical Appendix H*) includes the detailed CadnaA construction noise model inputs. (UXR, 2026e, p. 50)

Table 4.9-8 On-Site Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA Leq)				
	Removal of Existing Structures	Fine Grading	Site Development	Paving	Highest Levels[2]
R1	48.5	55.4	51.4	48.1	55.4
R2	49.5	56.4	52.4	49.1	56.4
R3	51.1	58.0	54.0	50.7	58.0
R4	52.1	59.0	55.0	51.7	59.0
R5	54.7	61.6	57.6	54.3	61.6
R6	60.7	67.6	63.6	60.3	67.6
R7	53.1	60.0	56.0	52.7	60.0
R8	50.9	57.8	53.8	50.5	57.8

1. Construction noise source and receiver locations are shown on Figure 4.9-7.
2. Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 9.1 to the Project's NIA (EIR *Technical Appendix H*).
Source: (UXR, 2026e, Table 9-2)

To evaluate whether the Project would generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations would satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities, as shown in Table 4.9-9, *On-Site Construction Noise Level Compliance*. Therefore, the noise impacts due to the Project construction noise would be less than significant at all receiver locations. (UXR, 2026e, p. 51)

To describe the temporary Project construction noise contributions to the existing ambient noise environment, the Project construction noise levels were combined with the existing ambient noise levels measurements at the nearest off-site receiver locations. The difference between the combined Project-

Table 4.9-9 On-Site Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	55.4	80	No
R2	56.4	80	No
R3	58.0	80	No
R4	59.0	80	No
R5	61.6	80	No
R6	67.6	80	No
R7	60.0	80	No
R8	57.8	80	No

1. Construction noise source and receiver locations are shown on Figure 4.9-7.
2. Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 4.9-8.
3. Construction noise level thresholds as shown on Table 4.9-4.
4. Do the estimated Project construction noise levels exceed the construction noise level threshold?
Source: (UXR, 2026e, Table 9-3)

construction and ambient noise levels is used to describe the construction noise level contributions. Temporary noise level increases that would be experienced at sensitive receiver locations when the Project construction-source noise is added to the ambient daytime conditions are presented in Table 4.9-10, *On-Site Daytime Construction Noise Increases*. As previously noted, a reasonable 20 dBA increase over the daytime noise limit can be tolerated without significant adverse effects. (UXR, 2026e, p. 51)

Table 4.9-10 On-Site Daytime Construction Noise Increases

Receiver Location[1]	Typical Project Construction Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	55.4	L5	60.3	61.5	1.2	20	No
R2	56.4	L5	60.3	61.8	1.5	20	No
R3	58.0	L4	49.4	58.5	9.1	20	No
R4	59.0	L4	49.4	59.4	10.0	20	No
R5	61.6	L3	58.0	63.2	5.2	20	No
R6	67.6	L2	59.0	68.1	9.1	20	No
R7	60.0	L1	47.0	60.2	13.2	20	No
R8	57.8	L1	47.0	58.1	11.1	20	No

1. Construction noise source and receiver locations are shown on Figure 4.9-7.
2. Typical Project daytime construction noise levels as shown on Table 4.9-9.
3. Reference noise level measurement locations as shown on Figure 4.9-3.
4. Observed daytime ambient noise levels as shown on Table 4.9-2.
5. Represents the combined ambient conditions plus the Project construction activities.
6. The noise level increase expected with the addition of the proposed Project construction activities.
7. Reasonable daytime increase that can be tolerated without significant adverse effects.
Source: (UXR, 2026e, Table 9-4)

As indicated in Table 4.9-10, 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. The construction noise analysis

shows that the nearest receiver locations would not be exposed to construction-related noise increases exceeding the temporary 20 dBA Leq noise level increase significance threshold during Project construction activities. Therefore, the temporary construction noise increase analysis shows that the noise impacts due to daytime Project construction noise would be less than significant. (UXR, 2026e, p. 51)

2. Off-Site Construction Noise Impacts

Off-site disturbances associated with Project-related construction activities would be limited to the construction of the off-site sewer connection between the Project site and De Portola Road; physical disturbances associated with the paving of driveway access points into the Project site and the installation of dedicated acceleration and deceleration lanes at each driveway location along Los Caballos Road (two paved driveways) and Los Corralitos Road (two paved driveways) and the installation of an eastbound left turn lane at the intersection of Los Caballos Road at SR-79. (UXR, 2026e, p. 59)

The activities typically would involve the removal of roadway surfaces, curbs, and gutters, laying of road base, pipes, backfilling, compaction, and paving activities. These activities would generate noise levels similar to site preparation, i.e., approximately 81.1 dBA Leq at 50 feet. The nearest receiver to off-site construction activity is located approximately 90 feet northeast of the intersection of SR-79 and Los Caballos Road, where the Project Applicant would install an eastbound left-turn lane. At a distance of 90 feet, the highest construction noise levels would be approximately 76 dBA Leq, which is less than the 80 dBA Leq threshold. The Project's remaining off-site construction activities, including the installation of the off-site sewer line between the northwest corner of the Project site and De Portola Road, would occur at a farther distance to sensitive receptors than the 90-foot distance cited above, and therefore would be exposed to construction-related noise levels less than 76 dBA Leq. Therefore, off-site construction noise impacts would be less than significant. (UXR, 2026e, p. 59)

B. Operational Noise Impacts

1. On-Site Stationary Noise Impacts

As previously noted, operational noise sources associated with the proposed Project are expected to include equestrian activity, special occasion activity, award ceremony activity, parking lot vehicle movements, sports field activity, and announcement/music speakers, and also would include noise associated with the proposed 36 park model lodging units and 18 additional employee modular housing units that would be subject to future County approvals. Using the reference noise levels (refer to Table 4.9-7) to represent the Project operations that include equestrian activity, special occasion activity, award ceremony activity, wine country lodging, employee housing, parking lot vehicle movements, sports field activity, and announcement/music speakers, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table 4.9-11, *Daytime Project Operational Noise Levels*, shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 42.4 to 49.3 dBA Leq. (UXR, 2026e, pp. 41-42)

Table 4.9-11 Daytime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)							
	R1	R2	R3	R4	R5	R6	R7	R8
Equestrian Activity	31.8	32.5	33.9	35.0	40.8	43.0	36.8	34.4
Special Occasion Activity	30.8	30.9	30.9	30.1	31.7	40.2	40.6	36.3
Award Ceremony Activity	32.3	33.3	34.3	33.4	31.0	34.1	34.1	33.8
Wine Country Lodging	13.1	13.8	15.1	15.8	18.7	21.1	17.8	15.7
Employee Housing	9.1	9.1	9.1	8.5	11.8	23.7	20.7	14.8
Parking Lot Vehicle Movements	20.2	21.1	22.7	23.8	24.6	24.6	26.0	22.8
Sports Field Activity	39.9	41.4	44.0	45.7	42.9	43.1	40.8	40.1
Announcement/Music Speakers	34.6	35.4	36.6	37.1	41.2	45.0	38.8	36.8
Total (All Noise Sources)	**42.4**	**43.5**	**45.6**	**46.9**	**46.8**	**49.3**	**45.9**	**43.9**

1. See Figure 4.9-6 for the noise source locations. CadnaA noise model calculations are included in Appendix 8.1 to the Project's NIA (EIR *Technical Appendix H*).
Source: (UXR, 2026e, Table 8-2)

Table 4.9-12, *Nighttime Project Operational Noise Levels*, shows the Project operational noise levels during the nighttime hours from 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the existing off-site receiver locations are expected to range from 29.9 to 39.8 dBA Leq. The differences between the daytime and nighttime noise levels are largely related to the estimated duration of noise activity as previously outlined in Table 4.9-7. (UXR, 2026e, p. 42)

Table 4.9-12 Nighttime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)							
	R1	R2	R3	R4	R5	R6	R7	R8
Equestrian Activity	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Special Occasion Activity	29.8	29.9	29.9	29.1	30.8	39.2	39.7	35.3
Award Ceremony Activity	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Wine Country Lodging	10.3	11.1	12.3	13.0	15.9	18.4	15.1	13.0
Employee Housing	6.3	6.3	6.3	5.8	9.1	21.0	18.0	12.0
Parking Lot Vehicle Movements	8.9	8.9	8.6	7.6	9.1	17.9	20.2	15.0
Sports Field Activity	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Announcement/Music Speakers	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total (All Noise Sources)	**29.9**	**30.0**	**30.0**	**29.3**	**31.0**	**39.3**	**39.8**	**35.4**

1. See Figure 4.9-6 for the noise source locations. CadnaA noise model calculations are included in Appendix 8.1 to the Project's NIA (*Technical Appendix H*).
Source: (UXR, 2026e, Table 8-3)

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against the County of Riverside exterior noise level standards at nearby receiver locations. Table 4.9-13, *Operational Noise Level Compliance*, shows that the operational noise levels associated with the Project would not exceed the County of Riverside daytime or nighttime exterior noise level standards at the existing nearby noise-sensitive receiver locations. Therefore, the Project's operational noise impacts would be less than significant at all nearby noise-sensitive receiver locations. (UXR, 2026e, p. 42)

Table 4.9-13 Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	42.4	29.9	55.0	45.0	No	No
R2	43.5	30.0	55.0	45.0	No	No
R3	45.6	30.0	55.0	45.0	No	No
R4	46.9	29.3	55.0	45.0	No	No
R5	46.8	31.0	55.0	45.0	No	No
R6	49.3	39.3	55.0	45.0	No	No
R7	45.9	39.8	55.0	45.0	No	No
R8	43.9	35.4	55.0	45.0	No	No

1. See Figure 4.9-5 for the receiver locations.
2. Proposed Project unmitigated operational noise levels as shown in Table 4.9-11 and Table 4.9-12.
3. Exterior noise level standards, as shown in Table 4.9-4.
4. Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
Source: (UXR, 2026e, Table 8-4)

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations that may be potentially impacted by Project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the equation identified in Subsection 8.6 of the Project's NIA (EIR *Technical Appendix H*). The difference between the combined Project and ambient noise levels describes the Project noise increases to the existing ambient noise environment. (UXR, 2026e, pp. 43-44)

Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented in Table 4.9-14, *Daytime Project Operational Noise Level Increases*, and Table 4.9-15, *Nighttime Project Operational Noise Level Increases*, respectively. As indicated in Table 4.9-14, the Project would generate daytime operational noise increases ranging from 0.1 to 2.5 dBA Leq at the nearest receiver locations. Table 4.9-15 shows that the Project would generate nighttime operational noise increases ranging from 0.1 to 0.3 dBA Leq at the nearest receiver locations. Project-related operational noise level increases would not exceed the operational noise level increase significance criteria presented in Table 4.9-4. Therefore, Project-related operational noise level increases at the sensitive receiver locations would be less than significant. (UXR, 2026e, p. 44)

2. Traffic-Related Operational Noise Impacts

As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, rather than solely on the activities expressly

Table 4.9-14 Daytime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	42.4	L5	60.3	60.4	0.1	5.0	No
R2	43.5	L5	60.3	60.4	0.1	5.0	No
R3	45.6	L4	49.4	50.9	1.5	5.0	No
R4	46.9	L4	49.4	51.3	1.9	5.0	No
R5	46.8	L3	58.0	58.3	0.3	5.0	No
R6	49.3	L2	59.0	59.4	0.4	5.0	No
R7	45.9	L1	47.0	49.5	2.5	5.0	No
R8	43.9	L1	47.0	48.7	1.7	5.0	No

1. See Figure 4.9-5 for the receiver locations.
2. Total Project daytime operational noise levels as shown in Table 4.9-11.
3. Reference noise level measurement locations as shown on Figure 4.9-3.
4. Observed daytime ambient noise levels as shown in Table 4.9-2.
5. Represents the combined ambient conditions plus the Project activities.
6. The noise level increase expected with the addition of the proposed Project activities.
7. Significance increase criteria as shown in Table 4.9-4.

Source: (UXR, 2026e, Table 8-5)

Table 4.9-15 Nighttime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	29.9	L5	54.6	54.6	0.0	5.0	No
R2	30.0	L5	54.6	54.6	0.0	5.0	No
R3	30.0	L4	42.3	42.6	0.3	5.0	No
R4	29.3	L4	42.3	42.5	0.2	5.0	No
R5	31.0	L3	51.8	51.8	0.0	5.0	No
R6	39.3	L2	51.0	51.3	0.3	5.0	No
R7	39.8	L1	53.7	53.9	0.2	5.0	No
R8	35.4	L1	53.7	53.8	0.1	5.0	No

1. See Figure 4.9-5 for the receiver locations.
2. Total Project nighttime operational noise levels as shown in Table 4.9-12.
3. Reference noise level measurement locations as shown on Figure 4.9-3.
4. Observed nighttime ambient noise levels as shown in Table 4.9-2.
5. Represents the combined ambient conditions plus the Project activities.
6. The noise level increase expected with the addition of the proposed Project activities.
7. Significance increase criteria as shown in Table 4.9-4.

Source: (UXR, 2026e, Table 8-6)

authorized under the existing CUPs. The 2023 operational dataset, which captures the full range of activities occurring at Galway Downs under baseline conditions, including equestrian events, sports events, and special occasion events, was compiled from data collected by the Project Applicant documenting the number of vehicles that accessed the site for each operational day in 2023, categorized according to event type. Because the proposed Project would not introduce operational activities beyond those reflected in the established 2023 environmental baseline, and because the maximum number of attendees at the facility on any given day would be governed by the parking management plan required as a condition of CUP 02303R1

that limits peak operations to a maximum of 4,639 parking spaces, compared to the 5,757 one-way vehicular trips documented during 2023 baseline conditions, the proposed Project would not result in an increase in peak daily traffic volumes or associated traffic-related noise levels beyond those already occurring under existing conditions. The environmental baseline for traffic-related noise thus represents the worst-case condition, and the proposed Project would not result in any increase in traffic-related noise in the local area relative to that baseline. Accordingly, the Project would not result in any measurable impacts due to traffic-related noise, and no further analysis of traffic-related noise is required. (UXR, 2026e, p. 31)

Threshold d.: Would the Project result in the generation of excessive ground-borne vibration or ground-borne noise levels?

The Project only has the potential to result in the generation of excessive ground-borne vibration or ground-borne noise levels during construction, as the event facility uses proposed as part of the Project would not generate any heavy-duty truck trips and are not associated with excessive ground-borne vibration or ground-borne noise levels. Accordingly, the analysis below focuses on potential vibration impacts during typical construction activities.

Using the vibration source level of construction equipment previously provided in Table 4.9-6 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts. Table 4.9-16, *On-Site Construction Vibration Levels*, presents the expected Project-related vibration levels at the nearby receiver locations. At distances ranging from 211 to 1,532 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.00 to 0.01 PPV in/sec. Based on the maximum acceptable continuous vibration threshold of 0.3 in/sec PPV, typical construction-related vibration from the Project would remain below building damage thresholds at all receiver locations. Therefore, the Project-related vibration impacts would be less than significant during construction activities at the Project site. (UXR, 2026e, p. 53)

4.9.7 Cumulative Impact Analysis

The cumulative study area for the issue of noise includes the Project site as well as areas located within one mile of the Project site. The cumulative study area encompass all of the sensitive receptor locations depicted on Figure 4.9-5 as well as all lands located within 0.5-mile of the nearest sensitive receptor locations. This study area was selected because noise levels dissipate with distance, and because land uses more than one mile from the Project site or more than 0.5-mile from the nearest Project-related sensitive receptors are too far away to cumulatively contribute to Project-related noise increases.

As indicated under the analysis of Thresholds a. and b., the nearest private airstrip occurs approximately 10.6 miles northeast of the Project site, while the Project site is located 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 dBA CNEL. Noise levels below 75 dBA CNEL are considered “Conditionally Acceptable” for outdoor spectator sports uses, “Normally Acceptable” for residential uses (i.e., employee housing), and “Normally Acceptable” for lodging uses. In

Table 4.9-16 On-Site Construction Vibration Levels

Location[1]	Distance to Const. Activity (feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]						Threshold PPV (in/sec)[4]	Threshold Exceeded?[5]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Vibratory Roller	Highest Vibration Level		
R1	1,316'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No
R2	1,336'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No
R3	1,532'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No
R4	1,353'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No
R5	535'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No
R6	211'	0.00	0.00	0.00	0.00	0.01	0.01	0.3	No
R7	526'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No
R8	989'	0.00	0.00	0.00	0.00	0.00	0.00	0.3	No

1. Construction noise source and receiver locations are shown on Figure 4.9-7.
2. Distance from receiver building facade to Project construction boundary (Project site boundary).
3. Based on the Vibration Source Levels of Construction Equipment (Table 4.9-6).
4. Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
5. Does the peak vibration exceed the acceptable vibration thresholds?

"PPV" = Peak Particle Velocity

Source: (UXR, 2026e, Table 9-6)

addition, there are no components of the proposed Project that would cause or contribute to increased airport-related noise in the area. As such, impacts associated with public and private airport-related noise would be less-than-cumulatively considerable.

The analysis under Threshold c. indicates that the Project would not generate substantial amounts of construction-related noise that could adversely affect nearby sensitive receptors. On-site construction activities associated with the proposed Project and other construction projects in the area may overlap, resulting in cumulative periodic noise increases in the local area; however, construction noise impacts primarily affect the areas immediately adjacent to a construction site. Although lands surrounding the Project site may be under construction simultaneous with the Project, the Project's peak construction noise at the nearest sensitive receptors (i.e., affecting Receptor R6) would be 67.6 dBA Leq. Thus, even if nearby cumulative developments were to expose Receptor R6 to noise levels of 80 dBA Leq (the identified threshold of significance for construction-related noise), the Project's contribution to construction-related noise levels at Receptor R6 would be only 0.2 dBA Leq, which is well below the range of human perception (refer to Figure 4.9-1)[1]. Accordingly, Project-related construction noise impacts would be less than significant on a cumulatively-considerable basis.

As previously shown in Table 4.9-11 and Table 4.9-12, the daytime hourly noise levels at the off-site receiver locations are expected to range from 42.4 dBA Leq to 49.3 dBA Leq, while the nighttime hourly noise levels at the off-site receiver locations are expected to range from 29.9 dBA Leq to 39.3 dBA Leq. As shown in Table 4.9-13, the operational noise level increases associated with the Project would not exceed the Riverside County daytime or nighttime exterior noise level standards at the nearest receiver locations. In addition, the

[1] $10 \text{ Log}_{10} (10^{6.76} + 10^{8.00}) = 80.2429$ dBA Leq.

Project's maximum increase in ambient noise level due to Project operations would be 2.5 dBA Leq during daytime hours and 0.3 dBA Leq during nighttime hours, both of which are far below the 5.0 dBA Leq increase that is identified as the threshold of significance for Project-related operational noise increases. Accordingly, the Project has no potential to result in cumulatively-considerable noise impacts during long-term operations, and impacts would therefore be less than significant on a cumulatively-considerable basis.

As also discussed under the analysis of Threshold c., the Project would not result in an increase in peak daily traffic at the facility beyond what already occurs under existing conditions. As such, the Project would have no potential to result in cumulatively-considerable traffic-related noise increases, and cumulatively-considerable traffic-related noise impacts would not occur.

As indicated under the analysis of Threshold d., the Project only has the potential to result in vibration impacts during construction activities. The analysis shows that Project-related construction vibration velocity levels would range from 0.00 to 0.01 PPV in/sec, which is well below the threshold of significance of 0.3 PPV in/sec. Thus, even when combined with vibration sources from cumulative developments, the Project would have no potential to result in cumulatively-considerable impacts due to construction-related vibration, and no impact would occur.

4.9.8 Significance of Impacts Before Mitigation

Thresholds a. and b.: No Impact. The Project site is located approximately 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 dBA CNEL. Noise levels below 75 dBA CNEL are considered "Conditionally Acceptable" for outdoor spectator sports uses, "Normally Acceptable" for residential uses (i.e., employee housing), and "Normally Acceptable" for lodging uses. Accordingly, the Project would have no potential to expose people residing or working in the Project area to excessive public airport-related noise levels. The nearest private airstrip to the Project site is Ernst Field, located approximately 10.6 miles northeast of the Project site; however, due to distance and the limited nature of airstrip operations at Ernst Field, the Project site is not subject to airstrip-related noise levels from Ernst Field. In addition, the Project does not include any airport- or airstrip-related components, and there are no components of the proposed Project with the potential to result in an increase in local airport operations. Accordingly, the proposed Project would not expose people residing or working in the Project area to excessive noise levels associated with public airports or private airstrips, and no impact would occur.

Threshold c.: Less-than-Significant Impact. On-site 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. 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. Additionally, construction-related noise affecting the nearest sensitive receptors would not exceed 76 dBA Leq, which is below the identified threshold of significance of 80 dBA Leq. Therefore, noise impacts due to daytime Project construction noise would be less than significant. 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; 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. In addition, 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. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. At distances ranging from 211 to 1,532 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.00 to 0.01 PPV in/sec. Based on the maximum acceptable continuous vibration threshold of 0.3 in/sec PPV, typical construction-related vibration from the Project would remain below building damage thresholds at all receiver locations. Therefore, the Project-related vibration impacts would be less than significant during construction activities at the Project site.

4.9.9 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847. Pursuant to that section, noise associated with private construction activity located within one-quarter mile of an inhabited dwelling is exempt from the noise ordinance's general standards (and therefore permitted) only during the following hours: between 6:00 a.m. and 6:00 p.m., Monday through Saturday, during the months of June through September; and between 7:00 a.m. and 6:00 p.m., Monday through Saturday, during the months of October through May. Construction activities shall not occur on Sundays or federal holidays. Construction activities that would generate noise audible at an inhabited dwelling located within one-quarter mile of the Project site are prohibited outside of these permitted hours. Exceptions to these time restrictions may be granted by Riverside County pursuant to Section 7 of Ordinance No. 847 upon a finding of necessity (e.g., to accommodate continuous concrete pouring operations that cannot be interrupted).No events with amplified sound shall occur outside of the locations depicted on EIR Figure 3-16, *Exception No. 9 to Riverside County Ordinance No. 847*, and all sound amplification within the authorized areas on site shall be restricted to between the hours of 8:00 a.m. and 10:00 p.m. No sound amplification shall occur on any portion of the Project site between the hours of 10:00 p.m. and 8:00 a.m.

Design Features

There are no features inherent in the Project's design that are specifically included to reduce or avoid impacts to noise.

Mitigation

❑ **Project-Specific Mitigation**

Project impacts due to noise would be less than significant; therefore, mitigation measures are not required.

❑ **Applicable Mitigation Measures from the Temecula Wine Country Community Plan Program Environmental Impact Report**

Although mitigation measures are not required, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's construction-related noise impacts. Refer also to EIR *Technical Appendix K*, which includes an analysis demonstrating why WCCP PEIR mitigation measures not listed below either are not applicable to the proposed Project, or that the required measures already have been addressed either as part of the Project's application materials or through the analysis conducted as part of this EIR for the Galway Downs Project.

WCCP PEIR MM NOI-2: Implementing project proponents shall submit a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. These measures may include the following:

- A sign posted on-site pertaining the permitted construction days and hours and complaint procedures and who to notify in the event of a problem. The sign shall also include a listing of both the County and construction contractor's telephone numbers (during regular construction hours and off-hours); and
- A pre-construction meeting may be held with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.

WCCP PEIR MM NOI-5: All implementing projects involving a special occasion facility shall be reviewed by the Riverside County Office of Industrial Hygiene and include at least the following conditions:

- All special event venders (e.g. DJs, musical bands, etc.) shall be notified regarding noise conditions of approval.

- Outdoor special events and associated audio equipment, sound amplifying equipment, and/or performance of live music shall be limited to the hours of 8:00 a.m. to 10:00 p.m. Monday through Sunday.
- Noise levels shall be kept below levels prescribed in the County's General Plan Noise Element and County noise Ordinances No. 847 by using a decibel-measuring device to measure music sound levels when amplified music is used.
- Clean-up activities associated with special events shall terminate no later than midnight.
- Outdoor speakers for all scheduled events shall be oriented toward the center of the property and away from adjoining land uses.
- Padding/carpeting shall be installed under music speakers for early absorption of music.

WCCP PEIR MM NOI-6: All implementing projects involving a special occasion facility shall include at least the following conditions to ensure proper enforcement of the County Ordinances and project conditions:

- After issuance of two Code Violation Notices for excessive noise, noise measurements shall be performed by the Office of Industrial Hygiene for every event at the property line, to determine if the Noise Ordinance and project conditions are being followed during the special events.
- If violations of the Noise Ordinance or project conditions are found, the County shall reconsider allowed hours of operation, number of guests, amount of special events per year, or approval of the specific facility.
- The proponents shall be required to pay fees assessed per the Department's hourly rate pursuant to Ordinance No. 671.

4.9.10 References

Cited As	Reference
ALUC, 2012	Riverside County Airport Land Use Commission, 2012. *Riverside County Airport Land Use Compatibility Plan Policy Document, Section FV., French Valley Airport*. January 2012. Accessed December 19, 2025. Available online at: https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-15-20--20Vol.-201-20French-20Valley-20Amd-202011.pdf
FTA, 2006	Federal Transit Administration, 2006. *Transit Noise and Vibration Impact Assessment (FTA-VA-90-1003-06)*. May 2006. Accessed December 19, 2025. Available online at:

Cited As	Reference
	https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf
Google Earth, 2025	Google Earth Pro, 2025. *Google Earth Pro* (mapping application). March 20, 2025. Available online at: https://www.google.com/earth/about/versions/
UXR, 2026e	Urban Crossroads, 2026e. *Galway Downs (CUP 2303R1) Noise and Vibration Analysis*. March 4, 2026. Included as EIR *Technical Appendix H*.

4.10 TRANSPORTATION

The information in this Subsection is based, in part, on two Project-specific technical studies prepared by Urban Crossroads, Inc. (herein, "UXR"). The first report addresses the Project's effects on Level of Service ("LOS"; i.e., traffic congestion), is titled "Galway Downs (CUP02303R1) Traffic Analysis," dated November 5, 2025, and included as EIR *Technical Appendix I* (UXR, 2025). The second report evaluates the Project's Vehicle Miles Traveled (VMT), is titled "Galway Downs (CUP02303R1) Vehicle Miles Traveled Assessment" (herein, "VMTA"), dated June 19, 2026, and included as EIR *Technical Appendix J* (UXR, 2026f).

4.10.1 Existing Conditions

A. Existing Vehicle Miles Traveled (VMT)

StreetLight is a software program that gets its data from anonymous location information collected through smartphones, navigation apps, connected vehicles, and commercial fleets. These signals show where and when devices are moving, but they do not identify individual people. StreetLight processes billions of these data points to figure out travel patterns, such as where trips start and end, the routes people take, and whether the travel is by car, truck, bike, or walking. To make sure the information is accurate, StreetLight compares its results to real traffic counts from sensors and state transportation records, then adjusts the data to match actual conditions. In simple terms, StreetLight turns anonymous signals from phones and vehicles into a clear picture of how people and goods move around, which planners can then use to understand traffic and transportation impacts. (UXR, 2026f, pp. 2-3)

Using StreetLight data, the Galway Downs Project site itself was used to capture travel behavior associated with existing baseline conditions. Galway Downs functions as a regional destination, drawing visitors from a wide geographic area and primarily generating trips during evenings and weekends, when conventional commute-based models are not representative. Travel to this type of facility is event-driven, discretionary, and characterized by longer average trip lengths than those associated with typical daily land uses. By selecting Galway Downs as the Streetlight survey zone, the VMT analysis is grounded in real-world conditions at the actual venue, ensuring that observed data reflects the full range of trip patterns expected with the Project. This approach provides a more reliable basis for evaluating VMT impacts than reliance on generalized assumptions from regional travel demand models for this unique land use. (UXR, 2026f, p. 3)

Utilizing the above parameters, an average trip length in miles was obtained from StreetLight Data for week days and weekends. Table 4.10-1, *Average Baseline Trip Length*, presents data based on traffic monitoring collected over the 12-month period of January 2024 through December 2024 from StreetLight Data. This timeframe was selected because it represents the most recent complete annualized dataset available at the time environmental analysis for the Project commenced. The 2025 rolling 12-month dataset was not yet a full calendar year and therefore was not considered a complete annualization, while a full 2023 dataset was not available from StreetLight at the time of analysis. Accordingly, the 2024 calendar year data provides the best available and most reliable basis for estimating baseline VMT conditions. The average weekday trip length of all vehicles is 30.5 miles, and the average weekend trip length of all vehicles is 39.2 miles. (UXR, 2026f, pp. 3-4)

Table 4.10-1 Average Baseline Trip Length

Galway Downs Project Site	Miles
Weekday Average Trip Length	30.5 miles
Weekend Average Trip Length	39.2 miles

(UXR, 2026f, p. 4)

According to the 2023 data, peak weekdays occurred on five occasions (April 21, April 28, June 2, June 9, and May 26, 2023), with approximately 4,458 two-way vehicle trips per day. The peak weekend day occurred on May 28, 2023, with approximately 11,514 two-way vehicle trips.

Using the full dataset collected by the Project Applicant in 2023 to document the number of vehicles accessing the site on each operational day over the full 2023 calendar year, Table 4.10-2, *Baseline Conditions VMT,* shows the average number of daily weekday trips and average number of daily weekend trips. These observed counts provide a representative measure of VMT in the baseline condition.

Table 4.10-2 Baseline Conditions VMT

Baseline Condition	Average Daily Vehicle Trips	Average Trip Length	Daily VMT	Days/Year	Annual VMT
Weekday Average (Mon-Fri)	632	30.5 mi	19,276	261	5,031,036
Weekends Average (Sat-Sun)	2,500	39.2 mi	98,000	104	10,192,000
				TOTAL VMT	**15,223,036**

(UXR, 2026f, p. 4)

B. Existing Transportation System

1. Existing Roadway System

Under existing conditions, the Galway Downs facility is surrounded by Los Caballos Road to the north, Pauba Road to the east, and Los Corralitos Road to the south and west. Anza Road occurs approximately 0.8 miles to the west of the Project site. SR-79 occurs approximately 0.25-mile southwest of the Project site, and is accessible in the Project area via Los Caballos Road and Pauba Road. The Riverside County General Plan Circulation Element and Southwest Area Plan (SWAP) classify SR-79 east of I-15 to the west of Pauba Road as an "Expressway," which are designated as six-lane or eight-lane divided roadways (typically divided by a raised median or painted two-way turn-lane) with a 184-foot or 220-foot right-of-way (ROW) and a 134-foot curb-to-curb measurement. Anza Road is classified as a "Major Roadway," which are designated as four-lane roadways and may include a painted median, and typically have a 118-foot ROW and a 76-foot curb-to-curb measurement. De Portola Road and Pauba Road (south of De Portola Road) are classified as "Mountain Arterials," which are designated as two-lane or four-lane roadways that do not include a painted median that typically have a 110-foot ROW and a 64-foot curb-to-curb measurement. Los Caballos Road and Pauba Road (north of De Portola Road) are classified as "Collector Streets," which are designated as two-lane

roadways that do not include a painted median and that typically have a 74-foot ROW and a 40-foot curb-to-curb measurement. (UXR, 2025, p. 27)

2. Transit Service

The Project area is served by Riverside Transit Agency (RTA), a public transit agency serving various jurisdictions within Riverside County. Based on a review of the existing transit routes within the vicinity of the Project site, there are no transit routes that currently serve the Project site. Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (UXR, 2025, p. 31)

3. Bicycle and Pedestrian Facilities

The SWAP trails and bike paths are shown in Exhibit 3-4 of the Project's Traffic Analysis ("TA"; *Technical Appendix I*). As shown in Exhibit 3-4 of the Project's TA, there are planned Wine Country Roadside and Regional Open Space trails surrounding the Project site. In addition, along SR-79 between Anza Road and Pauba Road there is a planned Class II bike path. Regional Open Space trails also are identified along Anza Road, Pauba Road, and De Portola Road, while Wine Country Roadside trails are identified along Los Caballos Road and Los Corralitos Road. Existing pedestrian facilities within the area are shown in Exhibit 3-5 of the Project's TA. Field observations and traffic counts conducted in August 2025 during typical operations, non-event weekend at Galway Downs indicate minimal pedestrian and bicycle activity within the area. (UXR, 2025, p. 31)

4.10.2 Applicable Regulatory Requirements

A. State Regulations

1. Assembly Bill 1358 (AB 1358; 2008) – Complete Streets Act

In September 2008, former Governor Arnold Schwarzenegger signed into law AB 1358, known as the Complete Streets Act. This legislation requires that cities and counties ensure their general plan circulation elements accommodate the needs of all users of the transportation system, including motorists, pedestrians, bicyclists, children, seniors, and individuals with disabilities, when they update their general plans. The intent of the Complete Streets Act is to foster the development of multimodal transportation networks that are safe, convenient, and accessible for all users, regardless of mode of travel. The law supports statewide goals to reduce greenhouse gas emissions, improve air quality, enhance public health, and reduce vehicle miles traveled. In compliance with the Complete Streets Act, local jurisdictions must integrate Complete Streets principles into planning and implementation efforts. As such, any transportation improvements, roadway redesigns, or circulation system modifications associated with a proposed project subject to the Act must consider and, where feasible, incorporate facilities for non-motorized users, consistent with local Complete Streets policies.

2. Statewide Transportation Improvement Program (STIP)

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd-numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation improvement plans for submittal by December 15th (odd years). Caltrans prepares the Interregional Transportation Improvement Plan (ITIP) and regional agencies prepare Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years).

3. Senate Bill 743 (SB 743; 2013)

Senate Bill 743 (SB 743, Steinberg, 2013), which was codified in Public Resources Code Section 21099, required changes to the implementing CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: "During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy…" (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*Id*., subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (CNRA) has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. With the CNRA's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020. (Pub. Resources Code Section 21099, subd. (b)(3).)

4. Senate Bill 325 (SB 325; 1971) - Transportation Development Act (Mills-Alquist-Deddeh Act)

The Mills-Alquist-Deddeh Act (SB 325) was enacted by the California Legislature to improve existing public transportation services and encourage regional transportation coordination. Known as the Transportation Development Act (TDA) of 1971, this law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. TDA established two funding sources; the Local Transportation Fund (LTF), and the State Transit Assistance (STA) fund. Providing certain conditions are met, counties with a population under 500,000 (according to the 1970 federal census) may also use the LTF for local streets and roads, construction, and maintenance. The STA funding can only be used for transportation planning and mass transportation purposes.

5. Road Repair and Accountability Act of 2017 (Senate Bill 1 (SB 1))

On April 28, 2017, former Governor Brown signed Senate Bill 1 (SB 1) (Chapter 5, Statutes of 2017), known as the Road Repair and Accountability Act of 2017. SB 1 augments the base of the State Transit Assistance program essentially doubling the funding for this program. To provide for SB 1 reporting and transparency, transit agencies are asked to work with Caltrans to report on planned expenditures for these augmented funds.

6. California Manual on Uniform Traffic Control Devices ("MUTCD")

The California MUTCD is the official standard for traffic control devices on all public roads in California. Developed and maintained by the Caltrans, the MUTCD is based on the federal MUTCD issued by the Federal Highway Administration (FHWA), with modifications to reflect California-specific laws, policies, and conditions. The MUTCD provides standards, guidance, and options for the design, placement, and use of signs, signals, pavement markings, and other traffic control devices to promote safe and efficient travel for all roadway users, including motorists, pedestrians, bicyclists, and transit vehicles. Compliance with the MUTCD is required by law for all jurisdictions in California under the California Vehicle Code (CVC) Section 21400. Transportation improvements or modifications are expected to follow the applicable provisions of the MUTCD to ensure consistent and effective communication with roadway users and support the safe operation of the transportation network. Chapter 5G of the MUTCD identifies standards for Temporary Traffic Control Zones, which establishes measures and sequencing requirements for temporary traffic control devices used during construction activities, including standards related to signage and lane transitions.

B. Regional Regulations

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project Site is within SCAG's regional authority. In April 2024, SCAG adopted the *2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* ("RTP/SCS"); also referred to herein as "Connect SoCal" with goals to: 1) build and maintain an integrated multimodal transportation network; 2) develop, connect and sustain communities that are livable and thriving; 3) create a healthy region for the people of today and tomorrow; and 4) support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use,

housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

2. Riverside County Congestion Management Program (CMP)

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The Riverside County CMP became effective with the passage of Proposition 111 in 1990 and updated most recently in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for Riverside County in December 2019. There are no Project study area intersections identified as a Riverside County CMP facility.

C. Western Riverside County Association of Governments Transportation Uniform Mitigation Fee

The Western Riverside Council of Governments (WRCOG) established a consolidated Transportation Uniform Mitigation Fee (TUMF) program for all of western Riverside County, which commenced in 2003. The establishment of TUMF was based on the desire to establish a single, uniform fee program to mitigate the cumulative impacts of new development on the western Riverside County sub-region's arterial highway system rather than having multiple and potentially uncoordinated fee programs across the region. WRCOG is responsible for establishing and updating TUMF payment rates, based on a TUMF Program Nexus Study, which is periodically updated to consider the impact of future development on the subregion's system of highways and arterial roads. The most recent Nexus Study update was approved by the WRCOG Executive Committee in 2024. The updated Nexus Study continues to demonstrate the relationship between the TUMF fee levels and the cost of anticipated improvements to the Regional System of Highways and Arterials (RSHA) necessitated by new development throughout western Riverside County.

D. Local Regulations

Ordinances specifically applicable to the circulation system are presented below :

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways.

- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads.

- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications.

- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499, subject to the control of the Board of Supervisors, delegates to the Riverside County Transportation Director the administration of the use of county highways, including county roads, for excavations and

encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses.

- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a development impact fee (DIF) for the development of infrastructure, including County roadways and the installation of traffic signals.

- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. This is a deposit-based fee program and provides for unused fees to be refunded to the applicant.

- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF program for western Riverside County. The fees are collected by Riverside County and administered by WRCOG to make roadway improvements in the WRCOG area. TUMF funds are intended for use solely for the engineering, construction, and right-of-way acquisition for regional facilities. TUMF funds may not be used to defray operational and maintenance expenses. Facilities eligible for TUMF are designated by WRCOG and updated periodically. They include streets, arterials, and road improvements as defined in the ordinance.

4.10.3 Basis for Determining Significance

A. Thresholds of Significance

Section XVII of Appendix G to the CEQA Guidelines addresses typical adverse effects related to transportation, and includes the following threshold questions to evaluate a project's impacts to transportation:

- Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

- Would the project conflict with or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

- Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- Would the project result in inadequate emergency access or access to nearby uses?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, which incorporate the current Appendix G thresholds pursuant to the 2018 changes to the CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on transportation. The proposed Project would result in a significant impact to transportation if the Project or any Project-related component would:

a. *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;*

b. *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);*

c. *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment);*

d. *Cause an effect upon, or a need for new or altered maintenance of roads;*

e. *Cause an effect upon circulation during the project's construction;*

f. *Result in inadequate emergency access or access to nearby uses;*

g. *Include the construction or expansion of a bike system or bike lanes; or*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified/updated per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on transportation.

4.10.4 Methodology

A. Overview

The analyses of potential transportation impacts are based on the nature and degree of changes to the local and regional transportation system that would be brought about by the Project. The analysis of potential impacts to transportation is based on a review of applicable State, regional, and local plans, programs, and policies governing the circulation system, as well as Project-specific technical analyses prepared in support of this EIR. Specific information sources consulted in the preparation of this analysis include: the Project's TA (EIR *Technical Appendix I*), which provides information regarding existing transportation conditions in the local area, including the existing roadway network, transit service, bicycle and pedestrian facilities, and existing baseline traffic volumes; the Project's VMTA (EIR *Technical Appendix J*), which evaluates the Project's potential impacts due to VMT consistent with CEQA Guidelines Section 15064.3(b) and SB 743; the County of Riverside Transportation Analysis Guidelines, including the County's VMT Screening Criteria; the Riverside Transportation Analysis Model (RIVTAM); the SCAG RTP/SCS; the Riverside County CMP; the Riverside County General Plan Circulation Element and applicable goals and policies governing the regional and local circulation system; and applicable policies from the Temecula Valley Wine Country Community Plan (TVWCCP). The methodology used to evaluate the Project's potential impacts to transportation is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County. Vehicular access to the Project site is provided by an existing network of access driveways connecting the site to Los Caballos Road along the

northern boundary, Los Corralitos Road along the western and southern boundaries, and Pauba Road along the eastern boundary, with four of the existing driveways currently designated for visitor use and the remaining driveways designated for emergency and employee access. The local and regional roadway network serving the Project site is described in detail in EIR subsection 4.10.1.B, and the existing baseline traffic conditions, transit service availability, and bicycle and pedestrian facilities in the local area are documented in the Project's TA (EIR *Technical Appendix I*).

Transportation conditions under the environmental baseline reflect the existing pattern of daily and event-related vehicular trips associated with ongoing operations at Galway Downs, including peak operational days documented in 2023 during which the facility accommodated up to 5,757 one-way daily vehicular trips. As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, rather than solely on the activities expressly authorized under the existing CUPs. The 2023 operational dataset captures the full range of activities occurring at Galway Downs under baseline conditions, including equestrian events, sports events, and special occasion events, and the transportation conditions associated with those activities, including peak daily vehicle trips of up to 5,757 one-way trips, constitute the baseline against which the Project's transportation impacts are measured.

The operational characteristics of the Galway Downs facility that would be permitted by proposed CUP 02303R1 would be the same as what occurs under the established 2023 environmental baseline. The maximum number of attendees at the facility on a daily basis would be restricted by the maximum amount of available parking under the parking management plan required as a condition of CUP 02303R1. Under the proposed Project, peak operations at the facility when multiple events are occurring would be limited to a maximum of 4,639 parking spaces, which is less than the 5,757 one-way vehicular trips documented during 2023 baseline conditions. Accordingly, the proposed Project would not result in an increase in peak daily traffic-related vehicle trips beyond what already occurs under the established environmental baseline. However, the frequency of weekend events has the potential to increase.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with limited new physical construction and operational uses that are substantially similar to those already occurring under existing conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to introduce a new traffic-generating use. The primary analytical questions addressed herein are therefore:

a. Whether the proposed Project, including the limited physical improvements proposed as part of the Project, the operational changes that would be authorized by proposed CUP 02303R1, and the future construction and operation of up to 36 park model lodging units and 18 employee modular housing units, would conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, with particular attention to the Project's

consistency with the SCAG RTP/SCS, the Riverside County CMP, the Riverside County General Plan Circulation Element, and the WRCOG Transportation Uniform Mitigation Fee program;

b. Whether the proposed Project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), regarding the evaluation of transportation impacts based on VMT, taking into consideration the County's adopted VMT screening criteria;

c. Whether the proposed Project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), with particular attention to the proposed reconfiguration of four visitor access driveways, the installation of acceleration and deceleration lanes at the access driveways, and the proposed installation of a traffic signal and turning lane improvements at the intersection of State Route 79 and Los Caballos Road.

d. Whether the proposed Project would result in an effect upon, or a need for new or altered maintenance of roads;

e. Whether construction activities associated with the proposed Project would cause an adverse effect upon circulation during the Project's construction phase; and

f. Whether the proposed Project would result in inadequate emergency access or access to nearby uses.

In evaluating these analytical questions, the analysis relies upon the Project's TA and VMTA (EIR *Technical Appendices I* and *J*, respectively), the existing transportation network information presented herein in Subsection 4.10.1, and the applicable plans, programs, policies, and design standards identified herein in Subsection 4.10.2. The analysis evaluates the Project's consistency with each applicable plan, program, ordinance, or policy by comparing the proposed Project's physical improvements, operational characteristics, and traffic generation against the relevant provisions of the plan, program, ordinance, or policy. A determination of inconsistency is made only where the Project would conflict with a specific provision of a plan, program, ordinance, or policy addressing the circulation system or otherwise adopted for the purpose of avoiding or mitigating an environmental effect, consistent with the threshold language in Section XVII of Appendix G to the State CEQA Guidelines.

1. VMT Analysis Methodology

CEQA requires all lead agencies to adopt VMT as the measure for identifying transportation impacts for land use projects. To comply with CEQA, the Governor's Office of Land Use and Climate Innovation (LCI) published the Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. Statewide application of the new guidelines went into effect on July 1, 2020. The County of Riverside adopted VMT baselines and thresholds of significance based on the OPR's Guidelines on December 2020. While the LCI Technical Advisory provides examples for evaluating VMT, they are not exhaustive and do not specifically address all land uses beyond residential, office, and retail. Instead, they allow flexibility in methodology and encourage the use of the best available data and tools, including travel demand models, sketch or spreadsheet models, and big data sources. LCI further notes:

> *Travel demand models, sketch models, spreadsheet models, research, and data can all be used to calculate and estimate VMT. To the extent possible, lead agencies should choose models that have sensitivity to features of the project that affect VMT. Those tools and resources can also assist in establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives. When using models and tools for those various purposes, agencies should use comparable data and methods, in order to set up an "apples-to-apples" comparison between thresholds, VMT estimates, and VMT mitigation estimates.*

For the Galway Downs Project, reliance on the Riverside County Transportation Model (RIVCOM) travel demand model was determined to be inappropriate because Galway Downs' extended market area and event-driven activities are not well represented by the model's underlying land use assumptions. Instead, an alternative methodology was developed using both existing customer travel data and StreetLight™ big data. Specifically, the Project Applicant collected historical data documenting the number of vehicles that accessed the site during each operational day in 2023. This dataset establishes the Project's baseline trip generation and provides a direct record of existing travel activity associated with equestrian operations as well as with non-equine events.

In parallel, StreetLight™ data was used to determine trip length distributions for trips generated by the Project. Unlike regional models, StreetLight™ relies on anonymized GPS and mobile device data, which captures actual travel patterns to and from the Galway Downs facility. By combining the Project's trip generation data with empirically observed trip lengths, the analysis ensures that VMT estimates are grounded in real-world conditions. This approach is consistent with CEQA and Riverside County guidance, which recognize that unique recreational and sports venue projects may require the use of alternative data sources when models do not adequately capture project-specific travel behavior. Accordingly, the methodology provides a more accurate, context-sensitive, and defensible basis for evaluating the Project's potential VMT impacts.

Establishing a significance threshold based on a net increase in VMT means that any scenario in which the Project generates more total VMT than the existing baseline would be considered to result in a significant impact. This approach is consistent with CEQA practice because it evaluates whether the Project adds to overall VMT compared to the baseline conditions, rather than relying solely on per-capita or regional averages that may not capture localized changes. The methodology also aligns with the County of Riverside Transportation Analysis Guidelines, which specifically recognize that recreational and sports venue projects can create unique travel patterns and should be assessed on the basis of total VMT. By applying a net increase threshold, the analysis provides a conservative and defensible framework for disclosing the additional travel demand associated with both the No Project (Existing Baseline Conditions) and With Project (Proposed Project) scenario. Accordingly, a net increase in the With Project VMT scenario would result in a significant VMT impact, which is analyzed under Threshold b., below.

4.10.5 Impact Analysis

Threshold a.: Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

This response provides an analysis of the Project's potential to result in a conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A project that generally conforms with, and does not obstruct, applicable plans, programs, ordinances, and policies is considered to be consistent with such plans, programs, ordinances, and policies. The transportation plans, policies, programs, ordinances, and standards that are relevant to the Project are identified in the analysis below.

A. SCAG Connect SoCal Consistency Analysis

The fundamental goals of SCAG's Connect SoCal are to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. As indicated in EIR Table 4.8-2, *Analysis of Consistency with Connect SoCal Goals*, in EIR Subsection 4.8, *Land Use and Planning*, implementation of the Project would not conflict with any of the goals or policies included in SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As such, Project impacts would be less than significant.

B. Riverside County Congestion Management Program

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The County of Riverside CMP became effective with the passage of Proposition 111 in 1990 and was most recently updated in 2019 as part of the Riverside County Long Range Transportation Study. The Riverside County Transportation Commission (RCTC) adopted the 2019 CMP for the County of Riverside in December 2019. There are no intersections within the Project's study area that are identified as a Riverside County CMP intersection. Accordingly, the Project would not result in a conflict with the Riverside County CMP and no impact would occur.

C. Riverside County General Plan Circulation Element

The Riverside County General Plan Circulation Element establishes several goals and policies related to the transportation network that are applicable to development projects. An analysis of the Project's consistency with the General Plan Circulation Element goals is provided in Table 4.10-2, *Project Consistency with Riverside County General Plan Circulation Element Policies*. As indicated in Table 4.10-2, the Project would be consistent with, or otherwise would not conflict with, any of the goals included in the General Plan Circulation Element. Accordingly, Project impacts to transportation due to a conflict with the General Plan Circulation Element goals would be less than significant.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
C 1.1: Design the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the Circulation Plan, Figure C-1. (AI 49)	Not Applicable. Policy C 1.1 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 1.2: Support development of a variety of transportation options for major employment and activity centers including direct access to transit routes, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.	Not Applicable. Policy C 1.2 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 1.3: Support the development of transit connections between Riverside County and regional activity centers in other counties as well as transit connections that link the community centers located throughout the county and as identified in the Land Use Element and in the individual Area Plans. (AI 26)	Not Applicable. Policy C 1.3 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 1.4: Utilize existing infrastructure and utilities to the maximum extent practicable and provide for the logical, timely, and economically efficient extension of infrastructure and services.	Consistent. The Project would utilize existing infrastructure and utilities to the maximum extent practicable, and would extend infrastructure only as necessary to serve existing and future uses on site.
C 1.5: Evaluate the planned circulation system as needed to enhance the arterial highway network to respond to anticipated growth and mobility needs. (AI 49)	Not Applicable. Policy C 1.5 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 1.6: Cooperate with and where appropriate lead local, regional, state, and federal agencies to establish an efficient circulation system. (AI 4, 41, 46, 50)	Not Applicable. Policy C 1.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 1.7: Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle lanes and paths, and mixed-use community centers.	Not Applicable. Policy C 1.7 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 1.8: Ensure that all development applications comply with the California Complete Streets Act of 2008 as set forth in California Government Code Sections 65040.2 and 65302.	Consistent: All future development on the Project site would be reviewed by the County for compliance with the California Complete Streets Act.
C 2.1: The following minimum target levels of service have been designated for the review of development proposals in the unincorporated areas	Consistent: The Project's TA (*Technical Appendix I*) demonstrates that with Project improvements and payment of fair-share contributions towards improvements not

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
areas of Riverside County with respect to transportation impacts on roadways designated in Riverside County Circulation Plan (Figure C-1) which are currently County maintained, or are intended to be accepted into the County maintained roadway system: LOS C shall apply to all development proposals in any area of Riverside County not located within the boundaries of an Area Plan, as well those areas located within the following Area Plans: REMAP, Eastern Coachella Valley, Desert Center, Palo Verde Valley, and those non- Community Development areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans. LOS D shall apply to all development proposals located within any of the following Area Plans: Eastvale, Jurupa, Highgrove, Reche Canyon/Badlands, Lakeview/Nuevo, Sun City/Menifee Valley, Harvest Valley/Winchester, Southwest Area, The Pass, San Jacinto Valley, Western Coachella Valley and those Community Development Areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans. LOS E may be allowed by the Board of Supervisors within designated areas where transit-oriented development and walkable communities are proposed. Notwithstanding the forgoing minimum LOS targets, the Board of Supervisors may, on occasion by virtue of their discretionary powers, approve a project that fails to meet these LOS targets in order to balance congestion management considerations in relation to benefits, environmental impacts and costs, provided an Environmental Impact Report, or equivalent, has been completed to fully evaluate the impacts of such approval. Any such approval must incorporate all feasible mitigation measures, make specific findings to support the decision, and adopt a statement of overriding considerations. (AI 3)	identified for funding as part of any existing fee programs, all study area facilities would operate at an acceptable LOS under all study scenarios. Thus, the Project is consistent with this policy.
C 2.2: Require that new development prepare a	Consistent: A Traffic Analysis (TA) has been prepared for the

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
traffic impact analysis as warranted by Riverside County Traffic Impact Analysis Preparation Guidelines or as approved by the Director of Transportation. Apply level of service targets to new development per Riverside County Traffic Impact Analysis Preparation Guidelines to evaluate traffic impacts and identify appropriate mitigation measures for new development. (AI 3)	proposed Project, and is included as EIR *Technical Appendix I*. The TA complies with the Riverside County Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled. Appropriate conditions of approval have been imposed to address Project-related impacts, including implementation of improvements and payment of fair-share contributions towards improvements not identified for funding as part of any existing fee programs.
C 2.3: Traffic studies prepared for development entitlements (tracts, public use permits, conditional use permits, etc.) shall identify project related traffic impacts and determine the significance of such impacts in compliance with CEQA and Riverside County Congestion Management Program Requirements. (AI 3)	Consistent. A TA has been prepared for the proposed Project, and is included as EIR *Technical Appendix I*, and appropriate conditions of approval have been imposed to address Project-related impacts, including implementation of improvements and payment of fair-share contributions towards improvements not identified for funding as part of any existing fee programs.
C 2.4: The direct project related traffic impacts of new development proposals shall be mitigated via conditions of approval requiring the construction of any improvements identified as necessary to meet level of service targets.	Consistent. A TA has been prepared for the proposed Project, and is included as EIR *Technical Appendix I*, and appropriate conditions of approval have been imposed to address Project-related impacts, including implementation of improvements and payment of fair-share contributions towards improvements not identified for funding as part of any existing fee programs.
C 2.5: The cumulative and indirect traffic impacts of development may be mitigated through the payment of various impact mitigation fees such as County of Riverside Development Impact Fees, Road and Bridge Benefit District Fees, and Transportation Uniform Mitigation Fees to the extent that these programs provide funding for the improvement of facilities impacted by development.	Consistent. A TA has been prepared for the proposed Project, and is included as EIR *Technical Appendix I*, and appropriate conditions of approval have been imposed to address Project-related impacts, including implementation of improvements and payment of fair-share contributions towards improvements not identified for funding as part of any existing fee programs.
C 2.6: Accelerate the construction of transportation infrastructure in the Highway 79 corridor between Temecula, Hemet, San Jacinto, and Banning. The County of Riverside shall require that all new development projects demonstrate adequate transportation infrastructure capacity to accommodate the added traffic growth. The County of Riverside shall coordinate with cities in the Highway 79 corridor to accelerate the usable revenue flow of existing funding programs, thus expediting the development of the transportation	Consistent. On SR-79 and pending Caltrans' approval of encroachment permits, the Applicant is required to install a traffic signal and adjust turning lane geometrics at the intersection of SR-79 and Los Caballos Road, and is required to make signal timing modifications at the intersection of SR-79 and Anza Road. Additionally, under proposed CUP 02303R1, events at Galway Downs would be conditioned to require traffic management by the California Highway Patrol (CHP) or other Caltrans approved traffic management company on SR-79 for any event anticipated to draw 3,500 or more one-way vehicle trips. When traffic management is

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
infrastructure.	required, traffic management would include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections.
C 2.7: Maintain a program to reduce overall trip generation in the Highway 79 Policy Area (Figure C-2) by creating a trip cap on residential development within this policy area which would result in a net reduction in overall trip generation of 70,000 vehicle trip per day from that which would be anticipated from the General Plan Land Use designations as currently recommended. The policy would generally require all new residential developments proposals within the Highway 79 Policy Area to reduce trip generation proportionally, and require that residential projects demonstrate adequate transportation infrastructure capacity to accommodate the added growth.	Not Applicable. The Project site is not located within the Highway 79 Policy Area; thus, Policy C 2.7 is not applicable to the proposed Project.
C 2.8: Riverside County shall coordinate with Caltrans, RCTC, and adjacent local jurisdictions in conformance with Riverside County Congestion Management Program to determine the appropriate LOS threshold for determining significance when reviewing development proposals that directly impact nearby State Highway facilities or city streets.	Not Applicable. Policy C 2.8 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.1: Design, construct, and maintain Riverside County roadways as specified in Riverside County Road Improvement Standards and Specifications. The standards shown in Figure C-4 may be modified by Specific Plans, Community Guidelines, or as approved by the Director of Transportation if alternative roadway standards are desirable to improve sustainability for the area.	Consistent. All roadway improvements, limited to driveway entrances and one traffic signal, proposed as part of the Project would be consistent with the Riverside County Road Improvement Standards and Specifications.
C 3.2: Maintain the existing transportation network, while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.	Not Applicable. Policy C 3.2 provides direction to County staff and decision makers and is not applicable to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
C 3.3: Implement design guidelines that identify intersection improvements consistent with the lane geometrics in Table C-2 unless additional lanes are needed to maintain consistency with Policy C 2.2. Where roadway classifications change on a continuous alignment, the standards of the higher classification will normally be transitioned on a portion of the roadway that has the lower classification, particularly where the change takes place at roadway intersections. This may result in additional right of way or lanes being required above the standards shown in Figure C-4 for the segment with the lower classification to accommodate the transition.	Consistent. All roadway improvements proposed as part of the Project, limited to driveway entrances and one traffic signal, would be consistent with the Riverside County Road Improvement Standards and Specifications.
C 3.4: Allow roundabouts or other innovative design solutions such as triple left turn lanes, continuous flow intersections, or other capacity improvements, when a thorough traffic impact assessment has been conducted demonstrating that such an intersection design alternative would manage traffic flow, and improve safety, if it is physically and economically feasible.	Not Applicable. Policy C 3.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.5: Require all major subdivisions to provide adequate collector road networks designed to feed traffic onto General Plan designated highways.	Not Applicable. The Project does not entail any subdivision of land.
C 3.6: Require private developers to be primarily responsible for the improvement of streets and highways that serve as access to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.	Consistent. On SR-79 and pending Caltrans' approval of encroachment permits, the Applicant is required to install a traffic signal and adjust turning lane geometrics at the intersection of SR-79 and Los Caballos Road, and is required to make signal timing modifications at the intersection of SR-79 and Anza Road and install acceleration and deceleration lanes at the four visitor access driveways at Galway Downs. Additionally, under proposed CUP 02303R1, events at Galway Downs would be conditioned to require traffic management by the California Highway Patrol (CHP) or other Caltrans approved traffic management company on SR-79 for any event anticipated to draw 3,500 or more one-way vehicle trips. When traffic management is required, traffic management would include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
	at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections.
C 3.7: Design interior collector street systems for commercial and industrial subdivisions to accommodate the movement of heavy trucks.	Not Applicable. The Project does not entail any subdivision of land, and there are no large industrial uses in the Project area that would entail the use of heavy trucks.
C 3.8: Restrict heavy duty truck through-traffic in residential and community center areas and plan land uses so that trucks do not need to traverse these areas.	Not Applicable. The Project would not generate or attract new heavy-duty truck trips.
C 3.9: Design off-street loading facilities for all new commercial and industrial developments so that they do not face surrounding roadways or residential neighborhoods. Truck backing and maneuvering to access loading areas shall not be permitted on the public road system, except when specifically permitted by the Transportation Department.	Not Applicable. Policy C 3.9 applies to off-street loading facilities for all new commercial and industrial developments, which are not proposed as part of the Project. Large vehicles such as horse trailers accessing Galway Downs are loaded and unloaded inside the facility.
C 3.10: Require private and public land developments to provide all onsite auxiliary facility improvements necessary to mitigate any development-generated circulation impacts. A review of each proposed land development project shall be undertaken to identify project impacts to the circulation system and its auxiliary facilities. The Transportation Department may require developers and/or subdividers to provide traffic impact studies prepared by qualified professionals to identify the impacts of a development.	Consistent. A Traffic Analysis (TA) has been prepared for the proposed Project, and is included as EIR *Technical Appendix I*. The TA complies with the Riverside County Traffic Impact Analysis Preparation Guidelines. Appropriate conditions of approval have been imposed to address Project-related effects on the roadway system, including implementation of improvements and payment of fair-share contributions towards improvements not identified for funding as part of any existing fee programs.
C 3.11: Generally locate commercial and industrial land uses so that they take driveway access from General Plan roadways with a classification of Secondary Highway or greater, consistent with design criteria limiting the number of such commercial access points and encouraging shared access. Exceptions to the requirement for access to a Secondary Highway or greater would be considered for isolated convenience commercial uses, such as standalone convenience stores or gas stations at an isolated off ramp in a remote area. Industrial park type developments may be provided individual parcel access via an internal network of Industrial Collector streets.	Not Applicable. The Galway Downs facility is an existing events facility and the Project does not propose any new driveways for commercial or industrial uses.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
C 3.12: Improve highways serving as arterials through mountainous and rural areas to adequately meet travel demands and safety requirements while minimizing the need for excessive cut and fill.	Not Applicable. The Project site does not entail the construction or improvement of highways through mountainous or rural areas.
C 3.13: Design street intersections, where appropriate, to assure the safe, efficient passage of through-traffic and the negotiation of turning movements.	Consistent. On SR-79 and pending Caltrans' approval of encroachment permits, the Applicant is required to install a traffic signal and adjust turning lane geometrics at the intersection of SR-79 and Los Caballos Road, to make signal timing modifications at the intersection of SR-79 and Anza Road, and to install acceleration and deceleration lanes at the four visitor access driveways at Galway Downs. Additionally, under proposed CUP 02303R1, events at Galway Downs would be conditioned to require traffic management by the CHP or other Caltrans approved traffic management company on SR-79 for any event anticipated to draw 3,500 or more one-way vehicle trips. When traffic management is required, traffic management would include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections, thereby assuring the safe, efficient passage of through-traffic and the negotiation of turning movements.
C 3.14 Design curves and grades to permit safe movement of vehicular traffic at the road's design speed. Design speed should be consistent with and complement the character of the adjacent area.	Not Applicable. Roadway improvements proposed as part of the Project would not include any curves or major changes to grade, nor would the Project affect speed limits on local area roads.
C 3.15: Provide adequate sight distances for safe vehicular movement at a road's design speed and at all intersections.	Consistent. The County has reviewed the Project's visitor driveway designs to ensure that all sight distances proposed would be adequate for safe vehicular movement.
C 3.16: Dedicate necessary rights-of-way as part of the land division and land use review processes.	Not Applicable. All roadway rights-of-way (ROW) previously were dedicated along the Project site's frontages with Los Caballos Road and Pauba Road in accordance with their General Plan Circulation Element standards as a "Collector (74' ROW)" and "Mountain Arterial (110' ROW)," respectively. The Riverside County Transportation Department determined that no additional ROW is required along the Project site's frontage with Los Corralitos Road.
C 3.17: Ensure dedications are made, where necessary, for additional rights-of-way or easements outside the road rights-of-way that are	Not Applicable. As indicated in the response to Policy C 3.16, no additional ROW dedications are required along the Project site's frontages with roadways abutting the site,

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
needed to establish slope stability, or drainage and related structures. These dedications shall be made by land dividers or developers to the responsible agency during the land division and land use review process. (AI 44, 51, 52)	and there are no slopes or drainage concerns that would require the dedication of additional ROW.
C 3.18: Align right-of-way dedications with existing dedications along adjacent parcels and maintain widths consistent with the ultimate design standard of the road, including required turning lanes. (AI 51)	Not Applicable. As indicated in the response to Policy C 3.16, no additional ROW dedications are required along the Project site's frontages with roadways abutting the site.
C 3.19: Coordinate with Caltrans to identify and protect ultimate freeway rights-of-way, including those for exclusive use by transit and those necessary for interchange expansion. Ultimate right-of-way needs shall be based upon build out traffic forecasts, with facilities sized to provide the appropriate level of service per state highway planning criteria. The County of Riverside, in consultation with Caltrans, will undertake a program to acquire such areas where additional right-of-way is required. (AI 44, 51)	Not Applicable. Policy C 3.19 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.20: Determine location of General Plan road rights of way and levels of road improvements needed based primarily upon land uses and travel demand.	Not Applicable. Policy C 3.20 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.21: Consider granting a reduction in improvement requirements for land divisions involving parcels greater than 20 acres in size and designated as agriculture on the General Plan Land Use map.	Not Applicable. Policy C 3.21 provides direction to County staff and decision makers and is not applicable to the Project site, which is not designated as agriculture on the General Plan Land Use map.
C 3.22: Limit through-traffic movements to General Plan designated roads. Provisions shall be made for highways capable of carrying high volumes of through-traffic between major trip generators.	Not Applicable. Policy C 3.22 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 2.23: Consider the utilization of traffic-calming techniques in the design of new community local street and road systems and within existing communities where such techniques will improve safety and manage traffic flow through sensitive neighborhoods.	Not Applicable. Policy C 3.23 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.24: Provide a street network with quick and efficient routes for emergency vehicles, meeting	Not Applicable. Policy C 3.24 provides direction to County staff and decision makers and is not applicable to the

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
necessary street widths, turn-around radius, secondary access, and other factors as determined by the Transportation Department in consultation with the Fire Department and other emergency service providers.	proposed Project.
C 3.25: Restrict on-street parking to reduce traffic congestion and improve safety in appropriate locations such as General Plan roadways.	Not Applicable. Policy C 3.25 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.26: Plan off-street parking facilities to support and enhance the concept of walkable and transit-oriented communities.	Not Applicable. Policy C 3.26 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.27: Evaluate proposed highway extensions or widening projects for potential noise impacts on existing and future land uses in the area. Require that the effects of truck mix, speed limits, and ultimate motor vehicle volumes on noise levels are also explored during the environmental process. (AI 49)	Not Applicable. Policy C 3.27 provides direction to County staff and decision makers and is not applicable to the proposed Project, and the proposed Project would not entail an increase in traffic volumes beyond what occurs under existing conditions.
C 3.28: Reduce transportation noise through proper roadway design and coordination of truck and vehicle routing.	Not Applicable. The proposed Project would not entail an increase in traffic volumes beyond what occurs under existing conditions.
C 3.29: Include noise mitigation measures in the design of new roadway projects in the County of Riverside.	Not Applicable. The proposed Project does not include new roadways.
C 3.30: Design roadways to accommodate wildlife crossings whenever feasible and necessary.	Not Applicable. Policy C 3.30 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 3.31: Through the development review process, identify existing dirt roads serving residential areas which may be impacted by traffic from new developments, and design new developments such that new traffic is discouraged from using existing dirt roads. When this is unavoidable, require that new developments participate in the improvement of the affected dirt roads.	Not Applicable. Visitors traveling to and from Galway Downs use paved roads. Visitor driveways accessing Galway Downs are paved. Dirt driveways inside the Galway Downs facility do not serve residential areas.
C 3.32: Support ongoing efforts to identify funding and improve existing dirt roads throughout the County of Riverside.	Not Applicable. Policy C 3.32 provides direction to County staff and decision makers and is not applicable to the proposed Project. No new dirt roadways are proposed as part of the Project.
C 3.33: Assure all-weather, paved access to all developing areas.	Consistent. The Project would accommodate all-weather, paved access to all developed areas of the Project site.
C 4.1: Provide facilities for the safe movement of	Consistent. The Project has been designed to

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
pedestrians within developments, as specified in Riverside County Ordinances Regulating the Division of Land of the County of Riverside.	accommodate safe and convenient access to all publicly-accessible portions of the Project site, and includes appropriate accommodations pursuant to the Americans with Disabilities Act (ADA).
C 4.2: Maximize visibility and access for pedestrians and encourage the removal of barriers (walls, easements, and fences) for safe and convenient movement of pedestrians. Special emphasis should be placed on the needs of disabled persons considering Americans with Disabilities Act (ADA) regulations.	Consistent. The proposed Project would not affect existing pedestrian circulation systems outside of the Project site. Inside the Project site, improvements would be made to ensure conformance with the ADA.
C 4.3: Assure and facilitate pedestrian access from developments to existing and future transit routes and terminal facilities through project design. (AI 26, 45)	Not Applicable. There are no transit routes or terminals that service the Project site. Inside the Project site, all publicly-accessible portions of site are designed to includes appropriate accommodations pursuant to the ADA.
C 4.4: Plan for pedestrian access that is consistent with road design standards while designing street and road projects. Provisions for pedestrian paths or sidewalks and timing of traffic signals to allow safe pedestrian street crossing shall be included.	Not Applicable. Policy C 4.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 4.5: Collaborate with local communities to ensure that school children have adequate transportation routes available, such as a local pedestrian or bike path, or local bus service.	Not Applicable. Policy C 4.5 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 4.6: Consult Riverside County Transportation Department as part of the development review process regarding any development proposals where pedestrian facilities may be warranted. The County of Riverside may require both the dedication and improvement of the pedestrian facilities as a condition of development approval. (AI 3)	Consistent. Inside the Galway Downs facility, the Project has been designed to accommodate safe and convenient access to all publicly-accessible portions of the Project site, and includes appropriate accommodations pursuant to the ADA. The design of the Project was reviewed by the Riverside County Transportation Department, which found that the Project accommodates adequate pedestrian facilities within the site.
C 4.7: Make reasonable accommodation for safe pedestrian walkways that comply with the Americans with Disabilities Act (ADA) requirements within commercial, office, industrial, mixed use, residential, and recreational developments.	Consistent. The Project has been designed to accommodate safe and convenient access to all publicly-accessible portions of the Project site, and includes appropriate accommodations pursuant to the ADA.
C 4.8: Coordinate with all transit operators to ensure that ADA compliant pedestrian facilities are provided along and/or near all transit routes, whenever feasible. New land developments may be required to provide pedestrian facilities due to	Not Applicable. Policy C 4.8 provides direction to County staff and decision makers and is not applicable to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
existing or future planned transit routes even if demand for pedestrian facility may not be otherwise warranted. (AI 45)	
C 4.9: Review all existing roadways without pedestrian facilities when they are considered for improvements to determine if new pedestrian facilities are warranted. New roadways should also be assessed for pedestrian facilities. (AI 49)	Not Applicable. Policy C 4.9 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 5.1: Encourage Caltrans to install and maintain landscaping and other mitigation elements along freeways and highways, especially when they are adjacent to existing residential or other noise sensitive uses.	Not Applicable. Policy C 5.1 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 5.2: Encourage the use of drought-tolerant native plants and the use of recycled water for roadway landscaping.	Consistent. No landscaping inside public ROWs is proposed as part of the Project. Landscaping materials inside the Galway Downs facility that are included as part of the CUP 2303R1 application materials include drought-tolerant species where appropriate.
C 5.3: Require parking areas of all commercial and industrial land uses that abut residential areas to be buffered and shielded by adequate landscaping.	Not Applicable. Galway downs is surrounded by roadways; no residential areas directly abut the Project site. Notwithstanding, trees are proposed within the existing permanent parking area accessible from the western driveway access from Los Corralitos Road, which would help screen this area from off-site areas.
C 6.1: Provide dedicated and recorded public access to all parcels of land, except as provided for under the statutes of the State of California.	Consistent. The Project site is and would continue to be served by recorded public access.
C 6.2: Require all-weather access to all new development.	Consistent. The Galway Downs facility currently is and will continue to be served by all-weather access.
C 6.3: Limit access points and intersections of streets and highways based upon the road's General Plan classification and function. Require that access points be located so that they comply with Riverside County's minimum intersection spacing standards. Under special circumstances the Transportation Department may consider exceptions to this requirement. (AI 3)	Not Applicable. No new access points or roadway intersections are proposed as part of the project.
C 6.4: Discourage parcel access points taken directly off General Plan designated highways. Access may be permitted off of General Plan designated highways only if no local streets are present.	Consistent. Under existing conditions, the Project site abuts two General Plan designated highways: Los Caballos Road along the northern site boundary, and Pauba Road along the eastern site boundary. In addition, Los Corralitos Road, a local roadway, occurs along the western/southwestern site

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
	boundary. Access to the Project site currently is accommodated via two driveways along Los Caballos Road and two driveways along Los Corralitos Road. These existing driveways would continue to provide site access with Project approval. Although the Project would continue to accommodate two driveway access points along Los Caballos Road, a General Plan-designated highway, these driveways are needed because there would not be sufficient stacking distance along Los Corralitos Road to accommodate 100% of the Project's traffic during peak events at the facility without creating unnecessary congestion/backup along Los Caballos Road. Furthermore, the Project's access driveways along both Los Caballos Road and Los Corralitos Road would be improved as part of the Project to accommodate acceleration and deceleration lanes in order to minimize disruptions to traffic in the local area associated with Project ingress and egress. Accordingly, the proposed Project would be consistent with this policy.
C 6.5: Provide common access via shared driveways and/or reciprocal access easements whenever access must be taken directly off a General Plan designated highway. Parcels on opposite sides of a highway shall have access points located directly opposite each other, whenever possible, to allow for future street intersections and increased safety.	Not Applicable. No parcels surrounding the Project site require new reciprocal access easements with the Galway Downs facility.
C 6.6: Consider access implications associated with adjacent development and circulation plans, and promote efficient and safe access for airport facilities.	Not Applicable. Policy C 6.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 6.7: Require that the automobile and truck access of commercial and industrial land uses abutting residential parcels be located at the maximum practical distance from the nearest residential parcels to minimize noise impacts. (AI 105)	Not Applicable. The Project does not consist of proposed commercial or industrial land uses, and no new access points are proposed.
C 7.1 – C 7.12: Property Owner Coordination.	Not Applicable. Policies C 7.1 through C 7.12 provide direction to County staff and decision makers and are not applicable to the proposed Project.
C 8.1: Implement a circulation plan that is consistent with funding and financing capabilities.	Not Applicable. All roadways abutting the Project site and within the Project vicinity consist of existing improved

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
(AI 53)	roadways that were constructed to implement the General Plan Circulation Element Circulation Plan, and no roadway improvements are required for the Project beyond the installation of a new traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at SR-79, the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project's visitor driveways.
C 8.2: Distribute the costs of transportation system improvements equitably among those who will benefit.	Consistent. The Project Applicant is responsible for the installation of a new traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at SR-79, although others will benefit from this improvement.
C 8.3: Use annexations, development agreements, revenue-sharing agreements, tax allocation agreements and the CEQA process as tools to ensure that new development pays a fair share of costs to provide local and regional transportation improvements and to mitigate cumulative traffic impacts.	Consistent. The Project Applicant would be required to construct transportation improvements and contribute fair share fees based on the recommendations of the Project's TA (EIR *Technical Appendix I*).
C 8.4: Prepare a multi-year Transportation Improvement Program (TIP) that establishes improvement priorities and scheduling for transportation project construction over a period consistent with state and federal requirements.	Not Applicable. Policy C 8.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 8.5: Participate in the establishment of regional traffic mitigation fees and/or road and bridge benefits districts to be assessed on new development. The fees shall cover a reasonable share of the costs of providing local, regional and subregional transportation improvements needed for serving new development in the unincorporated area.	Not Applicable. Policy C 8.5 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 8.6: Encourage the use of public improvement financing mechanisms, and equitably distribute the costs of road improvements among all those who benefit from the road improvements, including current roadway users.	Not Applicable. Policy C 8.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 8.7: Review and update the County of Riverside Road and Bridge Benefit District fee structure and development impact fees periodically to ensure that capacity expansion projects are developed	Not Applicable. Policy C 8.7 provides direction to County staff and decision makers and is not applicable to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
and constructed in a timely manner.	
C 8.8: Seek all available means to fund improvements, including state and federal grants, to offset the local cost of system improvements where appropriate. (AI 53)	Not Applicable. Policy C 8.8 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 9.1 – C 9.5: Common Carriers.	Not Applicable. Policies C 9.1 through C 9.5 provide direction to County staff and decision makers and are not applicable to the proposed Project.
C 10.1: Support programs developed by transit agencies/operators to provide paratransit service. (AI 50)	Not Applicable. Policy C 10.1 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 11.1: Where appropriate, reserve right-of-way to accommodate designated transit service. (AI 3, 52)	Not Applicable. Transit service is currently not available at the Project site.
C 11.2: Incorporate the potential for public transit service in the design of developments that are identified as major trip attractions (i.e., community centers, tourist and employment centers), as indicated in ordinances regulating the division of land of the County of Riverside.	Not Applicable. Transit service is currently not available at the Project site.
C 11.3: Design the physical layout of arterial and collector highways to facilitate bus operations. Locations of bus turn outs and other design features should be considered.	Not Applicable. Transit service is currently not available at the Project site.
C 11.4: Offer incentives to new development to encourage it to locate in a transit-oriented area such as a community center or along a designated transit corridor near a station. (AI 9)	Not Applicable. Policy C 11.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 11.5: Accommodate transit through higher densities, innovative design, and right-of-way dedication.	Not Applicable. Transit service is currently not available at the Project site.
C 11.6: Promote development of transit centers and park-n-rides for use by all transit operators, including development of multi-modal facilities.	Not Applicable. Policy C 11.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 12.1 – C 12.6: Transit Oasis and Transit Centers.	Not Applicable. Policies C 12.1 through C 12.6 address the planning, siting, design, and funding of Transit Oasis facilities and Transit Centers within the County of Riverside. No transit service currently operates within or adjacent to the Project site, no transit routes are planned to serve the Project site in the near term, and no Transit Oasis facilities or Transit Centers are proposed as part of the Project. Accordingly, Policies C 12.1 through C 12.6 have no application to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
C 13.1 – C 13.8: Passenger Rail System.	Not Applicable. Policies C 13.1 through C 13.8 provide direction to County staff and decision makers and are not applicable to the proposed Project.
C 14.1 – C 14.3: Aviation System.	Not Applicable. Policies C 14.1 through C 14.3 provide direction to County staff and decision makers and are not applicable to the proposed Project.
C 15.1: Implement a two-tiered system of trails, and later expand it into an effective non-motorized transportation system.	Not Applicable. Policy C 15.1 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 15.2: Seek financing to implement an effective non-motorized transportation system. This funding can include such potential sources as state and federal grants, Riverside County transportation funds, "in-lieu" fees, special assessments, parking meter revenues, other public and nonprofit organization funds, developer contributions, and other sources. (AI 36)	Not Applicable. Policy C 15.2 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 15.3: Develop a trail system which connects Riverside County parks and recreation areas while providing links to open space areas, equestrian communities, local municipalities, and regional recreational facilities (including other regional trail systems), and ensure that the system contains a variety of trail loops of varying classifications and degrees of difficulty and length.	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.
C 15.4: Periodically review and update the Trails and Bikeways Plan (Figure C-6) in accordance with the review procedures and schedule of the General Plan, in order to ensure its compatibility with the other components of Riverside County General Plan, and with the similar plans of agencies such as Western Riverside County Council of Governments (WRCOG), Coachella Valley Association of Governments (CVAG), Riverside County Transportation Commission(RCTC), Regional Conservation Authority, Riverside County Habitat Conservation Agency and all jurisdictions within and abutting Riverside County. This shall include consistency with the WRCOG and CVAG non-motorized planning documents.	Not Applicable. Policy C 15.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 15.5: Compliance with the Americans with Disabilities Act (ADA) standards will be assured so	Consistent. The Project has been designed to accommodate safe and convenient access to all publicly-accessible

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
as to make trails user-friendly, as much as reasonably feasible.	portions of the Project site, and includes appropriate accommodations pursuant to the ADA.
C 15.6: Provide, where feasible, the construction of overpasses or undercrossings where trails intersect arterials, urban arterials, expressways, or freeways.	Not Applicable. Policy C 15.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 16.1: Implement Riverside County trail system as depicted in the Bikeways and Trails Plan, Figure C-6. (AI 3, 33)	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.
C 16.2: Develop a multi-purpose trail network with support facilities which provide a linkage with regional facilities, and require trailheads and staging areas that are equipped with adequate parking, equestrian trailer parking (as appropriate), bicycle parking, restrooms, informative signage, interpretive displays, maps, and rules of appropriate usage and conduct on trails accessed from such facilities. (AI 35)	Not Applicable. Policy C 16.2 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 16.3: Require that trail alignments either provide access to or link scenic corridors, schools, parks, bus stops, transit terminals, park and ride commuter lots, and other areas of concentrated public activity, where feasible.	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.
C 16.4: Require that all development proposals located along a planned trail or trails provide access to, dedicate trail easements or right-of-way, and construct their fair share portion of the trails system. Evaluate the locations of existing and proposed trails within and adjacent to each development proposal and ensure that the appropriate easements are established to preserve planned trail alignments and trail heads. (AI 3, 33) a. Require that all specific plans and other large-scale development proposals include trail networks as part of their circulation systems. b. Ensure that new gated communities, and where feasible, existing gated communities, do not preclude trails accessible to the general public from traversing through their boundaries. c. Provide buffers between streets and trails, and between adjacent residences and trails.	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
d. Make use of already available or already disturbed land where possible for trail alignments. e. Require that existing and proposed trails within Riverside County connect with those in other neighboring city, county, state, and federal jurisdictional areas.	
C 16.5: Identify all existing rights-of-way which have been obtained for trail purposes through the land development process. (AI 34) a. Once the above task has been accomplished, analyze the existing rights of-way and determine the most expedient method for connecting the parts.	Not Applicable. No existing rights-of-way for trails occur within the Project site.
C 16.6: Examine the use of public access utility easements for trail linkages to the regional trails system and/or other open space areas, as feasible. These potential corridors include, but are not limited to, the rights-of-way for: (AI 35, 36, 42) a. water mains; b. water storage project aqueducts; c. irrigation canals; d. flood control; e. sewer lines; f. fiber optic cable lines, g. gas lines, h. electrical lines, and i. fire roads, railroads, and bridges.	Not Applicable. Policy C 16.6 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C16.7: Adhere to the following trail-development guidelines when siting a trail: (AI 3, 35, 36, 38, 39, 40, 41, 42)...	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.
C16.8: Require the installation (where appropriate and pursuant to County of Riverside standards) of the appropriate styles of fencing along trail alignments that separate trails from road right-of-ways (ROWs), or where trails are located within road ROWs, that provide adequate separation from road traffic, in order to adequately provide for public safety. Examples of such fence types include simulated wood post and rail fencing constructed of PVC material, wood round post and rail, and wood-textured concrete post and rail fencing. (AI 3)	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
C 16.9: Coordinate with cities, adjacent counties and affected state or federal land management entities regarding regional trails that cross over or terminate at jurisdictional boundaries. Ensure that adequate consideration is given to how the trail is addressed once it leaves the jurisdiction of Riverside County.	Not Applicable. Policy C 16.9 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 17.1: Develop Class I Bike Paths, Class II Bike Lanes and Class I Bike Paths/Regional Trails (Combination Trails) as shown in the Trails Plan (Figure C-7), to the design standards as outlined in the California Department of Transportation Highway Design Manual, adopted Riverside County Design Guidelines (for communities that have them), Riverside County Regional Park and Open Space Trails Standards Manual, and other Riverside County Guidelines. (AI 34, 41)	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.
C 17.2: Require bicycle access between proposed developments and other parts of Riverside County trail system through dedication of easements and construction of bicycle access ways.	Not Applicable. No trails are proposed or required as part of the Project, and the Project would have no effect on existing trails in the local area.
C 17.3 Ensure that the bikeway system incorporates the following: a. Interconnection throughout and between cities and unincorporated communities. b. Appropriate lanes to specific destinations such as state or county parks. c. Appropriate opportunities for recreational bicycle riding and bicycle touring. d. Opportunities for bicycle commuting and golf cart commuting within a community, as appropriate for the terrain, traffic levels and proximity to surrounding destinations. e. Bikeways connecting to all urban transit centers and systems (bus stops and Metrolink stations) in the vicinity. f. Bicycle parking at transit stops and park-and-ride lots.	Not Applicable. Policy C 17.3 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 17.4: Ensure that alternative modes of motorized transportation, such as buses, trains, taxi cabs, etc., plan and provide for transportation of recreational and commuting bicyclists and	Not Applicable. Policy C 17.4 provides direction to County staff and decision makers and is not applicable to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
bicycles on public transportation systems. Coordinate with all transit operators to ensure that bicycle facilities are provided along and/or near all transit routes, whenever feasible. New land developments shall be required to provide bicycle facilities to existing or future planned transit routes.	
C 18.1 – C 18.3: Acquisition, Maintenance, and Funding of Multipurpose Trails and Bikeways	Not Applicable. Policies C 18.1 through C 18.3 provide direction to County staff and decision makers and are not applicable to the proposed Project.
C 19.1: Preserve scenic routes that have exceptional or unique visual features in accordance with Caltrans' Scenic Highways Plan. (AI 79)	Consistent. As documented in EIR Subsection 4.1, *Aesthetics*, the Project would have less-than-significant impacts on scenic routes and corridors.
C 20.1: Ensure preservation of trees identified as superior examples of native vegetation within road rights-of-way through development proposals review process. Where the County of Riverside deems preservation to be infeasible, relocation and/or replacement shall be evaluated by a qualified arborist to ensure that impacts are mitigated.	Not Applicable. There are no trees identified as "superior examples" existing on the Project site.
C 20.2: Provide all roadways located within identified flood areas with adequate flood control measures.	Not Applicable. No major roadway improvements are proposed as part of the Project.
C 20.3: Locate roadways outside identified flood plains whenever possible. (AI 60)	Not Applicable. No major roadway improvements are proposed as part of the Project.
C 20.4: New crossings of watercourses by local roads shall occur at the minimum frequency necessary to provide for adequate neighborhood and community circulation and fire protection. Wherever feasible, new crossings shall occur using bridging systems that pass over entire watercourses and associated floodplains and riparian vegetation in single spans. Dip or culvert crossings shall be avoided, but, where their use is unavoidable, they shall be designed to minimize impacts on watercourses. (AI 60)	Not Applicable. No major roadway segment improvements are proposed as part of the Project, and no roadways that would cross watercourses are proposed.
C 20.5: In order to protect the watershed, water supply, groundwater recharge, and wildlife values of watercourses, the County of Riverside will avoid siting utility infrastructure and associated grading,	Not Applicable. Policy C 20.5 provides direction to County staff and decision makers and is not applicable to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
fire clearance, and other disturbances within or adjacent to watercourses, if there are feasible alternatives available, and discourage special districts and other governmental jurisdictions outside of Riverside County's authority, from doing so. Where such watershed utility siting locations cannot be avoided, the impacts on watercourses shall be minimized. (AI 60)	
C 20.6: Control dust and mitigate other environmental impacts during all stages of roadway construction.	Consistent. As documented in EIR Subsection 4.7, *Hydrology and Water Quality*, the Project would be subject to the County's NPDES requirements, including during construction of on-site and site-adjacent roadway improvements.
C 20.7: Protect all streets and highways located within identified blow sand areas from blow sand hazards to the extent practicable.	Not Applicable. The Project site and Project-related roadway improvements are not located within an identified blow sand area.
C 20.8: Protect Riverside County residents from transportation generated noise hazards. Increased setbacks, walls, landscaped berms, other sound absorbing barriers, or a combination thereof shall be provided along freeways, expressways, and four-lane highways in order to protect adjacent noise-sensitive land uses from traffic-generated noise impacts. Additionally, noise generators such as commercial, manufacturing, and/or industrial activities shall use these techniques to mitigate exterior noise levels to no more than 60 decibels. (AI 107)	Consistent. The analysis within EIR Subsection 4.9, *Noise*, demonstrates the Project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies, and impacts would be less than significant.
C 20.9: Incorporate specific requirements of the Western Riverside County Multiple Species Habitat Conservation Plan and the Coachella Valley Multiple Species Habitat Conservation Plan into transportation plans and development proposals.	Consistent. As demonstrated in EIR Subsection 4.3, *Biological Resources*, the Project inclusive of its roadway improvements would be fully consistent with the Western Riverside County MSHCP.
C 20.10: Avoid, where practicable, disturbance of existing communities and biotic resource areas when identifying alignments for new roadways, or for improvements to existing roadways and other transportation system improvements.	Consistent. As demonstrated in EIR Subsection 4.3, *Biological Resources*, with mitigation, the Project inclusive of its roadway improvements would result in less-than-significant impacts to biotic resources. Mitigation measures presented in EIR Subsection 4.3, *Biological Resources*, would reduce all of the Project's impacts to biological resources to less-than-significant levels.
C 20.11: Implement the Circulation Plan in a manner consistent with federal, state, and local	Consistent. On SR-79 and pending Caltrans' approval of encroachment permits, the Applicant is required to install a

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
environmental quality standards and regulations.	traffic signal and adjust turning lane geometrics at the intersection of SR-79 and Los Caballos Road, and is required to make signal timing modifications at the intersection of SR-79 and Anza Road and install acceleration and deceleration lanes at the four visitor access driveways at Galway Downs. The Project inclusive of its roadway improvements would be consistent with or otherwise would not conflict with applicable federal, State, and local environmental quality standards and regulations as demonstrated in this EIR.
C 20.12: Review proposals for expansion of pipelines for the transport of suitable products and materials. Any project proponent of such a pipeline shall mitigate impacts, particularly the potential for hazardous chemical or gas leakage and explosion, in accordance with local, state and federal regulations.	Not Applicable. The Project does not involve a proposal for expansion of pipelines for the transport of suitable products or materials.
C 20.13: Incorporate specific requirements of the General Plan Air Quality Element into transportation plans and development proposals where applicable. (AI 110)	Consistent. On SR-79 and pending Caltrans' approval of encroachment permits, the Applicant is required to install a traffic signal and adjust turning lane geometrics at the intersection of SR-79 and Los Caballos Road, and is required to make signal timing modifications at the intersection of SR-79 and Anza Road and install acceleration and deceleration lanes at the four visitor access driveways at Galway Downs. The Project inclusive of its roadway improvements would be consistent with applicable requirements of the General Plan Air Quality Element and result in less-than-significant air quality impacts as demonstrated in EIR Subsection 4.2, *Air Quality*.
C 20.14: Encourage the use of alternative non-motorized transportation and the use of non-polluting vehicles. (AI 118)	Not Applicable. Policy C 20.14 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 20.15 Implement National Pollutant Discharge Elimination System Best Management Practices relating to construction of roadways to control runoff contamination from affecting the groundwater supply	Consistent. As documented in EIR Subsection 4.7, *Hydrology and Water Quality*, the Project, including associated roadway and driveway improvements, would be required to comply with applicable NPDES requirements.
C 21.1 – C 21.7: Transportation Systems Management.	Not Applicable. Policies C 21.1 through C 21.7 provide direction to County staff and decision makers and are not applicable to the proposed Project.
C 22.1 and C 22.2: Transportation Demand Management.	Not Applicable. Policies C 22.1 and C 22.2 provide direction to County staff and decision makers and are not applicable to the proposed Project.

Table 4.10-3 Project Consistency with Riverside County General Plan Circulation Element Policies

General Plan Circulation Element Policy	Project Consistency
C 23.1 – C 23.14: Goods Movement.	Not Applicable. Policies C 23.1 through C 23.14 apply to areas in close proximity to freight rail or air cargo services where heavy truck traffic is anticipated, or otherwise provide direction to County staff and decision makers, and are not applicable to the proposed Project.
C 24.1: Encourage the integration of Intelligent Transportation Systems (ITS) consistent with the principles and recommendations referenced in the Inland Empire ITS Strategic Plan as the transportation system is implemented. (AI 117)	Not Applicable. Policy C 24.1 provides direction to County staff and decision makers and is not applicable to the proposed Project.
C 25.1 and C 25.2: Major Utility Corridors.	Not Applicable. Policies C 25.1 and C 25.2 relate to major utility corridors and are not applicable to the proposed Project.

Threshold b.: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Under CEQA Guidelines Section 15064.3(b), the primary metric for evaluating transportation impacts is VMT, which represents the total distance driven by vehicles attributable to a project. The proposed Project's VMT increase over baseline conditions is based on the net new vehicle trips associated with the Project.

As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description,* the County has exercised its discretion under N*eighbors for Smart Rail v. Exposition Metro Line Constr. Auth*. (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, and the VMT analysis presented below applies that baseline framework to evaluate the Project's net new vehicle trips and associated annual VMT above established baseline conditions.

According to the Project Applicant's 2023 data, which forms the Project's operational baseline for purposes of analyses in this EIR, peak weekdays occurred on five occasions (April 21, April 28, June 2, June 9, and May 26, 2023), with approximately 4,458 two-way vehicle trips per day. The peak weekend day occurred on May 28, 2023, with approximately 11,514 two-way vehicle trips (5,757 one-way trips x 2 = 11,514 two-way trips). Under the proposed Project, programming for equestrian events would be similar to baseline conditions, and no changes are anticipated to equestrian-related programming other than a higher level of competitive activities. Sports events and special occasion events also would continue to occur in a manner substantially similar to baseline conditions, except that these activities would be fully permitted to occur on the site in designated zones with approval of CUP 02303R1. Event frequency may increase on weekends, but maximum peak day conditions would not exceed the peak day recorded in 2023. For context, in 2023 there were a total of 22 weekend days (Saturdays or Sundays) where the facility experienced more than 2,500 one-way vehicle trips. Although weekend event frequency may slightly increase, for purposes of providing a

conservative analysis, a peak event was assumed to occur every Saturday and Sunday of the year under the proposed Project (104 peak event weekend days per year). This results in 1,197,456 projected annual two-way weekend trips based on 11,514 two-way trips per peak weekend day multiplied by 104 weekend days. Existing condition annual weekend trips were derived from available data on existing daily trip generation that occurred in 2023 and totaled 359,238 annual two-way weekend trips. The difference between the Project's annualized peak weekend trip generation and existing condition annual weekend trips results in 838,218 net new annual two-way weekend trips. The average weekend trip length applied to these net new trips, 39.2 miles per trip, was derived from available StreetLight data. Weekday trip generation is anticipated to be unchanged from baseline conditions and therefore no change in weekday VMT is assumed. (UXR, 2026f, pp. 5-6)

Based on this calculation, Project-related vehicle trips would result in approximately 32,857,946 net new annual VMT. Table 4.10-4, *Proposed Project VMT*, provides an estimate of annual VMT for the proposed Project based on baseline annual VMT and the net new annual vehicle trips associated with the Project conservatively assuming a peak event every weekend of the year. The resulting values conservatively represent the Project-generated total VMT under the proposed Project. It should be emphasized that the total VMT values presented in Table 4.10-4 assume a peak event every weekend of the year, which is not anticipated to occur, and thus overstates the Project's anticipated VMT since Galway Downs would not realistically host a peak event every weekend of the year. (UXR, 2026f, pp. 5-6)

Table 4.10-4 Proposed Project VMT

Baseline Condition	Baseline Annual VMT	Net New Annual Vehicle Trips	Trip Length	Additional Annual VMT	Proposed Project Total VMT
Weekday Average (Mon-Fri)	5,031,036	0	30.5 mi	0	5,031,036
Weekends Average (Sat-Sun)	10,192,000	838,218	39.2 mi	32,857,946	43,049,946
TOTAL VMT	**15,223,036**	--	--	**32,857,946**	**48,080,982**

(UXR, 2026f, p. 5)

As shown in Table 4.10-4, *Proposed Project VMT,* the proposed Project is estimated to generate substantially higher VMT compared to baseline conditions, with total annual VMT increasing from 15,223,036 miles to 48,080,982 miles. This increase exceeds the VMT significance threshold of any increase in VMT, indicating that the Project would result in a significant transportation impact.

Threshold c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

The only roadway improvements proposed as part of the Project include the installation of a traffic signal and an eastbound left-turn lane at the intersection of Los Caballos Road at SR-79, the implementation of

overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project access driveways. The Riverside County Transportation Department has reviewed the Project's proposed roadway improvements as depicted on the Project's CUP 02303R1 application materials, and has determined that the design of the improvements would not substantially increase hazards due to a geometric design feature; on the contrary, the installation of a new traffic signal, a new turn lane, overlap phasing, and the acceleration and deceleration lanes generally would serve to improve traffic safety in the local area. Additionally, under proposed CUP 02303R1, events at Galway Downs would be conditioned to require traffic management by the CHP or other Caltrans approved traffic management company on SR-79 for any event anticipated to draw 3,500 or more one-way vehicle trips. When traffic management is required, traffic management would include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections. Vehicle types accessing Galway Downs would be the same that occurs under baseline conditions. Accordingly, the Project would not substantially increase transportation safety hazards due to a geometric design feature or incompatible uses compared to the baseline condition, and impacts would be less than significant.

Threshold d: Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth*. (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, rather than solely on the activities expressly authorized under the existing CUPs. The 2023 operational dataset captures the full range of activities occurring at Galway Downs under baseline conditions, including equestrian events, sports events, and special occasion events, and the vehicle trip volumes associated with those activities, including peak weekend days with up to 5,757 one-way vehicle trips. This baseline constitutes the existing conditions against which the Project's incremental roadway maintenance impacts are measured. As future operations at the Galway Downs facility are anticipated to be consistent with the established 2023 environmental baseline, the data collected in 2023 are representative of future Project-related maximum daily traffic volumes. Event frequency on weekdays is reasonably anticipated to be the same as what occurs under the baseline condition, although event frequency on weekends could increase within the parameters established by the parking management plan required as a condition of CUP 02303R1, which limits peak operations to a maximum of 4,639 parking spaces, fewer than the 5,757 one-way vehicular trips documented during 2023 baseline conditions.

It can be concluded that implementation of the proposed Project would not increase the need for new or altered roadway maintenance in the local area beyond what already occurs under existing conditions for the following reasons. First, the Project would not increase peak daily vehicle trips above the established 2023 environmental baseline, and the parking management plan would in fact constrain peak trips below the 2023 maximum, meaning the pavement wear, erosion, and maintenance demand attributable to the Project's

daily traffic volume would not exceed those already generated by existing operations. Second, the Project's proposed physical roadway improvements including the reconfiguration of four visitor access driveways with acceleration and deceleration lanes, and the installation of a traffic signal at the SR-79/Los Caballos Road intersection, would improve traffic operations at the facility's primary access points and reduce the potential for traffic-related wear on the adjacent public roadway network by providing dedicated turning movements that currently do not exist. Third, the Project Applicant would be required to continue paying property taxes that fund the ongoing maintenance of the public roadways serving the Project, ensuring that the facility's contribution to cumulative roadway wear is offset through the standard fee mechanism applicable to all development within unincorporated Riverside County. Fourth, the private roadway improvements would be maintained by the Galway Downs facility at the applicant's expense and would not constitute a new maintenance obligation for Riverside County. For all of these reasons, the Project would not result in any impacts due to the need for new or altered maintenance of roadways, and a less-than-significant impact would occur.

Threshold e: Would the Project cause an effect upon circulation during the project's construction?

The Project includes the following roadway and intersection improvements that would require construction within or adjacent to the public right-of-way: installation of a new traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at SR-79; implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79; and installation of acceleration and deceleration lanes at each of the four reconfigured visitor access driveways along Los Caballos Road and Los Corralitos Road. Construction of these improvements would require temporary lane closures, flagging operations, and equipment staging within or immediately adjacent to SR-79, Los Caballos Road, and Los Corralitos Road, all of which carry existing vehicle, equestrian, and bicycle traffic. During construction of the traffic signal at Los Caballos Road and SR-79 in particular, temporary disruption to through-traffic movements on SR-79 is possible, as signal pole installation and underground conduit work typically require partial lane closures on a state highway that is subject to Caltrans encroachment permit requirements. Similarly, construction of the acceleration and deceleration lanes at the Project's access driveways could temporarily reduce available lane width or require lane shifts at each driveway location during construction and paving operations. These temporary construction-related circulation effects have the potential to adversely affect traffic flow during the short-term and temporary construction periods.

Because construction within the SR-79 right-of-way and at the access driveway locations could temporarily impede traffic flow on public roadways, this impact is conservatively evaluated as a significant impact prior to mitigation. Implementation of a project-specific Construction Traffic Control Plan, prepared in accordance with the California Manual on Uniform Traffic Control Devices (CA MUTCD) and subject to review and approval by Riverside County Transportation Department and Caltrans prior to commencement of any work within the public right-of-way, would reduce this impact to a less-than-significant level by establishing specific lane closure protocols, flagging requirements, construction hour restrictions, and emergency access maintenance procedures for each phase of construction activity.

Threshold f: Would the Project result in inadequate emergency access or access to nearby uses?

Under long-term operating conditions, the Project would not adversely affect emergency access in the local area. To the contrary, the Project's roadway improvements, including the new traffic signal and eastbound left-turn lane at Los Caballos Road at SR-79, the overlap phasing improvement at Anza Road at SR-79, and the acceleration and deceleration lanes at the four reconfigured access driveways, would improve the efficiency and safety of ingress and egress movements at the facility's primary access points, reducing the potential for event-related traffic queuing on SR-79 that could impede emergency vehicle movements along the corridor. Additionally, under proposed CUP 02303R1, events at Galway Downs would be conditioned to require traffic management by the CHP or other Caltrans approved traffic management company on SR-79 for any event anticipated to draw 3,500 or more one-way vehicle trips. When traffic management is required, traffic management would include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections. The Galway Downs Emergency Management Plan (EMP) designates three evacuation/refuge areas on the property and establishes protocols for coordinating with the Riverside County Fire Department (RCFD) in the event of a wildfire or other emergency. Under long-term operating conditions, impacts to emergency access would be less than significant.

During construction, however, the installation of the traffic signal and left-turn lane at Los Caballos Road at SR-79, the overlap phasing improvements at Anza Road at SR-79, and the acceleration and deceleration lanes at the Project's access driveways would require temporary lane closures, flagging operations, and equipment staging within or adjacent to SR-79, Los Caballos Road, and Los Corralitos Road. These temporary conditions have the potential to narrow available travel lanes, redirect traffic flows, and limit the ability of emergency vehicles to navigate through active construction zones without delay. SR-79 serves as a primary emergency response corridor for the western Riverside County area, and any temporary impediment to emergency vehicle movement on this corridor even for a short construction duration could constitute a potentially significant impact on emergency access. This impact is conservatively evaluated as significant prior to mitigation. The project-specific Construction Traffic Control Plan required as mitigation for Threshold e., prepared in accordance with the CA MUTCD and subject to review and approval by Riverside County Transportation Department and Caltrans prior to commencement of any work within the public right-of-way, shall also include specific provisions for maintaining emergency vehicle access throughout all phases of construction activity. These provisions shall include, at minimum: advance coordination with RCFD and the CHP regarding construction schedules and lane closure timing; establishment and signing of emergency vehicle access during construction; requirements that flaggers give immediate right-of-way to emergency vehicles at all times; and restrictions on simultaneous lane closures at multiple locations along the SR-79 corridor. Because the Construction Traffic Control Plan required for Threshold e. directly addresses emergency access as well as general circulation, no separate mitigation measure is required for Threshold f). The emergency access provisions shall be incorporated as a specific component of the Threshold e. Construction Traffic Control Plan. With implementation of these provisions, impacts to emergency access during construction would be less than significant.

Threshold g: Would the Project include the construction or expansion of a bike system or bike lanes?

All bike lanes planned in the local area already are in place, and no construction or expansion of bike systems or bike lanes are proposed as part of the Project. Accordingly, no impact would occur.

4.10.6 Cumulative Impact Analysis

This cumulative impact analysis considers implementation of the proposed Project in conjunction with other development projects and planned development that would occur with buildout of the Riverside County General Plan and the general plans of local jurisdictions within the County that are within the study area identified by the Project's TA (*Technical Appendix I*).

The analysis of Threshold a. demonstrates that the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Specifically, there are no components of the Project that would conflict with Connect SoCal, the Riverside County CMP, or the Riverside County General Plan Circulation Element. Accordingly, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system.

As indicated in the analysis of Threshold b., for cumulative VMT impacts, the relevant question is whether the Project's contribution to region-wide VMT, in combination with other past, present, and reasonably foreseeable future projects in western Riverside County, would result in a cumulatively considerable increase in VMT above regional and countywide baseline conditions. As demonstrated in the project-level analysis above, the proposed Project is estimated to generate approximately 32,857,946 net new annual VMT above the Project site's established 2023 environmental baseline under the conservative assumption that a peak event occurs at Galway Downs every weekend of the year. As noted in the project-level analysis, this figure overstates the Project's anticipated VMT because Galway Downs would not realistically host a peak event every weekend of the year; in 2023, only 22 weekend days experienced more than 2,500 one-way vehicle trips. Nevertheless, even using this conservative worst-case figure, the Project's contribution to cumulative VMT must be evaluated in the regional context. Under this threshold framework, a project's VMT impact is considered cumulatively considerable if the project contributes net new VMT to the regional travel network above the established baseline, since every increment of VMT above baseline represents an addition to the cumulative regional VMT pool that contributes to traffic congestion and GHG emissions region-wide. Because the proposed Project generates net new VMT above the established 2023 environmental baseline under the conservative assumptions described above, the Project's contribution to cumulative VMT is also considered significant. The SCAG Connect SoCal 2024 RTP/SCS projects population, employment, and VMT growth for the SCAG region and includes programmatic strategies, including land use intensification near transit, active transportation network investments, and TDM programs that are intended to reduce per-capita VMT below business-as-usual growth trajectories. The proposed Project, as a rural events facility drawing visitors from a regional market area with an average trip length of 39.2 miles on weekend days, is not the type of development that the Connect SoCal VMT reduction strategies are designed to address. The Project's event-driven travel pattern is not amenable to the transit-oriented, infill-focused strategies contemplated by Connect SoCal, and the Project's VMT contribution is not

offset by any programmatic regional mitigation measure. The Project's cumulative VMT impact would thus be significant.

As indicated under Threshold c., the only roadway improvements proposed as part of the Project include the installation of a traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at SR-79, the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project access driveways. The Riverside County Transportation Department has reviewed the Project's proposed roadway improvements plans, and has determined that the design of the improvements would not substantially increase hazards due to a geometric design feature; on the contrary, the installation of a new traffic signal and the acceleration and deceleration lanes generally would serve to improve traffic safety in the local area. In addition, the equestrian and sports event uses that would be accommodated by the proposed Project are fully consistent and compatible with surrounding land uses in the area. Accordingly, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment), and cumulatively-considerable impacts would be less than significant.

As indicated under Threshold d., the proposed Project would not result in a cumulatively-considerable increase in the need for new or altered roadway maintenance. As discussed in EIR Sections 2.0, *Environmental Baseline*, and 3.0, *Project Description,* the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in 2023. Under that baseline, peak daily vehicle trips of up to 5,757 one-way trips already constitute existing conditions, and the parking management plan required as a condition of CUP 02303R1 would constrain peak operations to a maximum of 4,639 parking spaces, below the 2023 peak. Accordingly, pavement wear, erosion, and maintenance demand attributable to Project traffic would not exceed those already generated by existing operations. Furthermore, the Project's roadway improvements including the reconfiguration of four visitor access driveways with acceleration and deceleration lanes and the installation of a traffic signal at the SR-79/Los Caballos Road intersection would improve traffic operations at the facility's primary access points and reduce the potential for traffic-related wear on the adjacent public roadway network. The Project Applicant would be required to continue paying property taxes funding the ongoing maintenance of public roadways serving the Project, and private roadway improvements along Los Corralitos Road would be maintained by the Galway Downs facility at the applicant's expense. For these reasons, consistent with the project-level finding under Threshold d., the Project would not result in a cumulatively-considerable increase in the need for new or altered roadway maintenance, and impacts would be less than significant on a cumulatively-considerable basis.

As indicated under Threshold e., the Project has the potential to adversely impact circulation in the local area during the construction of proposed frontage improvements, during the installation of the new traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at SR-79, and during the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79. There is a potential that other cumulative developments could be under simultaneous construction in

the local area, and may adversely affect traffic along local roadways. Both the Project and other cumulative developments would be required to implement appropriate traffic control measures during construction so as not to significantly adversely affect the circulation system. Nonetheless, in the absence of mitigation, the Project's potential impacts to circulation during construction would be cumulatively considerable.

As indicated under the analysis of Threshold f., under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during the installation of a traffic signal and left-turn lane at the intersection of Los Caballos Road at SR-79, during the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and during the installation of acceleration and deceleration lanes at the Project access driveways, there is a potential that the Project could adversely affect emergency access or access to nearby uses. Other cumulative developments similarly could be under construction and could cumulatively-contribute to potential impacts to emergency access. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan.

All bike lanes planned in the local area already are in place, and no construction or expansion of bike systems or bike lanes are proposed as part of the Project. Accordingly, cumulatively-considerable impacts would not occur.

4.10.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impacts. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Specifically, there are no components of the Project that would conflict with Connect SoCal, the Riverside County CMP, or the Riverside County General Plan Circulation Element. Accordingly, the Project has no potential to result in impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. The VMT significance threshold is any net increase in VMT above baseline conditions. The proposed Project is estimated to generate approximately 32,857,946 net new annual VMT above the established 2023 environmental baseline under the conservative assumption that a peak event occurs every weekend of the year. Because the Project's net new VMT represents an increase in VMT above baseline conditions, and the Project's direct VMT impact and contribution to cumulative VMT is therefore significant.

Threshold c.: Less-than-Significant Impact. The only roadway improvements proposed as part of the Project include the installation of a traffic signal and eastbound left-turn lane at the intersection of Los Caballos Road at SR-79, the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project access driveways. The Riverside County Transportation Department has reviewed the Project's proposed roadway improvements plans, and has determined that the design of the improvements would not substantially increase hazards due to a geometric design feature; on the contrary, the installation of a new traffic signal and the acceleration and deceleration lanes generally would serve to improve traffic safety in the local area.

In addition, the equestrian and sports event uses that would be accommodated by the proposed Project are fully consistent and compatible with surrounding land uses in the area. Accordingly, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment), and impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. Roadway pavement wear and maintenance demand attributable to Project traffic would not exceed those already generated by existing operations. Furthermore, the Project's proposed roadway improvements would improve traffic operations at the facility's primary access points and reduce the potential for traffic-related wear on the adjacent public roadway network. The Project Applicant would continue to pay property taxes funding the ongoing maintenance of public roadways serving the Project, and private driveways serving Galway Downs would be maintained by the Galway Downs facility at the Applicant's expense. For these reasons, the proposed Project would not result in an increase in the need for new or altered roadway maintenance in the local area beyond what already occurs under existing conditions, and a less-than-significant impact would occur.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project would include the installation of a traffic signal and left-turn lane at the intersection of Los Caballos Road at SR-79, the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and the installation of acceleration and deceleration lanes at the Project access driveways. As such, the Project has the potential to adversely impact circulation in the local area during the construction of proposed frontage improvements and during the proposed improvements at the intersections of Los Caballos Road at SR-79 and Anza Road at SR-79. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan during construction.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. Under long-term operating conditions, the Project would have no effect on emergency access in the local area, and impacts would be less than significant. However, during the installation of a traffic signal and left-turn lane at the intersection of Los Caballos Road at SR-79, during the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and during the installation of acceleration and deceleration lanes at the Project access driveways, there is a potential that the Project could adversely affect emergency access or access to nearby uses. This is conservatively evaluated as a significant impact for which mitigation would be required in the form of a traffic control plan.

Threshold g.: No Impact. All bike lanes planned in the local area already are in place, and no construction or expansion of bike systems or bike lanes are proposed as part of the Project. Accordingly, no impact would occur.

4.10.8 Regulatory Requirements, Design Features, and Mitigation

Applicable Regulations and Design Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- Prior to final building inspection for each phase of the proposed Project, the Project Applicant shall make fair-share contributions towards transportation improvements, in accordance with Table 1-3 of the Project's Traffic Analysis (*Technical Appendix I* to this EIR).

Design Features

The Project includes the following design features, which are integral to the Project's physical design and/or operational characteristics.

- As required by proposed CUP 02303R1, traffic management by the California Highway Patrol (CHP) or other Caltrans-approved traffic management company on SR-79 shall be provided for any event anticipated to draw 3,500 or more one-way vehicle trips. When required, traffic management shall include personnel directing traffic into and out of the Galway Downs facility at the Project's access driveways, with personnel also temporarily disabling the traffic signal lights at the intersections of Los Caballos Road at SR-79 and Pauba Road at SR-79 to manually direct traffic through both intersections.

- The Project includes the installation of a new traffic signal and an eastbound left-turn lane at the intersection of Los Caballos Road at SR-79. This improvement has been designed to improve traffic operations and safety at this intersection during peak event conditions, and is required as a condition of CUP 02303R1.

- The Project includes the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, which would improve traffic operations at this intersection during peak event conditions.

- The Project includes the reconfiguration and paving of four visitor access driveways along Los Caballos Road and Los Corralitos Road, with the installation of acceleration and deceleration lanes at each driveway location, reducing conflicts between event-related ingress and egress movements and through-traffic on the adjacent roadways.

- The Project's parking management plan, required as a condition of CUP 02303R1, limits peak operations at the facility to a maximum of 4,639 parking spaces, which constrains peak daily vehicle trips to a level below the 5,757 one-way vehicular trips documented during 2023 baseline conditions. This operational cap on parking ensures that the Project would not generate vehicle trips in excess of the established environmental baseline.

- The Project includes a prohibition on parking on public streets during special occasions, consistent with the proposed modification to the WC zone General Standards under CZ 22000010, which reduces the potential for event-related on-street parking to create traffic safety hazards or impede traffic flow on Los Caballos Road, Los Corralitos Road, and Pauba Road.

- The Project's four reconfigured visitor access driveways have been designed to comply with Riverside County Road Improvement Standards and Specifications and with the minimum intersection spacing standards of the Riverside County Transportation Department, ensuring safe and efficient ingress and egress for event attendees, employees, and emergency vehicles.

Mitigation

❑ **Project-Specific Mitigation**

MM 4.10-1 Prior to the issuance of grading permits or improvement plans affecting the intersection of Los Caballos Road at State Route 79 (SR-79), prior to issuance of grading permits or improvement plans affecting the intersection of Anza Road at SR-79, and prior to issuance of grading permits or improvements plans to accommodate acceleration lanes and deceleration lanes at the Project's access driveways, the Project Applicant shall prepare and Riverside County shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CA MUTCD). The traffic control plan shall also require advance coordination with RCFD and the CHP regarding construction schedules and lane closure timing; establishment and signing of emergency vehicle access during construction; requirements that flaggers give immediate right-of-way to emergency vehicles at all times; and restrictions on simultaneous lane closures at multiple locations along the SR-79 corridor. A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors.

❑ **Applicable Mitigation Measures from the Temecula Wine Country Community Plan Program Environmental Impact Report**

Although mitigation measures are not required beyond Mitigation Measure MM 4.10-1, the following mitigation measure from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's construction-related air quality emissions during construction activities. Refer also to EIR *Technical Appendix K*, which includes an analysis demonstrating why WCCP PEIR mitigation measures not listed below either are not applicable to the proposed Project, or that the required measures already have been addressed either as part of the Project's application materials or through the analysis conducted as part of this EIR for the Galway Downs Project.

WCCP PEIR MM TR-4: All future transportation related improvements in the Project area shall be consistent with the County ordinances (i.e. Ordinance No. 348, 460, 461, 499, 512, 585 etc.) and the Project (i.e., revised SWAP Figure 7 – Circulation Network,

development standards of the implementing zones, Temecula Valley Wine Country Design Guidelines, etc.). All implementing project designs, including site access points, turning lanes, etc. shall be reviewed by the County Transportation Department staff to determine that proposals are consistent with appropriate design standards.

4.10.9 Significance Of Impacts After Mitigation

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. No feasible mitigation measures are available to reduce the Project's VMT impact to a less-than-significant level. Transportation demand management measures including shuttle service, rideshare coordination, and carpool programs are not feasible for this Project because the nature and composition of Galway Downs event attendance makes organized transportation demand management (TDM) impracticable at the scale necessary to achieve meaningful VMT reductions. The Galway Downs facility hosts equestrian events, sports events, and special occasions whose attendees, including event participants, competitors, trainers, equine handlers, and spectators, arrive from dispersed origins throughout the region at varying times, often transporting horses, specialized equipment, trailers, and supplies that cannot be accommodated on shared transit or shuttle vehicles. Unlike a fixed-schedule commute population or a concentrated urban event venue served by existing transit infrastructure, Galway Downs event attendees have no common origin point, no fixed arrival or departure schedule, and highly variable transportation needs determined by the nature of their participation in each event. Based on published California Air Pollution Control Officers Association (CAPCOA) (CAPCOA, 2024, pp. 61-241) ranges and reasonable expectations for this type of facility, available TDM strategies could achieve only a 3 to 12 percent reduction in total Project VMT, if such strategies were feasible, and insufficient to reduce net new VMT to zero as required by the County's significance threshold. Limiting event frequency or scale would reduce VMT but is not feasible mitigation because it would be fundamentally inconsistent with the basic objectives of the proposed Project. Accordingly, the Project's VMT impact is significant and unavoidable on both a project-specific and cumulatively-considerable basis.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Mitigation Measure MM 4.10-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans associated with the installation of a traffic signal and eastbound left-turn lane at the Los Caballos Road at State Route 79 (SR-79) intersection, during the implementation of overlap phasing for the southbound right-turn lane at the intersection of Anza Road at SR-79, and during the construction of acceleration and deceleration lanes at the Project's access driveways. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Mitigation Measure MM 4.10-1 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits or improvement plans associated with the installation of a traffic signal and eastbound left-turn lane at the Los Caballos Road at State Route 79 (SR-79) intersection, the

overlap phasing improvements at Anza Road at SR-79, and the acceleration and deceleration lanes at the Project access driveways. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect emergency access or access to nearby uses during the Project's construction phase. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

4.10.10 References

Cited As	Reference
CAPCOA, 2024	California Air Pollution Control Officers Association, 2024. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. October 2024. Available on-line at: https://www.caleemod.com/documents/handbook/full_handbook.pdf
Riverside County, 2020b	Riverside County, 2020. *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled*. December 2020. Accessed December 20, 2025. Available on-line at: https://trans.rctlma.org/sites/g/files/aldnop401/files/migrated/Portals-7-2020-12-15-20--20Transportation-20Analysis-20Guidelines.pdf
UXR, 2025	Urban Crossroads, Inc., 2025. *Galway Downs (CUP02303R1) Traffic Analysis*. November 4, 2025. Included as EIR *Technical Appendix I*.
UXR, 2026f	Urban Crossroads, Inc., 2026f. *Galway Downs (CUP02303R1) Vehicle Miles Traveled (VMT) Assessment*. June 19, 2026. Included as EIR *Technical Appendix J*.

4.11 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection documents the results of the County's consultation with local Native American tribes. It should be noted that much of the written and oral communication between Native American tribes and Riverside County is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code Section 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archaeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs., tit. 14, Section 15120(d)).

4.11.1 Existing Conditions

A. Tribal Cultural Resources Definition

Tribal Cultural Resources (TCRs) are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as a cultural landscape. CEQA defines a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or a local historical register, or determined by the lead agency to be one based on substantial evidence (Public Resources Code [PRC] Section 21074(a)). A cultural landscape that meets this definition is a tribal cultural resource to the extent that the landscape is geographically defined in terms of size and scope (PRC Section 21074(b)). A historical resource or archaeological resource that meets this definition might also be a tribal cultural resource, if identified as such by a consulting tribe (PRC Section 21074(c)).

Also relevant is the concept of cultural places through consultation under Senate Bill 18 (SB 18). The purpose of SB 18 is to seek ways to preserve and protect cultural places of California Native Americans. SB 18 requires local governments to involve California Native Americans in early stages of land use planning. SB 18 refers to Public Resources Code Sections 5097.9 and 5097.993 to define a cultural place as Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9) or a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to PRC Section 5024.1, including any historic or prehistoric ruins, any burial ground, or any archaeological or historic site (PRC Section 5097.993).

Also relevant is the category termed "traditional cultural property" (TCP), which is typically associated with cultural resource management performed under federal auspices. "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living

community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP and by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

B. Tribal Cultural Setting

Refer to EIR subsection 4.4.1 for a complete description of the cultural setting, existing site conditions, and the archaeological and historical resources assessment.

4.11.2 Applicable Regulatory Requirements

The following is a brief description of the State environmental laws and related regulations addressing TCRs. Refer also to EIR subsection 4.4.2 for a complete description of federal, State, and local environmental laws and regulations governing the protection of cultural resources.

A. Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations.

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code Section 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment.

B. Assembly Bill 52 (AB 52)

California Assembly Bill 52 (AB 52) (Stats. 2014, Chapter 532) amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3 to, the PRC, relating

to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the Legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the Legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, Section 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, Section 21080.3.1.)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. PRC Section 21084.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015.

Section 21074 of the PRC defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe.

C. State Health and Safety Code

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "[i]n the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can make a determination regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. HSC Section 7051 specifies that the

removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC Sections 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

PRC Section 5097.98 states that whenever the commission receives notification of a discovery of Native American human remains pursuant to HSC Section 7050.5(c), it shall immediately notify those persons that are the most likely descendants. The descendants may inspect the site and make recommendations to the landowner as to the treatment of the human remains. The landowner shall ensure that the immediate vicinity around the remains is not damaged or disturbed by further development activity until coordination has occurred with the descendants regarding their recommendations for treatment, taking into account the possibility of multiple human remains. The descendants shall complete their inspection and make recommendations within 48 hours of being granted access to the site.

4.11.3 Basis for Determining Significance

Section XVIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects on tribal cultural resources, and includes the following threshold question to evaluate the Project's impacts to tribal cultural resources:

- *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
    - *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*
    - *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section XVIII of Appendix G to the State CEQA Guidelines, and indicate significant impacts would occur if the Project or any Project-related component would:

a. *Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is*

geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is

1. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k); or*
2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

4.11.4 Methodology

A. Overview

The analysis of potential TCR impacts is based on the nature and degree of any substantial adverse change to TCRs that would be brought about by the Project, along with how such changes, if any, would affect the integrity and significance of these resources to the California Native American tribes that are traditionally and culturally affiliated with the Project area. The County of Riverside, as Lead Agency under CEQA, conducted AB 52 consultation with all California Native American tribes that have submitted a request to be notified of projects within their traditional area. AB 52 notifications were mailed on March 27, 2025, with responses received from multiple tribes and formal consultation conducted with the Pechanga Band of Indians. The results of the AB 52 consultation are presented herein in subsection 4.11.5, including the substantive information provided by the Pechanga Band of Indians regarding the cultural sensitivity of the Project area and the agreed-upon mitigation measures to address the potential for inadvertent discovery of TCRs during ground-disturbing activities. In addition, because the Project does not involve adoption or amendment of a general plan or specific plan, the consultation requirements of SB 18 are not triggered by the Project; however, the consultation efforts undertaken by the County for purposes of AB 52 are consistent with the spirit and intent of SB 18 regarding early tribal involvement in land use decisions affecting tribal cultural places.

Information regarding the broader prehistoric, historic, and archaeological context of the Project site documented in EIR Subsection 4.4, *Cultural Resources*. Information regarding the archaeological records search conducted through the South Coastal Information Center (SCIC), the intensive pedestrian field survey of the Project's physical disturbance area, the Sacred Lands File (SLF) search conducted through the Native American Heritage Commission (NAHC), and the informal Native American outreach conducted by Brian F. Smith and Associates, Inc. (BFSA) in connection with the Project's Cultural Resources Study (CRS) is presented in EIR subsection 4.4.4 and is not repeated herein; the results of those efforts inform but are distinct from the AB 52 consultation conducted by the County for purposes of the analysis presented in this section. The methodology used to evaluate the Project's potential impacts to TCRs is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County, within the Temecula Valley Wine Country Policy Area. The broader prehistoric, historic, and archaeological setting of the Project site, including the cultural sequence applicable to the Temecula Valley region and the results of the records search, field survey, and SLF search conducted in connection with the Project's CRS, is described in detail in EIR Subsection 4.4, *Cultural Resources*, and is not repeated herein. The baseline conditions reflect the long-term physical disturbance to the Project site associated with the site's prior agricultural use from at least the 1940s through the late 1960s and its continuous use as an equestrian-oriented events facility since 1968, which has resulted in the clearing, grading, discing, or other disturbance of the ground surface across the majority of the Project's physical disturbance area. Consistent with State CEQA Guidelines Section 15125, the analysis of potential TCR impacts evaluates the incremental effects of the proposed Project relative to the physical and tribal-cultural baseline conditions described above, as they existed at the Project site at the time the NOP for this EIR was published (January 14, 2025).

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with limited new physical construction and ground-disturbing activities, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to convert previously undisturbed land to a new use. The primary analytical question addressed herein is whether the limited physical improvements proposed as part of the Project, including the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure, additional area for equestrian RV park use, an off-site sewer line, and future areas for up to 36 park model lodging units and 18 employee modular housing units, would cause a substantial adverse change in the significance of any TCR within or adjacent to the Project's limits of physical disturbance, taking into consideration: (1) the results of the County's AB 52 consultation with California Native American tribes traditionally and culturally affiliated with the Project area; (2) the long-term prior disturbance of the Project site and the absence of previously recorded TCRs within the Project's physical disturbance area, as documented in EIR Subsection 4.4, *Cultural Resources*; and (3) the potential for ground-disturbing activities to result in the inadvertent discovery of previously unrecorded subsurface TCRs.

The methodology applies the criteria for evaluating TCRs established by PRC Section 21074, under which a resource is considered a TCR if it is (a) listed, or determined eligible for listing, in the California Register of Historical Resources (CRHR) or in a local register of historical resources, or (b) a resource that the Lead Agency, in its discretion and supported by substantial evidence, determines to be significant pursuant to the criteria set forth in PRC Section 5024.1(c), with consideration given to the value of the resource to the affiliated tribe. The methodology further applies the standard set forth in PRC Section 21084.2, under which a project that may cause a substantial adverse change in the significance of a TCR is considered a project that may have a significant effect on the environment under CEQA. The criteria for evaluating CRHR eligibility

under PRC Section 5024.1 and the criteria for evaluating "substantial adverse change" are described in further detail in EIR subsection 4.4.4.C (Criteria for Evaluating Significance of Cultural Resources) and are applied here with the additional consideration of the resource's value to the affiliated tribe.

4.11.5 Impact Analysis

Threshold a.: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

TCRs are resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as a cultural landscape. Also relevant is the category termed “traditional cultural property” (TCP) which is typically associated with cultural resource management performed under federal auspices. “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP and by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB 52), notices regarding this project were mailed to all requesting tribes on March 27, 2025. Consultation was requested by the Pechanga Band of Indians. There was no response from Ramona Band of Cahuilla, Cahuilla Band of Indians, Colorado River Indian Tribes (CRIT), Santa Rosa Band of Cahuilla Indians, Morongo Band of Mission Indians, or the Soboba Band of Luiseño Indians. A summary of the results of the correspondence and/or consultation with these local area tribes is provided below.

Agua Caliente Band of Cahuilla Indians

The Agua Caliente Band of Cahuilla Indians responded in an email dated March 27, 2025. The email stated, "[a] records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts." As such, consultation with the Agua Caliente Band of Indians was not initiated nor required.

Augustine Band of Cahuilla Indians

The Augustine Band of Cahuilla Indians responded in an emailed letter dated March 27, 2025. The letter stated, "[a]t this time, we are not aware of any specific cultural resources within the project area that would be affected by the proposed development. Therefore, we do not believe that formal consultation is necessary at this stage." As such, consultation with the Augustine Band of Cahuilla Indians was not initiated nor required.

Pala Band of Mission Indians

The Pala Band of Mission Indians responded in an emailed letter dated March 28, 2025. The letter stated, "[w]e have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we decline AB-52 consultation at this time, but do not waive our right to request consultation under other applicable laws in the future. At this point we defer to the wishes of Tribes in closer proximity to the project area." As such, consultation with the Pala Band of Mission Indians was not initiated nor required.

Fort Yuma Quechan Tribe

The Fort Yuma Quechan Tribe responded in an email dated March 27, 2025. The email stated, "[t]his email is to inform you that the Historic Preservation Office does not wish to comment on this project. We defer to the local Tribes and support their determinations on this matter." As such, consultation with the Fort Yuma Quechan Tribe was not initiated nor required.

Rincon Band of Luiseño Indians

The Rincon Band of Luiseño Indians responded in an email dated May 8, 2025. The email stated, "[t]he Rincon Band has received the notification for the above referenced project. The location identified within project documents is not within the Tribe's specific Area of Historic Interest (AHI). At this time, we have no additional information to provide and do not request consultation. We recommend that you directly contact a Tribe that is closer to the project and may have pertinent information." As such, consultation with the Rincon Band of Luiseño Indians was not initiated nor required.

Pechanga Band of Indians

The Pechanga Band of Indians responded in an email dated April 24, 2025. The email stated, "[t]he Pechanga Tribe asserts that the Undertaking is a part of 'Atáaxum (Luiseño) territory, and therefore the Tribe's

aboriginal territory as evidenced by the existence of cultural features associated with religious practice and an extensive artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Indians because of the Tribe's cultural ties to this area as well as our extensive history with the County and other projects within the area. The Tribe hereby informs the County that the Project site is located within a Traditional Cultural Property (TCP). We will provide additional information regarding tribal affiliation and the TCP in our consultation as well as provide more specific, confidential information on potential TCRs that may be impacted by the proposed Project. Additionally, the Tribe requests that no Phase II testing or other ground-disturbing archaeological activities be conducted on the site until after the Tribe and the County consult about the TCRs in our government-to-government consultation."

On June 10, 2025 and July 28, 2025, meetings were held in which the proposed Project was discussed with the Pechanga Band of Indians, and Project documents were then provided on August 21, 2025. Pechanga provided information regarding the cultural sensitivity of the area. Due to resources in the area, they are concerned that there is a high potential for subsurface resources to be present. The Pechanga Band of Indians recommends that a tribal monitor be present during any ground disturbing activities. This will ensure that if there are any unanticipated resources identified during ground disturbance, they will be handled in a professional and culturally appropriate manner. Consultation was concluded on December 17, 2025.

The Project would be subject to compliance with EIR Mitigation Measures MM 4.4-1 through MM 4.4-3, which requires a Tribal Monitor from the consulting Tribe(s) to be present during grading activities, and identify the procedures to be followed should any unanticipated cultural resources be identified during ground-disturbing activities in order to ensure that any uncovered resources are appropriately treated.

Additionally, and as required by EIR Mitigation Measure MM 4.4-4, the Project also would be required to adhere to HSC Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Mitigation Measure MM 4.4-4 and PRC Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

Notwithstanding, because the Pechanga Band of Indians expressed concern that the Project area is sensitive for cultural resources and there is the possibility that previously unidentified resources, including tribal cultural resources, might be found during ground disturbing activities, and because the Project would require mitigation measures to ensure the appropriate treatment of any tribal cultural resources that may be identified during ground-disturbing activities, the Project's potential to result in impacts to previously-undiscovered subsurface tribal cultural resources represents a potentially significant impact of the proposed Project for which mitigation would be required.

4.11.6 Cumulative Impact Analysis

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was

selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions that would potentially yield associated TCRs.

As indicated under the analysis of Threshold a., the Project has the potential to result in impacts to previously-unidentified Tribal Cultural Resources that may be present beneath the ground surface of the Project site. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to Tribal Cultural Resources, including sites or resources that may be buried beneath the ground surface as well as the potential presence of human remains. As such, Project impacts to Tribal Cultural Resources would be cumulatively considerable prior to mitigation.

4.11.7 Significance of Impacts Before Mitigation

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project has the potential to result in significant impacts to previously-undiscovered Tribal Cultural Resources, including human remains, and could result in significant impacts to previously-identified Tribal Cultural Resources within the Project site in the absence of protective measures. As such, Project impacts to TCRs represent a potentially significant impact for which mitigation would be required.

4.11.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

Design Features

There are no features inherent in the Project's design that are specifically included to reduce or avoid impacts to tribal cultural resources.

Mitigation

Mitigation Measures MM 4.4-1 through MM 4.4-4 shall apply (refer to EIR Subsection 4.4, *Cultural Resources*). The mitigation measures included in EIR Subsection 4.4 have been drafted to include all of the mitigation requirements requested during the Project's Tribal Consultation process. No additional mitigation measures are required.

4.11.9 Significance of Impacts After Mitigation

Threshold a.: Less-than-Significant Impact with Mitigation. Implementation of EIR Mitigation Measures MM 4.4-1 through MM 4.4-4 would ensure appropriate treatment of any Tribal Cultural Resources that may be identified during Project-related ground-disturbing activities, including human remains. Implementation of the required mitigation would reduce Project impacts to Tribal Cultural Resources to below a level of significance.

4.11.10 References

Cited As	Reference
BFSA, 2025	Brian F. Smith and Associates ("BFSA"), *A Phase I Cultural Resources Study for the Galway Downs Project*. June 18, 2025.
Riverside County, 2015a	Riverside County, 2015a. *Environmental Impact Report No. 521*. February 2015. Accessed April 25, 2024. Available online at: https://planning.rctlma.org/general-plan-and-zoning/riverside-county-general-plan/riverside-county-general-plan-december-2015-0

4.12 UTILITIES AND SERVICE SYSTEMS

This Subsection 4.12 evaluates the Project's potential to result in impacts on existing utilities and service systems and/or impacts to the environment that could result from the Project's proposed utilities and service system improvements. The analysis is based in part upon the Rancho California Water District (RCWD) 2020 Urban Water Management Plan (UWMP), dated June 10, 2021, which is herein incorporated by reference and is available for public review online at the link below (RCWD, 2021). Refer to Section 7.0, *References*, for a complete list of reference sources.

https://www.ranchowater.com/DocumentCenter/View/3343/Chapter-5-Section-4-Cover-Sheet-Urban-Water-Mgmt-Plan?bidId=

4.12.1 Existing Conditions

The Project site is located within the boundaries of RCWD for water and sewer services, Southern California Edison for electricity service, and numerous service providers for cable television and telephone services. Waste disposal for the Project site and surrounding area is provided by CR&R Environmental Services, while natural gas at the Project site is provided through propane tanks delivered to the property by a propane tank vending service.

A. Water Service, Supply, and Demand

Water service to the Project area is provided by the RCWD. The RCWD is a local, independent "Special District," organized on August 16, 1965, operating pursuant to the California Water District Law, Division 13 of the California Water Code (RCWD, n.d.). RCWD provides potable water, recycled water, and wastewater services to the portion of Riverside County known as Rancho California, which includes the City of Temecula, portions of the City of Murrieta, and unincorporated areas of Riverside County, encompassing an approximately 154.7 square-mile service area and accommodating approximately 45,500 potable water meters and 215 recycled water meters as of 2020. The RCWD currently obtains its water supplies from the following primary water sources: 1) local groundwater from the Temecula Valley Groundwater Basin; 2) imported State Water Project (SWP) and Colorado River water from the Metropolitan Water District of Southern California (MWDSC) via the Eastern Municipal Water District (EMWD) and Western Municipal Water District (WMWD); and 3) recycled water from both the RCWD and EMWD. (RCWD, 2021, pp. 1-6, 1-13)

Treated imported water (potable) is received from MWDSC's storage and filtration facility at Lake Skinner directly into the RCWD's distribution system through 4 turnouts. The RCWD operates 31 potable water pump stations and 48 active potable groundwater production wells, and maintains 39 potable water storage reservoirs with a capacity of 149.7 million gallons (MG). The potable water system includes 950 miles of water pipelines that convey water from its source to water customers. (RCWD, 2021, pp. 1-8 to 1-9)

In addition, the RCWD owns an open (surface) reservoir, Vail Lake, with a current storage capacity of 31,395 Acre-Feet (AF) used to help recharge the groundwater basin, using natural runoff. Raw water is delivered to

the RCWD from MWDSC's Pipeline No. 5 through turnout WR-34, and Pipeline No. 6 through turnout EM-21. Raw water from EM-21 is conveyed through the Pauba Valley Transmission Main in De Portola Road to the RCWD's Valle De Los Caballos (VDC) Recharge and Recovery Facility. This system consists of 26 wells (included in the 48 active wells) and the Upper Valley de los Caballos (VDC) and Lower VDC Percolation Basins. (RCWD, 2021, p. 1-9)

The RCWD operates 6 recycled water pump stations and 3 active recycled groundwater production wells, and maintains 4 recycled water storage reservoirs with a combined capacity of 7.5 MG. The RCWD owns 5 recycled water storage ponds with a total of 1,495 acre-feet per year (AFY) of storage, including the Cole Creek Storage Pond. The recycled water system includes 58.9 miles of water pipelines that convey recycled water for irrigation. The recycled water supply is from tertiary facilities at the Santa Rosa Water Reclamation Facility (SRWRF) and the seasonal storage ponds constructed adjacent to the reclamation facility. Recycled water is also received from the Temecula Valley Regional Water Reclamation Facility (TVRWRF) under agreement with EMWD. (RCWD, 2021, p. 1-9)

Historically, groundwater has supplied between 25% to 40% of the RCWD's total water supply, and imported water has supplied between 60% to 70%. In 2020, recycled water comprised approximately 7% of the RCWD's water supply portfolio. Imported water is water that originated from outside of the Santa Margarita River Watershed (generally water from the Colorado River and the SWP). Imported water is acquired from the member agencies of the MWDSC. For the RCWD, its member agencies are WMWD for the Santa Rosa Division and EMWD for the Rancho Division. Imported water provided to the RCWD is from MWDSC's Lake Skinner Reservoir and Water Treatment Facility, with back-up storage provided by Diamond Valley Lake. (RCWD, 2021, p. 3-1)

MWDSC has 6 pipeline facilities that depart from MWDSC's Lake Skinner Reservoir and Water Treatment Facility and convey water south towards San Diego county. These include 2 raw water pipelines (Pipeline Nos. 5 and 6) and 2 treated water pipelines (Bypass Pipeline No. 3 and Pipeline No. 4). Bypass Pipeline No. 3 is a treated water pipeline ultimately planned to connect to Pipeline No. 3 in a future conversion to potable water. (RCWD, 2021, p. 3-1)

EMWD and WMWD do not convey the water through their facilities to the RCWD; rather, the RCWD receives the water directly at these MWDSC turnouts. Imported treated water flow rates vary seasonally at the RCWD's turnouts. During winter months when demand is typically lower, the RCWD relies mostly on local groundwater resources. During these periods, the RCWD may turn off all the imported water turnouts. As demands increase throughout the year, groundwater sources are augmented with imported water supplies to meet daily demand variations. (RCWD, 2021, p. 3-1)

The RCWD's actual supplies for Fiscal Year 2020 are provided in Table 4.12-1, *RCWD Retail Water Supplies Utilized – Fiscal Year 2020*.

Table 4.12-1 RCWD Retail Water Supplies Utilized – Fiscal Year 2020

Water Supply	Additional Detail on Supply	2020	
		Actual Volume (AF)	Water Quality
Purchased or Imported	Treated water delivered to RCWD service area	14,329	Drinking Water
Purchased or Imported	Untreated for groundwater recharge and recovery	13,433	Other Non- Potable
Wheeled Water	Wheeled water (not accounted for in Rancho Water production)	*	Drinking Water
Purchased or Imported	Untreated water for release as Make-Up Water to Santa Margarita River	4,799	Other Non- Potable
Groundwater (Not Desalinated)	Native groundwater	17,736	Drinking Water
Groundwater (Not Desalinated)	Artificially recharged groundwater. No volume listed because this is already accounted for in "Purchased or Imported Water - Untreated for groundwater recharge"	**	Other Non- Potable
Surface Water (Not Desalinated)	Used for groundwater recharge. No volume listed because this is already accounted for in "Groundwater (not desalinated) - Native groundwater"	**	Other Non- Potable
Recycled Water	--	4,020	Recycled Water
	Total:	**54,317**	

* Wheeled water is provided by wholesale agencies and is not treated as a part of Rancho Water's production.
** Groundwater that is artificially recharged using imported water is only accounted for once, under imported water.
*** Surface water used for groundwater recharge is only accounted for as a groundwater source.
(RCWD, 2021, Table 3-2)

Since 1996 RCWD has seen a steady increase in population but at the same time a steady decline in the annual per capita usage. From 1996 to 2000 RCWD 's gallons per capita per day (GPCD) average 415. In the period 2000 through 2005, the GPCD averaged about 372. In 2015, the per capita figure dropped to 240 GPCD. This decrease in per capita consumption is the result of plumbing code changes such as low flow fixtures and low water consuming appliances in some existing and all new housing; an active water conservation program undertaken by Rancho Water; and expansion of the District recycled water system. In FY20 GPCD dropped to 201. Table 4.12-2, *RCWD Actual Water Demands – 2020*, illustrates Rancho Water's demands for Fiscal Year 2020. (RCWD, 2021, pp. 2-7 to 2-8)

Table 4.12-3, *RCWD Water Supply Estimates – Average/Normal Year (AF)*, Table 4.12-4, *RCWD Water Supply Estimates – Single-Dry Year (AF)*, and Table 4.12-5, *RCWD Water Supply Estimates – Multiple-Dry Years (AF)*, provide details on supplies anticipated to be available to RCWD in average/normal, single-dry, and multiple dry years, respectively, between 2025 and 2045 (RCWD, 2021, p. 3-20).

Table 4.12-2 RCWD Actual Water Demands – 2020

Use Type	Level of Treatment	AF
Single Family Residential	Drinking Water	20,670
Multi-Family Residential	Drinking Water	2,018
Agricultural Residential	Drinking Water	5,083
Commercial/Industrial	Drinking Water	2,763
Institutional	Drinking Water	263
Landscape Irrigation	Drinking Water	3,825
Golf Course Irrigation	Drinking Water	173
Agriculture	Drinking Water	10,910
Wheeling	Drinking Water	176
Other (construction meters, fire flows)	Drinking Water	332
Santa Margarita River Discharge	Untreated Water	4,799
Water Loss	Drinking Water	2,974
Total Potable and Untreated		*53,986*
Landscape Irrigation Recycled	--	3,681
	Total Water Demand:	**57,667**

(RCWD, 2021, Table 2-4)

Table 4.12-3 RCWD Water Supply Estimates – Average/Normal Year (AF)

Water Supply Source	2025	2030	2035	2040	2045
Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
Groundwater – Native	22,000	22,000	22,000	22,000	22,000
Recycled Water [b]	3,762	3,941	4,115	4,289	4,461
Planned Additional Recycled Water [c]	413	413	413	413	413
Planned Indirect Potable Reuse [c]	0	550	550	550	550
Total Supplies	**80,275**	**83,554**	**85,328**	**87,552**	**89,824**

a. See UWMP Table 3-3. This table illustrates supplies RCWD anticipates being available. If not needed to meet demand RCWD will not purchase this volume of imported water. b. See UWMP Table 4-4. Based on demand that can be served in existing recycled water system. c. See UWMP Table 3-7.

(RCWD, 2021, Table 3-8)

Table 4.12-4 RCWD Water Supply Estimates – Single-Dry Year (AF)

Water Supply Source	2025	2030	2035	2040	2045
Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
Groundwater – Native	22,000	22,000	22,000	22,000	22,000
Recycled Water [b]	3,762	3,941	4,115	4,289	4,461
Planned Additional Recycled Water [c]	413	413	413	413	413
Planned Indirect Potable Reuse [c]	0	550	550	550	550
Total Supplies	**80,275**	**83,554**	**85,328**	**87,552**	**89,824**

a. See UWMP Table 3-3. This table illustrates supplies RCWD anticipates being available. If not needed to meet demand RCWD will not purchase this volume of imported water. b. See UWMP Table 4-4. Based on demand that can be served in existing recycled water system. c. See UWMP Table 3-7. Anticipates that recycled water available for use goes down by 7% due to conservation actions undertaken during dry years.

(RCWD, 2021, Table 3-9)

Table 4.12-5 RCWD Water Supply Estimates – Multiple-Dry Years (AF)

Drought Year	Water Supply Source	2025	2030	2035	2040	2045
1st Year	Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
	Groundwater - Native [b]	22,000	22,000	22,000	22,000	22,000
	Recycled Water [c]	3,762	3,941	4,115	4,289	4,461
	Planned Additional Recycled Water [d]	413	413	413	413	413
	Planned Indirect Potable Reuse [d]	0	550	550	550	550
	Total Supplies 1st Year Drought	***80,275***	***83,554***	***85,328***	***87,552***	***89,824***
2nd Year	Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
	Groundwater - Native [b]	22,000	22,000	22,000	22,000	22,000
	Recycled Water [c]	3,762	3,941	4,115	4,289	4,461
	Planned Additional Recycled Water [d]	413	413	413	413	413
	Planned Indirect Potable Reuse [d]	0	550	550	550	550
	Total Supplies 2nd Year Drought	***80,275***	***83,554***	***85,328***	***87,552***	***89,824***
3rd Year	Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
	Groundwater - Native [b]	19,000	19,000	19,000	19,000	19,000
	Recycled Water [c]	3,762	3,941	4,115	4,289	4,461
	Planned Additional Recycled Water [d]	413	413	413	413	413
	Planned Indirect Potable Reuse [d]	0	550	550	550	550
	Total Supplies 3rd Year Drought	***77,275***	***80,554***	***82,328***	***84,552***	***86,824***
4th Year	Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
	Groundwater - Native [b]	17,000	17,000	17,000	17,000	17,000
	Recycled Water [c]	3,574	3,744	3,909	4,075	4,238
	Planned Additional Recycled Water [d]	392	392	392	392	392
	Planned Indirect Potable Reuse [d]	0	523	523	523	523
	Total Supplies 4th Year Drought	***75,066***	***78,309***	***80,074***	***82,289***	***84,553***
5th Year	Imported Treated and Untreated Water [a]	54,100	56,650	58,250	60,300	62,400
	Groundwater - Native [b]	15,000	15,000	15,000	15,000	15,000
	Recycled Water [c]	3,499	3,665	3,827	3,989	4,149
	Planned Additional Recycled Water [d]	384	384	384	384	384
	Planned Indirect Potable Reuse [d]	0	512	512	512	512
	Total Supplies 5th Year Drought	***72,983***	***76,211***	***77,973***	***80,184***	***82,444***

a See UWMP Table 3-3; b See UWMP Table 3-6; c See UWMP Table 4-4. Based on demand that can be served in existing recycled water system. Assumes 7% reduction in indoor water use and recycled water supply generation in years 4 and 5 of extended drought; d See UWMP Table 3-7. Assumes 7% reduction in indoor water use and recycled water supply generation in years 4 and 5 of extended drought.

(RCWD, 2021, Table 3-10)

Projected water demands within the RCWD service area in a normal year are shown in Table 4.12-6, *Projected Water Use 2020 to 2045 by Standard Water Use Types – Normal Year (AF)*. These projections include current water conservation efforts, including regional conservation efforts with wholesale partners. Current efforts and water savings are articulated in Section 6 of the UWMP and shown in Appendix F to the UWMP. (RCWD, 2021, pp. 2-16 to 2-17)

Table 4.12-6 Projected Water Use 2020 to 2045 by Standard Water Use Types – Normal Year (AF)

	Use Type	2025	2030	2035	2040	2045
Single Family Residential	Drinking Water	26,232	27,517	28,168	29,004	29,868
Multi-Family Residential	Drinking Water	2,561	2,686	2,750	2,832	2,916
Agricultural Residential	Drinking Water	6,451	6,767	6,927	7,132	7,345
Commercial/Industrial	Drinking Water	3,507	3,678	3,765	3,877	3,993
Institutional	Drinking Water	334	350	358	369	380
Landscape Irrigation	Drinking Water	4,854	5,092	5,213	5,367	5,527
Golf Course Irrigation	Drinking Water	220	230	236	243	250
Agriculture	Drinking Water	13,846	14,524	14,868	15,309	15,765
Wheeling [1]	Drinking Water	5,278	5,278	5,278	5,278	5,278
Other (fire flows, construction meters) [2]	Drinking Water	409	409	409	409	409
Santa Margarita River Discharge [3]	Untreated Water	4,000	4,000	4,000	4,000	4,000
Water Loss [4]	Drinking Water	3,175	3,308	3,375	3,462	3,552
Total Potable and Untreated:		70,866	73,839	75,347	77,282	79,283
Landscape Irrigation Recycled [5]	Non-Potable	4,175	4,354	4,528	4,702	4,874
Total Demand:		**75,041**	**78,193**	**79,875**	**81,984**	**84,157**

Notes:
1. Wheeling assumed to increase to 5,278 by year 2025.
2. Other flows assumed to be same as average FY2016 to FY2021.
3. Santa Margarita River Discharge estimated based on historical trends.
4. Water Loss assumed to be same percentage as occurred FY2016 to FY2020.
5. See UWMP Table 4-4. Accounts for infill of existing recycled water system. Does not include water used internally at the recycled water plant.

(RCWD, 2021, Table 2-13)

However, historically when the weather is hot and dry, water usage increases. The amount of increase varies according to the number of consecutive years of hot, dry weather and the conservation activities imposed. During cool-wet years, historical water usage has decreased to reflect less water usage for external landscaping. During a dry year, there is an increase in irrigation demand throughout Rancho Water due to low precipitation levels. Consistent with historic trends, almost all demands are anticipated to increase by 5% during a single-dry year. The exception are the following uses: wheeling, other (fire flows and construction meters), and Santa Margarita River Discharge, which are expected to be similar to normal year use. Table 4.12-7, *Projected Water Use 2020 to 2045 by Standard Water Use Types – Dry Years (AF)*, shows the projected demands during dry years.

B. Sewer Service and Treatment

Under existing conditions, wastewater generated at the Galway Downs facility is treated by several existing septic holding tanks located in the western portion of the Project site, which are routinely serviced by a septic service company that disposes of Project-generated wastewater at an appropriate off-site

Table 4.12-7 Projected Water Use 2020 to 2045 by Standard Water Use Types – Dry Years (AF)

Use Type	2025	2030	2035	2040	2045
Single Family Residential	27,544	28,892	29,577	30,454	31,362
Multi-Family Residential	2,689	2,821	2,888	2,973	3,062
Agricultural Residential	6,773	7,105	7,273	7,489	7,712
Commercial/Industrial	3,682	3,862	3,954	4,071	4,192
Institutional	350	368	376	387	399
Landscape Irrigation	5,097	5,347	5,473	5,636	5,804
Golf Course Irrigation	231	242	248	255	262
Agriculture	14,538	15,250	15,611	16,074	16,553
Wheeling	5,278	5,278	5,278	5,278	5,278
Other (fire flows, construction meters)	409	409	409	409	409
Santa Margarita River Discharge	4,000	4,000	4,000	4,000	4,000
Water Loss	3,311	3,451	3,522	3,613	3,707
Total Potable and Untreated	73,902	77,024	78,608	80,639	82,740
Landscape Irrigation Recycled	4,175	4,354	4,528	4,702	4,874
Total Demand	**78,077**	**81,378**	**83,136**	**85,341**	**87,614**

(RCWD, 2021, Table 2-14)

location. However, the Eastern Municipal Water District (EMWD), which ultimately will provide sewer service to the Project site, currently is planning to construct a modernized sewer system in the Temecula Valley Wine Country Region. EMWD in 2015 completed the first phase of a sewer system in Northern Wine Country, which protected groundwater quality and allowed for economic development opportunities (EMWD, 2025). Due to on-going growth, many existing facilities within the Wine Country area have outgrown the capacities of their on-site septic systems.

The Northern Wine Country Phase II project will be undertaken by the EMWD, which will install 14,000 linear feet of sewer lines along Rancho California Road, Glen Oaks Road, Warren Road, and East Benton Road, along with 23,200 linear feet of sewer line along De Anza Road and De Portola Road as part of the Southern Wine Country sewer improvement project. (EMWD, n.d.) Environmental impacts associated with the Northern Wine Country Phase II and Southern Wine Country sewer improvements will be evaluated as part of a CEQA compliance document to be prepared by the EMWD. The EMWD sewer improvement projects are separate and apart from the Project evaluated in this EIR, other than the fact that Galway Downs would connect to the new EMWD lines when they become available. The EMWD sewer line connection is not required for the Project, as the Project can operate using septic holding tanks indefinitely if the EMWD connection does not become available for any reason.

In the interim period prior to completion of the Northern Wine Country Phase II project, sewer service on the Project site would continue to be conveyed to the on-site septic holding tanks, as previously shown on EIR Figure 3-11. Wastewater conveyed to the on-site septic holding tanks is and would continue to be serviced by a septic service company, which pumps wastewater from the holding tanks and disposes of the wastewater at an appropriate off-site location. As shown on EIR Figure 3-11, interim sewer service to the

proposed Employee Modular Housing and the Equestrian Park Model Lodging (which would be subject to separate County approvals in the future) would be accommodated by new 6- and 8-inch sewer lines and laterals that would convey wastewater to the northwestern portion of the site, where new 12-foot-wide by 30-foot-long holding tanks are proposed. In addition, new sewer lines would be constructed in the southwestern portion of the site to provide sewer service to the existing barn/restaurant and existing retail/restaurant dining uses.

Once the sewer lines within De Portola Road are installed and operational, the Galway Downs facility would be required to connect to the new sewer lines in order to eliminate the existing on-site septic holding tanks. As previously shown on EIR Figure 3-12, the 6- to 8-inch sewer lines that are proposed for interim conditions would be disconnected from the septic holding tanks and the sewer lines would be extended northerly across Los Caballos Road. As previously shown on EIR Figure 3-13, a new 8-inch sewer line would be constructed within an off-site parcel (APN No. 927-690-005) and would convey sewer flows northerly to De Portola Road where it would connect with the new Northern Wine Country Phase II sewer main. As part of the off-site sewer line construction, and as shown on EIR Figure 3-13, an existing ephemeral drainage would be avoided as part of construction of the off-site sewer line (refer also to Mitigation Measure MM 4.3-2 in EIR Subsection 4.3), as the portion of the sewer line that would traverse this existing drainage would be constructed using a jack and bore technique such that there would be no physical disturbance to the surface drainage feature.

Wastewater in the Project area is collected by a sewer system in the more densely populated areas and by septic systems in the rural areas. RCWD and EMWD together collect all wastewater within the RCWD's water service area. Wastewater collected by the RCWD is conveyed to a collection system owned and operated by the Santa Rosa Regional Resources Authority (SRRRA). The SRRRA collection system also conveys flow from the Elsinore Valley Municipal Water District (EVMWD) and Western Municipal Water District (WMWD) for ultimate treatment at the Santa Rosa Water Reclamation Facility (SRWRF). Wastewater collected by EMWD is treated at the Temecula Valley Regional Water Reclamation Facility (TVRWRF). In 2020, the RCWD collected approximately 3,338 AF of wastewater requiring treatment, which when combined with the 8,744 AF collected by EMWD resulted in a total of 12,082 AF requiring treatment at either the SRWRF or at the TVRWRF. (RCWD, 2021, pp. 4-1 to 4-2)

Once the new sewer main is installed in De Portola Road, it is anticipated that sewer flows generated in the Project area would be conveyed to the TVRWRF for treatment. According to information available from EMWD, the TVRWRF receives typical daily flows of 14 million gallons per day (MGD), has a current capacity to treat 23 MGD, and ultimately is planned to have a capacity to treat 28 MGD of wastewater. (EMWD, 2021)

C. Stormwater Drainage

Under existing conditions, the Project site is relatively flat, with elevations on site ranging from approximately 1,313 feet above mean sea level (amsl) at the southern portion of the Project site to approximately 1,196 feet amsl near the northwest corner of the site. Runoff on the Project site is conveyed by a natural drainage system that primarily directs stormwater runoff through a combination of sheet flow,

earthen channels, and culverts. Runoff generated within the southeastern portion of the Project site drains to an existing culvert beneath Pauba Road, where it is conveyed to an improved storm drain channel that runs along the east side of Pauba Road, and ultimately is conveyed beneath a separate culvert where flows are conveyed into the Temecula Creek located to the north of the Project site. Flows from the majority of the remainder of the site sheet flow towards Los Corralitos Road and northerly towards an existing on-site retention basin located just northwest of the existing race track. In addition, a well-defined ephemeral drainage enters the northeast region of the Project site and drains in a western direction towards the on-site retention basin. Flows within this retention basin partially infiltrate into the groundwater table. During peak rain events, runoff from the retention basin is conveyed northerly by an existing culvert located beneath Los Caballos Road, where it discharges into an existing drainage swale and ultimately is conveyed to Temecula Creek.

D. Solid Waste Collection and Disposal

Solid waste collection and disposal is provided by the Riverside County Department of Waste Resources (RCDWR) through a franchise agreement with Waste Management of the Inland Empire (WMIE). Waste within the Project area is conveyed to the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. A description of these facilities is provided below. (RCDWR, 2025)

- El Sobrante Landfill. The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2023 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 47.2 million tons. In 2023, the El Sobrante Landfill accepted a daily average of 10,341 tons with a period total of approximately 3,184,920 tons. The landfill is expected to reach capacity in approximately 2059. (RCDWR, 2025)

- Lamb Canyon Landfill. The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill currently is permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons. As of January 1, 2024 (beginning of day), the landfill has a total remaining capacity of approximately 6.7 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2023 to December 2023, the Lamb Canyon

Landfill accepted a daily average of 2,049 tons with a period total of approximately 627,127 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site. (RCDWR, 2025)

- Badlands Landfill. The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill currently is permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons. As of January 1, 2024 (beginning of day), the landfill had a total remaining disposal capacity of approximately 49.8 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2023 to December 2023, the Badlands Landfill accepted a daily average of 2,848 tons with a period total of approximately 874,450 tons. (RCDWR, 2025)

4.12.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to utilities and service systems.

A. Federal Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

2. Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the United States. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes EPA to establish minimum standards to protect tap

water and requires all owners or operators of public water systems to comply with these primary (health-related) standards. The 1996 amendments to SDWA require that EPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for EPA, also encourage attainment of secondary standards (nuisance-related). Under the Act, EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids.

B. State Regulations

1. Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. When such an ordinance has not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary must be adopted. In the absence of such an ordinance or findings, the policies and requirements contained in the "model" ordinance drafted by the State of California shall apply within the affected jurisdiction.

2. Water Recycling in Landscaping Act

In 2000, Senate Bill 2095 (Water Recycling in Landscaping Act) was approved by Governor Davis requiring any local public or private entity that produces recycled water and determines that within 10 years it will provide recycled water within the boundaries of a local agency, to notify the local agency of that fact. In turn, local agencies are required to adopt and enforce within 180 days a specified recycled water ordinance, unless the local agency adopted a recycled water ordinance or other regulation requiring the use of recycled water in its jurisdiction prior to January 1, 2001.

3. Urban Water Management Planning Act

The UWMP Act was enacted to ensure that water planning is conducted at the local level, recognizing that water agencies within the same region may face vastly different impacts from drought conditions. The Act requires urban water agencies to develop UWMPs over a 20-year planning horizon, updated every five years. UWMPs provide a framework for long-term water planning and inform the public of a supplier's approach to ensuring adequate water supplies for existing and future demands. Under the applicable provisions of the California Water Code (CWC), urban water suppliers are required to report, describe, and evaluate (1) water deliveries and uses; (2) water supply sources; (3) efficient water uses; (4) demand management measures; and (5) water shortage contingency planning. (DWR, 2021)

The UWMP Act has been amended several times in response to the State's recurring water shortages, droughts, and evolving water management priorities. A significant amendment came in 2009 following the 2007–2009 drought and Governor Schwarzenegger's Executive Order S-06-08 (2008), which called for a statewide 20 percent reduction in urban water use by 2020. The resulting Water Conservation Act of 2009

(SB X7-7) required agencies to establish per-capita water use targets for 2015 and 2020 to achieve that statewide reduction. Under SB X7-7, urban water suppliers must address the following within their UWMPs: (1) Assess the reliability of water sources over a 20-year planning horizon; (2) Describe demand management measures and water shortage contingency plans; (3) Report progress toward achieving a 20 percent reduction in per-capita urban water consumption by 2020; and (4) Discuss current and planned use of recycled water.

The 2020 statewide reduction target established under SB X7-7 has since been succeeded by additional conservation mandates. Notably, Assembly Bill (AB) 1668 and SB 606, both enacted in 2018, established a new framework for long-term water use efficiency with indoor and outdoor per-capita water use standards. The Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) finalized implementing regulations, with long-term water budget standards taking effect in 2030.

4. CA Water Code Section 10610 et seq. (Senate Bill 901)

Signed into law on October 16, 1995, Senate Bill (SB) 901 required every urban water supplier to identify as part of its urban water management plan, the existing and planned sources of water available to the supplier over a prescribed five-year period. The code requires the water service purveyor to assess the projected water demand associated with a proposed project under environmental review. Later provisions of SB 901 required compliance in the event that the proposed Project involved the adoption of a specific plan, amendment to, or revision of the land use element of a general plan or specific plan that would result in a net increase in the state population density. Upon completion of the water assessment, cities and counties may agree or disagree with the conclusions of the water service purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings.

5. Sustainable Groundwater Management Act (SGMA)

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA required, by June 30, 2017, the formation of locally-controlled groundwater sustainability agencies (GSAs) in the State's high- and medium-priority groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. The GSP Emergency Regulations for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016.

6. California Solid Waste Integrated Waste Management Act (AB 939, 1989)

The Integrated Waste Management Act (IWMA) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (CIWMB) and local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal (it should be noted that the CIWMB no longer exists, and its duties have been assumed by the California Department of Resources Recycling and Recovery [CalRecycle]). As part of the IWMA, the CIWMB was given a purpose to mandate the reduction of disposed waste. The IWMA also

required, among other items, each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan (IWMP) and each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities.

7. Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRA) required the CIWMB to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.

8. AB No. 341 (2011)

AB 341 of 2011 established a new statewide policy goal of diverting 75 percent of solid waste from landfills by 2020. AB 341 also mandated commercial recycling for businesses and multifamily residential complexes generating four or more cubic yards of solid waste per week, requiring such entities to arrange for recycling services. CalRecycle was directed to develop a statewide plan to achieve the 75 percent diversion goal, incorporating strategies for source reduction, recycling, and composting. The Mandatory Commercial Recycling program was established under California Public Resources Code (PRC) Section 42649.

9. AB No. 1826 (2014)

AB 1826 of 2014 established mandatory commercial organics recycling requirements for businesses generating organic waste above specified thresholds. Organic waste subject to AB 1826 includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste. Requirements were phased in beginning April 1, 2016, with thresholds progressively lowered over time. By January 1, 2019, businesses generating two or more cubic yards of solid waste per week were required to arrange for organic waste recycling service. Jurisdictions were required to implement organic waste recycling programs and report annually to CalRecycle on program implementation.

10. SB No. 1383 (2016) - Short-Lived Climate Pollutants

SB 1383 represented the most comprehensive update to solid waste diversion requirements since the IWMA. SB 1383 was enacted as part of California's strategy to reduce short-lived climate pollutants, recognizing that organic waste decomposing in landfills is a significant source of methane, a potent greenhouse gas. SB 1383 established the following statewide targets: (1) Reduce the disposal of organic waste in landfills by 50 percent by 2020 and 75 percent by 2025, relative to 2014 levels; and (2) Recover at least 20 percent of currently disposed edible food for human consumption by 2025.

CalRecycle and the State Water Resources Control Board adopted implementing regulations, which took effect January 1, 2022. Under SB 1383, jurisdictions are required to provide organic waste collection services to all residents and businesses, establish edible food recovery programs, conduct education and outreach, and monitor and enforce compliance. Regulated entities, including multifamily residences, businesses, and commercial edible food generators, are required to subscribe to organic waste collection services, properly sort organic waste, and, where applicable, arrange for the recovery of edible food.

11. California Code of Regulations (CCR) Title 24, Part 6, Energy Efficiency Standards

CCR Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. The California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2025 Standards for building construction, which went into effect on January 1, 2026, improved upon the former 2022 Standards for residential and nonresidential buildings. The 2025 California Energy Code builds on California's technology innovations, encouraging energy efficient approaches to encourage building decarbonization, emphasizing in particular heat pumps for space heating and water heating. The 2025 California Energy Code also extends the benefits of photovoltaic and battery storage systems and other demand flexible technology to work in combination with heat pumps to enable California buildings to be responsive to climate change. The 2025 California Energy Code also strengthens ventilation standards to improve indoor air quality.

The California Energy Code is conceptually divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards – the energy budgets – that vary by climate zone (of which there are 16 in California) and building type; thus the California Energy Code are tailored to local conditions, and provide flexibility in how energy efficiency in buildings can be achieved. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that provide a recipe or a checklist compliance approach.

C. Local Regulations

1. Riverside County Ordinance No. 745.4

Riverside County Code Chapter 8.136 (Ordinance No. 745.4, adopted December 8, 2020) establishes a compulsory solid waste and recyclable materials collection program. All residential and commercial properties within designated compulsory collection areas are required to participate in the County's three-container collection system, utilizing separate green containers for organic waste, blue containers for recyclable materials, and gray containers for non-recyclable waste, consistent with the requirements of California SB 1383. Collection services must be provided by a County-franchised hauler, and property owners are ultimately responsible for payment of collection fees.

2. Riverside County Ordinance No. 859.3

Riverside County Code Chapter 17.276 (Ordinance No. 859.3, amended July 21, 2015) establishes water-efficient landscape requirements for new and rehabilitated landscapes within unincorporated Riverside County. The ordinance applies to all new residential landscapes and rehabilitated residential landscapes of 2,500 square feet or more requiring a discretionary permit, as well as all new and rehabilitated commercial and industrial landscapes requiring discretionary approval. Landscapes served by potable water may not exceed a maximum water demand of 50 percent of reference evapotranspiration (ETo), while landscapes served entirely by recycled water may not exceed 70 percent of ETo.

4.12.3 Basis for Determining Significance

Section XIX of Appendix G to the CEQA Guidelines addresses typical adverse effects on utilities and service systems and includes the following threshold questions to evaluate a project's impacts on utilities and service systems:

- Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

- Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

- Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

- Would the project fail to comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, as modified by the 2018 updates to Appendix G to the CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on utilities and service systems. The proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

a. *Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage systems, whereby the construction or relocation would cause significant environmental effects;*

b. *Have insufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years;*

c. *Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects;*

d. *Result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments;*

e. *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;*

f. *Fail to comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan); or*

g. *Impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects:*

    1. *Electricity;*
    2. *Natural gas;*
    3. *Communications systems;*
    4. *Street lighting;*
    5. *Maintenance of public facilities, including roads; or*
    6. *Other governmental services.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, as modified per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts to utilities and service systems.

4.12.4 Methodology

A. Overview

The analyses of potential utilities and service systems impacts are based on the nature and degree of changes to the demand for, and the existing infrastructure supporting, water supply, wastewater conveyance and treatment, stormwater drainage, solid waste collection and disposal, and energy and communications services that would be brought about by the Project, along with how such changes, if any, affect the long-term ability of the applicable service providers to serve the Project and other existing and reasonably foreseeable future development within their respective service areas. The analysis of potential impacts to utilities and service systems is based on a review of applicable federal, State, and local regulations and plans, as well as service provider planning documents and Project-specific information. Specific information sources consulted in the preparation of this analysis include: the RCWD 2020 UWMP,

which provides projected water supply and demand information for the RCWD service area through 2045; the EMWD planning documentation for the Northern Wine Country Phase II sewer improvements; the Riverside County General Plan and Southwest Area Plan (SWAP); the Riverside County Integrated Waste Management Plan (CIWMP); applicable federal regulations governing water supply (including the Safe Drinking Water Act); applicable State regulations governing water supply (including the Sustainable Groundwater Management Act [SGMA], Senate Bill 610, Senate Bill 221, and the UWMP Act), solid waste (including AB 939, AB 341, AB 1826, and SB 1383), and energy conservation (including Title 24, Parts 6 and 11); the Project's Water Quality Management Plan (WQMP) prepared by Kolibrien Corp. (EIR *Technical Appendix G*), which describes the proposed drainage and water quality improvements associated with the Project; and Project-specific water and wastewater demand estimates based on the Project's proposed land uses and operational characteristics. The methodology used to evaluate the Project's potential impacts to utilities and service systems is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County, within the TVWCPA. The site is served by the following existing utilities and service systems under baseline conditions, as described below.

Water service is provided by the RCWD, which conveys potable water to the site through existing water lines located beneath Los Corralitos Road, Pauba Road, and a small segment of Los Caballos Road near the northwest corner of the site, with a series of internal potable water lines distributing water to individual uses on the property. Several existing non-potable irrigation water lines also traverse the property to support landscape irrigation, and existing fire water lines and fire hydrants are in place on the property. RCWD's service area, water supplies, and projected demand are documented in the RCWD 2020 UWMP.

Sewer service is currently provided by on-site septic holding tanks, which are routinely emptied by a septic services company that conveys the wastewater to a permitted off-site disposal location. Sewer service is not currently available in the Project area, but the EMWD is planning to construct the Northern Wine Country Phase II sewer system improvements, which would extend new sewer lines along De Portola Road and other roadways in the Wine Country region. Upon completion of those improvements, the Galway Downs facility would be required to connect to the new EMWD sewer system.

Stormwater drainage is conveyed by an existing on-site network of sheet flow patterns, earthen channels, culverts, and an on-site retention basin located in the northwest portion of the site, which collectively convey runoff from the majority of the site northerly toward Temecula Creek. The existing drainage system is described in further detail in EIR Subsection 4.7, *Hydrology and Water Quality*.

Solid waste generated at the existing facility is collected by a private waste hauler under contract and is disposed of at a permitted regional landfill in accordance with applicable Riverside County waste management requirements.

Electrical service to the Project site is provided by Southern California Edison (SCE) through existing electrical service connections, transformers, and distribution infrastructure already in place to serve the existing facility, as described in further detail in EIR Subsection 4.5, *Energy*. Natural gas service is not available in the Project area, and accordingly the existing facility relies on delivered propane for those uses requiring combustion fuel, as also described in EIR Subsection 4.5. None of the uses that would be permitted as part of the Project would require or result in an increase in natural gas consumption as compared to existing (baseline) conditions, and no new natural gas lines or connections are proposed as part of the Project. Telecommunications service is provided to the existing facility through existing service connections.

Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential utilities and service systems impacts evaluates the incremental change in utility demand and infrastructure requirements attributable to the proposed Project relative to the existing baseline conditions described above.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, developed events facility with limited new physical construction and operational uses proposed that are substantially similar to those already occurring under existing conditions, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to introduce a new utility-consuming use into an undeveloped area. The primary analytical questions addressed herein are therefore:

1. Whether the Project would require or result in the relocation or construction of new or expanded water, wastewater, or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects, with particular attention to the proposed installation of a new fire pump along the southern side of the existing race track, the interim on-site sewer improvements (including new sewer lines, laterals, and septic holding tanks), the future off-site sewer connection to the EMWD Northern Wine Country Phase II sewer system, and the self-retaining water quality treatment areas proposed in conjunction with the reconfigured visitor access driveways;
2. Whether the RCWD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development within the RCWD service area during normal, dry, and multiple dry years, based on the water supply and demand projections set forth in the RCWD 2020 UWMP;
3. Whether the EMWD, as the future wastewater treatment provider for the Project, would have adequate capacity to serve the Project's projected long-term wastewater demand in addition to its existing commitments, and whether sewer service during the interim period prior to completion of the EMWD Northern Wine Country Phase II improvements would be adequately provided through the proposed on-site septic holding tanks;

4. Whether the Project would generate solid waste in excess of State or local standards or in excess of the capacity of local landfill infrastructure, and whether the Project would otherwise impair the attainment of applicable solid waste reduction goals;
5. Whether the Project would comply with federal, State, and local statutes and regulations governing solid waste management and reduction, including the CIWMP and applicable State diversion requirements established by AB 939, AB 341, AB 1826, and SB 1383; and
6. Whether the Project would require or result in the construction of new or expanded electrical, natural gas, telecommunications, street lighting, or public facility maintenance infrastructure, the construction or relocation of which could cause significant environmental effects.

In evaluating these analytical questions, the analysis quantifies the Project's incremental water demand, wastewater generation, and solid waste generation based on the Project's proposed land uses (including the new restroom building, future park model lodging units, future employee modular housing units, and other Project components), and compares the Project's incremental utility demands to the existing service provider capacities and to the demand projections set forth in the applicable service provider planning documents. The analysis evaluates the Project's compliance with applicable State and local utility-related regulations by comparing the Project's design features and operational characteristics against the relevant regulatory requirements. The analysis also identifies the proposed utility-related improvements that would be required to serve the Project and evaluates whether the construction or relocation of those improvements could cause significant environmental effects, with cross-reference to the related analyses presented in other technical subsections of this EIR (including, as applicable, EIR Subsections 4.2, *Air Quality*; 4.3, *Biological Resources*; 4.5, *Energy*; 4.7, *Hydrology and Water Quality*; and 4.9, *Noise*).

4.12.5 Impact Analysis

Threshold a.:	**Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage systems, whereby the construction or relocation would cause significant environmental effects?**

As described in further detail in Section 3.0 of this EIR, the only water-related improvement that would occur in association with the proposed Project is the installation of a new fire pump along the southern side of the existing race track. In addition, subsurface on-site water line connections would be made to the new restroom, to the area where up to 36 park model lodging units could be placed in the future and where 18 additional employee modular housing units could be placed in the future.

For wastewater treatment, in the interim period prior to completion of the Northern Wine Country Phase II project, sewer flows on the Project site would continue to be conveyed to the on-site septic holding tanks, as previously shown on EIR Figure 3-11, which are routinely emptied by a septic services company that pumps the wastewater from the holding tanks and disposes it at an appropriate off-site location. As also shown on EIR Figure 3-11, interim sewer service to the proposed employee modular housing area and the equestrian park model lodging area (the details of which would be separately permitted by the County in the future through discretionary Plot Plan approvals) would be accommodated by new 6- and 8-inch sewer lines

and laterals that would convey wastewater to the northwestern portion of the site, where new 12-foot-wide by 30-foot-long holding tanks are proposed. In addition, new sewer lines would be constructed in the southwestern portion of the site to convey flows from an off-site property and to provide sewer service to the existing barn/restaurant and existing retail/restaurant dining uses to the proposed septic holding tanks in the northwest portion of the site.

Once the EMWD sewer lines within De Portola Road are installed and operational, the Galway Downs facility would be required to connect to the new sewer lines in order to eliminate the existing on-site septic holding tanks. As previously shown on EIR Figure 3-12, the 6- to 8-inch sewer lines that are proposed for interim conditions would be repurposed and would be extended northerly across Los Caballos Road. As previously shown on EIR Figure 3-13, a new 8-inch sewer line would be constructed within an off-site parcel (APN No. 927-690-005) and would convey sewer flows northerly to De Portola Road where it would connect with the new Northern Wine Country Phase II sewer main. As part of the off-site sewer line construction, and as shown on EIR Figure 3-113, an existing ephemeral drainage would be avoided (refer also to Mitigation Measure 4.3-2 in EIR Subsection 4.3), as the portion of the sewer line that would cross this existing drainage would be constructed under the drainage feature using a jack and bore technique such that there would be no physical disturbance to the surface drainage feature.

Improvements are proposed for stormwater drainage to address runoff from the Project's reconfigured driveways. As previously shown on EIR Figure 3-2, each of the proposed reconfigured driveways would be paved with asphalt or cement, and each of the proposed driveways have been designed to convey runoff generated by the driveways to adjacent self-retaining areas. The self-retaining areas would be improved to include an amended soil configuration, which would accommodate a total ponding depth of 6 inches and would include 8 inches of amended soil covered by three inches of mulch to provide water quality treatment for runoff from each driveway. The details of storm water drainage for the park model lodging area and the additional employee modular housing unit area would be determined at the time of discretionary Plot Plan approvals for these areas, following the requirements of the Riverside County Hydraulic Design Manual prepared by the Riverside County Flood Control and Water Conservation District (RCFCWCD). Runoff from new building areas and the remainder of the Project site would continue to be conveyed to the existing on-site retention basin located in the northwest portion of the site, which is sized to accommodate the increase in runoff associated with approximately 1.8 acres of new impervious surfaces, and which provides infiltration of retained runoff into the Temecula Valley Groundwater Basin.

Impacts associated with the Project-related water, sewer, and drainage improvements described above are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to below a level of significance. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, or drainage improvements that have not already been addressed under the appropriate subject headings within this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and stormwater drainage improvements would be less than significant.

Threshold b.: Would the Project have insufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

For purposes of analysis within this EIR, it is assumed that the proposed Project would slightly increase Galway Downs' demand for potable water as compared to the baseline conditions to provide water service to the proposed restroom, grand pavilion tent, additional area for equestrian RV park use, an office trailer, as well as future water demands associated with 36 park model lodging units and 18 additional employee modular housing units that would be subject to future County Plot Plan approvals. Based on the CalEEMod modeling outputs included in the Project's Air Quality Impact Analysis ("AQIA"; refer to AQIA Appendix 3.2 included as EIR *Technical Appendix B*), the new and expanded uses proposed as part of the Project are anticipated to generate an annual demand for approximately 5,858,518 gallons per year (gpy), equating to approximately 16,051 gallons per day (gpd) or approximately 18.0 acre-feet per year [AFY]) (UXR, 2026a, Appendix 3.2). There would be no increased water use associated with event size or frequency changes because event participants and spectators use portable restrooms that are waterless or have a self-contained water system not connected to the domestic water system.

A Water Supply Assessment (WSA) is not required for the Project. Pursuant to Senate Bill 610 (codified at California Water Code Sections 10910 through 10915), a WSA is required only for projects that meet or exceed specified size thresholds set forth at Water Code Section 10912(a), including residential developments of more than 500 dwelling units and non-residential projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit residential project. The proposed Project's anticipated annual water demand of approximately 18.0 AFY is well below the water demand equivalent to a 500-dwelling unit residential project and is also well below all of the other size thresholds set forth at Water Code Section 10912(a). Accordingly, the proposed Project does not constitute a "project" for which a WSA is required under SB 610, and the water supply analysis presented herein evaluates the Project's water demand within the context of the RCWD's overall planned supplies and demands as documented in the RCWD 2020 UWMP rather than through a separately prepared WSA.

Section 5 of the RCWD UWMP provides an analysis of the RCWD's anticipated water supplies and demands for normal, single-dry, and multiple dry years between 2025 and 2045. Table 5-1 of the UWMP indicates that the RCWD would have available supplies that exceed the anticipated demand during "normal" years by between 10,512 AFY and 10,945 AFY from 2025 and 2045, which is more than adequate to accommodate the Project's anticipated increase in demand by 18.0 AFY. Table 5-2 of the UWMP indicates that the RCWD would have available supplies that exceed the anticipated demand during "single-dry" years by between 7,476 AFY and 7,488 AFY from 2025 and 2045, which also is more than adequate to accommodate the Project's anticipated increase in demand by 18.0 AFY. Table 5-3 of the UWMP shows that in the fifth year of "multiple-dry year conditions," which would have the lowest available water supplies, the RCWD would have available supplies that exceed the anticipated demand by approximately 184 AFY in 2025 and by 108 AFY by 2045; thus, the anticipated available supplies during multiple-dry year conditions also would be more than adequate to accommodate the Project's anticipated increase in demand for 18.0 AFY. (RCWD, 2021, Tables 5-1 through 5-3)

Based on the foregoing analysis, the Project's existing and proposed uses are within the scope of land uses and demand projections accounted for by the RCWD UWMP. The UWMP demonstrates that the RCWD would have sufficient water supplies available to serve all existing and projected land uses within the RCWD service area through at least 2045 during normal, dry, and multiple dry years, relying on a diversified portfolio of imported water, recycled water, and groundwater supplies that provides redundancy against drought and supply disruption. The Project's anticipated incremental increase in demand for potable water above baseline conditions represents a negligible fraction of the excess supply capacity projected to be available within the RCWD service area through the UWMP planning horizon, and would be fully accommodated without requiring new or expanded water supply infrastructure, accelerating depletion of existing supplies, or affecting RCWD's ability to serve other existing or planned users within its service area. The Project's water demand would therefore not result in a determination by RCWD that it has inadequate water supply capacity to serve the Project, and would not require the preparation of a WSA under Water Code Section 10910 et seq. (RCWD, 2021) Accordingly, the Project's impact to water supply would be less than significant.

Threshold c.: Would the Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

As discussed under the analysis of Threshold a., above, the Project includes both an interim sewer plan and a long-term sewer plan. In the interim period prior to completion of the Northern Wine Country Phase II project, sewer service on the Project site would continue to be treated by on-site septic holding tanks, as previously shown on EIR Figure 3-11. The septic holding tanks are and would continue to be routinely emptied by a septic services company that pumps the wastewater from the holding tanks and disposes it at an appropriate off-site location. As also shown on EIR Figure 3-11, interim sewer service to the proposed employee modular housing area and the equestrian park model lodging area (which would be separately permitted by the County in the future through discretionary Plot Plans) would be accommodated by new 6- and 8-inch sewer lines and laterals that would convey wastewater to the northwestern portion of the site, where new 12-foot-wide by 30-foot-long holding tanks are proposed. In addition, new sewer lines would be constructed in the southwestern portion of the site to provide sewer service to the existing barn/restaurant and existing retail/restaurant dining uses.

Once the EMWD sewer lines within De Portola Road are installed and operational, the Galway Downs facility would be required to connect to the new sewer lines in order to eliminate the existing on-site septic holding tanks. As previously shown on EIR Figure 3-12, the 6- to 8-inch sewer lines that are proposed for interim conditions would be repurposed and would be extended northerly across Los Caballos Road. As previously shown on EIR Figure 3-13, a new 8-inch sewer line would be constructed within an off-site parcel (APN No. 927-690-005) and would convey sewer flows northerly to De Portola Road where it would connect with the new Northern Wine Country Phase II sewer main. As part of the off-site sewer line construction, and as shown on EIR Figure 3-13, impacts to an existing ephemeral drainage would be avoided, as the portion of the sewer line that would traverse across this existing drainage would be constructed underneath the drainage feature using a jack and bore technique such that there would be no physical disturbance to the surface drainage feature.

Impacts associated with the Project-related sewer improvements described above are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been identified to reduce the Project's impacts to the extent feasible. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed under the appropriate subject headings within this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to sewer improvements would be less than significant.

Threshold d.: Would the Project result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

As noted above, under interim conditions wastewater generated at the Project site would be treated by the existing on-site septic holding tanks. The on-site septic holding tanks are routinely emptied by a septic services company, which pumps the wastewater from the holding tanks and disposes it at an appropriate off-site location, which for purposes of analysis is assumed to be disposed of at facilities that convey wastewater to the TVRWRF for treatment. Under long-term conditions, following the construction of a new connection between the Galway Downs facility and the new sewer line planned in De Portola Road, wastewater generated on site would be conveyed to the TVRWRF for treatment.

Because there are no wastewater generation rates available for the Project's unique range of land uses, wastewater generation above the baseline condition is assumed to match the water demand above the baseline condition. Based on the CalEEMod modeling outputs included in the Project's AQIA (refer to Appendix 3.2 of EIR *Technical Appendix B*), the new and expanded uses proposed as part of the Project are anticipated to generate an annual demand for approximately 5,858,518 gallons per year (gpy), equating to approximately 16,051 gallons per day (gpd) or approximately 18.0 acre-feet per year [AFY]) (UXR, 2026a, Appendix 3.2). There would be no increased wastewater generation associated with event size or frequency changes because event participants and spectators use portable restrooms that are not connected to the onsite wastewater system. Portable restrooms are serviced by a licensed portable sanitation company under contract with the facility operator and the disposal of effluent from the portable units occurs offsite at a permitted wastewater treatment facility or Class B biosolids facility for disposal. This arrangement does not constitute a discharge to waters of the state, does not require an individual NPDES permit, and does not affect the capacity of the on-site septic holding tank system or the TVRWRF. The volume of portable restroom effluent generated during peak event days is included within the conservative worst-case wastewater generation estimate of 145,590 gpd calculated above, which is based on peak 2023 vehicle trip counts and therefore captures the full range of sanitation demand associated with maximum event attendance.

While the Project's net incremental increase in wastewater demand above the baseline condition is estimated at approximately 16,051 gpd based on CalEEMod modeling of the new and expanded uses, the

following analysis evaluates the facility's total peak-day wastewater generation on a gross worst-case basis to demonstrate that the TVRWRF has adequate capacity to serve the entire facility's demand.

As discussed in EIR Sections 2.0, *Environmental Baseline,* and 3.0, *Project Description*, the County has exercised its discretion under *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth*. (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset, rather than solely on the activities expressly authorized under the existing CUPs. The 2023 operational dataset captures the full range of activities occurring at Galway Downs under baseline conditions, including equestrian events, sports events, and special occasion events, and the peak-day vehicle trip count documented in that dataset, which is 5,757 one-way vehicle trips and represents the maximum operational intensity of the facility under established baseline conditions. For the purpose of evaluating the TVRWRF's capacity to serve the facility's total wastewater demand, the Project's peak-day vehicle trip count has been converted into dwelling unit equivalents using a conservative worst-case methodology, as described below.

Using a conservative assumption, the Project's peak traffic volumes were converted into "dwelling unit equivalents" for the purpose of estimating the Project's anticipated wastewater generation over baseline conditions using standard rates. Treating each vehicle trip to the facility as if it generates wastewater at a rate equivalent to a single-family residence (230 gpd per dwelling unit equivalent) is a highly conservative methodology, when in fact a substantial proportion of event attendees are day visitors who access the facility for a few hours and make only limited use of on-site restroom facilities. Day visitors to an outdoor equestrian events facility generate substantially less wastewater per trip than a full-time resident, meaning the dwelling unit equivalent methodology overstates actual wastewater generation. Based on data collected at the Galway Downs facility in 2023, the Galway Downs facility had a peak day where there were 5,757 one-way vehicle trips at the facility. According to trip generation rates available from the Institute of Transportation Engineers (ITE, 12th Edition), single-family dwelling units generate approximately 9.09 trips per day per dwelling unit. Accordingly, the Project's peak day in 2023 of 5,757 one-way vehicle trips is equivalent to approximately 633 single-family homes (5,757 vehicle trips ÷ 9.09 trips/dwelling unit = 633.3 dwelling units). According to Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 update to its General Plan, single-family residential uses generate approximately 230 gallons per day (gpd) of wastewater per dwelling unit per day. Thus, during peak days the proposed Project conservatively would result in the generation of approximately 145,590 gpd of wastewater requiring treatment (633 equivalent dwelling units x 230 gpd/dwelling unit = 145,590 gpd).

As previously indicated, it is anticipated that sewer flows generated at Galway Downs other than from the portable restrooms would be conveyed to the TVRWRF for treatment. According to information available from EMWD, the TVRWRF receives typical daily flows of 14 million gallons per day (MGD), has a current capacity to treat 23 MGD, and ultimately is planned to have a capacity to treat 28 MGD of wastewater. (EMWD, 2021) Thus, the Project's worst-case demand for wastewater treatment of 145,590 gpd would represent only 1.6% of the TVRWRF's current excess capacity of 9 MGD (145,590 gpd ÷ 9,000,000 gpd x 100 = 1.62%). In addition, the Project's demand for wastewater treatment would represent only 1.0% of the TVRWRF's planned excess capacity of 14 MGD (145,590 gpd ÷ 14,000,000 gpd x 100 = 1.04%). Accordingly,

the Project would not result in a determination by the EMWD that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and impacts would therefore be less than significant.

Threshold e.: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As previously noted, solid waste generated by the proposed Project would be conveyed to the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. The El Sobrante Landfill is permitted to receive a maximum of 16,054 tpd of solid waste, while data from 2023 indicates that the El Sobrante Landfill received an average of 10,341 tpd. The Lamb Canyon Landfill is permitted to receive a maximum of 5,000 tpd of solid waste, and data from 2023 indicates that the Lamb Canyon Landfill received an average of 2,049 tpd. The Badlands Landfill is permitted to receive 5,000 tpd of solid waste, while data from 2023 indicates that the Badlands Landfill received an average of 2,848 tpd. (RCDWR, 2025)

As discussed in EIR Sections 2.0, *Environmental Baseline,* and 3.0, *Project Description*, the County has exercised its discretion under N*eighbors for Smart Rail v. Exposition Metro Line Constr. Auth*. (2013) 57 Cal.4th 439 to define the environmental baseline for operational conditions based on actual facility operations as documented in the 2023 operational dataset. The peak-day vehicle trip count documented in the 2023 operational dataset is 5,757 one-way vehicle trips and represents the maximum operational intensity of the Galway Downs facility under established baseline conditions and is used as the basis for the following conservative worst-case solid waste generation estimate.

As noted under the analysis of Threshold d., above, and based on data for the Galway Downs facility in 2023, the facility had a peak day where there were 5,757 one-way vehicle trips at the facility. According to trip generation rates available from the Institute of Transportation Engineers (ITE, 12th Edition), single-family dwelling units generate approximately 9.09 trips per day per dwelling unit. Accordingly, the Project's peak day in 2023 of 5,757 one-way vehicle trips is equivalent to approximately 633 single-family homes (5,757 vehicle trips ÷ 9.09 trips/dwelling unit = 633.3 dwelling units). According to Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 update to its General Plan, single-family residential uses generate approximately 0.41 tons of solid waste per dwelling unit per year. Thus, the Project's 633 dwelling unit equivalents would generate approximately 259.53 tons per year (tpy) requiring disposal, or approximately 0.7 tpd. The Project's 0.7 tpd of solid waste would represent approximately 0.01% of the current excess capacity at the El Sobrante Landfill (0.7 tpd ÷ 5,713 tpd excess capacity × 100 = 0.012%), approximately 0.02% of the excess daily capacity at the Lamb Canyon Landfill (0.7 tpd ÷2,951 tpd excess capacity × 100 = 0.024%), and approximately 0.03% of the excess daily capacity at the Badlands Landfill (0.7 tpd ÷ 2,152 tpd excess capacity × 100 = 0.033%).

Because the Project under peak activities would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity

to accept solid waste generated by the Project. As such, because regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases, and impacts would therefore be less than significant.

Threshold f.:	**Would the Project fail to comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?**

The proposed Project would be regulated by the Riverside Countywide Integrated Waste Management Plan (CIWMP) (RCWRMD, 1996). The CIWMP outlines goals, policies, and programs Riverside County and its cities would implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. Additionally, AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, although the California Department of Resources Recycling and Recovery may not establish or enforce a diversion rate greater than the 50% as set forth by the CIWMP (per Public Resources Code Section 41780.01[b]).

The proposed Project would be regulated by the RCDWR and would be required to comply with the CIWMP's requirement to divert up to 50% of its solid waste from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Implementation of a waste disposal strategy for the proposed Project would assist Riverside County in achieving the mandated goals of the IWMA by developing feasible waste programs that encourage source reduction, recycling, and composting. The RCDWR is specifically charged with the responsibility of implementing programs that ensure that unincorporated Riverside County achieves 50% diversion of solid waste from landfill disposal as well as monitoring and reporting unincorporated Riverside County's compliance with the CIWMP and AB 939. Additionally, the Project would be subject to the requirements of SB 1383, which includes requirements related to organics recycling in order to reduce the amount of solid waste that ends up in area landfills. With mandatory compliance to AB 939, AB 341, SB 1383, and RCDWR's programs and policies, the Project would result in a less-than-significant impact due to a conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP.

Threshold g.:	**Would the Project Impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects:**
	1. Electricity;
	2. Natural gas;
	3. Communications systems;
	4. Street lighting;

5. Maintenance of public facilities, including roads; or

6. Other governmental services?

Electric service is currently available to the proposed Project site through Southern California Edison. Existing facilities would need to be expanded as necessary to provide service to the Project. However, the Project site already is served by existing electrical lines; therefore, the construction of electricity facilities as necessary to serve the new uses proposed as part of the Project would occur within the areas already planned for impact by the Project. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in any significant impacts to the environment that are not already addressed by this EIR. No additional mitigation would be required.

The Galway Downs facility currently utilizes a private propane system for natural gas, meaning Galway Downs has propane tanks delivered to the site to meet the overall demand for natural gas, which under existing conditions is limited to the existing barn/restaurant (also referred to as the "Carriage House"). It is anticipated that natural gas service would continue to be provided via the private propane system similar to existing conditions, and no natural gas service would be provided for the new buildings or uses proposed as part of the Project. As such, there would be no impacts due to natural gas line construction on site, and there would be no net increase in the consumption of natural gas as compared to existing (baseline) conditions. Accordingly, no impacts would occur related to natural gas service.

Additional points of connection to telecommunication facilities would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans, although any improvements to provide telecommunication connections to the new and expanded uses would occur on site within areas already anticipated to be impacted by the Project. As such, the construction of communication utility connections is evaluated under the appropriate subject headings within this EIR. No environmental impacts would occur specifically from the provision of these utilities, as all lines would be installed within the Project's anticipated disturbance areas.

Improvements proposed for stormwater drainage would be limited to the Project's reconfigured driveways, as runoff from the remaining portions of the site, including those portions of the site that would include new buildings, would continue to be treated in the same manner as occurs under existing conditions by the existing on-site retention basin. As previously shown on EIR Figure 3-2, each of the proposed reconfigured driveways would be paved with asphalt or cement, and each of the proposed driveways have been designed to convey runoff generated by the driveways to adjacent self-retaining areas. The self-retaining areas would be improved to include an amended soil configuration, which would accommodate a total ponding depth of 6 inches and would include 8 inches of amended soil covered by three inches of mulch to provide water quality treatment for runoff from each driveway. Impacts associated with improvements at the Project's access driveways already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent.

The Project site is located in a semi-rural portion of Riverside County where street lighting is discouraged. Accordingly, no new street lighting is proposed as part of the Project; thus, the Project would not result in any impacts related to street lighting.

Roadway improvements proposed as part of the Project would be limited to the reconfiguration of the site's driveway entrances and the construction of deceleration and acceleration lanes at the driveway approaches. Impacts associated with these proposed improvements already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent.

With respect to roadway maintenance, the proposed improvements along Los Corralitos Road would consist of private roadway improvements that would be maintained by the Galway Downs facility. While the construction of acceleration/deceleration lanes and the reconfigured driveways along Pauba Road and Los Caballos Road would be maintained by Riverside County, maintenance of these roadways would be funded through the Project Applicant's payment of Development Impact Fees (DIF) and future property taxes generated by the facility. Therefore, the maintenance of roadways proposed by the Project would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this EIR, and a less-than-significant impact would occur.

No known other facilities would require off-site construction or maintenance as a result of the proposed Project.

Based on the foregoing analysis, impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

4.12.6 Cumulative Impact Analysis

The cumulative study area used for the analysis of water and wastewater includes areas within RCWD's service area for water and sewer service, and is based on the buildout of the Riverside County General Plan, the City of Temecula General Plan, and a portion of the City of Murrieta General Plan. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by the WMIE, and the cumulative analysis is based on the buildout of the Riverside County General Plan and the general plans of cities within western Riverside County. For the remaining issue areas, the cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As discussed under the analysis of Threshold a., the Project would require a number of improvements related to water, wastewater treatment, and storm drainage systems, although such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with the Project's construction phase have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed water, wastewater, or storm drainage

systems that could result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded water, wastewater treatment, and stormwater drainage systems would be less-than-cumulatively considerable.

As analyzed under Threshold b., the RCWD would have sufficient excess water supplies to accommodate the Project's anticipated increase in demand for 18.0 AFY during normal, single-dry, and multiple-dry year conditions through at least 2045. Therefore, it can be concluded that the RCWD would have sufficient water supplies to serve the Project and other cumulative developments based on existing or already planned entitlements and resources. Accordingly, cumulatively-considerable impacts to water supply would be less than significant.

As analyzed under Threshold c., the Project's interim sewer plan would entail only minor on-site improvements to install new 6- and 8-inch sewer lines and laterals. In addition, new sewer lines would be constructed in the southwestern portion of the site to provide sewer service between the existing barn/restaurant and existing retail/restaurant dining uses to the proposed septic holding tanks in the northwest portion of the site. Once the sewer lines within De Portola Road are installed and operational, the 6- to 8-inch sewer lines that are proposed for interim conditions would be repurposed and would be extended northerly across Los Caballos Road and northerly to De Portola Road where it would connect with the new Northern Wine Country Phase II sewer main. Cumulatively-considerable impacts associated with the Project's construction phase have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed sewer improvements that could result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new wastewater treatment systems would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold d., under near-term conditions the Project would have no impact on the wastewater treatment capacity of the RCWD or EMWD, as all wastewater generated on site would be conveyed to on-site septic holding tanks that are routinely emptied by a septic service company. Following completion of the new EMWD sewer main in De Portola Road, the Project would connect to the new sewer main and would generate wastewater requiring treatment at the TVRWRF. However, the Project's worst-case demand for wastewater treatment of 145,590 gpd would represent only 1.6% of the TVRWRF's current excess capacity of 9 MGD (145,590 gpd ÷ 9,000,000 gpd x 100 = 1.62%). In addition, the Project's demand for wastewater treatment would represent only 1.0% of the TVRWRF's planned excess capacity of 14 MGD (145,590 gpd ÷ 14,000,000 gpd x 100 = 1.04%). Thus, even when considered in a cumulative context, the proposed Project would not result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Accordingly, impacts would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold e., the Project's 0.7 tpd of solid waste would represent approximately 0.01% of the current excess capacity at the El Sobrante Landfill (0.7 tpd ÷ 5,713 tpd excess capacity x 100 = 0.012%), approximately 0.02% of the excess daily capacity at the Lamb Canyon Landfill (0.7

tpd ÷2,951 tpd excess capacity x 100 = 0.024%), and approximately 0.03% of the excess daily capacity at the Badlands Landfill (0.7 tpd ÷ 2,152 tpd excess capacity x 100 = 0.033%). Because the Project under peak activities would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project as well as other cumulative developments. As such, because regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases, cumulatively-considerable impacts would therefore be less than significant.

The Project would adhere to regulations set forth by local and State regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative developments would also be required to comply with such regulations. As such, the Project as well as other cumulative developments in the area would not result in cumulative impacts with respect to compliance with federal, State, and local statutes and regulations related to solid wastes. Impacts would be less-than-cumulatively considerable.

Cumulatively-considerable impacts associated natural gas would not occur, as the new uses to be permitted as part of the Project would not utilize natural gas and no new natural gas lines or connections are proposed as part of the Project. In addition, cumulatively-considerable impacts associated with the provision of facilities for electricity, communications systems, stormwater drainage, maintenance of facilities, construction of off-site sewer and water lines, and other governmental services are evaluated throughout the appropriate issue areas in this EIR. In all cases, where cumulatively-considerable impacts associated with any Project component are identified, mitigation measures have been imposed to reduce such impacts to the maximum feasible extent. Accordingly, cumulatively-considerable impacts associated with the provision of utility facilities to serve the proposed Project would be less than significant.

4.12.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. Although the Project would require construction of new or expanded water, wastewater conveyance, and stormwater drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been identified to reduce the Project's impacts to the extent feasible. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant.

Threshold b.: Less-than-Significant Impact. The RCWD 2020 UWMP demonstrates that RCWD would have sufficient water supplies to meet existing and projected demands without shortage under normal, single-dry-year, and multiple-dry-year conditions through 2045. The Project's anticipated incremental increase in potable water demand of 18.0 AFY is negligible relative to RCWD's projected excess supply capacity and would be fully accommodated without requiring new or expanded water supply infrastructure or affecting

RCWD's ability to serve other users within its service area. Impacts due to water supply would be less than significant.

Threshold c.: Less-than-Significant Impact. The Project's proposed sewer improvements consist of a new off-site sewer line connecting the northwestern corner of the Project site to the EMWD sewer main within De Portola Road, installed entirely below grade through APN 927-690-005 using standard trenching and directional drilling (jack and bore) techniques beneath an ephemeral drainage feature. Construction of the sewer line would generate temporary impacts that have been evaluated under the appropriate subject headings in this EIR and reduced to less-than-significant levels through the implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2. Upon completion of construction, all temporarily disturbed areas would be recontoured to pre-existing grades and the sewer line would leave no permanent above-ground infrastructure within the off-site parcel. Long-term operation of the sewer line would convey wastewater generated at the Galway Downs facility to the TVRWRF for treatment, eliminating the need for interim septic system reliance and reducing the risk of on-site wastewater-related water quality impacts. The sewer line has been designed solely to serve the Galway Downs facility and would not extend wastewater service capacity to other properties in a manner that removes barriers to their development. Accordingly, there are no environmental effects associated with the Project's sewer improvements that have not been fully evaluated and addressed in this EIR. With implementation of the identified mitigation measures, Project impacts due to sewer improvements would be less than significant.

Threshold d.: Less-than-Significant Impact. With respect to sewer treatment capacity, the Project's worst-case demand for wastewater treatment of 145,590 gpd would represent only 1.6% of the TVRWRF's current excess capacity of 9 MGD (145,590 gpd ÷ 9,000,000 gpd x 100 = 1.62%). In addition, the Project's demand for wastewater treatment would represent only 1.0% of the TVRWRF's planned excess capacity of 14 MGD (145,590 gpd ÷ 14,000,000 gpd x 100 = 1.04%). Accordingly, the Project would not result in a determination by the EMWD that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and impacts would therefore be less than significant.

Threshold e.: Less-than-Significant Impact. The Project's 0.7 tpd of solid waste would represent approximately 0.01% of the excess daily capacity at El Sobrante Landfill, approximately 0.02% of the excess daily capacity at the Lamb Canyon Landfill, and approximately 0.03% of the excess daily capacity at the Badlands Landfill. Because the Project would generate a relatively small amount of solid waste per day, as compared to the permitted daily capacities for the El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. Therefore, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals, and impacts would be less than significant.

Threshold f.: Less-than-Significant Impact. The proposed Project would be regulated by the RCDWR and would be required to comply with all applicable federal, State, and local solid waste management and reduction statutes and regulations, including AB 939 (50% diversion mandate), AB 341 (mandatory commercial recycling), AB 1826 (mandatory commercial organics recycling), SB 1383 (short-lived climate

pollutants and organic waste diversion), and the Riverside County Integrated Waste Management Plan (CIWMP). Mandatory compliance with these requirements, together with the Project Applicant's obligation to work with a County-franchised hauler to implement recycling, organics diversion, and waste reduction programs consistent with the CIWMP and SB 1383, would ensure that the Project does not conflict with applicable solid waste management and reduction requirements. Impacts would be less than significant.

Threshold g.: Less-than-Significant Impact. Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

4.12.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- The Project is required to comply with the provisions of the California IWMA of 1989 (AB 939) which mandates a reduction of disposed waste throughout California.

- The Project is required to comply with the provisions of the California Solid Waste Reuse and Recycling Act (AB 1327) which developed a model ordinance for adoption of recyclable materials in development projects. AB 1327 requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.

- The Project is required to comply with the provisions of the Mandatory Commercial Recycling Program (AB 341): AB 341 made a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and required by the California Department of Resources, Recycling, and Recovery, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.

- The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:
    - Prior to issuance of a building permit, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts; the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of material; the facilities and/or haulers that

will be utilized; and the targeted recycling or reduction rate. During Project construction, the Project site shall have, at a minimum, two bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.

- Prior to final building inspection, evidence (i.e., receipts or other type of verification) to demonstrate Project compliance with the approved WRP shall be presented by the Project proponent to the Planning Division of the Riverside County Department of Waste Resources in order to clear the project for occupancy permits. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
- Hazardous materials are not accepted at Riverside County landfills. In compliance with federal, State, and local regulations and ordinances, any hazardous waste generated in association with the Project shall be disposed of at a permitted Hazardous Waste disposal facility. Hazardous waste materials include, but are not limited to, paint, batteries, oil, asbestos, and solvents.

Design Features

The following feature is inherent in the Project's design and is specifically included to reduce or avoid impacts to biological resources associated with sewer line installation.

- The Project's off-site sewer line alignment has been designed to cross beneath the ephemeral drainage feature within APN 927-690-005 using a directional drilling (jack and bore) technique, thereby avoiding any surface disturbance to the drainage feature and preventing construction-related impacts to water quality within the drainage corridor.

Mitigation

❑ **Project-Specific Mitigation**

Project impacts to utilities and service systems would be less than significant; therefore, mitigation measures are not required beyond Mitigation Measures MM 4.3-1 and MM 4.3-2 (refer to EIR Subsection 4.3, *Biological Resources*), which were identified to reduce potential impacts to jurisdictional waters associated with the Project-related off-site sewer line construction.

❑ **Applicable Mitigation Measures from the Temecula Wine Country Community Plan Program Environmental Impact Report**

Although mitigation measures are not required, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's impacts due to water demand. Refer also to EIR *Technical Appendix K*, which includes an analysis demonstrating why WCCP PEIR mitigation measures not listed below either

are not applicable to the proposed Project, or that the required measures already have been addressed either as part of the Project's application materials or through the analysis conducted as part of this EIR for the Galway Downs Project.

WCCP PEIR MM PSU WATER-3: All implementing projects shall be required to use graywater advanced water conservation pursuant to the intent of Riverside County Policy OS 2.5 through implementation of at least the following best management practices:

- Irrigation systems shall be designed, maintained, and managed to meet or exceed an irrigation system efficiency of 80%.
- The capacity of the irrigation system shall not exceed peak system capacity to meet crop-specific water requirements, water meter capacity, and backflow preventer device capacity.
- Irrigation systems shall be designed to prevent runoff, overspray, and low-head drainage.
- Irrigation systems shall be designed to ensure the dynamic pressure at each emission device is within the manufacturers recommended pressure range for optimum performance.
- Irrigation systems shall be designed to include a device(s), which provides site-specific soil moisture and/or evapotranspiration data that can be used to schedule irrigation events effectively.
- Care shall be taken to design irrigation systems so that irrigation blocks are contained within areas of uniform soil texture and solar orientation.
- Irrigation shall be scheduled to apply water at or below crop-specific water requirements.
- Crops with different water needs shall be irrigated separately.

WCCP PEIR MM PSU SEWER 2: All implementing projects shall make a fair share contribution toward proposed sewer improvements, as set forth in the phasing and financing plan being developed by EMWD. In addition, all implementing projects shall be responsible for extending sewer lines from available trunk lines as a condition of approval for the project, and/or otherwise ensuring adequate wastewater service consistent with County, Rancho California Water District and Regional Water Quality Control Board requirements, as deemed appropriate by the County during application review, in order to meet water quality standards and comply with applicable policies and regulations adopted by the County, Rancho California Water District and the Regional Water Quality Control Board. Every future project in the Project area have special sewer conditions as established by the County

pursuant to the "Temecula Valley Wine Country (TVWC) Draft Conditions of Approval" adopted by the Board on February 14, 2012.

WCCP PEIR MM PSU WASTE-1: All implementing project proponents shall make every effort feasible to recycle, reuse, and/or reduce the amount of construction and demolition materials (i.e., concrete, asphalt, wood, etc.) generated by implementing projects of the Project that would otherwise be taken to a landfill. This diversion of waste must exceed a 50 percent reduction by weight. The project shall complete the Riverside County Waste Management Department Construction and Demolition Waste Diversion Program Form B or Form C process as evidence to ensure compliance. Form B (Recycling Plan) must be submitted and approved by the Riverside County Waste Management Department and provided to the Department of Building and Safety prior to the issuance of building permits. Form C (Reporting Form) must be approved by the Riverside County Waste Management Department and submitted to the Department of Building and Safety prior to the issuance of certificate of occupancy/final inspection.

WCCP PEIR MM PSU WASTE-2: All implementing project proponents shall dispose of any hazardous wastes, including paint, used during construction and grading at a licensed facility in accordance with local, state, and federal guidelines.

WCCP PEIR MM PSU WASTE-4: Prior to issuance of Building Permits for any commercial or agricultural facilities, clearance from the Riverside County Waste Management Department is needed to verify compliance with California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires the local jurisdiction to require adequate areas for collecting and loading recyclable materials.

4.12.9 References

Cited As	Reference
EMWD, 2021	Eastern Municipal Water District, 2021. *Temecula Valley Regional Water Reclamation Facility* (Fact Sheet). January, 2021. Accessed August 22, 2025. Available on-line at: https://content.emwd.org/sites/default/files/migrate-documents/tvrwrffactsheet.pdf
EMWD, 2025	Eastern Municipal Water District, 2025. *Temecula Wine Country Benefits From EMWD Partnerships to Expand Sewer Service* (web page). February 19, 2025. Accessed August 27, 2025. Available on-line at:

Cited As	Reference
	https://www.emwd.org/news/temecula-wine-country-benefits-emwd-partnerships-expand-sewer-service
EMWD, n.d.	Eastern Municipal Water District, no date. *Temecula Wine Country Sewer Infrastructure* (web page). Accessed August 27, 2025. Available on-line at: https://www.emwd.org/what-we-do/emwd-construction-updates/temecula-projects/temecula-wine-country-sewer-infrastructure
RCDWR, 2025	Riverside County Department of Waste Resources, 2025. *RE: Notice of Preparation (NOP) of the Environmental Impact Report (EIR) for the Galway Downs, Revision No. 1 to Conditional Use Permit No. 2303 (CUP 2303R1), Change of Zone No. 22000010 (CZ 22000010), and Exception No. 9 to Riverside County Ordinance No. 847 (Project)*. January 17, 2025. Included within EIR *Technical Appendix A*.
RCWD, 2021	Rancho California Water District, 2021. *2020 Urban Water Management Plan*. June 10, 2021. Accessed August 21, 2025. Available on-line at: https://www.ranchowater.com/DocumentCenter/View/6144/2020-Urban-Water-Management-Plan
RCWD, n.d.	Rancho California Water District, no date. *About Rancho Water* (web page). Accessed August 22, 2025. Available on-line at: https://www.ranchowater.com/93/About-Rancho-Water
RCWRMD, 1996	Riverside County Waste Resources Management District, 1996. *Riverside Countywide Integrated Waste Management Plan*. September 1996. Accessed August 22, 2025. Available on-line at: https://rcwaste.org/sites/g/files/aldnop376/files/migrated/LinkClick.aspx-fileticket-3RRsA2NqGJw-3d-tabid-261-portalid-0-mid-2412.pdf
UXR, 2026a	Urban Crossroads, Inc., 2026. *Galway Downs (CUP02303R1) Air Quality Impact Analysis*. March 4, 2026. Included as EIR *Technical Appendix B1*.

4.13 WILDFIRE

This EIR Subsection 4.13 evaluates the Project's potential to result in impacts due to wildfire hazards as well as physical impacts associated with fire protection-related infrastructure that may be required for the proposed Project.

4.13.1 Existing Conditions

A. Fire Hazard Classification

Under existing conditions, Galway Downs 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 primarily on the weekends and holiday weekends. The Galway Downs site currently is developed with a number of existing structures, as previously discussed in EIR Subsection 2.5 and as previously shown on EIR Figure 2-5, *Existing On-Site Structures*. Land uses surrounding the Project site include a mixture of rural residential and agriculture uses (including equestrian-oriented uses), along with undeveloped lands.

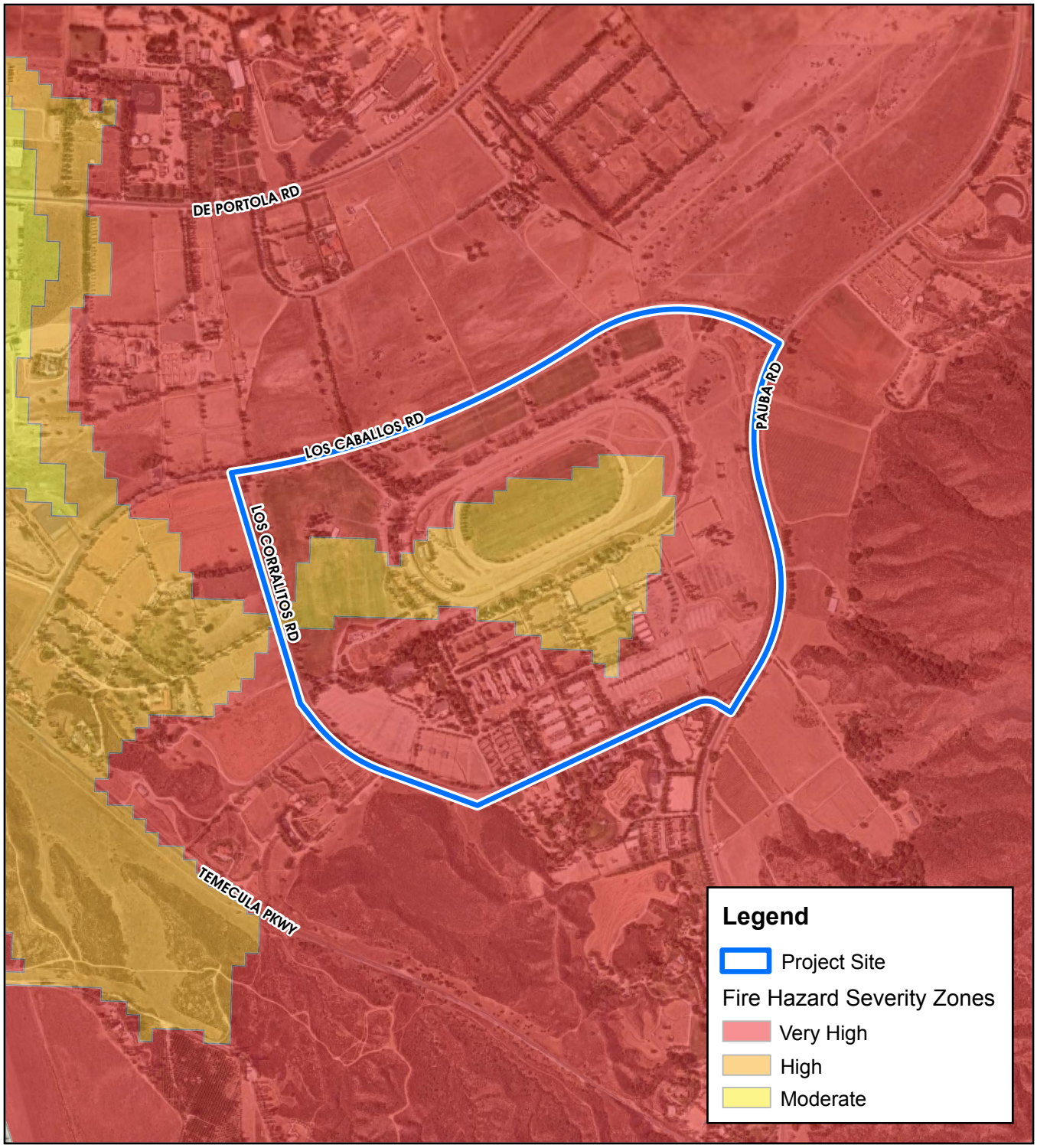
According to the most recent mapping information available from the California Department of Forestry and Fire Protection (CalFire), and as shown on Figure 4.13-1, *Wildfire Susceptibility*, under existing conditions the majority of the Galway Downs property is classified as being located within a "Very High Fire Hazard Severity Zone (VHFHSZ)," while the central portions of the property are classified as being located within a "High Fire Hazard Severity Zone (HFHSZ)." As also shown on Figure 4.13-1, lands to the north, east, and south, along with areas to the northwest and southwest, all are classified as being located within a VHFHSZ, while lands to the west of the Project site are classified as being located within a HFHSZ.

B. Topography

As previously depicted on EIR Figure 2-6, *USGS Topographic Map*, under existing conditions the topography of the Project site slopes gently in a south-to-north orientation, with elevations ranging from approximately 1,313 feet above mean sea level (amsl) at the southern portion of the Project site to approximately 1,196 feet amsl along the northern portion of the site.

C. Climate

Weather has a dramatic influence on wildland fire behavior. The climate in the Project area is characterized by a hot-summer Mediterranean climate, which creates very high wildfire susceptibility, particularly during the region's long, hot, and dry seasons. The combination of hot weather and minimal rainfall from late spring through fall dries out abundant native vegetation, such as grasslands, sage scrub, and chaparral, creating ample fuel for fires. This risk is compounded by strong, dry seasonal winds, most notably the Santa Ana winds, that can rapidly spread flames and make containment difficult. As a result, the area has a high risk of wildfire on dangerous weather days.



Source(s): Esri, Nearmap Imagery (August 2024), CalFire (2025)

Figure 4.13-1

0 325 650 1,300 Feet

Wildfire Susceptibility

D. Existing Vegetation

Under existing conditions, the Galway Downs facility is actively disturbed and vegetation on site is routinely removed both for fire abatement purposes and to facilitate on-going site operations. As discussed in further detail in EIR Subsection 4.3, *Biological Resources*, the existing vegetation on site primarily consists of disturbed and developed habitats, with portions of the property containing an ephemeral drainage, open water, non-native grassland/livestock feed yards, coast live oak, and disturbed willow scrub. In addition, the Project is subject to routine disturbances, including discing for fire abatement purposes, that reduces the vegetative cover on site and the attendant potential for wildfires to occur on site. (Cadre, 2026a, p. 10)

4.13.2 Applicable Regulatory Requirements

The following is a brief description of the federal, State, and local environmental laws and related regulations related to wildfire hazards.

A. Wildland Fire Hazards Regulations and Plans

1. Federal Regulations

❑ **Healthy Forests Restoration Act of 2003**

On August 22, 2002, President Bush established the Healthy Forests Initiative, directing the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. On June 5, 2003, the Departments of Agriculture and the Interior adopted two new categorical exclusions from documentation in an environmental assessment or environmental impact statement (EIS): an exclusion for hazardous-fuel reduction and another for rehabilitation of resources and infrastructure damaged by wildfire (Federal Register, 2003).

2. State Regulations

❑ **Public Resources Code (PRC) Sections 4290-4299**

These sections establish minimum statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The State requirements, however, do not supersede more restrictive local regulations.

As defined by CalFire, wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to Public Resources Code (PRC) Section 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions,

and owners of properties in wildland areas are subject to PRC Section 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor.

❑ **PRC Section 4213 – Fire Prevention Fees**

Pursuant to PRC Section 4213, in July of 2011, the State of California began assessing an annual "Fire Prevention Fee" for all habitable structures within SRAs to pay for fire prevention services. SRAs are the portions of California where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal land, or federally owned land. As a result of Assembly Bill (AB) 398, California Global Warming Solutions Act of 2006, the Fire Prevention Fee was suspended as of July 1, 2017.

❑ **California Government Code (CGC) Section 51178**

This section specifies that the Director of CalFire, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRAs), based on consistent statewide criteria, and the expected severity of fire hazard. Per California Government Code (CGC) Section 51178, a local agency may, at its discretion, exclude from the requirements of CGC Section 51182 an area within its jurisdiction that has been identified as a VHFHSZ, if it provides substantial evidence in the record that the requirements of CGC Section 51182 are not necessary for effective fire protection within the area. Alternatively, local agencies may include areas not identified as VHFHSZ by CalFire, following a finding supported by substantial evidence in the record that the requirements of CGC Section 51182 are necessary for effective fire protection within the new area. According to CGC Section 51182, such changes made by a local agency shall be final, and shall not be rebuttable by CalFire.

❑ **California Code of Regulations Title 14 – Natural Resources**

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, California Code of Regulations (CCR) Title 14 requires the design and construction of structures, subdivisions, and developments in an SRA to provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.).

❑ **CCR Title 24, Parts 2 and 9 – Fire Codes**

Part 2 of Title 24 of the CCR refers to the California Building Code (CBC), which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," in the 2010 CBC

addresses fire safety standards for new construction. In addition, Section 701A.3.2, "New Buildings Located in Any Fire Hazard Severity Zone," states:

> "*New buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted on or after January 1, 2008, shall comply with all sections of this chapter.*"

B. Local Regulations

1. Riverside County Ordinance No. 787 – Fire Code Standards

Riverside County Ordinance No. 787 addresses implementation of the California Fire Code, based on the International Code Council. The codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection and include the Wildland-Urban Interface (WUI) fire area building standards mentioned above. Collectively, the ordinance establishes the requirements and standards for fire hazard reduction regulations within Riverside County (including additions and deletions to the California Fire Code) to fully protect the health, safety, and welfare of existing and future residents and workers of Riverside County.

Among other things, this ordinance assures that structural and nonstructural architectural elements of the building do not: (a) impede emergency egress for fire safety staffing/personnel, equipment, and apparatus; nor (b) hinder evacuation from fire, including potential blockage of stairways or fire doors. In addition, for the purposes of California Fire Code implementation, the ordinance also adds a statement noting: "In accordance with California Government Code Sections 51175 through 51189, Very High Fire Hazard Severity Zones are designated as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010, and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas." It also defines a "hazardous fire area" as "private or public land not designated as State or local fire hazard severity zone (FHSZ) which is covered with grass, grain, brush or forest and situated in a location that makes suppression difficult resulting in great damage. Such areas are designated on Hazardous Fire Area maps filed with the office of the Fire Chief." (Riverside County, 2015a, p. 4.13-49)

2. Riverside County Ordinance No. 695 – Hazardous Vegetation

Hillsides throughout Riverside County are predominantly mapped as having a substantial fire risk; thus, much of Riverside County is subject to PRC Sections 4291 through 4299 and Riverside County Ordinance No. 695. This ordinance requires property owners in such areas to reduce fire danger through mowing and other fuel modification methods. This ordinance affects anyone who "owns, leases, controls, operates, or maintains any building or structure in, upon, or adjoining any mountainous area or forest-covered lands, brush-covered lands, or grass-covered lands or any land covered with flammable material." (Riverside County, 2015a, p. 4.13-50)

Among other measures, Riverside County Ordinance No. 695 requires the abatement of "hazardous vegetation," which is defined in the ordinance as vegetation that is flammable and endangers the public safety by creating a fire hazard. The type of abatement can depend on the location, terrain, and vegetation present, but typically includes the mowing or discing (plowing up) of vegetation, such as seasonal and recurrent weeds, stubble, brush, dry leaves, and tumbleweeds. Abatement is generally required along roadways and habitable structures either on or adjacent to the property. (Riverside County, 2015a, pp. 4.13-50 to 4.13-51)

Prior to development, Riverside County requires a development within a high fire hazard area (SRA or Very High FHSZ Local Responsibility Area [LRA]) to design and implement fuel modification programs for the interface between developed and natural areas within and adjacent to the proposed project area. Such fuel modification plans shall be subject to approval by the Riverside County Fire Department (RCFD). The fuel modification programs shall be achieved through graduated transition from native vegetation to irrigated landscape. The program shall also establish parameters for the percent, age, extent, and nature of native plant removal necessary to achieve Riverside County fire prevention standards to protect human lives and property, while preserving as much natural habitat as practicable. (Riverside County, 2015a, p. 4.13-51)

3. Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan

In April 2023 the County of Riverside Emergency Management Department (EMD) published a Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP) for the purposes of identifying the County's hazards, reviewing and assessing past disaster occurrences, estimating the probability of future occurrences, and setting goals to reduce or eliminate potential risks to people and property from natural and human-caused hazards, including wildfire. Regarding the topic of Wildland Fire, the LHMP recognizes that wildfire poses a significant risk to the people of California and their homes, and the most significant risk is predominantly associated with wildland-urban interface (WUI) areas. WUI is a general term that applies to development interspersed within or adjacent to landscapes that support wildland fire. The LHMP includes a set of fire hazard strategies (Strategies 4.1 through 4.26) recommended for implementation. (Riverside EMD, 2023)

4. Riverside County Ordinance No. 457

Every three years, Riverside County's Building and Fire Codes are adapted from the California Building Standards Code (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards and inspection procedures to ensure that development authorized by the County of Riverside does not pose a threat to the health, safety or welfare of the public. The California Building Standards Code contains minimum baseline standards to guard against unsafe development. This ordinance also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. Riverside County Ordinance No. 457 (Building Codes and Fees Ordinance; herein "Ordinance No. 457") regulates grading, buildings and structures within Riverside County. (Riverside County, 2015a, p. 4.12-35)

4.13.3 Basis for Determining Significance

Section L of Appendix G to the California Environmental Quality Act (CEQA) Guidelines ("State CEQA Guidelines") addresses typical adverse effects due to wildfire hazards and includes the following threshold questions to evaluate the Project's impacts due to wildfire hazards.

- *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations for a wildfire or the uncontrolled spread of a wildfire?*
- *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section L of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact due to wildfires if construction and/or operation of the Project would:

a. *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, substantially impair an adopted emergency response plan or emergency evacuation plan;*
b. *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;*
c. *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;*
d. *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, expose people*

or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; or

e. *If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires*.

The significance thresholds set forth in Riverside County's standard Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to wildfire hazards.

4.13.4 Methodology

A. Overview

The analyses of potential wildfire impacts are based on the nature and degree of changes to wildland fire hazards and the Project's exposure to such hazards that would be brought about by the Project, along with how such changes, if any, would affect the long-term safety of Project occupants, surrounding land uses, and emergency response operations within the local area. The analysis of potential impacts due to wildfire is based on a review of applicable federal, State, and local regulations and plans, as well as mapping and planning resources pertaining to the Project site and surrounding area. Specific information sources consulted in the preparation of this analysis include: the CalFire Fire Hazard Severity Zone maps; the California Public Resources Code (PRC) provisions governing State Responsibility Areas (SRAs) (including Sections 4290 and 4291) and the California Building Code (Title 24, Part 2) Chapter 7A standards governing materials and methods of construction in wildfire-prone areas; the Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), published by the Riverside County Emergency Management Department (EMD) in April 2023; Riverside County Ordinance No. 787 (Fire Code Standards), Ordinance No. 695 (Hazardous Vegetation), and Ordinance No. 457; the Riverside County General Plan Safety Element; vegetation information described in EIR Subsection 4.3, *Biological Resources*; and the Project's proposed physical improvements and operational characteristics as described in EIR Section 3.0, *Project Description*. The methodology used to evaluate the Project's potential impacts due to wildfire is described in the subsections that follow.

B. Environmental Baseline

Under baseline conditions, the Project site consists of an existing, fully developed equestrian-oriented events facility that has operated continuously since 1968 and that encompasses approximately 241.6 acres in the southwestern portion of unincorporated Riverside County. The Project site is located fully within an SRA, with the majority of the Project site classified as being within a "Very High Fire Hazard Severity Zone" (VHFHSZ) and the central portions of the property classified as being located within a "High Fire Hazard Severity Zone (HFHSZ)," as depicted on Figure 4.13-1. The topography of the Project site slopes gently in a south-to-north orientation, with elevations ranging from approximately 1,313 feet above mean sea level (amsl) at the southern portion of the Project site to approximately 1,196 feet amsl along the northern portion of the site. The local climate is characterized by a hot-summer Mediterranean climate, which creates very

high wildfire susceptibility, particularly during the region's long, hot, and dry seasons. The existing vegetation on the Project site primarily consists of disturbed and developed habitats associated with the ongoing operations at the facility, with vegetation routinely removed both for fire abatement purposes and to facilitate on-going site operations.

The Project site is accessible via existing roadways consisting of Los Caballos Road along the northern boundary, Los Corralitos Road along the western and southern boundaries, and Pauba Road along the eastern boundary, which collectively serve as the primary emergency response and evacuation routes serving the property. The existing baseline emergency response framework applicable to the Project site is documented in the Riverside County Operational Area Multi-Jurisdictional LHMP and the Riverside County General Plan Safety Element, both of which identify the Project site and its surrounding area as being subject to elevated wildfire risk and prescribe the regulatory framework governing wildfire preparedness and response in the area.

Consistent with Section 15125 of the State CEQA Guidelines, the analysis of potential wildfire impacts evaluates the incremental effects of the proposed Project relative to the physical and regulatory baseline conditions described above, as they existed at the Project site at the time the NOP for this EIR was published (January 14, 2025), taking into account that the operational characteristics of the Galway Downs facility that would be permitted by proposed CUP 02303R1 would be substantially the same as what occurs under existing conditions. As discussed in further detail in EIR subsection 3.7.2.A, the maximum number of attendees at the facility on a daily basis would be restricted by the maximum amount of available parking, and under the proposed Project peak operations when multiple events are occurring would be limited to a maximum of 4,639 parking spaces, which is less than the 5,757 one-way vehicular trips documented during 2023 baseline conditions. Accordingly, the proposed Project would not result in an increase in the number of daily visitors at the facility beyond what already occurs under existing conditions, and the incremental wildfire-related effects evaluated herein focus on the limited physical improvements proposed as part of the Project rather than on operational changes that would introduce additional people or structures into the wildfire-prone area.

C. Scope of Analysis

Because the Project involves the continued operation of an existing, fully-developed events facility with limited new physical construction and no substantial increase in the number of daily visitors at the facility, the analytical framework for this section differs in emphasis from that which would be applied to a conventional development project proposing to introduce a new use, new residents, or new permanent occupants into a wildfire-prone area. The primary analytical questions addressed herein are therefore:

1. Whether the limited physical improvements proposed as part of the Project, consisting of the construction, installation, and/or permitting of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure, additional area for equestrian RV park use, an off-site sewer line, and future areas for up to 36 park model lodging units and 18 employee modular housing units, would substantially impair implementation of, or interfere with, the adopted

emergency response and evacuation plans applicable to the Project site, including the Riverside County Operational Area Multi-Jurisdictional LHMP;

2. Whether the Project, due to the Project site's topography, prevailing wind patterns, and other site characteristics, would exacerbate wildfire risks, taking into consideration that the proposed Project would not introduce substantial new ignition sources or substantially increase the on-site fuel load;
3. Whether the Project would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, taking into consideration that the Project's principal infrastructure-related improvements are limited to the reconfiguration of existing driveways, the installation of a new fire pump along the southern side of the existing race track, interim on-site sewer improvements, and a future off-site sewer connection;
4. Whether the Project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes attributable to the Project, taking into consideration the Project's limited new impervious surfaces and the analysis and conclusions presented in EIR Subsection 4.7, *Hydrology and Water Quality*; and
5. Whether the Project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, taking into consideration that the Project would not increase the number of daily visitors or permanent occupants at the facility beyond what already occurs under existing conditions.

The analysis evaluates each of these questions by comparing the Project's proposed physical improvements and operational characteristics against the applicable wildfire-related regulations, design standards, and emergency response and hazard mitigation plans identified above in subsection 4.13.2 and against the existing baseline wildfire-related conditions described above. The analysis also relies upon the related analyses presented in other technical subsections of this EIR, including EIR Subsection 4.3, *Biological Resources* (for vegetation and fuel load conditions), EIR Subsection 4.7, *Hydrology and Water Quality* (for drainage and post-fire runoff considerations), and EIR Subsection 4.10, *Transportation* (for emergency access and evacuation routes).

4.13.5 Impact Analysis

Threshold a.:	**If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

According to mapping information available from CalFire, the Project site is located fully within an SRA and is within areas classified as having a "high" to "very high" susceptibility to wildfire-related hazards (CalFire, 2024). In April 2023, the Riverside County Emergency Management Department (EMD) published a Multi-Jurisdictional LHMP. The purpose of the LHMP is to identify the County's hazards, review and assess past

disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-caused hazards. The LHMP describes the County's plans for a variety of potential hazards, ranging from wildfires to tornados. However, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies or requirements specific to the Project site or surrounding areas. Rather, the LHMP provides a series of policies to be enacted by the various agencies and jurisdictions within the County in the event of emergency situations. As noted by the LHMP, "[t]here has been no development within Riverside County unincorporated areas that have increased hazard risk or vulnerability since the previous plan was adopted in 2018" (Riverside EMD, 2023, p. 49). Therefore, it can be concluded that developments within Riverside County that adhere to the applicable provisions of County ordinances, including design measures related to emergency access, would not result in a conflict with the LHMP.

The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire hazard safety. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along streets that abut the Project site including along Los Caballos Road, Los Corralitos Road, and Pauba Road. Furthermore, implementation of the Project has been determined by the Project's Traffic Analysis report (refer to *Technical Appendix I*) to not cause or significantly contribute to traffic congestion that would adversely affect traffic operations in the local area, with the implementation of improvements and payment of fees. As part of the County's discretionary review process, Riverside County staff reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to and from the Project site, inclusive of both existing/on-going uses as well as new structures to be permitted as part of the Project, and determined that the Project's design provides adequate ingress and egress for emergency vehicles. Moreover, the Project's implementation includes planned improvements to the driveway access points along Los Caballos Road and Los Corralitos Road, including the addition of new deceleration/acceleration lanes and the reconfiguration of the existing driveways as necessary to provide adequate traffic movement as well as sight distances. Furthermore, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies or requirements specific to the Project site or surrounding areas.

The Project as evaluated herein would not result in an increase in maximum daily vehicle trips as compared to existing conditions. In addition, while the Project would result in the construction/installation of a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure placed over an existing arena to support rooftop solar panels (hereafter called "metal solar structure"), and additional area for equestrian recreational vehicle (RV) park use, and would allow the Project Applicant to 1) make physical and operational modifications on the property to increase the level of competition of equestrian events that can be hosted on the site; 2) permit a portion of the site to host non-equestrian sports events (primarily on the weekends and holiday 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. Although the Project would introduce new structures on site that could be subject to wildland fire hazards, future operations would be subject to compliance with the existing *Galway Downs Event Site & Event Management Plan* (herein, "EMP"), which was most recently updated in February 2026 and is included in the Project's application materials, which are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. Specifically, Section 8 of the EMP includes specific provisions related to fire protection and emergency medical services. As identified by the EMP, in the event of a wildfire requiring evacuation in the local area, three areas have been identified as Evacuation/Refuge (E/R) areas where guests can be moved to for safety. These E/R area locations may change due to the dynamics of the emergency including, but not limited to, the type of threat, location of threat, and current and predicted weather. For a regional emergency, the EMP requires managers at Galway Downs to follow CalFire/Riverside County Fire Department's (RCFD) lead on evacuation and, to minimize off-site traffic, consider sheltering in place until direction is given. The Galway Downs facility comprises a 241.6-acre property that is routinely maintained to remove flammable vegetation as necessary to facilitate on-going site operations and to eliminate the potential for wildfire-related hazards on site. Thus, during wildfire emergencies, and prior to being given direction from CalFire and/or RCFD, Project employees, visitors, and local area residents would shelter-in-place at the Galway Downs facility until such time that evacuation orders are given by CalFire and/or the RCFD. Thus, with on-going implementation of the existing Galway Downs EMP and the ability to remain on site within one of the three areas on site identified by the EMP as E/R areas, and with evacuation planning by CalFire and the RCFD, there are no conditions associated with the proposed Project that would interfere with local area evacuations in the event of an emergency.

Accordingly, and based on the preceding analysis, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

Threshold b.:	**If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**
Threshold e.:	**If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

As previously noted, according to mapping information available from CalFire, the Project site is located fully within an SRA and is within areas classified as having a "high" to "very high" susceptibility to wildfire-related hazards (CalFire, 2024). Although the proposed Project is located within areas classified as having a "high" to "very high" susceptibility to wildfire hazards, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on

site. These conditions would continue under the proposed Project. Furthermore, the Project site and surrounding areas do not contain any steep slopes that could exacerbate wildfire hazards. Although the Project area is subject to high winds, particularly during Santa Ana wind events, there are no components of the proposed Project that would result in increased wildland fire hazards in the local area beyond what occurs under existing conditions. Moreover, all of the new structures on site are proposed in the interior portions of the Project site and are not located at the edges of the Project site that could be affected by wildfires originating in off-site locations. Additionally, all proposed new structures on site would be constructed in accordance with the provisions of Ordinance No. 457. Ordinance No. 457 is the local implementing ordinance incorporating CCR Title 24, which includes the CBC. All structures proposed on site would be required to incorporate the fire protection and life safety system requirements of CBC Chapter 9, including the incorporation of fire alarm and detection systems; the fire and smoke protection features specified by CBC Chapter 7, inclusive of requirements related to fire-resistance ratings for new structures; and the WUI requirements of CBC Chapter 7A, inclusive of requirements to maintain a minimum 100-foot defensible space from high-risk fire zones. Although there is a potential that future Project occupants could be subject to exposure to wildfire-related pollutant concentrations, this condition is not materially different from what occurs under existing conditions, and there are no components of the proposed Project that would have the potential to exacerbate wildfire-related pollution in the Project area. Accordingly, the proposed Project would not exacerbate wildfire risks, would not expose Project occupants to a substantial increase in pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Threshold c.:	**If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

As previously noted, according to mapping information available from CalFire, the Project site is located fully within an SRA and is within areas classified as having a "high" to "very high" susceptibility to wildfire-related hazards (CalFire, 2024). Although the Project site is located within an area that is considered susceptible to wildfire-related hazards, under existing conditions the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. Because the entirety of the Project site already is subject to vegetation removal under existing conditions, any vegetation removal under the proposed Project would not result in any new or more severe impacts due to ongoing fuel management activities at the Project site. In addition, the proposed Project would not require any new or modified infrastructure to address wildfire hazards, as the on-going removal of flammable vegetation largely precludes the potential for wildfire hazards on the Project site. There are no components of the proposed Project that would require new or expanded infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing

impacts to the environment beyond what already occurs under existing conditions. Accordingly, Project impacts would be less than significant.

Threshold d.:	**If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

As previously noted, according to mapping information available from CalFire, the Project site is located fully within an SRA and is within areas classified as having a "high" to "very high" susceptibility to wildfire-related hazards (CalFire, 2024). Although the Project site is located within an area that is considered susceptible to wildfire-related hazards, the Project site and surrounding areas exhibit relatively level topography and there are no major slopes in the immediate Project area. In addition, and as discussed above, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. According to mapping information available from the California Geological Survey (CGS), which also is depicted on Figure 3 (Landslide Risk) of the General Plan Safety Element, the majority of the lands surrounding the Project site exhibit low susceptibility to landslides, with exception of lands to the southwest that have a high susceptibility for landslides due to steep slopes (CGS, 2025; Riverside County, 2024b, Figure 3). However, there is no evidence that any landslides have occurred in association with these steep slopes, including during fire events associated with the 1993 Vail Fire and the 2004 Eagle Fire, both of which burned all or portions of these slopes (CalFire, 2025; Google Earth, 2025). In addition, based on FEMA's Flood Insurance Rate Map (FIRM) No. 06065C3310G, the northern portions of the Project site are located within Flood Zone "A (unshaded)," which includes areas subject to the 1% annual flood (100-year flood) where "No Base Elevations [have been] determined" (FEMA, 2008). However, the only improvements proposed as part of the Project within the areas subject to the existing flood plain would be the paving and reconfiguration of the site access driveway along Los Corralitos Road, and there are no existing or proposed structures within this portion of the Project site. Thus, the portions of the Project site that include existing or proposed permanent structures would not be subject to inundation as a result of fire hazards. There are no components of the proposed Project that would have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and no impact would occur.

4.13.6 Cumulative Impact Analysis

The cumulative study area for the issue of wildfire includes areas within a five-mile radius of the Project site. This study area is appropriate for analysis because fire events located more than five miles from the Project site are unlikely to affect the Project, and any fires starting in the Project area likely would not affect lands located more than five miles away.

As previously noted, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies

or requirements specific to the Project site or surrounding areas. In addition, the proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire hazard safety. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Although the Project would have the potential to produce large volumes of traffic that could interfere with evacuations in the local area during wildfire-related events, future operations would be subject to compliance with the existing Galway Downs EMP, which includes specific provisions related to fire protection and emergency medical services. As identified by the EMP, in the event of a wildfire requiring evacuation in the local area, three areas have been identified as Evacuation/Refuge (E/R) areas where guests can be moved to for safety. These E/R area locations may change due to the dynamics of the emergency including, but not limited to, the type of threat, location of threat, and current and predicted weather. For a regional emergency, the EMP requires managers at Galway Downs to follow CalFire/RCFD lead on evacuation and, to minimize off-site traffic, consider sheltering in place until direction is given. Thus, with on-going implementation of the Galway Downs EMP, there are no conditions associated with the proposed Project that would interfere with local area evacuations in the event of an emergency. Other cumulative developments similarly would be required to ensure compliance with applicable components of the LHMP, would be required to incorporate measures to preclude the exacerbation of wildfire-related hazards, and would be required to address any potential impacts to emergency evacuation routes. Accordingly, Project impacts due to an impairment to an adopted emergency response plan or emergency evacuation plan would be less than significant on a cumulatively-considerable basis.

As indicated under the analysis of Thresholds b. and e., although the proposed Project is located within areas classified as having a "high" to "very high" susceptibility to wildfire hazards, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project, and would largely preclude the site's potential susceptibility to wildfire-related hazards. Furthermore, the Project site and surrounding areas do not contain any steep slopes that could exacerbate wildfire hazards. Although the Project area is subject to high winds, particularly during Santa Ana wind events, there are no components of the proposed Project that would result in increased wildland fire hazards in the local area beyond what occurs under existing conditions. Although there is a potential that future Project occupants could be subject to exposure to wildfire-related pollutant concentrations, this condition is not materially different from what occurs under existing conditions, and there are no components of the proposed Project that would have the potential to exacerbate wildfire-related pollution in the Project area. Other cumulative developments similarly would be required to demonstrate that measures have been incorporated where necessary to preclude the potential for exposure of people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. Accordingly, Project impacts due to the exposure of people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires would be less than significant on a cumulatively-considerable basis.

As discussed under the analysis of Threshold c., although the Project site is located within an area that is considered susceptible to wildfire-related hazards, under existing conditions the vegetation on the Project site is routinely removed from the property in order to facilitate ongoing site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. Because the entirety of the Project site already is subject to vegetation removal under existing conditions, any vegetation removal under the proposed Project would not result in any new or more severe impacts due to on-going fuel management activities at the Project site. In addition, the proposed Project would not require any new or modified infrastructure to address wildfire hazards, as the on-going removal of flammable vegetation largely precludes the potential for wildfire hazards on the Project site. There are no components of the proposed Project that would require new or expanded infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment beyond what already occurs under existing conditions. Accordingly, Project impacts would be less than significant on both a direct and cumulatively-considerable basis.

As discussed under the analysis of Threshold d., although the Project site is located within an area that is considered susceptible to wildfire-related hazards, the Project site and surrounding areas primarily exhibit relatively level topography and there are no major slopes in the immediate Project area. Although lands to the southwest of the Project site are susceptible to landslides, there is no evidence that any landslides have occurred in association with these steep slopes, including during fire events associated with the 1993 Vail Fire and the 2004 Eagle Fire, both of which burned all or portions of these slopes (CalFire, 2025; Google Earth, 2025). Additionally, although the northern portions of the Project site are located within a FEMA-mapped floodplain, no existing or proposed structures are proposed within the portions of the site subject to inundation from floods (FEMA, 2008). There are no components of the proposed Project that would exacerbate local slope instability or flood hazards in the local area as a result of wildfires; thus, cumulatively-considerable impacts due to post-fire landslide and flood hazards would be less than significant. In addition, and as discussed above, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. There are no components of the proposed Project that would have the potential to cumulatively contribute to the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Accordingly, cumulatively-considerable impacts would not occur.

4.13.7 Significance of Impacts Before Mitigation

Threshold a.: Less-than-Significant Impact. The Project site and surrounding areas are not identified as evacuation routes, and the Project has no potential to conflict with the Riverside County LHMP. The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety. During construction and at Project build-out, adequate emergency access for emergency vehicles would be required to be maintained along streets that abut the Project site including along Los Caballos Road, Los Corralitos Road, and Pauba Road. The proposed Project would be subject to on-going implementation of the Galway Downs EMP, which includes specific provisions related

to fire protection and emergency medical services. As identified by the EMP, in the event of a wildfire requiring evacuation in the local area, three areas have been identified as Evacuation/Refuge (E/R) areas where guests can be moved to for safety. These E/R area locations may change due to the dynamics of the emergency including, but not limited to, the type of threat, location of threat, and current and predicted weather. For a regional emergency, the EMP requires managers at Galway Downs to follow CalFire/Riverside County Fire Department's (RCFD) lead on evacuation and, to minimize offsite traffic, consider sheltering in place until direction is given. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

Threshold b. and e.: Less-than-Significant Impact. Although the proposed Project is located within areas classified as having a "high" to "very high" susceptibility to wildfire hazards, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. Furthermore, the Project site and surrounding areas do not contain any steep slopes that could exacerbate wildfire hazards. Although the Project area is subject to high winds, particularly during Santa Ana wind events, there are no components of the proposed Project that would result in increased wildland fire hazards in the local area beyond what occurs under existing conditions. Furthermore, all of the new structures on site are proposed in the interior portions of the Project site and are not located at the edges of the Project site that could be affected by wildfires originating in off-site locations. Accordingly, the proposed Project would not exacerbate wildfire risks, would not expose Project occupants to a substantial increase in pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. Although the Project site is located within an area that is considered susceptible to wildfire-related hazards, under existing conditions the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. Because the entirety of the Project site already is subject to vegetation removal under existing conditions, any vegetation removal under the proposed Project would not result in any new or more severe impacts due to ongoing fuel management activities at the Project site. In addition, the proposed Project would not require any new or modified infrastructure to address wildfire hazards, as the on-going removal of flammable vegetation largely precludes the potential for wildfire hazards on the Project site. There are no components of the proposed Project that would require new or expanded infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment beyond what already occurs under existing conditions. Accordingly, Project impacts would be less than significant.

Threshold d.: No Impact. Although the Project site is located within an area that is considered susceptible to wildfire-related hazards, the Project site and surrounding areas primarily exhibit relatively level topography and there are no major slopes in the immediate Project area. Although lands to the southwest of

the Project site are susceptible to landslides, there is no evidence that any landslides have occurred in association with these steep slopes, including during fire events associated with the 1993 Vail Fire and the 2004 Eagle Fire, both of which burned all or portions of these slopes (CalFire, 2025; Google Earth, 2025). Thus, the Project would not be subject to fire-induced landslide hazards. Additionally, although the northern portions of the Project site are located within a FEMA-mapped floodplain, no existing or proposed structures are proposed within the portions of the site subject to inundation from floods (FEMA, 2008). Thus, the portions of the Project site that include existing or proposed permanent structures would not be subject to inundation as a result of fire hazards. In addition, and as discussed above, the vegetation on the Project site is routinely removed from the property in order to facilitate on-going site operations and to preclude potential wildfire hazards on site. These conditions would continue under the proposed Project. There are no components of the proposed Project that would have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and no impact would occur.

4.13.8 Regulatory Requirements, Design Features, and Mitigation

Regulatory Requirements

The following are regulatory requirements that apply to the Project. Although mandatory regulatory requirements do not meet CEQA's definition for mitigation, they are listed below to inform the environmental review process.

- All future development on site shall be reviewed for conformance with applicable Riverside County ordinances and requirements related to wildfire protection, including, but not necessarily limited to, Riverside County Ordinance Nos. 695, 787, and 457 and the applicable provisions of the County of Riverside Emergency Management Department (EMD) Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP).

Design Features

The following Project Design Features have been included as part of the Project in order to reduce the Project's potential adverse effects associated with wildfire hazards and emergency evacuation during emergencies:

On-going operations at the Galway Downs facility shall continue to comply with the existing Galway Downs Event Site & Event Management Plan (herein, "EMP"), which was most recently updated in February 2026 and is included as part of the Project's application materials, which are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501. The Project would be required to comply with the EMP requirements related to fire protection and emergency medical services and the EMP provisions related to evacuation in the event of wildfire emergencies.

- The Project includes the installation of a new fire pump along the southern side of the existing race track. The fire pump would be installed and operated consistent with the applicable requirements of Riverside County Ordinance No. 787 (Fire Code Standards) and CCR Title 24, Part 9 (California Fire

Code), and would improve the on-site fire suppression water supply available to the Riverside County Fire Department (RCFD) in the event of a fire emergency at the facility.

Mitigation

Project impacts related to wildfire and wildfire-related hazards would be less than significant; therefore, mitigation measures are not required.

4.13.9 References

Cited As	Reference
Cadre, 2026a	Cadre Environmental, 2026. *Biological Resources Technical Report, Galway Downs Project Site*. February 2026. Included as EIR *Technical Appendix C1*.
CalFire, 2024	California Department of Forestry and Fire Protection (Cal Fire), 2024. *Fire Hazard Severity Zones* (on-line mapping application). April 2024. Accessed August 25, 2025. Available online at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones
CalFire, 2025	California Department of Forestry and Fire Protection (CalFire), 2025. *Historical Fire Perimeters* (online mapping application). April 2025. Accessed March 4, 2026. Available online at: https://www.fire.ca.gov/what-we-do/fire-resource-assessment-program/fire-perimeters
CGS, 2025	California Geological Survey, 2025. *Landslide Susceptibility Classes* (on-line mapping application). February 20, 2025. Accessed June 18, 2026. Available online at: https://maps.conservation.ca.gov/cgs/lsi/app/
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Google Earth Pro, 2025	Google Earth Pro, 2025. *Google Earth Mapping*. March 20, 2025. Accessed March 4, 2026. Available online at: https://www.google.com/earth/about/versions/
Riverside County, 2015a	Riverside County, 2015a. *Environmental Impact Report No. 521*. February 2015. Accessed April 25, 2024. Available online at: https://planning.rctlma.org/general-plan-and-zoning/riverside-county-general-plan/riverside-county-general-plan-december-2015-0

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Riverside County, 2024b	Riverside County, 2024b. *General Plan Safety Element.* June 25, 2024. Accessed March 4, 2026. Available online: https://planning.rctlma.org/sites/g/files/aldnop416/files/2024-07/Safety%20Element.pdf
Riverside EMD, 2023	County of Riverside Emergency Management Department (EMD), 2023. *County of Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan*. April 2023. Accessed August 25, 2025. Available online at: https://rivcoready.org/sites/g/files/aldnop181/files/2023-08/MJLHMP%208.7.23.pdf

5.0 OTHER CEQA CONSIDERATIONS

California Environmental Quality Act (CEQA) Guidelines Section 15126 requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. It also sets forth general content requirements for environmental impact reports (EIRs). Potential significant effects of the proposed Project; mitigation measures to address these effects and potential cumulative impacts have been identified throughout the analysis presented in Sections 4.1 through 4.13 of this EIR. An analysis of alternatives is included in Section 6.0, Alternatives.

This section provides: (1) identification of significant environmental effects that cannot be avoided if the Project is implemented, (2) identification of significant irreversible environmental changes that would result from implementing the Project, (3) growth-inducing impacts of the Project, and (4) a summary of issues for which impacts were determined by the Project's Initial Study (EIR *Technical Appendix A*) to be less than significant.

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

The State CEQA Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (State CEQA Guidelines Section 15126.2(c)). As described in detail in Section 4.0, *Environmental Analysis*, of this EIR, the proposed Project is not anticipated to result in any impacts to the environment that cannot be reduced to below a level of significance after the consideration of Project design features, compliance with applicable federal, State and local regulations, and the application of the feasible mitigation measures identified by this EIR.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

The State CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (State CEQA Guidelines Section 15126.2(d)). An environmental change would fall into this category if: a) the Project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the Project would generally commit future generations to similar uses; c) the Project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources are not justified (e.g., the Project results in the wasteful use of energy).

Determining whether the Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources, in the form of construction materials and energy resources, would be used in the construction of the proposed Project, but development of the Project site as proposed would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels), particularly in consideration of the limited

number of physical improvements proposed as part of the Project. Additionally, the Project is required by law to comply with the California Green Building Standards Code (CALGreen), compliance with which would minimize the Project's demand for energy, including energy produced from non-renewable sources. The Project also would be subject to California Energy Code, or Title 24, which contains measures to reduce natural gas and electrical demand, thus requiring less non-renewable energy resources.

EIR subsection 5.4.3, *Hazards and Hazardous Materials*, below provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage. As concluded in the analysis, compliance with federal, State, and local regulation related to hazardous materials would ensure that impacts related to hazards and hazardous materials would be less than significant. As such, construction and long-term operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project could be growth inducing. The State CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (State CEQA Guidelines Section 15126.2(e)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. Economic growth would likely take place as a result of the proposed Project's operation as 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. Based on information provided by the Project Applicant, the proposed Project would not require an increase in employees beyond what occurs under existing conditions (Clancy Sports, 2025).

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as Southern California Association of Governments (SCAG). Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

Areas surrounding the Project site are primarily characterized by a mix of rural residential, agricultural uses (including equestrian, wineries, and related uses), and undeveloped land. New structures and uses that would be constructed, installed, or permitted on the site pursuant to proposed Conditional Use Permit (CUP) 02303R1 include a new restroom building, an awards/ceremony area, a grand pavilion tent, an office trailer, a metal solar structure that was previously installed under separate permit, and additional area for equestrian RV park use. Additionally, areas are proposed where 36 park model lodging units could be placed and where 18 additional employee modular housing units could be placed; the design of these areas would be subject to future County approvals. In addition, several structures that were installed on the site without permits would be permitted as part of CUP 02303R1, including an existing 1,513 square foot (s.f.) barn/storage building, an existing 624 s.f. storage building, an existing 1,560 s.f. polo field metal storage building, and an existing 360 s.f. manufactured storage structure. In addition, the Project would implement improvements to the site's access driveways. Improvements proposed as part of the Project would not directly induce surrounding properties to develop, because areas surrounding the Project site already are designated by the Riverside County General Plan for future development with rural residential and agricultural uses. Furthermore, roadway and utility improvements proposed as part of the Project are limited to the construction of acceleration and deceleration lanes at the Project's access driveways and the construction of a new off-site sewer line that has been designed to serve the proposed Project, and would not remove infrastructure-related obstacles to development of other offsite properties. Additionally, with mandatory improvements, fee payments, and fair-share monetary contributions, all roadways that would serve the Project would have the capacity to accommodate Project and cumulative traffic. The analysis in EIR Subsection 4.12, *Utilities and Service Systems*, demonstrates that the Project would be adequately served by water service, sewer service, drainage facilities, and other utilities and service systems. Accordingly, the growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth of land use changes on other parcels in the vicinity, as other lands surrounding the site are either already developed or planned to be developed consistent with their general plan land use designations.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT DURING THE INITIAL STUDY PROCESS

CEQA Guidelines Section 15128 requires that an EIR "*...contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.*" Based on the Project's Initial Study (*Technical Appendix A*), it was determined that the following environmental topical issues would result in no impact or less than significant impacts: Aesthetics, Geology and Soils, Hazards and Hazardous Materials, Mineral Resources, Paleontological Resources, Population and Housing, Public Services, and Recreation.

5.4.1 Aesthetics

Threshold a.:	**Would the Project have a substantial adverse effect upon a scenic highway corridor within which it is located?**

According to Figure C-8, Scenic Highways, of the Riverside County General Plan Circulation Element, there are no officially-designated State-designated scenic highways in the Project vicinity, with the nearest State-

designated scenic highway (State Route 74 [SR-74]) occurring approximately 24.5 miles east of the Project site. Although there are no officially-designated State or County scenic highways in the Project vicinity, California State Route 79 (SR-79), located approximately 0.25-mile southwest of the Project site, is classified as a Riverside County Eligible Scenic Highway (Riverside County, 2024a, Figure C-8). While the Project includes the construction/installation of new structures on site, all proposed structures would be required to adhere to the design measures established for the Wine Country – Equestrian (WC-E) zone. The Project's plot plan application materials are currently under review by the County, but are required to comply with the WC-E zoning requirements for site design, building design, grading, fencing, and landscaping (including the new requirements to be imposed as part of the proposed revisions to Ordinance No. 348). The new structures that would be constructed/installed on site largely are confined to the interior portions of the site and would be surrounded by existing structures. The new structures would appear as an extension of the existing developed nature of the property, and there are no components of the proposed new structures that would have the potential to adversely affect views available from SR-79. Based on the foregoing analysis, and assuming mandatory compliance with the Project's plot plan application materials, Project impacts to scenic highways would be less than significant, and no further analysis of this subject is required.

Threshold b.:	**Would the Project substantially damage scenic resources, including, but not limited to trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?**

Under existing conditions, the Project site largely is disturbed or developed with existing event facilities, including a horse racetrack, stables, barns, arenas, and other equestrian facilities; polo fields; lodging facilities; retail and restaurant/dining space; a recreational vehicle (RV) park with club house; grooms quarters; office space; a clock tower house; and storage spaces. The Project would entail construction or installation of new structures on site. However, given the developed nature of the site, the Project site does not contain any scenic resources under existing conditions, such as trees, rock outcroppings and unique or landmark features; thus, the Project would not result in any impacts to scenic resources. In addition, the proposed structures that would be constructed or installed on site would not exceed a height of 14 feet, while several of the existing structures on site are taller than the proposed buildings, including the existing barn/restaurant building that measures up to 31' 4" in height; thus, the Project has no potential to obstruct any prominent scenic vista or view open to the public. In addition, all proposed structures would be required to adhere to the design measures established for the Wine Country – Equestrian (WC-E) zone. The Project's plot plan application materials are currently under review by the County, but are required to comply with the WC-E zoning requirements for site design, building design, grading, fencing, and landscaping (including the new requirements to be imposed as part of the proposed revisions to Ordinance No. 348, as described in Section 3.0, *Project Description*). Accordingly, the Project would not substantially damage scenic resources, including, but not limited to trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view. No further analysis of this subject is required.

Threshold c.: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The United States Census Bureau defines "urbanized area" as a densely settled core of census tracts and/or census blocks that have 50,000 or more residents and meet minimum population density requirements while also being adjacent to territory containing non-residential urban land uses. The Project site is not located within the boundaries of any Census-defined urbanized areas (USCB, 2010); thus, Project impacts would be considered significant if the Project were to substantially degrade the existing visual character or quality of public views of the site and its surroundings. As indicated above, the new buildings proposed as part of the Project would be required to adhere to the design measures established for the Wine Country – Equestrian (WC-E) zone. The Project's plot plan application materials are currently under review by the County, but are required to comply with the WC-E zoning requirements for site design, building design, grading, fencing, and landscaping (including the new requirements to be imposed as part of the proposed revisions to Ordinance No. 348, as described in Section 3.0). In addition, the new structures that would be constructed/installed on site largely are confined to the interior portions of the site and would be surrounded by existing structures. The new structures would appear as an extension of the existing developed nature of the property. Accordingly, the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and impacts would be less than significant. No further analysis of this subject is required.

Threshold d.: Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

As shown on SWAP Figure 6, Southwest Area Plan Mt Palomar Nighttime Lighting Policy Area, the Project site is located within the limits of "Zone A" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2024b, p. 51). All development projects within Zone A of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the Observatory. Ordinance No. 655 states that low-pressure sodium lamps are the preferred illuminating source, and that outdoor lighting fixtures are required to be shielded. Pursuant to Section 7 of Ordinance No. 655, future building permits would be required to include specific information with regards to lighting, as follows: 1) the location of the site where outdoor light fixtures would be installed; 2) plans indicating the location and type of fixtures of the premises; and 3) a description of the outdoor light fixtures, including, but not limited to, manufacturer's catalog cuts and drawings. The required plans and descriptions would enable the County to determine whether compliance with the requirements of the ordinance is met. No building permits would be issued by the County unless the building permit applications demonstrate consistency with the applicable provisions of Ordinance No. 655. As such, the Project has no potential to interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655, and impacts would be less than significant. No further analysis of this subject is required. (Riverside County, 1988)

Threshold e.: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Under existing conditions, the Project site is developed and contains artificial light sources associated with the existing uses at the site. New sources of lighting would be installed in association with the construction/ installation of new structures at the site, although such lighting is anticipated to be limited to lighting for safety and security purposes, such as lighting on the building façades. All proposed new structures would be required to comply with the requirements of Riverside County Ordinance No. 915 (Outdoor Lighting), which regulates light trespass and protects the health, property, and well-being of residents residing in the unincorporated areas of Riverside County. Section 5 of Ordinance No. 915 requires that all outdoor lighting be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. (Riverside County, 2012) Mandatory compliance with Riverside County Ordinance No. 915 would ensure that the Project artificial lighting sources would not adversely affect day or nighttime views in the area. Additionally, building materials associated with the Project would not include any highly reflective materials, and any minor amounts of glare that would be produced in association with the new structures on site largely would be obscured by existing structures on site and would not substantially adversely affect any day or nighttime views in the area. Therefore, impacts due to light and glare would be less than significant and no further analysis of this subject is required.

Threshold f.: Would the Project expose residential property to unacceptable light levels?

The Project site occurs in an area that largely is surrounded by existing equestrian and agricultural uses and scattered rural residential uses. New sources of lighting would be installed in association with the construction/ installation of new structures at the site, although such lighting is anticipated to be limited to lighting for safety and security purposes, such as lighting on the building façades. All proposed new structures would be required to comply with the requirements of Riverside County Ordinance No. 915 (Outdoor Lighting), which regulates light trespass and protects the health, property, and well-being of residents residing in the unincorporated areas of Riverside County. Section 5 of Ordinance No. 915 requires that all outdoor lighting be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. (Riverside County, 2012) Mandatory compliance with Riverside County Ordinance No. 915 would ensure that the Project artificial lighting sources would not expose residential property to unacceptable light levels, and impacts would be less than significant. No further analysis of this subject is required.

5.4.2 Geology and Soils

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

According to Riverside County's GIS database and Figure 1 of the County's General Plan Safety Element, a County Fault Zone abuts and slightly encroaches into the southern portion of the Project site (Riverside County, 2024a, p. 33; RCIT, n.d.). However, no new development or structures are proposed within the

designated County fault zone. As is the case with most locations in Southern California, the Project site is located in a region that is characterized by moderate to high seismic activity. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project would be required to construct all proposed structures in accordance with the California Building Standards Code (CBSC, Title 24) and the Riverside County Building Code. The CBSC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking. Therefore, the Project would not be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, and impacts would be less than significant. No further analysis of this topic is required.

Threshold b.: Would the Project be subject to seismic-related ground failure, including liquefaction?

According to Riverside County's GIS database and Figure 2 of the County's General Plan Safety Element, the portions of the Project site where new buildings would be constructed or installed on site range from a "Low" to "Very High" potential for liquefaction hazards (Riverside County, 2024a, p. 35; RCIT, n.d.). However, Riverside County Ordinance No. 457 requires preparation of a geotechnical evaluation prior to issuance of grading or building permits, and further requires that grading and building plans incorporate the recommendations of the geotechnical evaluation in order to attenuate risks associated with liquefaction hazards (Riverside County, 2023b). With mandatory compliance with the recommendations contained in the Project's site-specific geotechnical investigation and Riverside County Ordinance No. 457, impacts due to liquefaction would be reduced to less-than-significant levels. No further analysis of this topic is required.

Threshold c.: Would the Project be subject to strong seismic ground shaking?

As indicated in the analysis of Threshold a, above, as is the case with most locations in Southern California, the Project site is located in a region that is characterized by moderate to high seismic activity. As previously stated under the above thresholds, Section 5.C of Riverside County Ordinance No. 457, which incorporates Sections 107.1 and R106.1 of the California Building Code, requires preparation of a geotechnical evaluation prior to issuance of grading or building permits, and further requires that grading and building plans incorporate the recommendations of the geotechnical evaluation in order to attenuate risks associated with county fault zone hazards and strong seismic ground shaking (Riverside County, 2023b). With mandatory compliance with the recommendations contained in the Project's site-specific geotechnical investigation and Riverside County Ordinance No. 457, impacts due to County fault zones and strong seismic ground shaking would be reduced to less-than-significant levels. No further analysis of this topic is required.

Threshold d.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?

The Project site and surrounding areas generally exhibit level terrain, with exception of hillsides that occur to the southeast and southwest of the Project site. Thus, the minor grading proposed as part of the Project would not have the potential to result in landslides or rockfall hazards on or off site. Lateral spreading is a

type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. The Project site likely is subject to lateral spreading hazards based on the Project site's "Moderate" to "Very High" liquefaction potential (as discussed under Threshold b)). In addition, according to Riverside County GIS the Project site is considered "susceptible" to subsidence (collapse) hazards. However, and as noted above, Section 5.C of Riverside County Ordinance No. 457, which incorporates Sections 107.1 and R106.1 of the California Building Code, requires preparation of a geotechnical evaluation prior to issuance of grading or building permits, and further requires that grading and building plans incorporate the recommendations of the geotechnical evaluation in order to attenuate risks associated with liquefaction and landslide hazards (Riverside County, 2023b). The Project's future geotechnical report will incorporate site-specific recommendations to address potential hazards associated with lateral spreading and collapse, and the Project would be conditioned to comply with the recommendations of the site-specific investigation. Preparation and implementation of a site-specific geotechnical evaluation as part of future implementing grading and building permits and compliance with the recommendations of the Project's geotechnical report would ensure that hazards associated with unstable geologic units that could potentially result in on- or off-site lateral spreading or collapse are reduced to a level below significance. No further analysis of this topic is required.

Threshold e.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?

According to Riverside County's GIS database, the Project site is considered "susceptible" to subsidence hazards but is not located in an area with recorded ground subsidence (RCIT, n.d.). No large-scale extraction of groundwater, gas, oil, or geothermal energy is proposed as part of the Project, and no such uses occur in the vicinity of the Project. As such, there is little to no potential for ground subsidence due to withdrawal of fluids or gases at the Project site. Additionally, and as noted above, Section 5.C of Riverside County Ordinance No. 457, which incorporates Sections 107.1 and R106.1 of the California Building Code, requires preparation of a geotechnical evaluation prior to issuance of grading or building permits, and further requires that grading and building plans incorporate the recommendations of the geotechnical evaluation in order to attenuate risks associated with ground subsidence hazards (Riverside County, 2023b). The Project's future geotechnical report will incorporate site-specific recommendations to address potential ground subsidence hazards, and the Project would be conditioned to comply with the recommendations of the site-specific investigation. Preparation and implementation of a site-specific geotechnical evaluation as part of future implementing grading and building permits and compliance with the recommendations of the Project's geotechnical report would ensure that hazards associated with ground subsidence are reduced to a level below significance. Therefore, impacts due to ground subsidence hazards would be less than significant. No further analysis of this topic is required.

Threshold f.: Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

There are no known volcanoes within the Project area; therefore, the Project would not be subject to hazards associated with volcanoes and no impacts would occur. A seiche is a standing wave in an enclosed or

partially enclosed body of water that are observed on lakes, reservoirs, swimming pools, bays, harbors, and seas. The nearest enclosed body of water to the Project site is Vail Lake, located approximately 2.7 miles east of the Project site. Although the northern portions of the Project site are located within a flood zone (Flood Zone A, which includes areas subject to flood hazards but where the base elevations of flooding have not been determined), the Project site is not subject to inundation due to a failure of any dams, including the dam at Vail Lake (RCIT, n.d.). Given the site is not subject to flooding from dam failure, it can also be assumed that the Project site is not subject to inundation from seiche events that may occur within Vail Lake; thus, no impacts due to seiches would occur with implementation of the Project. Although hill forms occur to the southeast and southwest of the Project site, the Project site is separated from these hillsides by Los Corralitos Road, and these areas are covered with natural vegetation (sage scrub), which reduces the potential for mudflow hazards. Accordingly, impacts associated with mudflow hazards would be less than significant. Accordingly, the Project would result in less-than-significant impacts due to geologic hazards, such as seiche, mudflow, or volcanic hazard, and no further analysis of this subject is required.

Threshold g.: Would the Project change topography or ground surface relief features?

Under existing conditions, the Project site exhibits very little topographic variation. Grading activities associated with the Project would be minimal and generally would consist of fine grading activities (i.e., the creation of level building pads), and no mass grading is anticipated as part of the Project. As such, the Project has no potential to change topography or ground surface relief features, and no impact would occur. No further analysis of this topic is required.

Threshold h.: Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

Minimal grading would occur as part of the proposed Project since the Project site is fully disturbed and developed under existing conditions. Given the relatively flat nature of the Project site, cut or fill slopes are not anticipated, and where minor slopes occur they would not exceed a gradient of 2:1 and would not be higher than 10 feet in height. Furthermore, Section 5.C of Riverside County Ordinance No. 457, which incorporates Sections 107.1 and R106.1 of the California Building Code, requires preparation of a geotechnical evaluation prior to issuance of grading or building permits, and further requires that grading and building plans incorporate the recommendations of the geotechnical evaluation in order to ensure that any proposed manufactured slopes would be grossly stable (Riverside County, 2023b). With mandatory compliance with Riverside County Ordinance No. 457, impacts due to manufactured slopes constructed at a gradient steeper than 2:1 or higher than 10 feet in height would be reduced to less-than-significant levels. No further analysis of this topic is required.

Threshold i.: Would the Project result in grading that affects or negates subsurface sewage disposal systems?

Under existing conditions, the Project site is developed and wastewater generated at the Project site is treated by existing septic systems. Grading proposed as part of the Project would not occur within any areas containing existing septic systems, and all future uses proposed as part of the Project either would be required to connect to the existing septic systems, or would be required to connect to the new EMWD sewer

line within De Portola Road. Accordingly, the Project would not result in grading that affects or negates subsurface sewage disposal systems, and no impact would occur. No further analysis of this topic is required.

Threshold j.: Would the Project result in substantial soil erosion or the loss of topsoil?

Proposed grading activities associated with the Project, which are anticipated to be minor and only would entail fine grading to establish building pads, would temporarily expose underlying soils to water and air, which would increase erosion susceptibility while the soils are exposed. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and before the Project's structure foundations are established and paving and landscaping occur. Erosion by wind would be highest during periods of high wind speeds when soils are exposed.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavations that disturb at least one acre of total land area. Additionally, during grading and other construction activities involving soil exposure of the transport of earth materials, Riverside County Ordinance No. 457 would apply, which establishes, in part, requirements for the control of dust and erosion during construction, would apply to the Project. The Project Applicant would be required pursuant to Section 8.F of Ordinance No. 457 to prepare an erosion control plan that would address construction fencing, sandbags, and other erosion-control features that would be implemented during the construction phase to reduce the site's potential for soil erosion or the loss of topsoil. Requirements for the reduction of particulate matter in the air also would apply, pursuant to SCAQMD Rule 403. Mandatory compliance with the Project's NPDES permit and these regulatory requirements would ensure that water and wind erosion impacts during construction would be less than significant. Accordingly, no further analysis of this topic is required. (Riverside County, 2023b; AQMD, 2005)

Threshold k.: Would the Project be located on expansive soil, as defined in Section 1803.5.3. of the California Building Code (2022), creating substantial risks to life or property?

As indicated by the County's GIS database, the Project site has a "high" expansion potential (RCIT, n.d.) However, Section 5.C of Riverside County Ordinance No. 457, which incorporates Sections 107.1 and R106.1 of the California Building Code, requires preparation of a geotechnical evaluation prior to issuance of grading or building permits, and further requires that grading and building plans incorporate the recommendations of the geotechnical evaluation in order to ensure that any expansive soils that may be present are properly addressed (Riverside County, 2023b). With mandatory compliance with Riverside County Ordinance No. 457 and applicable State building codes, impacts due to expansive soils would be reduced to less-than-significant levels. Accordingly, no further analysis of this topic is required.

Threshold l.: Would the Project have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Under existing conditions, the existing uses at the Project site are served by existing septic systems. These septic systems were permitted by Riverside County, and as part of the permit process evidence was provided to the County demonstrating that the soils on site are suitable for septic systems. Under near-term conditions, any new uses on site either would be required to connect to the existing septic systems on site, or would be required to install additional sewage treatment system on site. Should any new sewage treatment systems be proposed on site, they would be subject to compliance with Riverside County Ordinance No. 650.7 (Regulating the Discharge of Sewer), which imposes strict requirements to demonstrate that on-site soils are capable of adequately supporting use of septic tanks or alternative wastewater disposal systems. Ultimately, all uses on site would be required to connect to the new EMWD sewer line planned within De Portola Road, at which time the existing septic systems on the property would be abandoned in accordance with the requirements of the Riverside County Department of Environmental Health. Accordingly, the Project would not have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater, and no impact would occur. No further analysis of this topic is required.

Threshold m.: Would the Project be impacted by or result in an increase in wind erosion and blowsand, either on or off site?

According to Riverside County General Plan Amendment 960 (the County's 2003 comprehensive General Plan update), the Project site is located in an area with "moderate" potential for wind erosion hazards. Proposed grading activities, which are anticipated to be minor and mostly comprising fine grading activities, would expose underlying soils at the Project site, which would increase erosion susceptibility during grading and construction activities. Exposed soils would be subject to erosion due to the removal of stabilizing vegetation and exposure of these erodible materials to wind. Erosion by wind would be highest during periods of high-wind speeds. During construction activities involving soil exposure or the transport of earth materials, significant short-term impacts associated with wind erosion would be precluded with mandatory compliance to the Project's SWPPP and Riverside County Ordinance No. 484.2, which establishes requirements for the control of blowing sand. In addition, the Project would be required to comply with South Coast Air Quality Management District (SCAQMD) Rule 403, which addresses the reduction of airborne particulate matter with mandatory compliance to these regulatory requirements. Wind erosion impacts would be less than significant during construction. Following construction, wind erosion on the Project site would be negligible as the disturbed areas would be landscaped or covered with impervious surfaces. Therefore, implementation of the proposed Project would not significantly increase the risk of long-term wind erosion on- or off-site, and impacts would be less than significant. No further analysis of this topic is required.

Applicable Mitigation Measures from the Temecula Wine Country Community Plan Program Environmental Impact Report

Although mitigation measures are not required since Project impacts due to geology and soils would be less than significant, the following mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR) would apply to the proposed Project to further reduce the Project's potential impacts due to geology and/or soils.

WCCP PEIR MM GEO-1: All implementing projects shall prepare a site-specific assessment as determined by the County Geologist to ascertain all site-specific geologic/geotechnical information, including, but not limited to, ground shaking potential, blasting hazards, liquefaction potential, fault rupture potential and landslide/slope instability potential. This assessment and report shall be prepared by a California-licensed geologist and/or geotechnical engineer and shall be submitted to the County Geologist for review and approval prior to approval of the implementing project. This report shall include sites specific measures such as grading recommendations, foundation design recommendations, slope stability recommendations, and the alternative siting of structures, as appropriate, to reduce the significance of potential geologic and/or geotechnical hazards associated with the proposed implementing project.

WCCP PEIR MM GEO-2: Any development within the Project area shall consider retention of topsoil should any grading be necessary, with the intent to minimize loss of valuable topsoil for agricultural purposes. The topsoil removed from grading areas, if any, could be reapplied to areas proposed for viticultural production or other agricultural use, subject to consistency with project grading plans, other applicable regulations, and viticulture Best Management Practices as determined appropriate by the landowner.

5.4.3 Hazards and Hazardous Materials

Threshold a.:	**Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

During Project construction, limited amounts of hazardous materials typical of construction activities would be transported to, stored, and used on the Project site (e.g., fuel, lubricants, architectural coatings). Mandatory compliance with regulatory requirements pertaining to the transport, use, and disposal of hazardous materials would ensure that impacts would be less than significant. There are no reasonably foreseeable circumstances associated with the Project's construction or operation that would result in a significant hazard to the public or the environment associated with standard construction and operational practices. A less-than-significant impact would occur, and no further analysis is required on this topic.

Threshold b.: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As indicated in the response to Threshold a above, limited amounts of hazardous materials typical of construction activities would be transported to, stored, and used on the Project site during Project construction and limited amounts of hazardous materials may be used and stored on the Project site as part of routine business operations. Mandatory compliance with regulatory requirements pertaining to the transport, use, and disposal of hazardous materials would ensure that impacts would be less than significant. There are no reasonably foreseeable circumstances associated with the Project's construction or operation that would result in a significant hazard to the public or the environment associated with standard construction and operational practices. A less-than-significant impact would occur, and no further analysis is required on this topic.

Threshold c.: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. In April 2023, the Riverside County Emergency Management Department (EMD) published a Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP). The purpose of the LHMP is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-caused hazards. The LHMP describes the County's plans for a variety of potential hazards, ranging from wildfires to tornados. However, the LHMP does not identify any emergency management facilities on the Project site, does not identify any specific evacuation routes within the Project area, and does not identify any policies or requirements specific to the Project site or surrounding areas. Rather, the LHMP provides a series of policies to be enacted by the various agencies and jurisdictions within the County in the event of emergency situations. As noted by the LHMP, "[t]here has been no development within Riverside County unincorporated areas that have increased hazard risk or vulnerability since the previous plan was adopted in 2018" (Riverside EMD, 2023, p. 49) Therefore, it can be concluded that developments within Riverside County that adhere to the applicable provisions of County ordinances, including design measures related to emergency access, would not result in a conflict with the LHMP. The proposed Project would be required to comply with all applicable provisions of County policies and ordinances related to public safety, including but not limited to Ordinance No. 457, which establishes the County's building and fire protection regulations and includes measures requiring the provision of adequate emergency access and other measures to address fire hazard safety. There are no components of the proposed Project with the potential to conflict with the County's LHMP. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur, and no further analysis is required on this subject.

Threshold d.: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project site is not located within one-quarter mile of an existing or proposed school (Google Earth, 2025). The nearest existing school facilities to the Project site are Crowne Hill Elementary (located approximately 2.4 miles northwest of the site), Pauba Valley Elementary School (located approximately 2.7 miles west of the site), and Great Oak High School (located 3.8 miles east of the site). In addition, the Project does not include any land uses that may be considered point source emitters or that would be involved with the storage or use of hazardous materials. Accordingly, the proposed Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur, and no further analysis of this topic is required.

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

The California Environmental Protection Agency (CalEPA) maintains several lists of contaminated sites that are identified as meeting the "Cortese List" requirements for hazardous materials sites. A review of the CalEPA's Cortese List Data Resources indicates that the Project site is not included on any list of hazardous materials sites compiled pursuant to Government Code 65962.5 (DTSC, n.d.). As such, no impact would occur, and further analysis of this topic is not required.

Threshold f.: Would the Project result in an inconsistency with an Airport Master Plan?

The nearest airport to the Project site is the French Valley Airport, located approximately 7.4 miles northwest of the Project site (Google Earth, 2025). According to the Riverside County GIS database and Figure 5, Southwest Area Plan French Valley Airport Influence Area, of the SWAP, the Project site is not located within any Airport Influence Area (AIA) or Airport Safety Zone (Riverside County, 2024b, Figure 5; RCIT, n.d.). As such, the Project site is not located in an area that is subject to any Airport Master Plans or Airport Land Use Compatibility Plans. Accordingly, implementation of the Project does not have the potential to result in an inconsistency with an Airport Master Plan and the Project would not require review by the Airport Land Use Commission. No impacts would occur, and no further analysis of this topic is required.

Threshold g.: Would the Project require review by the Airport Land Use Commission?

Refer to the discussion of Threshold f above. Because the Project site is not located within the AIA of any airports, the Project would not require review by the Airport Land Use Commission (ALUC). No impact would occur, and no further analysis of this topic is required.

Threshold h.:	**For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the project area?**

Refer to the discussion within Threshold f above. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport, and as such the Project would not result in a safety hazard for people residing or working in the Project area. No impact would occur, and no further analysis of this topic is required.

Threshold i:	**For a project within the vicinity of a private airstrip, or heliport, would the Project result in a safety hazard for people residing or working in the project area?**

The nearest public airport to the Project site is the French Valley Airport, located approximately 7.4 miles northwest of the Project site, while there are no heliports in the Project vicinity. According to Map FV-1 of the French Valley Airport Land Use Compatibility Plan (ALUCP), the Project site is located approximately 4.8 miles from the nearest portion of Riverside County that is located within the Compatibility Zones for this airport, indicating that the Project site is not subject to hazards associated with the French Valley Airport (ALUC, 2012, Map FV-1)As such, the Project would not result in a safety hazard for people residing or working in the Project area. No impact would occur, and no further analysis of this topic is required.

5.4.4 Land Use and Planning

Threshold b.:	**Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?**

Under existing conditions, the Galway Downs facility is surrounded by existing improved roadways, including Los Caballos Road to the north, Pauba Road to the east, and Los Corralitos Road to the west and southwest. These roadways would continue to serve existing residential uses in the surrounding area. As such, the Project has no potential to physically divide the physical arrangement of an established community. No impact would occur, and no further analysis of this topic is required.

5.4.5 Mineral Resources

Threshold a.:	**Would the Project result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?**

According to mapping information available from the CDC and within the Multipurpose Open Space Element of the County's General Plan, the Project site is located within Mineral Resources Zone (MRZ)-3 (Riverside County, 2024a, Figure OS-6). The MRZ-3 category represents "areas where the available geologic information indicates that mineral deposits exist; however, the significance of the deposit is undetermined" (CDC, 2015). Additionally, the Project site is not designated as a "Mineral Resource" site by the Riverside County General Plan or SWAP and there are no active mining operations on or in the vicinity of the Project site (RCIT, n.d.; Google Earth, 2025). Accordingly, implementation of the Project would not result in the loss

of availability of a known mineral resource that would be of value to the region, or the residents of the State and no impact would occur. No further analysis of this topic is required.

Threshold b.: Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Neither the County's General Plan nor the SWAP identify the Project site as comprising a locally important mineral resource site and there are no plans applicable to the Project site that designate the Site as a mineral resource recovery site. (Riverside County, 2024a; Riverside County, 2024b) Accordingly, no impact would occur, and no further analysis of this topic is required.

Threshold c.: Would the Project potentially expose people or property to hazards from proposed, existing or abandoned quarries or mines?

According to Riverside County's GIS database, there have been no surface mining permits issued within the Project vicinity, which indicates that there are no existing surface mines in the Project vicinity (RCIT, n.d.). Additionally, there are no State-classified or designated areas for mineral resources within the Project site's vicinity. There are no mines or quarries proposed by the Project nor are there any existing or former mines known to exist on the site or in the surrounding area (Google Earth, 2025). Due to the lack of surface mines in the Project site's vicinity, the Project would not expose people or property to hazards resulting from past or present mining activities, nor would the Project be an incompatible use with any proposed or existing surface mines. No impact would occur, and no further analysis of this topic is required.

5.4.6 Paleontological Resources

Threshold a.: Would the Project directly or indirectly destroy a unique paleontological resource, or site, or unique geologic feature?

According to Riverside County's GIS database, the majority of the Project site has a "Low" potential for paleontological sensitivity, while a small portion in the southern area of the Site has a "High" potential for paleontological sensitivity (RCIT, n.d.). The area identified with a "High" potential for the presence of paleontological resources consists of lands south of Los Corralitos Road, a portion of Los Corralitos Road, and the existing ranch houses, the existing equine event trailer parking, the resident arena, and lands not identified with any existing or proposed uses. The portions of the Project site that would be subject to new development as part of the Project all occur within areas with a "Low" potential for containing paleontological resources. Furthermore, there would not be a mass grading phase associated with the Project, and any fine grading that would be needed likely would not exceed the depths of historic ground disturbance at the site. Accordingly, Project impacts to paleontological resources would be less than significant, and no further analysis of this topic is required.

5.4.7 Population and Housing

Threshold a.: Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No housing would be demolished as part of the Project, and the Project would provide for 18 new employee modular housing units on site, in addition to up to 36 park model lodging units . Accordingly, the proposed Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. No impact would occur, and no further analysis of this topic is required.

Threshold b.: Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

The proposed Project generally would entail a continuation of activities at the existing Galway Downs facility, with an expansion of the permitted range of uses allowed on site. The Project would not result in an increase in the number of employees at the site. Additionally, the Project includes the installation of 18 new employee modular units on site, which would off-set any increased demand for housing, including affordable housing, that may result from the Project. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's Regional Housing Needs Assessment (RHNA) obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Impacts would be less than significant, and no further analysis of this topic is required.

Threshold c.: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

There are no components of the proposed Project with the potential to induce substantial unplanned population growth in an area, either directly or indirectly. With exception of the Project's proposed new sewer line connection to the EMWD sewer main to be constructed in De Portola Road, none of the improvements proposed as part of the Project would result in substantial population growth in the area. Although the Project would entail the construction of a new sewer line off site, this sewer line only would serve the Galway Downs facility and would not serve other properties. While other properties in the area may ultimately connect to the new EMWD sewer main, any such future connections would be made directly to the EMWD sewer main and not to the sewer line proposed to extend between De Portola Road and the Project site. Accordingly, the proposed Project would not induce substantial unplanned population growth in the local area, either directly or indirectly, and no impact would occur. No further analysis of this topic is required.

5.4.8 Public Services

Threshold a.: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or

physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

The proposed Project involves the continuation and expansion of an existing events facility, which is provided fire protection services under existing conditions by the Riverside County Fire Department (RCFD). According to mapping data published by CalFire, the central portions of the Project site are classified as having a "High" potential for fire hazards, while lands along the perimeter of the site are classified as having a "Very High" potential for wildfire-related hazards (CalFire, 2024). Implementation of the Project would cumulatively affect the RCFD's ability to service the planned population. The Project would require an "Rural-Category III" level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station located within five miles of the Project site, and a full first alarm assignment team operating on the scene within 20 minutes of dispatch. (Riverside County, 1986) The nearest fire station to the Project site is RCFD Station 95 (Roripaugh Ranch), located approximately 4.9 miles northwest of the Project site, while RCFD Fire Station 96 (Glen Oaks) is located 5.0 miles northeast of the Project site. Accordingly, the Project site would be located within 5.0 miles of the nearest fire station, and a full first alarm assignment team could operate on site within 20 minutes of dispatch. Thus, the RCFD would be able to meet the Rural-Category III Land Use protection goals of the Fire Protection Master Plan for the Project.

Development of the proposed Project would nonetheless impact fire services by placing an incremental increase in demand on existing RCFD resources and personnel. As set forth by the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more. The Project only includes the installation of 18 new employee modular housing units and 36 park model lodging units. The Project would not create a demand on RCFD resources and personnel equivalent to 2,000 dwelling units or more; thus, no new fire station would be required to serve the Project. Notwithstanding, the expanded range of uses allowed on site could result in an increased number of emergency and public service calls due to the increased presence of structures. However, the Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction. Accordingly, with the mandatory payment of DIF fees, Project-related impacts to fire protection services would be less than significant, and no further analysis of this topic is required.

Threshold b.: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?

Police protection services for the Project site would be provided by the Riverside County Sheriff's Department (RCSD). The nearest RCSD station is the Southwest Station, located at 30755-A Auld Rd.,

Murrieta, CA 92563, approximately 7.9 miles northwest of the Site (Google Earth, 2025). The proposed Project only entails the continuation and expansion of existing operations at the Galway Downs facility, and the Project only would include the installation of 18 new employee modular housing units and 36 park model lodging units, and would not result in an increase in the number of employees on site. Additionally, according to the Riverside County Sheriff's Department (RCSD), as the population and use of an area increases, additional financing of equipment and manpower needs are required to meet the increased demand. The proposed Project would result in a nominal increase in the cumulative demand for services from the RCSD, which provides police protection services to the Project site. Staff necessary to support the additional deputies would include an appropriate level of civilian, investigation, and supervisory personnel. The proposed Project would not, however, in and of itself result in the need for new or expanded sheriff facilities to accommodate new personnel.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of the County's DIF fee to assist the County in providing for sheriff protection services, including new or expanded facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and sheriff facilities construction. Accordingly, Project-related impacts to sheriff protection services would be less than significant and no mitigation would be required.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities, and impacts would be less than significant. The Project's incremental demand for sheriff protection services also would be less than significant because the Project Applicant would be required to contribute DIF fees. Accordingly, a less-than-significant impact would occur with respect to sheriff protection services or facilities as a result of implementation of the proposed Project, and no further analysis of this topic is required.

Threshold c.:	**Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?**

The Project would not create a direct demand for public school services, as the 36 park model lodging units that primarily would accommodate equestrian event participants with stays as short as over a single weekend, and the 18 new employee modular housing units proposed as part of the Project are intended for employees only. Thus, the Project would not directly generate population growth (i.e., school-aged children requiring public education). Under existing conditions, no schools are located on the Project site or are planned to be located on the Site. As such, there is no potential for the Project to have a direct physical impact on any school facility. Additionally, no component of the Project would measurably increase public school demands or result in the need for new or physically altered school facilities. Nonetheless, the Project Applicant would be required to contribute fees to the Temecula Valley Unified School District (TVUSD), in compliance with California Senate Bill 50 (SB 50), California Government Code Sections 65995.5 to 65998, which allows school districts to collect fees from new developments to offset the costs associated with

increasing school capacity needs. The payment of school mitigation impact fees authorized by SB 50 is deemed to provide "full and complete mitigation of impacts" on school facilities from the development of real property (California Government Code Section 65995). (CA Legislative Info, 1998) Implementation of mandatory payment of school impact fees would reduce the Project's impacts to school facilities to a level below significance. Accordingly, no further analysis of this topic is required.

Threshold d.:	**Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?**

Development of the Project site and associated site improvements would not directly create a demand for public library facilities and would not directly result in the need for new or physically altered library facilities. Increased demand for library facilities results from an increase in the resident population and the Project only would include the installation of 18 new employee modular housing units and 36 park model lodging units. The 36 park model lodging units primarily would accommodate equestrian event participants with stays as short as over a single weekend and are highly unlikely to result in an increase in demand for library facilities; thus, the Project's only potential to result in an increase in demand for library facilities is due to the addition of the 18 new employee modular housing units on site.

Although use of the internet has resulted in decreased demand being placed on library services nation-wide, the County continues to maintain its standards for book titles and library square footage. Library services in the County of Riverside are provided by the Riverside County Public Library System (RCPLS). Assuming that all 18 new employee modular housing units would be occupied by new residents within the County, and based on the population generation rates specified in Table E-2 of Appendix E to the Riverside County General Plan, the 18 employee modular units would generate a future population of approximately 57 persons (18 households x 3.17 persons/per household = 57.1 persons). In order to attain the RCPLS level of service standard of 2.5 titles-per-capita, the employees that would be accommodated by the proposed modular units would require an additional 143 titles (2.5 titles-per-capita x 57 persons = 142.5 titles). The RCPLS also has a standard of 0.5 square foot of library space per capita. In order to meet the RCLPS standard of 0.5 square feet (s.f.) per capita, the Project would generate a demand for 28.5 s.f. of additional library space (0.5 s.f. of library space per capita x 57 persons = 28.5 s.f.). However, these estimates are conservative in nature because the majority of jobs that would be generated by the Project likely would be filled by existing County residents, given the County's generally poor jobs-to-housing ratio. Thus, the Project's impacts to the local library system likely would be substantially less than described above. (Riverside County, 2015, Table 4.17-W)

The provision of additional library space would be addressed through the County's compliance with the adopted level of service standards. Additionally, mandatory compliance with Riverside County Ordinance No. 659 would require the payment of impact fees. These fees would provide funding for library books and library expansion projects. Furthermore, given that the Project only would result in an increase in demand

for 143 titles and 28.5 s.f. of additional library space, the Project would not result in a need for new or expanded library facilities. Although new library facilities may be under consideration by the RCPLS in the Project area, it is not possible to identify environmental impacts that may be associated with the development of any new library facilities until a specific proposal and design for the facility is prepared by the RCPLS, and any such planned increase would not be the result of the proposed Project. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation (State CEQA Guidelines Section 15145). Environmental effects of such library facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. Any mitigation measures required for new or expanded library facilities could be funded, in part, from property taxes, including increased property taxes resulting from buildout of the Project site.

Accordingly, and based on the preceding analysis, Project impacts to library facilities and resources would be less than significant, and no further analysis of this topic is required.

Threshold e.:	**Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health services?**

The nearest medical facility to the Project site is Temecula Valley Hospital, located approximately 3.9 miles northeast of the Project site at 31700 Temecula Parkway in the City of Temecula (Google Earth, 2025). Due to the nature of the Project, development of the Project would not result in a substantial increase in demand for health services and would not directly result in the need for new of physically altered health service facilities that could result in substantial adverse impacts to the environment. That is, assuming that all 18 of the proposed employee modular housing units would consist of new residents within the County, and based on the average household sizes reported by Appendix E to the Riverside County General Plan, the 18 new employee modular housing units would be expected to generate a worst-case population of approximately 57 people. Using a 1.9 hospital beds per 1,000 persons generation factor, the Project would not generate the need for any new hospital beds, as the Project only would result in an incremental increase in demand for 0.1 hospital beds (57 x 1.9 ÷ 1,000 = 0.11). Furthermore, as most of the future jobs on the Project site would be filled by existing County residents, the Project's conservatively estimated demand for health care services and hospital beds would not represent a new demand for such resources within the County.

The provision of private health care is largely based on economic factors and demand and is beyond the scope of the proposed Project. However, EIR No. 521 concluded impacts associated with buildout of the General Plan would be less than significant, and further notes that: "compliance with…existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts…" (Riverside County, 2015, p. 4.17-18). Mitigation Measure 4.15.7A requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level

of medical service provided within each Area Plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A. Furthermore, mandatory compliance with County Ordinance No. 659 requires a development impact fee payment to the County that is partially allocated to public health services and facilities. While new or expanded health care facilities may ultimately be needed within the County due to the anticipated growth in population, it is not possible to identify environmental impacts that may be associated with the development of any new health care facilities until a specific proposal and design for the facility is prepared. Accordingly, impacts due to the construction of new or expanded health care facilities are too speculative for evaluation in this EIR (State CEQA Guidelines Section 15145). As such, with payment of mandatory DIF fees, impacts to public medical facilities and resources associated with the proposed Project would be less than significant.

Accordingly, and based on the preceding discussions, no further analysis of this topic is required.

5.4.9 Recreation

Threshold a.:	**Would the Project require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

The Project would entail an expansion of activities at the existing Galway Downs facility, which consists of an events facility that could be considered a recreational facility. Impacts associated with implementation of the Project as proposed, including physical impacts associated with fine grading and the construction/installation of new structures on site, are evaluated throughout this EIR (e.g., refer to the discussion of Biological Resources and Cultural Resources in Sections 4.3 and 4.4). Because the physical impacts associated with the Project will be fully evaluated in the required EIR, impacts would be less than significant and no further analysis of this topic is necessary.

Threshold b.:	**Would the Project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

While the project involves the development of 36 park model lodging units and 18 employee modular homes, the overall Galway Downs facility comprises a recreational resource within the County that will include expanded operations under the proposed Project. Given the nominal potential increase in the site's population as a result of the Project and the fact that the Project entails the expansion of an existing recreational facility, the proposed Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant, and no further analysis of this topic is required.

Threshold c.: Would the Project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

The Project site is within the boundaries of the Valley Wide Recreation and Park District (VWRPD), which adopted its 2020 Master Plan in January 2021. The Master Plan establishes a standard of 5.0 acres of parkland for each 1,000 residents. The VWRPD assumes a population generation factor of 3.12 for single-family residential uses. The Project's 36 park model lodging units would accommodate equestrian event participants with stays as short as over a single weekend and are highly unlikely to result in an increase in demand for recreational facilities, particularly given that the users of the park model lodging units likely would make use of the existing and proposed recreational facilities and amenities at the Galway Downs site; thus, the Project's only potential to result in an increase in demand for recreational facilities is due to the addition of the 18 new employee modular housing units on site. It should be noted that the VWRPD utilizes a different person per household (pph) value than is identified in the Riverside County General Plan; however, for purposes of analysis herein, the VWRPD population generation rates have been utilized for purposes of calculating future population associated with the Project's proposed 18 employee modular housing units. Based the VWRPD Master Plan, the VWRPD assumes a population generation factor of 3.1 for single-family residential uses. Based on VWRPD's population generation factor for single-family residential uses, the Project's proposed 18 new employee modular housing units would generate a future population of approximately 56 persons (18 units x 3.12 persons/unit = 56.2 persons), conservatively resulting in a parkland demand of 0.33-acre (56.2 persons x 5 acres/1,000 persons = 0.326-acre). The expanded recreational uses and amenities proposed as part of the Project would be more than sufficient to account for the potential 0.33-acre increase in demand for recreational resources within the County. Furthermore, as most of the future jobs on the Project site would be filled by existing County residents, the estimated increase in demand for recreational resources likely is overstated. Therefore, the Project would not conflict with the VWRPD's 2020 Master Plan and would not be required to pay in-lieu park fees (Quimby). Impacts would be less than significant, and no further analysis of this topic is required. (VWRPD, 2020, p. 14 and Figure 1)

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6.0 ALTERNATIVES

An EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with CEQA Guidelines Section 15126.6(a), an EIR must *"describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives."* This section identifies and evaluates potential alternatives to the Project, as required by CEQA.

Key provisions of CEQA Guidelines Sections 15126.6(b)-(f) on alternatives are provided below to explain the foundation and requirements for the alternatives analysis in this EIR.

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly (CEQA Guidelines Section 15126.6(b)).

- The specific alternative of 'no project' shall also be evaluated along with its impact (CEQA Guidelines Section 15126.6(e)(1)).

- The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)).

- The range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (CEQA Guidelines Section 15126.6(f)).

- For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (Section 15126.6(f)(2)(A)).

- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (Section 15126.6(f)(2)(B)).

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6(f)(3)).

As discussed in EIR Section 4.0, *Environmental Analysis*, the Project would result in significant and unavoidable impacts under the issue area of Greenhouse Gas (GHG) Emissions (due to GHG emissions exceeding 3,000 $MTCO_2e$/yr and due to an unavoidable conflict with the Riverside County Climate Action Plan [CAP] Update) and under the issue area of Transportation (due to Project-related Vehicle Miles Traveled [VMT]). Mitigation measures are not available to reduce these impacts to less-than-significant levels. Additionally, Project-level mitigation measures are required to reduce potentially significant impacts to less-than-significant levels for the following environmental topics: Biological Resources (to address an amendment to JPR 10-12-27-01, to assure avoidance of sewer line impacts to Temecula Creek, and to address burrowing owl should the species migrate onto the site), and Cultural Resources and Tribal Cultural Resources (to address potential for subsurface resource discovery during ground-disturbing construction activities). These potentially significant impacts are temporary, would occur during Project construction, and would be reduced to less-than-significant levels with mitigation measures. Additionally, and although not required to address any of the Project's impacts, the Project would be subject to applicable mitigation measures from the Temecula Wine Country Community Plan (WCCP) Program Environmental Impact Report (PEIR), which would further reduce Project-related impacts under the issue areas of air quality, noise, transportation, and utilities/service systems. Accordingly, a total of four alternatives to the Project are discussed herein, and are intended to reduce to the extent feasible the Project's less-than-significant impacts (following mitigation).

6.1 ALTERNATIVES UNDER CONSIDERATION

State CEQA Guidelines Section 15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "no project" alternative). For development projects that include a revision to an existing land use plan, the "no project" alternative is considered to be the continuation of the existing land use plan into the future. For projects other than a land use plan, such as a development project on an identifiable property, the "no project" alternative is considered to be a circumstance under which the project does not proceed (CEQA Guidelines Sections 15126.6(e)(3)(A-B). For the alternatives analysis in this EIR, the potential scenario where the Project's proposed applications, including CUP 02303R1, CZ 22000010, and Exception No. 9 to

Riverside County Noise Ordinance No. 847, are not approved by Riverside County is considered to be the "No Project Alternative (NPA)." The circumstance in which Project operations would continue but where the Project would not entail any new construction or introduction of any new land uses on site is considered to be a no project alternative and is described herein as the "No Construction Alternative (NCA)." Although the NCA is a separately defined alternative, it is operationally analogous to the NPA in that neither alternative would result in physical development on site beyond existing conditions. Because both the NPA and the NCA would avoid the majority of the Project's environmental impacts, either could be considered the environmentally superior alternative. Pursuant to CEQA Guidelines Section 15126.6(e)(2), when the no project alternative, or an alternative that is functionally equivalent to a no project scenario, is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Consistent with this requirement, the Residential Only Alternative (ROA), as discussed in Subsection 6.3.3, is identified as the Environmentally Superior Alternative pursuant to State CEQA Guidelines Section 15126.6, based on the substantial reduction in long-term operational impacts associated with vehicular traffic that would result from redevelopment of the site with low-density residential uses.

6.1.1 No Project Alternative (NPA)

The No Project Alternative (NPA) assumes that the Project Applicant's applications for proposed CUP 02303R1, CZ 22000010, and Exception No. 9 to Riverside County Noise Ordinance No. 847 are not approved by Riverside County. In such a case, future activities at Galway Downs would consist of equestrian-oriented land uses that are currently allowed under existing permits, including CUP 02303 which places no capacity limit on equestrian activities. The temporarily-permitted sports events that occur on the property under existing conditions, including events such as soccer and lacrosse, would cease to operate. Additionally, there would be no special occasion zone under the NPA. Galway Downs would continue to host events such as weddings, remembrances, and award ceremonies, but these activities would be restricted to the existing Carriage House where they currently occur. In addition, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented under the NPA. Also, all activities involving exterior sound amplification would require issuance of separate permits providing exceptions to the provisions of Ordinance No. 847 instead of having a blanket exception as proposed by the Project's Exception No. 9. Furthermore, no changes would be made to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification and Galway Downs would continue to be regulated by the adopted version of Ordinance No. 348. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative under which Galway Downs would continue operate under existing CUP 2303 and other existing permits.

6.1.2 No Construction Alternative (NCA)

The No Construction Alternative (NCA) assumes that no construction requiring a new or modified entitlement permit would occur at Galway Downs. The NCA would eliminate potential environmental effects associated with ground-disturbing construction activities, and is considered a "no project alternative" because without the construction of new land uses on site, there would be no new uses on site

beyond what already occurs under existing conditions, although non-equestrian sports events such as soccer and lacrosse would be permitted uses under the NCA. Under the NCA, Galway Downs would continue operating on a holding tank sewer system and the construction of a new sewer line connecting to the newly installed EMWD sewer main in De Portola Road would not occur. In addition, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented and there would be no physical improvements associated with establishment of a special occasion zone or due to temporary parking areas. The NCA would consist of proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for sports events. However, it should be noted that under the NCA, Ordinance No. 348 would not be revised to include establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348, as the Project's proposed Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Park uses would not be accommodated under the NCA. CUP 02303R1 would be modified to omit physical construction aspects of the Project. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative under which no physical alteration of the Galway Downs property would occur resulting from an entitlement permit or permit modification.

6.1.3 Residential Only Alternative (ROA)

Under existing conditions, the 241.6 acres of the Galway Downs property is designated by the Riverside County General Plan and Southwest Area Plan (SWAP) for "Rural – Rural Residential (R-RR)" land uses, which normally would allow for development of residential uses on minimum five-acre lot sizes. However, the Project also is subject to the Temecula Valley Wine Country Community Plan (TVWCCP), which has been incorporated into the SWAP. Pursuant to SWAP and TVWCCP Policy SWAP 1.5, residential densities within the "Wine Country – Equestrian" (WC-E) District (which includes the Project site) are restricted to 10-acre minimum lot sizes. Accordingly, the Residential Only Alternative (ROA) assumes that the Galway Downs site would be subdivided and developed with up to 24 single-family homes on minimum 10-acre lot sizes. As part of implementation of the ROA, all of the existing structures and facilities on site would be demolished and/or removed from the Project site, and the 241.6-acre property would be developed entirely with single-family residential homes. Under the ROA, equestrian uses only would be permitted as an ancillary use to the residential units, and equestrian-related events, such as competitive events, would not be allowed. Implementation of the ROA would require approval of a Tentative Tract Map (TTM) to subdivide the 241.6-acre site to establish legal lots to accommodate residential development on site. As part of the TTM, the ROA would be required to construct the off-site sewer connection between the Project site and the planned sewer line within De Portola Road. This alternative was selected to allow Riverside County to consider development of the Project site with an alternative permitted use based on the site's existing R-RR General Plan land use designation and the TVWCCP restriction on residential lot sizes, and to enable consideration of an alternative that would further reduce the Project's significant and unavoidable impacts due to GHG emissions and VMT.

6.1.4 Specific Plan Alternative (SPA)

The Specific Plan Alternative (SPA) considers development of the Project site with residential uses while still maintaining some equestrian-related components. Under the SPA, a Specific Plan would be proposed to address future development within the 241.6-acre property. Under the SPA, the northern +/- 137.9 acres of the existing Galway Downs facility, inclusive of the existing race track, special events zone, and most of the existing northern parking areas, would continue to be used for equestrian-related events, including but not limited to, English Style such as Dressage, Hunter/Jumper, Eventing, Peruvian, etc., or multiple disciplines of Western styles such as Reining, Barrel Racing, Roping, etc. No other sports events (e.g., soccer, lacrosse, etc.) would be allowed within the northern portion of the site that would be reserved for equestrian uses. As part of the SPA, the southern +/- 98.7 acres of the Project site would be developed with up to 98 single-family residential dwelling units on minimum one-acre lot sizes, which would be designed to meet the requirements of the Wine Country's "Clustered Subdivision Development Standards" pursuant to Section 14.93.B of Riverside County Ordinance No. 348. In addition, approximately 5.0 acres within the northern portions of the site would be reserved for vineyard uses, as required by Section 14.93.B.5 of Riverside County Ordinance No. 348 for Wine Country Clustered Subdivisions. In total, the SPA would allow for equestrian-related uses on approximately 137.9 acres, vineyard uses on approximately 5.0 acres, and up to 98 clustered single-family homes on approximately 98.7 acres. Implementation of the SPA would require the following discretionary approvals from Riverside County:

1. A Foundation General Plan Amendment, as described by Chapter 11 of the Riverside County General Plan, in order to change the existing General Plan Foundation Component and General Plan land use designation applied to the southern 98.7 acres of the site from "Rural – Rural Residential (R-RR)" to "Rural Community – Very Low Density Residential (RC-VLDR)";
2. A General Plan Amendment to revise Figure 4B of the SWAP and TVWCCP to redesignate the southern +/- 98.7 acres of the site from the "Wine Country – Equestrian District (WC-ED)" to the "Wine Country – Residential District (WC-RD)", with no changes to the northern 142.9 acre of the site (i.e., the 137.9-acre equestrian area and the 5.0-acre vineyard area) that would remain designated within the WC-ED,
3. A Change of Zone to change the existing zoning classification of the 241.6-acre property from "Wine Country – Equestrian (WC-E)" to "Specific Plan (SP) Zone," which would apply zoning regulations, permitted uses, and development standards for the northern 142.9 acres (i.e., the 137.9-acre equestrian area and the 5.0-acre vineyard area) similar to those provided in Section 14.96 of Riverside County Ordinance No. 348 for the WC-E zone, and would apply zoning regulations, permitted uses, and development standards for the southern +/- 98.7 acres similar to those provided in Section 14.98 of Riverside County Ordinance No. 348 for the "Wine Country – Residential (WC-R)" zone;
4. A Conditional Use Permit (CUP) as required by Section 14.98.B of Riverside County Ordinance No. 348 for Wine Country Clustered Subdivisions; and
5. A Tentative Tract Map (TTM) to subdivide the southern +/- 98.7 acres of the Project site to establish up to 98 single-family lots on minimum one-acre lot sizes.

This alternative was selected to allow for consideration of an alternative that would increase the available housing supply within unincorporated Riverside County generally and within the Wine Country area specifically, thereby assisting the County in meeting its Regional Housing Needs Assessment (RHNA) allocations for the "Above Moderate" income category.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, CEQA Guidelines Section 15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site..."*

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, and/or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected are described below.

6.2.1 Alternative Sites

CEQA does not require that an analysis of alternative sites always be included in an EIR. However, if the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the *"key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR"* (CEQA Guidelines Section 15126.6(f)(2)).

The proposed Project consists of modifications to an existing equestrian-oriented events facility that also hosts a variety of other activities primarily on the weekends and holiday weekends. As such, it would not be feasible to consider implementation of the proposed Project at an alternative site location. Therefore, Riverside County finds that evaluation of an alternative site location is not required for the Project because alternative site locations are not feasible for the proposed Project.

6.3 ALTERNATIVES ANALYSIS

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Project, as detailed in EIR Section 4.0, *Environmental Analysis*. A conclusion is provided for each impact as to whether the alternative results in one of the following: (1) reduction or elimination of the proposed Project's impact, (2) a greater impact than would occur under the proposed Project, (3) the same impact as the proposed Project, or (4) a new impact in addition to the proposed Project's impacts. Table 6-1, *Alternatives to the Proposed Project – Comparison of Environmental Impacts* located at the end of this Section, compares the environmental hazard and resource impacts of the alternatives with those of the proposed Project and identified the ability of the alternative to meet the basic objectives of the Project.

As described in EIR Subsection 3.5, The underlying purposes of the proposed Project are threefold: (1) to allow Galway Downs to continue operating primarily as an equestrian facility; (2) to attract higher level of competition for equestrian events that can be hosted on the property; and (3) to allow for other types of events including sports to help the operator cover its obligations to the equestrian uses. The proposed Project reflects the Project Applicant's determination that the continued vitality of Galway Downs as a working equestrian center depends on a diversified event programming model in which non-equestrian uses support the facility's equestrian character and equestrian operations. The following objectives are intended to achieve these underlying purposes:

A. To make physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.

B. To make operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.

C. To align past and current uses that occur at Galway Downs under Riverside County Ordinance No. 348 and the Temecula Wine Country Community Plan.

D. To provide expanded opportunities for equestrian-related overnight accommodations.

E. To allow multi-sports field activities as secondary uses, primarily on weekends and holiday weekends, to help ensure the facility remains financially viable to enable the facility to continue hosting equestrian-oriented uses.

F. To eliminate reliance on septic systems for sewage disposal.

G. To reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source.

H. To establish procedures and protocols for the management of special occasion traffic generated by Galway Downs.

I. To clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone.

J. To establish Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Parks, and Multi-Use Sport Field land uses as new conditionally permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.

6.3.1 No Project Alternative (NPA)

The No Project Alternative (NPA) assumes that the Project Applicant's applications for proposed CUP 02303R1, CZ 22000010, and Exception No. 9 to Riverside County Noise Ordinance No. 847 are not approved by Riverside County. In such a case, future activities at Galway Downs would consist of equestrian-oriented land uses that are currently allowed under existing permits, including CUP 02303 which places no capacity limit on equestrian activities. The temporarily-permitted sports events that occur on the property under existing conditions, including events such as soccer and lacrosse, would cease to operate. Additionally, there would be no special occasion zone under the NPA. Galway Downs would continue to host events such as weddings, remembrances, and award ceremonies, but these activities would be restricted to the existing Carriage House where they currently occur. In addition, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented under the NPA. Also, all activities involving exterior sound amplification would require issuance of separate permits providing exceptions to the provisions of Ordinance No. 847 instead of having a blanket exception as proposed by the Project's Exception No. 9. Furthermore, no changes would be made to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification and Galway Downs would continue to be regulated by the adopted version of Ordinance No. 348. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative under which Galway Downs would continue operate under existing CUP 2303 and other existing permits.

A. Agriculture and Forestry Resources

Under the NPA, there would be no changes to the site's operational characteristics, although there would be a reduction in the frequency of events at the facility due to the elimination of the temporarily-permitted sports events. Thus, the Galway Downs facility would continue to operate with only equestrian-related activities and permitted ancillary uses. As with the proposed Project, neither the Project nor the NPA would result in impacts due to the conversion of Prime Farmland, unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use, and the level of impact would be the same. Similarly, neither the Project nor the NPA would conflict with existing agricultural zoning, agricultural use, or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve, and the level of impact would be similar. Both the Project and NPA would be subject to compliance with Riverside County Ordinance No. 625, and no impact would occur and the level of impact would be the same. Additionally, both the Project and NPA would be subject to compliance with the lighting regulations established by Riverside County Ordinance No. 915, which requires all outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-

way; thus, indirect lighting impacts to nearby agricultural, equestrian-oriented, and winery properties would be less than significant under both the proposed Project and the NPA, and the level of impact would be similar. Additionally, although the proposed Project would result in less-than-significant indirect noise impacts to nearby agricultural, equestrian-oriented, and winery properties due to the continued operation of the announcement/music speakers (as would be authorized pursuant to proposed Exception No. 9 to Riverside County Ordinance No. 847), the temporary use of announcement/music speakers would not be allowed under the NPA without issuance of individual exceptions to Ordinance No. 847; thus, the NPA would reduce the Project's less-than-significant impacts due to indirect noise from speaker use on site, as it is anticipated that with the requirement to obtain individual noise ordinance exceptions, the frequency of sound amplification equipment would be reduced under the NPA. Additionally, neither the Project nor the NPA would result in impacts to forestry resources or due to a conflict with forestry zoning; thus, no impact would occur, and the level of impact would be the same.

B. Air Quality

Under the NPA, no new uses would be constructed or installed on site, and as such there would be no construction phase under the NPA. Additionally, there would be no changes to the site's operational characteristics, although there would be a reduction in the frequency of events at the facility due to the elimination of the temporarily-permitted sports events. Accordingly, the Project's less-than-significant construction-related impacts due to a conflict with or obstruction of the SCAQMD AQMP would be avoided under the NPA. For long-term operations, while the events at the facility would be less frequent under the NPA due to the elimination of non-equestrian sports events, the data for events at the facility in 2023 shows that the peak days (in terms of traffic and number of visitors) were associated with equestrian-oriented only events. Accordingly, because the SCAQMD publishes daily emission thresholds and not annual emission thresholds, operational impacts due to a conflict with the AQMP would be similar under the Project and NPA, and such impacts would be less than significant. Similarly, while construction and operation of both the Project and the NPA would result in less-than-significant impacts due to emissions of criteria pollutants for which the Project region is non-attainment, the NPA would avoid the Project's less-than-significant construction-related impacts due to the lack of a construction phase, while peak operational impacts to air quality would be similar under both the NPA and proposed Project. Additionally, because the NPA would not involve a construction phase, the NPA would avoid the Project's less-than-significant localized air quality impacts during construction (i.e., based on SCAQMD's Localized Significance Thresholds [LSTs]), and the NPA would avoid the Project's less-than-significant impacts due to construction-related health risks. Under operations, neither the NPA nor the Project would exceed the SCAQMD LSTs or generate potential Toxic Air Contaminants (TACs); thus, impacts would be less than significant and the level of impact would be similar. Under both the Project and the NPA, there would be no introduction of potential odor sources to the property beyond what already exists under existing conditions; thus, impacts due to odors would be less than significant under both the NPA and proposed Project, and the level of impact would be similar.

C. Biological Resources

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions. Therefore, the NPA would avoid the Project's less-than-significant impacts (after mitigation) due to a potential conflict with the MSHCP. In addition, the NPA would not result in any new or increased impacts to sensitive plant or wildlife species, including the burrowing owl, and as such the NPA would avoid the Project's less-than-significant impact (after mitigation) to the burrowing owl. Neither the Project nor the NPA would substantially interfere with the movement of migratory fish or wildlife species or impede the use of native wildlife nursery sites; thus, no impact would occur, and the level of impact would be similar. Neither the Project nor the NPA would result in significant impacts to sensitive vegetation communities or riparian habitat; thus, impacts would be less than significant under both the Project and NPA, although the level of impact would be slightly reduced under the NPA because the NPA would not involve the removal of any existing vegetation. Additionally, the NPA would avoid the Project's less-than-significant impacts (after mitigation) to the Temecula Creek due to the construction of the off-site sewer line, although it should be noted that even under the NPA it is likely that EMWD ultimately would require the Galway Downs site to connect to the planned sewer line within De Portola Road. Neither the Project nor the NPA would conflict with local policies protecting biological resources, and the level of impact would be the same.

D. Cultural Resources

Under the NPA, there would be no new construction or expansion of operations on site beyond what occurs under existing conditions. Therefore, the NPA would avoid the Project's less-than-significant impacts (after mitigation) due to the potential presence of subsurface historical resources and/or to archaeological resources that may be buried beneath the site's surface. Because no new development or grading would occur under the NPA, the NPA also would avoid the Project's less-than-significant impacts (after mitigation) to human remains that may be buried beneath the site's surface.

E. Energy

As noted above, there would be no construction phase associated with the NPA; thus, the NPA would completely avoid the Project's less-than-significant construction-related impacts due to wasteful, inefficient, or unnecessary energy consumption. Under long-term operations, events at the facility would be less frequent in comparison to the proposed Project due the elimination of non-equestrian sports events, and energy usage also would be reduced due to the elimination of the Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing uses. Thus, implementation of the NPA would result in reduced operational-related impacts due to wasteful, inefficient, or unnecessary operational energy consumption, although impacts due to operational-related energy consumption would be less than significant under both Project and the NPA. Neither the Project nor the NPA would conflict with or obstruct a State or local plan for renewable energy or energy efficiency; thus, such impacts would be less than significant, and the level of impact would be similar.

F. Greenhouse Gas Emissions

Under the NPA, no new uses would be constructed or installed on site, and as such there would be no construction phase under the NPA. Additionally, there would be no changes to the site's operational characteristics, although there would be a reduction in the frequency of events at the facility due to the elimination of the temporarily-permitted sports events. Accordingly, implementation of the NPA would avoid the Project's construction-related emissions of greenhouse gases (GHGs), and would result in a substantial reduction in operational-related GHG emissions due to the elimination of non-equestrian sports events, Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing uses. Thus, implementation of the NPA would completely avoid the Project's significant and unavoidable impacts due to emissions that would exceed the County's Climate Action Plan (CAP) screening threshold of 3,000 $MTCO_2e$/yr. Additionally, implementation of the NPA would avoid the Project's significant and unavoidable impacts due to a conflict with the CAP requirements related to the reduction of GHGs.

G. Hydrology and Water Quality

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions. Therefore, the NPA would avoid the Project's less-than-significant impacts to water quality and due to a conflict with the San Diego Region Basin Plan. Similarly, the NPA would avoid the Project's less-than-significant impacts due to alteration of the existing drainage pattern, due to the contribution of runoff that would exceed the capacity of existing or planned drainage systems, and due to additional sources of polluted runoff. The NPA also would avoid the Project's less-than-significant impacts during construction due to erosion and siltation, although impacts under operating conditions would slightly increase under the NPA as the NPA would include less area of impervious surfaces on site. The NPA also would avoid the Project's less-than-significant impacts due to increases in runoff that could result in flooding and due to impeding or redirecting flood flows. Similarly, the NPA would avoid the Project's less-than-significant impacts due to inundation from floods or due to failure of a dam.

H. Land Use and Planning

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions. Therefore, the NPA would avoid the Project's less-than-significant impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and would avoid the Project's less-than-significant impacts due to land use compatibility.

I. Noise

The Project site is located approximately 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 dBA CNEL, and neither the Project nor the NPA would include an airport- or airstrip-related component; thus, no impact would occur due to airport-related noise under the Project or NPA, and the level of impact would be similar. Under the NPA, no new uses would be constructed or installed on site, and as such there would be no construction phase under the NPA; thus, the NPA would avoid the Project's less-than-significant construction-related noise impacts. Under long-term

operations, there would be no changes to the site's operational characteristics, although there would be a reduction in the frequency of events at the facility due to the elimination of the temporarily-permitted sports events. In addition, the temporary use of announcement/music speakers would not be allowed under the NPA without issuance of individual exceptions to Ordinance No. 847; thus, the NPA would reduce the Project's less-than-significant impacts due to indirect noise from speaker use on site, as it is anticipated that with the requirement to obtain individual noise ordinance exceptions, the frequency of sound amplification equipment would be reduced under the NPA in comparison to the Project. Accordingly, the NPA would avoid the Project's less-than-significant long-term operational noise impacts. Under the NPA, there would be no construction phase; thus, the NPA would avoid the Project's less-than-significant impacts due to excessive ground-borne vibration or ground-borne noise levels.

J. Transportation

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions. Thus, the NPA would completely avoid the Project's less-than-significant impacts due to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In addition, because there would be an overall reduction in annual traffic under the NPA as compared to the Project, the NPA would avoid the Project's significant and unavoidable impacts due to a net increase in VMT. Additionally, no new construction or roadway improvements would occur under the NPA, and as such the NPA would not implement acceleration and deceleration lanes at the Project's access driveways; thus, impacts due to a substantial increase hazards due to a geometric design feature would increase under the NPA in comparison to the Project, although such impacts would be less than significant under both the Project and the NPA. Additionally, it should be noted that under the NPA, there would be no installation of a traffic signal at the intersection of Los Caballos Road at SR-79, there would be no installation of an additional eastbound left turn lane at the Los Caballos Road at SR-79 intersection, and there would be no addition of overlap phasing for the southbound right-turn lane at the Anza Road at SR-79 intersection. Thus, due to the lack of these improvements, it is likely that hazardous conditions associated with traffic would increase under the NPA in comparison to the Project. The existing land uses that would continue under the NPA and the proposed land uses under the Project both would be compatible with land uses in the surrounding area; thus, impacts due to incompatible land uses would be less than significant under both the Project and NPA, and the level of impact would be similar. Under the NPA, there would be no changes to the site's operational characteristics, although there would be a reduction in the frequency of events at the facility due to the elimination of the temporarily-permitted sports events. Thus, the NPA would result in reduced impacts due to the need for new or altered maintenance of roads, although such impacts would be less than significant under both the Project and the NPA. The NPA would not involve any roadway improvements or construction activities, and as such the NPA would avoid the Project's less-than-significant impacts (after mitigation) due to construction-related effects on circulation. Similarly, because the NPA would not have a construction phase, the NPA would avoid the Project's less-than-significant impacts (after mitigation) due to near-term construction-related impacts due to inadequate emergency access or access to nearby uses. All bike lanes planned in the local area already are in place, and neither the Project nor the NPA would include the construction or expansion of a bike system or bike lanes. Thus, neither the Project nor the NPA would result in impacts due to the construction

or expansion of bike systems or bike lanes, and no impact would occur and the level of impact would be the same.

K. Tribal Cultural Resources

Under the NPA, there would be no construction phase and there would be no new ground disturbing activities. As such, the NPA would completely avoid the Project's less-than-significant impacts (after mitigation) to tribal cultural resources.

L. Utilities and Service Systems

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions, and there would be no new improvements related to water, wastewater treatment, or stormwater drainage. Accordingly, the NPA would completely avoid the Project's less-than-significant impacts (after mitigation) due to new or expanded water, wastewater treatment, and stormwater drainage improvements. Similarly, because there would be no changes to the existing permitted uses on site, the NPA would avoid the Project's less-than-significant impacts to water supply. The NPA also would avoid the Project's less-than-significant impacts due to the construction of new wastewater facilities and due to increased wastewater flows that could affect the capacity of wastewater treatment systems. The NPA also would not result in an increase in the amount of solid waste generated on the Project site, and as such the NPA would avoid the Project's less-than-significant impacts to landfill capacity. Both the Project and the NPA would be required to comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP; thus, impacts would be less than significant, and the level of impact would be similar. Finally, the NPA would avoid the Project's less-than-significant impacts due to expansion of facilities for electricity, communications facilities, roadway improvements, drainage improvements and other government services.

M. Wildfire

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions. Neither the Project nor the NPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the NPA would exacerbate wildfire hazards in the local area that could result in exposure of persons to pollutant concentrations from wildfires or due to loss, injury, or death involving wildfires, as operations under both the Project and NPA would continue to be subject to the Fire Protection/Emergency Medical Services Plan portion of the existing Galway Downs Event Site & Event Management Plan (included as part of the Project's application materials, which are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501); thus, impacts would be less than significant under both the Project and NPA, and the level of impact would be similar. Neither the NPA nor the Project would require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; thus, impacts would be less than significant under both the Project and NPA, and the level of impact would be similar. Similarly, neither the Project nor the NPA would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a

result of runoff, post-fire slope instability, or drainage changes; thus, impacts would be less than significant under both the Project and NPA, and the level of impact would be similar.

N. Conclusion

Under the NPA, there would be no expanded operations on site beyond what occurs under existing conditions. The NPA would avoid the Project's significant and unavoidable impacts due to GHG emissions and VMT. Additionally, almost all of the remaining effects of the proposed Project would be avoided or lessened by the selection of the NPA, although the NPA would result in a slight increase in impacts due to operational-related erosion hazards. Because this alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to CEQA Guidelines Section 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Residential Only Alternative (ROA), as discussed in subsection 6.3.3, is identified as the environmentally superior alternative.

The NPA would fail to meet all of the Project's objectives. Specifically, the NPA would not accommodate any physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs. The NPA would not accommodate operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs. The NPA also would not align past and current uses that occur at Galway Downs under Riverside County Ordinance No. 348 and the Temecula Wine Country Community Plan. In addition, the NPA would not provide any expanded opportunities for equestrian-related lodging, and would not accommodate multi-sports field activities as secondary uses, primarily on weekends, to help cover obligations to equestrian uses. Additionally, the NPA would not necessarily eliminate reliance on septic systems for sewage disposal, although it is possible that EMWD ultimately would require the Galway Downs facility to connect to the new sewer line within De Portola Road regardless as to whether the proposed Project is approved. The NPA also would not reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source, as under the NPA separate permits would continue to be required for each individual event requiring sound amplification. Furthermore, the NPA would fail to meet the Project's objective to establish procedures and protocols for the management of special occasion traffic generated by Galway Downs. The NPA also would not meet the Project's objective to clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone, and would fail to meet the Project's objective to establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.

6.3.2 No Construction Alternative (NCA)

The No Construction Alternative (NCA) assumes that no construction requiring a new or modified entitlement permits would occur at Galway Downs, and would eliminate potential environmental effects associated with ground-disturbing construction activities. First, Galway Downs would continue operating on a holding tank sewer system and the construction of a new sewer line connecting to the newly installed

EMWD sewer main in De Portola Road would not occur. In addition, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented and there would be no physical improvements associated with establishment of a special occasion zone and temporary parking areas. The NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for sports events and would allow for use of sound amplification equipment. However, it should be noted that under the NCA, Ordinance No. 348 would not be revised to include establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348, as Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Park uses would not be accommodated under the NCA. CUP 02303R1 would be modified to omit physical construction aspects of the Project. This alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative under which no physical alteration of the Galway Downs property would occur as a result of entitlement permit or permit modification.

A. Agriculture and Forestry Resources

Under the NCA, there would be no new construction activities on site, although the NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for sports events. Under the NCA, the equestrian and non-equestrian sports events would continue to occur, along with sound amplification equipment during certain events. As with the proposed Project, neither the Project nor the NCA would result in impacts due to the conversion of Prime Farmland, unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use, and the level of impact would be the same. Similarly, neither the Project nor the NCA would conflict with existing agricultural zoning, agricultural use, or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve, and the level of impact would be similar. Both the Project and NCA would be subject to compliance with Riverside County Ordinance No. 625, and no impact would occur and the level of impact would be the same. Additionally, both the Project and NCA would be subject to compliance with the lighting regulations established by Riverside County Ordinance No. 915, which requires all outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way; thus, indirect lighting impacts to nearby agricultural, equestrian-oriented, and winery properties would be less than significant under both the proposed Project and the NCA, and the level of impact would be similar. Additionally, both the Project and NCA would include sound amplification systems, although indirect noise impacts would be less than significant under both the Project and the NCA and the level of impact would be similar. Additionally, neither the Project nor the NCA would result in impacts to forestry resources or due to a conflict with forestry zoning; thus, no impact would occur, and the level of impact would be the same.

B. Air Quality

Under the NCA, there would be no new construction activities on site, although the NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for non-equestrian sports events. Accordingly, the Project's less-than-significant construction-related impacts due to a conflict with or obstruction of the SCAQMD AQMP would be avoided under the NCA. For long-term operations, there would be a slight reduction in peak operational emissions because the NCA would not allow for the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing; thus, long-term operation of the NCA would reduce the Project's less-than-significant impact due to operational conflicts with the SCAQMD AQMP. Similarly, the NCA would avoid the Project's less-than-significant construction-related impacts due to regional air quality emissions, and the NCA would result in a reduction in the Project's less-than-significant long-term operational impacts to air quality because he NCA would not allow for the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing uses. Due to the lack of a construction phase, the NCA also would avoid the Project's less-than-significant construction-related localized air quality impacts based on SCAQMD's LSTs. Under long-term operating conditions, the NCA would result in a slight reduction in intensity on site because the NCA would not allow for the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing, and as such the NCA would result in reduced impacts due to localized air quality emissions based on SCAQMD's LSTs. Neither the Project nor the NCA would result in impacts due to CO "hot spots," and the level of impact would be similar. In addition, because the NCA would not entail a construction phase, the NCA would avoid the Project's less-than-significant construction-related health risk impacts due to construction-related diesel particulate matter (DPM). Neither the Project nor the NCA would involve uses with the potential to generate DPM emissions during long-term operations, so operation of both the Project and the NCA would result in no impacts due to DPM-related health risks under long-term operations, and the level of impact would be similar. Impacts due to odors would be similar under both the Project and NCA, and such impacts would be less than significant with mandatory compliance with SCAQMD Rule 402 and with continued implementation of the Project's Manure Management Program (included as part of the Project's application materials, which are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501).

C. Biological Resources

Under the NCA, there would be no new construction activities on site, and the NCA also would not include construction of the Project's off-site sewer connection to the new EMWD sewer main within De Portola Road. The Project site is not located within areas targeted for conservation or where fee payment is required pursuant to the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan (HCP); thus, neither the Project nor the NCA would result in impacts due to a conflict with the SKR HCP, and impacts would be similar. While both the Project and the NCA would be consistent with the MSHCP after implementation of mitigation measures, the NCA would not include the off-site sewer line construction and thus the NCA would avoid the Project's less-than-significant impacts (after mitigation) due to the need to revise the approved Joint Project

Review (JPR) approval to accommodate the off-site sewer line construction. Similarly, because there would not be a construction phase under the NCA, the NCA would avoid the Project's potential impacts to the burrowing owl and no mitigation would be required. Thus, implementation of the NCA would result in reduced impacts due to a conflict with the MSHCP in comparison to the Project, although such impacts would be less than significant for both the Project and NCA with implementation of mitigation. Neither the Project nor the NCA would result in impacts to sensitive plant species; however, and as noted above, implementation of the NCA would avoid the Project's less-than-significant impacts (after mitigation) to the burrowing owl, and as such the NCA would completely avoid the Project's impacts to sensitive wildlife. Neither the Project nor the NCA would result in impacts to wildlife movement corridors, and the level of impact would be similar. With respect to riparian habitats and sensitive vegetation communities, because the NCA would not involve the construction of the off-site sewer line, the NCA would avoid the Project's less-than-significant impacts to sensitive vegetation communities and riparian habitats. Similarly, because the NCA would not involve the construction of the off-site sewer line, the NCA would avoid the Project's less-than-significant impacts (after mitigation) to the 0.01-acre ephemeral drainage that represents a potential resource regulated by the USACE, RWQCB and CDFW. Neither the Project nor the NCA would have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; thus, no impacts due to such a conflict would occur under the Project or the NCA, and the level of impact would be similar.

D. Cultural Resources

Under the NCA, there would be no new construction activities on site, and the NCA also would not include construction of the Project's off-site sewer connection to the new EMWD sewer main within De Portola Road. As such, the NCA would completely avoid the Project's less-than-significant impacts (after mitigation) to previously-undiscovered historical and archaeological resources that may be buried beneath the site surface. Similarly, due to the lack of a construction phase, the NCA also would avoid the Project's less-than-significant impacts (after mitigation) to human remains.

E. Energy

Under the NCA, there would be no new construction activities on site, although the NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for non-equestrian sports events. Accordingly, the NCA would avoid the Project's less-than-significant impacts due to construction-related energy consumption. Additionally, the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented under the NCA, and as such the NCA would result in a reduction in the Project's less-than-significant impacts due to long-term operational energy consumption. Neither the Project nor the NCA would conflict with or obstruct a State or local plan for renewable energy or energy efficiency; thus, impacts would be less than significant under both the Project and the NCA and the level of impact would be similar.

F. Greenhouse Gas Emissions

Under the NCA, there would be no new construction activities on site, and the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented under the NCA. Accordingly, the NCA would completely avoid the Project's construction-related emissions of GHGs, while long-term operational emissions of GHGs would be reduced because the Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be implemented, and the resulting emissions under the NCA would be well below the CAP screening threshold of 3,000 $MTCO_2e/yr$. As such, implementation of the NCA would avoid the Project's significant and unavoidable impacts due to GHG emissions exceeding 3,000 $MTCO_2e/yr$ and due to a conflict with the Riverside County CAP.

G. Hydrology and Water Quality

Neither the Project nor the NCA would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impeded sustainable groundwater management of the basin; thus, impacts would be less than significant under both the Project and NCA, and the level of impact would be similar. Under the NCA, there would be no new construction activities on site; thus, the NCA would avoid the Project's less-than-significant impacts to surface and groundwater quality. Neither the Project nor the NCA would conflict with the San Deigo Region Basin Plan; thus, impacts would be less than significant, and the level of impact would be similar. Due to the lack of a construction phase, the NCA would avoid the Project's less-than-significant construction-related impacts due to on- and off-site erosion, although impacts under operating conditions would slightly increase under the NCA as the NCA would include less area of impervious surfaces on site. Similarly, due to the lack of a construction phase and lack of changes to the site's drainage patterns, the NCA would avoid the Project's less-than-significant impacts due to impeding or redirecting flood flows. Neither the Project nor the NCA would introduce new structures within the portions of the site that contain a FEMA-mapped flood plain or within the portions of the site that may be inundated by dam failure; thus, impacts due to inundation from floods and/or due to dam failure would be less than significant under both the Project and NCA, and the level of impact would be similar. Neither the Project nor the NCA would be subject to inundation from tsunamis; thus, no impact would occur under the Project or NCA, and the level of impact would be the same.

H. Land Use and Planning

Aside from the Project's unavoidable impact due to a conflict with the Riverside County CAP, which is separately addressed above under the discussion of Greenhouse Gas Emissions, neither the Project nor the NCA would conflict with the General Plan, SWAP, Temecula Valley Wine Country Community Plan, Connect SoCal, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and land uses proposed under both the Project and NCA would be compatible with surrounding land uses; thus, impacts due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and due to land use compatibility would be less than significant under both the Project and NCA, and the level of impact would be similar.

I. Noise

The Project site is located approximately 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 dBA CNEL, and neither the Project nor the NCA would include an airport- or airstrip-related component; thus, no impact would occur due to airport-related noise under the Project or NCA, and the level of impact would be similar. Under the NCA, there would be no new construction activities on site, although the NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for non-equestrian sports events. However, under the NCA the Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing that are proposed as part of the Project would not be implemented. Accordingly, the NCA would completely avoid the Project's less-than-significant impacts due to construction-related noise, including construction-related noise associated with the off-site construction of the new sewer line. Both the Project and the NCA would allow for the operation of sound amplification equipment, and would result in similar less-than-significant operational noise impacts to nearby sensitive receptors. However, the NCA would result in a slight reduction in the Project's less-than-significant operational-related noise impacts because the NCA would not include the proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing. Because the NCA would not involve a construction phase, the NCA would avoid the Project's less-than-significant construction-related impacts due to vibration. Under long-term operating conditions, neither the Project nor the NCA would be associated with groundborne vibration or noise; no impact would occur, and the level of impact would be similar.

J. Transportation

Neither the Project nor the NCA would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; thus, impacts would be less than significant under both the Project and the NCA, and the level of impact would be similar. The NCA would not entail the construction of the proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing. As such, the NCA would result in a reduction in the amount of traffic that would be generated on site, and would avoid the Project's significant and unavoidable impacts due to VMT. No roadway improvements are proposed as part of the NCA, including the proposed deceleration and acceleration lanes at the Project's access driveways; thus, impacts from hazards due to a geometric design feature would be slightly increased under the NCA in comparison to the Project, although such impacts would be less than significant. Additionally, it should be noted that under the NCA, there would be no installation of a traffic signal at the intersection of Los Caballos Road at SR-79, there would be no installation of an additional eastbound left turn lane at the Los Caballos Road at SR-79 intersection, and there would be no implementation of overlap phasing for the southbound right-turn lane and to increase the cycle length to 120 seconds at the Anza Road at SR-79 intersection. Thus, due to the lack of these improvements, it is likely that hazardous conditions associated with traffic would increase under the NCA in comparison to the Project. The existing land uses that would continue under the NCA and the proposed land uses under the Project both would be compatible with land uses in the surrounding area; thus, impacts due to incompatible land uses would be less than significant under both the Project and NCA,

and the level of impact would be similar. No new roadways would be constructed as part of the Project or the NCA, although the Project would include improvements to the Los Caballos Road at SR-79 and Anza Road at SR-79 intersections, which would not occur under the NCA; thus, there would be a nominal decrease in the need for County maintenance of roadways and thus reduced impacts due to maintenance of roadways, although no impacts would occur under the Project or the NCA. The NCA would not entail a construction phase; thus, the NCA would avoid the Project's less-than-significant impacts (after mitigation) due to effects on circulation due to construction. Similarly, due to a lack of a construction phase, the NCA would avoid the Project's less-than-significant construction-related impacts (after mitigation) due to inadequate emergency access or access to nearby uses. No bike lanes would be constructed under the Project or the NCA; thus, no impacts due to construction or expansion of bike lanes would occur under the Project or the NCA, and the level of impact would be similar.

K. Tribal Cultural Resources

Under the NCA, there would be no construction phase and there would be no new ground disturbing activities. As such, the NCA would completely avoid the Project's less-than-significant impacts (after mitigation) to tribal cultural resources.

L. Utilities and Service Systems

Under the NCA, there would be no new construction activities on site, although the NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for non-equestrian sports events. Additionally, under the NCA there would be no new improvements related to water, wastewater treatment, or stormwater drainage. Accordingly, the NCA would completely avoid the Project's less-than-significant impacts (after mitigation) due to new or expanded water, wastewater treatment, and stormwater drainage improvements. Similarly, although both the Project and the NCA would entail an expansion in site operations to include non-equestrian sports events, the overall demand for potable water would be slightly reduced under the NCA in comparison to the Project because the NCA would not include the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing; thus, impacts to water supply would be slightly reduced under the NCA, although such impacts would be less than significant under both the Project and NCA. The NCA would, however, avoid the Project's less-than-significant impacts due to the construction of new wastewater facilities and the due to increased wastewater flows that could affect the capacity of wastewater treatment systems. The NCA also would result in a slight decrease in the amount of solid waste generated on the Project site (due to the elimination of the Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing), and as such the NCA would have reduced impacts to landfill capacity in comparison to the Project, although such impacts would be less than significant under both the Project and NCA. Both the Project and the NCA would be required to comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP; thus, impacts would be less than significant, and the level of impact would be similar. Finally, the NCA would avoid the Project's less-than-significant impacts due to expansion of facilities for

electricity, communications facilities, roadway improvements, drainage improvements and other government services, as there would be no new construction of new buildings on site under the NCA.

M. Wildfire

The Project site and surrounding areas are not identified as evacuation routes; thus, neither the NCA nor the Project would result in a conflict with the Riverside County LHMP, and as such impacts would be less than significant under both the NCA and Project and the level of impact would be similar. Because the NCA would not have a construction phase and would not introduce any new structures on site, the NCA would avoid the Project's less-than-significant impacts due to a significant risk of loss, injury, or death involving wildfires, including impacts due to slope, prevailing winds, and other factors, that could exacerbate wildfire risks and thereby expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Neither the Project nor the NCA would require the installation or maintenance of fire-protection-related infrastructure that may exacerbate fire risk or result in temporary or on-going impacts to the environment; thus, impacts would be less than significant under both the Project and NCA, and the level of impact would be similar. Because the NCA would not introduce any new structures on site, the NCA would avoid the Project's less-than-significant impacts due to fire risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, and drainage changes.

N. Conclusion

Under the NCA, there would be no new construction activities on site, although the NCA would include proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 and the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, which would allow for operational modifications including allowance for sports events. In addition, the NCA would not allow for the Project's proposed Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, or additional Employee Housing. The NCA would avoid the Project's significant and unavoidable impacts due to GHG emissions and VMT. Additionally, almost all of the remaining impacts of the Project's would be reduced under the NCA, with exception of operational-related erosion and hazards due to transportation-related geometric design features, both of which would increase under the NCA in comparison to the Project. Because this alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, the NCA effectively serves as a "no project" alternative, as the NCA would allow for the continued operation of events on site similar to those that occur under existing conditions. Pursuant to CEQA Guidelines Section 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Residential Only Alternative (ROA), as discussed in subsection 6.3.3, is identified as the environmentally superior alternative.

The NCA would fail to meet several of the Project's objectives. Specifically, the NCA would not accommodate any physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs. The NCA would accommodate continued operation of equestrian events, and so would meet the Project's objective to make operational changes that would

attract higher level of competition for equestrian events that can be hosted at Galway Downs. The NCA also would authorize non-equestrian sports activities that already occur on the property under existing conditions, and as such the NCA would meet the Project's objective to align past and current uses that occur at Galway Downs under Riverside County Ordinance No. 348 and the Temecula Wine Country Community Plan. The NCA would not allow for the Project's proposed Wine Country Equestrian Park Model Lodging, and as such the NCA would fail to meet the Project's objective to provide expanded opportunities for equestrian-related lodging. Because the NCA would accommodate non-equestrian sports activities on site, the NCA would meet the Project's objective to allow multi-sports field activities as secondary uses, primarily on weekends and holiday weekends, to help cover obligations to equestrian uses. However, because the NCA would not entail the construction of the off-site sewer line between the Project site and De Portola Road, the NCA would fail to meet the Project's objective to eliminate reliance on septic systems for sewage disposal. The NCA would include the Project's proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 to allow for exterior sound amplification, and thus would meet the Project's objective to reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source. The NCA would not entail any new requirements related to traffic management, and as such the NCA would fail to meet the Project's objective to establish procedures and protocols for the management of special occasion traffic generated by Galway Downs. The NCA would entail the same revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification as proposed under the Project, and as such the NCA would meet the Project's objective to clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone. Because the Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be accommodated under the NCA, the NCA would not entail revision to Ordinance No. 348 to establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks as permitted use, and thus the NCA would fail to meet the Project's objective to establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.

6.3.3 Residential Only Alternative (ROA)

Under existing conditions, the 241.6 acres of the Galway Downs property is designated by the Riverside County General Plan and Southwest Area Plan (SWAP) for "Rural – Rural Residential (R-RR)" land uses, which normally would allow for development of residential uses on minimum five-acre lot sizes. However, the Project also is subject to the Temecula Valley Wine Country Community Plan (TVWCCP), which has been incorporated into the SWAP. Pursuant to SWAP and TVWCCP Policy SWAP 1.5, residential densities within the "Wine Country – Equestrian" (WC-E) District (which includes the Project site) are restricted to 10-acre minimum lot sizes. Accordingly, the Residential Only Alternative (ROA) assumes that the Galway Downs site would be subdivided and developed with up to 24 single-family homes on minimum 10-acre lot sizes. As part of implementation of the ROA, all of the existing structures and facilities on site would be demolished and/or removed from the Project site, and the 241.6-acre property would be developed entirely with single-family residential homes. Under the ROA, equestrian uses only would be permitted as an ancillary use to the residential units, and equestrian-related events, such as competitive events, would not be allowed.

Implementation of the ROA would require approval of a TTM to subdivide the 241.6-acre site to establish legal lots to accommodate residential development on site. As part of the TTM, the ROA would be required to construct the off-site sewer connection between the Project site and the planned sewer line within De Portola Road. This alternative was selected to allow Riverside County to consider development of the Project site with an alternative permitted use based on the site's existing R-RR General Plan land use designation and the TVWCCP restriction on residential lot sizes, and to enable consideration of an alternative that would further reduce the Project's less-than-significant impacts to air quality and due to GHG emissions.

A. Agriculture and Forestry Resources

Neither the Project nor the ROA would result in impacts due to the conversion of Prime Farmland, unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use, and the level of impact would be the same. Similarly, neither the Project nor the ROA would conflict with existing agricultural zoning, agricultural use, or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve, and the level of impact would be similar. Both the Project and ROA would be subject to compliance with Riverside County Ordinance No. 625, which would address land use compatibility between residential uses and agricultural uses; however, the ROA would be less compatible with surrounding agricultural uses in comparison to the Project, and as such indirect impacts to agricultural lands would be increased under the ROA, although such impacts would remain below a level of significance with mandatory compliance with Riverside County Ordinance No. 625. Both the Project and ROA would be subject to compliance with the lighting regulations established by Riverside County Ordinance No. 915, which requires all outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way; thus, indirect lighting impacts to nearby agricultural, equestrian-oriented, and winery properties would be less than significant under both the proposed Project and the ROA, and the level of impact would be similar. However, under the ROA there would be no sound amplification systems on site, and as such the ROA would result in reduced indirect noise impacts and associated land use incompatibility impacts with surrounding agricultural lands in comparison to the Project, although such impacts would be less than significant under both the Project and ROA. Additionally, neither the Project nor the ROA would result in impacts to forestry resources or due to a conflict with forestry zoning; thus, no impact would occur, and the level of impact would be the same.

B. Air Quality

Under the ROA, the existing buildings and structures on site would be demolished and removed, the site would be subject to grading activities to accommodate single-family development, and the site ultimately would be developed with up to 24 single-family homes. Accordingly, implementation of the ROA would result in increased construction-related impacts due to regional air quality emissions in comparison to the Project due to the increased intensity of construction activities on site, although such impacts likely would remain below a level of significance. Under long-term operating conditions, the primary source of air quality emissions under the ROA would be associated with traffic; however, the ROA only would generate

approximately 218 vehicular trips-ends per day (24 du x 9.09 trips/day/du = 218.2 trips[1]). Based on data from the Galway Downs facility from 2023, the existing uses at the site generated between 120 and 11,514 trip-ends per day, with an average of approximately 1,456 trip-ends per day; thus, implementation of the ROA would result in a reduction in the amount of traffic generated on site, thereby reducing the level of operational air quality emissions, although operational emissions would be less than significant under both the Project and ROA. Additionally, neither the Project nor the ROA would result in a conflict with the SCAMQD AQMP; thus, impacts would be less than significant and the level of impact would be similar. Because the ROA would include a more intensive construction phase than the proposed Project, the ROA would result in an increase in localized air quality emissions during construction in comparison to the Project, although such emissions would be less than significant under both the Project and ROA. Under long-term operating conditions, neither the Project nor the ROA would exceed the SCAQMD LSTs; thus, impacts due to operational LSTs would be less than significant under both the Project and ROA and the level of impact would be similar. While neither the Project nor the ROA would have the potential to cause or contribute to a CO "hot spot," due to the reduction in traffic from the Project site under the ROA, the ROA would have reduced impacts due to CO "hot spots." Due to the increased intensity of construction activities under the ROA and in comparison to the Project, the ROA would have an increased potential for resulting in construction-related health risk impacts affecting nearby sensitive receptors, although such impacts would be less than significant. Neither the Project nor the ROA would be associated with stationary sources or mobile sources with long queuing times, and as such neither the Project nor the ROA would result in operational-related health risk impacts, and the level of impact would be similar. Implementation of the ROA would result in a reduction in potential odor sources on site, resulting in reduced impacts in comparison to the Project, although such impacts would be less than significant under both the Project and the ROA.

C. Biological Resources

Neither the Project nor the ROA would have the potential to conflict with the SKR HCP. However, under the ROA, the majority of the Project site would be subject to grading activities, including areas in the northern portions of the site that include an east-west oriented ephemeral drainage that qualifies as a riverine resource under the MSHCP and a 0.13-acre patch of disturbed southern willow scrub that comprises riparian habitat. The ROA also would have a similar potential to result in impacts to the Temecula Creek during construction of the off-site sewer alignment, and as with the Project mitigation would be required to avoid impacts to this drainage. Due to the proposed change in land use on site, the increase in areas subject to physical impacts, as well as the off-site sewer line that traverses MSHCP criteria cells, both the Project and the ROA would require approval of an amendment to the approved JPR 10-12-27-01. While impacts due to a conflict with the MSHCP would be less than significant under both the Project and the ROA following the implementation of mitigation measures, impacts would be increased under the ROA in comparison to the Project due to the increase in physical impacts and due to impacts to the on-site ephemeral drainage, the disturbed southern willow scrub that would not occur under the proposed Project. Neither the Project nor the ROA would result in impacts to special-status plants, and the level of impact would be similar. Both the

[1] Trip generation information taken from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, August 18, 2025.

Project and the ROA would have the potential to result in impacts to the burrowing owl during construction that would be mitigated to less-than-significant levels; however, as the areas subject to development would be increased under the ROA, impacts to the burrowing owl would be increased under the ROA in comparison to the Project. Neither the Project nor the ROA would result in impacts to wildlife movement corridors or native wildlife nursery sites, and the level of impact would be similar. Implementation of the ROA would result in impacts to the 0.13-acre patch of disturbed southern willow scrub that comprises riparian habitat that would not be impacted under the Project, and also would result in potential impacts to the Temecula Creek in association with the off-site sewer alignment; thus, while impacts would be less than significant following the implementation of mitigation measures, impacts to riparian habitat and to State-protected jurisdictional waters would be increased in comparison to the proposed Project. Neither the Project nor the ROA would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; thus, impacts would not occur and the level of impact would be the same.

D. Cultural Resources

Under the ROA, the majority of the Project site would be subject to grading activities, and implementation of the ROA also would require construction of the off-site sewer alignment. Thus, due to the increase in areas subject to disturbance during construction, the ROA would have an increased potential to result in impacts to previously undiscovered historical and/or archaeological resources in comparison to the Project, although such impacts would be reduced to less-than-significant levels with the implementation of mitigation measures. Similarly, the ROA would have an increased potential for uncovering human remains in comparison to the Project, although as with the Project impacts would be less than significant with mandatory compliance with State law.

E. Energy

Under the ROA, the existing buildings and structures on site would be demolished and removed, the site would be subject to grading activities to accommodate single-family development, and the site ultimately would be developed with up to 24 single-family homes. Accordingly, energy consumption during construction would be increased under the ROA in comparison to the Project, although as with the Project, construction-related energy consumption would not be wasteful, inefficient, or unnecessary and such impacts would be less than significant. Under long-term operational conditions, the ROA would result in a substantial reduction in the amount of energy consumed in association with vehicular traffic, as the ROA would generate substantially less traffic on average than the existing uses at the facility. Additionally, the ROA likely would be associated with an overall reduction in the amount of energy consumed by the proposed uses on site, although as with the Project impacts due to the wasteful, inefficient, or unnecessary consumption of energy would be less than significant. Neither the Project nor the ROA would conflict with or obstruct a State or local plan for renewable energy or energy efficiency; thus, impacts would be less than significant under both the Project and the ROA and the level of impact would be similar.

F. Greenhouse Gas Emissions

Under the ROA, the existing buildings and structures on site would be demolished and removed, the site would be subject to grading activities to accommodate single-family development, and the site ultimately

would be developed with up to 24 single-family homes. As such, construction-related GHG emissions would increase under the ROA in comparison to the Project. Under long-term operating conditions, the primary source of air quality emissions under the ROA would be associated with traffic; however, the ROA only would generate approximately 218 vehicular trips-ends per day (24 du x 9.09 trips/day/du = 218.2 trips[2]). Based on data from the Galway Downs facility from 2023, the existing uses at the site generated between 120 and 11,514 trip-ends per day, with an average of approximately 1,456 trip-ends per day; thus, implementation of the ROA would result in a reduction in the amount of traffic generated on site, thereby reducing the level of operational-related GHG emissions in comparison to the Project. Thus, the ROA would result in GHG emissions that would be well below the CAP screening threshold of 3,000 $MTCO_2e$/yr, and as such the ROA would completely avoid the Project's significant and unavoidable impact due to GHG emissions. In addition, because the ROA would be below the CAP screening threshold, the ROA also would avoid the Project's significant and unavoidable impacts due to a conflict with the CAP.

G. Hydrology and Water Quality

Under the ROA, the existing buildings and structures on site would be demolished and removed, the site would be subject to grading activities to accommodate single-family development, and the site ultimately would be developed with up to 24 single-family homes. Neither the Project nor the ROA would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, as potable water service would continue to be provided by the Rancho California Water District (RCWD); thus, impacts would be less than significant under both the Project and ROA, and the level of impact would be similar. Under the ROA, the entire property would be subject to grading and disturbance; thus, the ROA would result in increased construction-related impacts to surface and groundwater quality in comparison to the Project, although as with the Project such impacts would be less than significant with mandatory preparation and implementation of a SWPPP. Under long-term operating conditions, the ROA would be required to incorporate detention/water quality basins or other measures to address water quality concerns in site runoff; thus, under both the Project and ROA, impacts to surface and groundwater quality would be less than significant, and the level of impact would be similar. Neither the Project nor the ROA would conflict with the San Diego Region Basin Plan; thus, impacts would be less than significant, and the level of impact would be similar. Due to the increase in intensity of construction activities under the ROA, the ROA would result in increased construction-related impacts due to erosion and siltation, although as with the Project such impacts would be reduced to less-than-significant levels through preparation and implementation of a SWPPP. Under long-term operating conditions, both the Project and ROA would have similar potential to result in sediments and siltation, although such impacts would be less than significant with either the existing drainage system or the drainage system that would be installed as part of the ROA. However, the ROA would introduce new structures within the portions of the site that contain a FEMA-mapped flood plain and within the portions of the site that may be inundated by dam failure. As such, implementation of the ROA would require approval of a Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) from FEMA in order to remove the portions of the

[2] Trip generation information taken from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, August 18, 2025.

Project site proposed for residential use under the ROA from the existing mapped floodplain], which would represent increased impacts in comparison to the Project due to inundation from floods and/or due to dam failure. Neither the Project nor the ROA would be subject to inundation from tsunamis; thus, no impact would occur under the Project or ROA, and the level of impact would be the same.

H. Land Use and Planning

Aside from the Project's unavoidable impact due to a conflict with the Riverside County CAP, which is separately addressed above under the discussion of Greenhouse Gas Emissions, implementation of the ROA would convert the existing Galway Downs facility from an equestrian-oriented sports venue to that of a large-lot single-family development. As such, the ROA would have the potential to conflict with the Temecula Valley Wine Country Policy Area (TVWCPA), as development of the site with only residential uses could conflict with the equestrian-oriented nature of the TVWCPA's Equestrian District, resulting in increased impacts due to land use compatibility; however, such impacts likely would be less than significant as residential uses are an allowed use within the Equestrian District. The ROA and the Project both would be otherwise consistent with the General Plan, SWAP, Temecula Valley Wine Country Community Plan, Connect SoCal, and all other land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect; thus, impacts due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant under both the Project and ROA, and the level of impact would be similar. Neither the ROA nor the Project would physically disrupt or divide the arrangement of an established community; thus, no impact would occur, and the level of impact would be similar.

I. Noise

Although the ROA would introduce noise-sensitive residential uses to the Project site, the Project site is not located within the vicinity of any public or private airports, and neither the Project nor the ROA would include an airport- or airstrip-related component; thus, no impact would occur due to airport-related noise under the Project or ROA, and the level of impact would be similar. Under the ROA, construction activities on site would be more extensive than the construction activities anticipated under the Project, and as such, the ROA would result in an increase in construction-related noise impacts, although such impacts would be less than significant. Under long-term operating conditions, the ROA would not involve the use of sound amplification equipment and would not be associated with intensive equestrian- or sports-related events; thus, long-term operational noise impacts would be reduced under the ROA in comparison to the Project, although such impacts would be less than significant under both the ROA and Project. Similarly, due to the reduction in traffic under the ROA in comparison to existing traffic generated by the Project site under existing conditions, the ROA would result in reduced transportation-related noise impacts, although such impacts would be less than significant under both the Project and ROA. Because the ROA would involve a more intensive construction phase in comparison to the Project, the ROA would result in increased construction-related impacts due to vibration as compared to the Project, although such impacts would be less than significant under both the Project and ROA. Under long-term operating conditions, neither the Project nor the ROA would be associated with groundborne vibration or noise; no impact would occur, and the level of impact would be similar.

J. Transportation

Neither the Project nor the ROA would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; thus, impacts would be less than significant under both the Project and the ROA, and the level of impact would be similar. The ROA would result in a reduction in overall GHG emissions to below 3,000 $MTCO_2e$/yr and would generate only 218 vehicular trips-ends per day. Thus, the ROA would avoid the Project's significant and unavoidable impacts due to a net increase in VMT. Due to the significant reduction in the amount of traffic under the ROA as compared to the Project resulting from the elimination of the site's existing uses, the ROA would not require any transportation-related improvements in the surrounding area, and thus the ROA would avoid the Project's less-than-significant impacts due to a geometric design feature. The residential uses proposed under the ROA would be less compatible with land uses in the surrounding area, although impacts due to incompatible land uses that could result in traffic hazards would be less than significant under both the Project and ROA. No new roadways would be constructed as part of the Project or the ROA, although the Project would include improvements to the Los Caballos Road at SR-79 and Anza Road at SR-79 intersections, which would not occur under the ROA; thus, impacts due to increased need for County maintenance of roadways would be nominally reduced under the ROA, although no impacts would occur under the Project or the ROA. The ROA would, however, result in a more intensive construction phase, and it is anticipated that new roadway connections would need to be constructed to provide access to the proposed residential uses under the ROA; thus, the ROA would result in similar less-than-significant impacts (after mitigation) as the Project due to effects on circulation due to construction. Similarly, both the Project and the ROA would result in less-than-significant construction-related impacts due to inadequate emergency access or access to nearby uses, and the level of impact would be similar. No bike lanes would be constructed under the Project or the ROA; thus, no impacts due to construction or expansion of bike lanes would occur under the Project or the ROA, and the level of impact would be similar.

K. Tribal Cultural Resources

Under the ROA, grading activities would be more intensive than would occur under the Project. Thus, implementation of the ROA would result in increased impacts to subsurface tribal cultural resources in comparison to the Project, although such impacts would be reduced to less-than-significant levels with the implementation of mitigation measures.

L. Utilities and Service Systems

The ROA would require more intensive construction activities than the Project, and would require more improvements than the proposed Project related to water, wastewater treatment, or stormwater drainage. Accordingly, the ROA would result in increased impacts due to new or expanded water, wastewater treatment, and stormwater drainage improvements, although such impacts would be less than significant with implementation of the mitigation measures identified throughout this EIR as well as mitigation measures to address potential impacts to the existing on-site ephemeral drainage and the disturbed southern willow scrub habitat. In addition, the overall demand for potable water would decrease under the ROA in comparison to the Project; thus, impacts to water supply would be decreased under the ROA, although such impacts would be less than significant under both the Project and ROA. The ROA would be

associated with the generation of less wastewater than the existing uses on site, and as such the ROA would have reduced impacts in comparison to the Project's less-than-significant impacts to wastewater treatment capacity. The ROA also would result in a decrease in the amount of solid waste generated on the Project site in comparison to the existing uses on site; thus, the ROA would have reduced impacts to landfill capacity in comparison to the Project, although such impacts would be less than significant under both the Project and ROA. Both the Project and the ROA would be required to comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP; thus, impacts would be less than significant, and the level of impact would be similar. Finally, the ROA would result in increased impacts due to expansion of facilities for electricity, communications facilities, roadway improvements, and drainage improvements in comparison to the Project to serve the proposed residential lots under the ROA, although as with the Project such impacts would be less than significant.

M. Wildfire

Under the ROA, the site would be developed with up to 24 single-family residential units, which would require more intensive construction activities than the proposed Project and would require the incorporation of provisions to address wildfire hazards, such as fuel modification zones. Neither the Project nor the ROA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the ROA would exacerbate wildfire hazards in the local area that could result in exposure of persons to pollutant concentrations from wildfires or due to loss, injury, or death involving wildfires, as operations under the Project would continue to be subject to the Fire Protection/Emergency Medical Services Plan portion of the existing Galway Downs Event Site & Event Management Plan (included as part of the Project's application materials, which are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501), while the residential units under the ROA would be required to incorporate provisions to address wildfire hazards, such as fuel modification zones; thus, impacts would be less than significant under both the Project and ROA, and the level of impact would be similar. The ROA would require the installation or maintenance of associated infrastructure to address wildfire hazards, although such infrastructure would involve thinning or removal of vegetation and would not result in temporary or ongoing impacts to the environment; thus, impacts would be less than significant under both the Project and ROA, and the level of impact would be similar. Similarly, neither the Project nor the ROA would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; thus, impacts would be less than significant under both the Project and ROA, and the level of impact would be similar.

N. Conclusion

Under the ROA, the existing buildings and structures on site would be demolished and removed, the site would be subject to grading activities to accommodate single-family development, and the site ultimately would be developed with up to 24 single-family homes. Implementation of the ROA would avoid the Project's significant and unavoidable impacts due to GHG emissions and VMT, and would result in reduced impacts in comparison to the Project under the issue areas of agriculture/forestry resources, air quality (long-term

operations), energy (long-term operations), noise (long-term operations), and utilities and service systems (water and wastewater treatment demand, solid waste). Implementation of the ROA would have the same or similar impacts in comparison to the Project under the issue of wildfire hazards. Implementation of the ROA would result in increased impacts in comparison to the Project under the issue areas of agriculture/forestry resources (due to land use compatibility), air quality (construction), biological resources, cultural resources, energy (construction), hydrology/water quality, land use and planning (land use compatibility), noise (construction), utilities/service systems (construction). Due to the substantial reduction in impacts under long-term operating conditions, the ROA is identified as the Environmentally Superior Alternative pursuant to State CEQA Guidelines Section 15126.6.

The ROA would fail to meet all of the Project's objectives, except for the Project's objective to eliminate reliance on septic systems for sewage disposal, as the ROA would require a future connection to the new sewer main within De Portola Road. However, the ROA would not meet any of the Project's remaining objectives, including objectives that seek to: make physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs; make operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs; align past and current uses that occur at Galway Downs under Riverside County Ordinance 348 and the Temecula Wine Country Community Plan; provide expanded opportunities for equestrian-related lodging; allow multi-sports field activities as secondary uses, primarily on weekends, to help cover obligations to equestrian uses; reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source; and establish procedures and protocols for the management of special occasion traffic generated by Galway Downs.

6.3.4 Specific Plan Alternative (SPA)

The Specific Plan Alternative (SPA) considers development of the Project site with residential uses while still maintaining some equestrian-related components. Under the SPA, a Specific Plan would be proposed to address future development within the 241.6-acre property. Under the SPA, the northern +/- 137.9 acres of the existing Galway Downs facility, inclusive of the existing race track, special events zone, and most of the existing northern parking areas, would continue to be used for equestrian-related events, including but not limited to, English Style such as Dressage, Hunter/Jumper, Eventing, Peruvian, etc., or multiple disciplines of Western styles such as Reining, Barrel Racing, Roping, etc. No other sports events (e.g., soccer, lacrosse, etc.) would be allowed within the northern portion of the site that would be reserved for equestrian uses. As part of the SPA, the southern +/- 98.7 acres of the Project site would be developed with up to 98 single-family residential dwelling units on minimum one-acre lot sizes, which would be designed to meet the requirements of the Wine Country's "Clustered Subdivision Development Standards" pursuant to Section 14.93.B of Riverside County Ordinance No. 348. In addition, approximately 5.0 acres within the northern portions of the site would be reserved for vineyard uses, as required by Section 14.93.B.5 of Riverside County Ordinance No. 348 for Wine Country Clustered Subdivisions. In total, the SPA would allow for equestrian-related uses on approximately 137.9 acres, vineyard uses on approximately 5.0 acres, and up to 98 clustered single-family homes on approximately 98.7 acres. Implementation of the SPA would require the following discretionary approvals from Riverside County:

1. A Foundation General Plan Amendment, as described by Chapter 11 of the Riverside County General Plan, in order to change the existing General Plan Foundation Component and General Plan land use designation applied to the southern 98.7 acres of the site from "Rural – Rural Residential (R-RR)" to "Rural Community – Very Low Density Residential (RC-VLDR)";
2. A General Plan Amendment to revise Figure 4B of the SWAP and TVWCCP to redesignate the southern +/- 98.7 acres of the site from the "Wine Country – Equestrian District (WC-ED)" to the "Wine Country – Residential District (WC-RD)", with no changes to the northern 142.9 acre of the site that would remain designated within the WC-ED;
3. A Change of Zone to change the existing zoning classification of the 241.6-acre property from "Wine Country – Equestrian (WC-E)" to "Specific Plan (SP) Zone," which would apply zoning regulations, permitted uses, and development standards for the northern 142.9 acres (i.e., the 137.9-acre equestrian area and the 5.0-acre vineyard area) similar to those provided in Section 14.96 of Riverside County Ordinance No. 348 for the WC-E zone, and would apply zoning regulations, permitted uses, and development standards for the southern +/- 98.7 acres similar to those provided in Section 14.98 of Riverside County Ordinance No. 348 for the "Wine Country – Residential (WC-R)" zone;
4. A Conditional Use Permit (CUP) as required by Section 14.98.B of Riverside County Ordinance No. 348 for Wine Country Clustered Subdivisions; and
5. A Tentative Tract Map (TTM) to subdivide the southern +/- 98.7 acres of the Project site to establish up to 98 single-family lots on minimum one-acre lot sizes.

In addition, it is anticipated that Exception No. 9 to Riverside County Noise Ordinance No. 847 also would be proposed under the SPA. This alternative was selected to allow for consideration of an alternative that would increase the available housing supply within unincorporated Riverside County generally and within the Wine Country area specifically, thereby assisting the County in meeting its Regional Housing Needs Assessment (RHNA) allocations for the "Above Moderate" income category.

A. Agriculture and Forestry Resources

Neither the Project nor the SPA would result in impacts due to the conversion of Prime Farmland, unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use, and the level of impact would be the same. Similarly, neither the Project nor the SPA would conflict with existing agricultural zoning, agricultural use, or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve, and the level of impact would be similar. Both the Project and SPA would be subject to compliance with Riverside County Ordinance No. 625, which would address land use compatibility between residential uses and agricultural uses; however, the SPA would be less compatible with surrounding agricultural uses in comparison to the Project due to the inclusion of more residential uses on site, and as such indirect impacts to agricultural lands would be increased under the SPA, although such impacts would remain below a level of significance. Both the Project and SPA would be subject to compliance with the lighting regulations established by Riverside County Ordinance No. 915, which requires all outdoor luminaires to be located, adequately shielded, and directed such that no direct light falls outside

the parcel of origin, or onto the public right-of-way; thus, indirect lighting impacts to nearby agricultural, equestrian-oriented, and winery properties would be less than significant under both the proposed Project and the SPA, and the level of impact would be similar. Both the Project and SPA would include sound amplification systems on site, although such impacts would be less than significant under both the SPA and Project and the level of impact would be similar. Additionally, neither the Project nor the SPA would result in impacts to forestry resources or due to a conflict with forestry zoning; thus, no impact would occur, and the level of impact would be the same.

B. Air Quality

Under the SPA, the existing buildings and structures in the southern +/- 98.7 acres of the Project site would be demolished and removed, and the southern portions of the site would be subject to grading activities to accommodate development of up to 98 single-family homes. Accordingly, implementation of the SPA would result in increased construction-related impacts due to regional air quality emissions in comparison to the Project due to the increased intensity of construction activities on site, although such impacts likely would remain below a level of significance. Under long-term operating conditions, the primary source of air quality emissions under the SPA would be associated with traffic. Due to the intensification of uses under the SPA (i.e., the introduction of 98 single-family homes while continuing operation of equestrian events in the northern portions of the site), the SPA would generate substantially more traffic than the Project, and as such would result in increased operational impacts to air quality, although such impacts likely would remain less than significant when taking into consideration the uses at the site under existing (baseline) conditions. Additionally, neither the Project nor the SPA would result in a conflict with the SCAMQD AQMP; thus, impacts would be less than significant and the level of impact would be similar. Because the SPA would include a more intensive construction phase than the proposed Project, the SPA would result in an increase in localized air quality emissions during construction in comparison to the Project, although such emissions would be less than significant under both the Project and SPA. Under long-term operating conditions, and due to the intensification of uses under the SPA as described above, impacts due to operational LSTs would be increased under the SPA, although such impacts would remain less than significant. While neither the Project nor the SPA would have the potential to cause or contribute to a CO “hot spot,” due to the increase in traffic from the Project site under the SPA, the SPA would have increased impacts due to CO “hot spots” due to the increase in traffic associated with the SPA in comparison to the Project. Due to the increased intensity of construction activities under the SPA in comparison to the Project, the SPA would have an increased potential for resulting in construction-related health risk impacts affecting nearby sensitive receptors, although such impacts would be less than significant. Neither the Project nor the SPA would be associated with stationary sources or mobile sources with long queuing times, and as such neither the Project nor the SPA would result in operational-related health risk impacts, and the level of impact would be similar. Implementation of the SPA would result in a reduction in potential odor sources on site due to the elimination of a portion of the existing equestrian uses on site, resulting in reduced impacts in comparison to the Project, although such impacts would be less than significant under both the Project and the SPA.

C. Biological Resources

Neither the Project nor the SPA would have the potential to conflict with the SKR HCP. However, under the SPA, the majority of the Project site would be subject to grading activities, although under the SPA the northern portions of the site that include an east-west oriented ephemeral drainage that qualifies as a riverine resource under the MSHCP and a 0.13-acre patch of disturbed southern willow scrub that comprises riparian habitat would not be impacted. The SPA would have the similar potential to result in impacts to the Temecula Creek during construction of the off-site sewer alignment, and as with the Project mitigation would be required to avoid impacts to this drainage. Due to the proposed change in land use on site, the increase in areas subject to physical impacts, as well as the off-site sewer line that traverses MSHCP criteria cells, both the Project and the SPA would require approval of an amendment to the approved JPR 10-12-27-01. While impacts due to a conflict with the MSHCP would be less than significant under both the Project and the SPA following the implementation of mitigation measures, impacts would be increased under the SPA in comparison to the Project due to the increase in areas subject to physical impact. Neither the Project nor the SPA would result in impacts to special-status plants, and the level of impact would be similar. Both the Project and the SPA would have the potential to result in impacts to the burrowing owl during construction that would be mitigated to less-than-significant levels; however, as the areas subject to development would be increased under the SPA, impacts to the burrowing owl would be increased under the SPA in comparison to the Project. Neither the Project nor the SPA would result in impacts to wildlife movement corridors or native wildlife nursery sites, and the level of impact would be similar. Both the Project and the SPA would avoid impacts to the 0.13-acre patch of disturbed southern willow scrub that comprises riparian habitat, although both the Project and the SPA would result in potential impacts to the Temecula Creek in association with the off-site sewer alignment; thus, impacts to jurisdictional drainages under the proposed Project and SPA would be less than significant following the implementation of mitigation measures, and the level of impact to riparian habitat and to State-protected jurisdictional waters would be similar. Neither the Project nor the SPA would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; thus, impacts would not occur and the level of impact would be the same.

D. Cultural Resources

Under the SPA, there would be no substantive changes in the northern +/- 137.9 of the property, while the southern +/- 98.7 acres of the Project site would be subject to extensive grading as necessary to accommodate the development of up to 98 single-family homes. Although neither the Project nor the SPA would result in impacts to known historical sites or resources, due to the increased intensity of grading under the SPA the SPA would have an increased potential to result in impacts to subsurface resources. Similarly, while no impacts to known archaeological resources would occur under the Project or SPA, due to the increased intensity of grading, the SPA also would have an increased potential to result in impacts to subsurface resources as compared to the proposed Project. Additionally, due to the increased intensity of grading activities, the SPA would have a greater potential to result in impacts to human remains in comparison to the Project. However, while impacts generally would be increased under the SPA in comparison to the Project, impacts to previously-undiscovered historical and archaeological resources and

impacts to human remains would be reduced to less-than-significant levels with implementation of mitigation measures under both the Project and SPA.

E. Energy

Under the SPA, the northern +/- 137.9 acres of the existing Galway Downs facility would continue to be used for equestrian-related events while the southern +/- 98.7 acres of the Project site would be developed with up to 98 single-family residential dwelling units. Thus, and in comparison to the proposed Project, the SPA would result in a substantial increase in the site's demand for energy resources during both construction and long-term operation, although neither the Project nor the SPA would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Neither the Project nor the SPA would conflict with or obstruct a State or local plan for renewable energy or energy efficiency; thus, impacts would be less than significant under both the Project and the SPA and the level of impact would be similar.

F. Greenhouse Gas Emissions

Under the SPA, the northern +/- 137.9 acres of the existing Galway Downs facility would continue to be used for equestrian-related events while the southern +/- 98.7 acres of the Project site would be developed with up to 98 single-family residential dwelling. Due to the increased intensity of construction activities under the SPA in comparison to the Project, the SPA would result in a substantial increase in construction-related GHG emissions. However, under long-term operating conditions, the equestrian-related events that would continue to occur on the northern +/- 137.9 acres of the property, which would generate traffic volumes similar to existing conditions, along with the 98 dwelling units in the southern portions of the property would generate an additional approximately 891 vehicular trips per day (98 du x 9.09 trips/day/du = 890.82 trips[3]). Thus, the SPA would result in GHG emissions that would be just below the Riverside County CAP screening threshold of 3,000 $MTCO_2e$ when taking into consideration the uses at the site under existing (baseline) conditions. Thus, implementation of the SPA would avoid the Project's significant and unavoidable impacts due to GHG emissions that exceed 3,000 $MTCO_2e$/yr. Moreover, the SPA would result in the emission of less than 3,000 $MTCO_2e$/yr of GHG emissions, and therefore would not conflict with the County's CAP. Thus, the SPA would avoid the Project's significant and unavoidable impacts due to a conflict with the CAP.

G. Hydrology and Water Quality

Under the SPA, extensive grading would be required in the southern +/- 98.7 acres of the Project site to allow for the development of 98 dwelling units while accommodating appropriate drainage and sewer flows. It is anticipated that potable water service to the Project site under the SPA would be provided by the RCWD, and as such neither the Project nor the SPA would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impeded sustainable groundwater management of the basin; thus, impacts would be less than significant under both the Project and SPA, and the level of impact would be similar. Under the SPA, the southern +/- 98.7 acres of the property would be

[3] Trip generation information taken from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, August 18, 2025.

subject to grading and disturbance; thus, the SPA would result in increased construction-related impacts to surface and groundwater quality in comparison to the Project, although as with the Project such impacts would be less than significant with mandatory preparation and implementation of a SWPPP. Under long-term operating conditions, the SPA would be required to incorporate detention/water quality basins or other measures to address water quality concerns in site runoff; thus, under both the Project and SPA, impacts to surface and groundwater quality would be less than significant, and the level of impact would be similar. Neither the Project nor the SPA would conflict with the San Diego Region Basin Plan; thus, impacts would be less than significant, and the level of impact would be similar. Due to the increase in intensity of construction activities under the SPA, the SPA would result in increased construction-related impacts due to erosion and siltation, although as with the Project such impacts would be reduced to less-than-significant levels through preparation and implementation of a SWPPP. Similarly, due to the increased intensity of construction activities, the SPA would result in increased impacts due to impeding or redirecting flood flows, although such impacts would be less than significant. Under long-term operating conditions, both the Project and SPA would have similar potential to result in sediments and siltation, although such impacts would be less than significant with either the existing drainage system or the drainage system that would be installed as part of the SPA and the level of impact would be similar. Neither the Project nor the SPA would introduce new structures within the portions of the site that contain a FEMA-mapped flood plain or within the portions of the site that may be inundated by dam failure; thus, impacts due to inundation from floods and/or due to dam failure would not occur under the Project or SPA, and the level of impact would be similar. Neither the Project nor the SPA would be subject to inundation from tsunamis; thus, no impact would occur under the Project or SPA, and the level of impact would be the same.

H. Land Use and Planning

Under the SPA, the northern +/- 137.9 acres of the existing Galway Downs facility would continue to be used for equestrian-related events, while the southern +/- 98.7 acres of the Project site would be developed with up to 98 single-family residential dwelling units on minimum one-acre lot sizes. Thus, the SPA would not meet the requirement of SWAP and TVWCCP Policy SWAP 1.5, which restricts residential density within the WC-E District to minimum 10-acre lot sizes. Furthermore, the introduction of up to 98 single family homes on site would result in increased impacts with respect to land use compatibility, as the proposed residential uses would be less compatible with equestrian- and wine country-oriented uses in the surrounding area. Thus, impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be increased under the SPA as compared to the Project, and such impacts would represent a significant and unavoidable impact due to a conflict with the SWAP and TVWCCP. Neither the SPA nor the Project would physically disrupt or divide the arrangement of an established community; thus, no impact would occur, and the level of impact would be similar.

I. Noise

The Project site is located approximately 6.7 miles from the nearest portion of Riverside County that is subject to airport-related noise levels above 55 dBA CNEL, and neither the Project nor the NCA would include an airport- or airstrip-related component; thus, no impact would occur due to airport-related noise under the Project or SPA, and the level of impact would be similar. In comparison to the Project, the SPA

would require a much more intensive construction phase. Thus, construction-related noise impacts under the SPA would increase in comparison to the Project, although impacts likely would be less than significant or could be reduced to less-than-significant levels with the implementation of mitigation measures. Under long-term operations, it is assumed that sound amplification equipment would continue to be used as occurs under existing conditions; thus, long-term operational noise impacts would be less than significant and the level of impact would be similar. However, under long-term operating conditions the SPA would generate an additional 891 vehicular trips per day, and as such the SPA would have the potential to result in significant traffic-related noise impacts along local area roadway segments. Thus, traffic-related noise impacts under the SPA would substantially increase in comparison to the Project, and may also result in significant and unavoidable impacts due to the challenges associated with mitigating traffic-related noise impacts for existing uses along existing roadways. Additionally, due to the increased intensity of construction activities under the SPA, the SPA would have a greater potential for exposing nearby properties to excessive groundborne vibration or noise, although as with the Project such impacts would be less than significant due to the general lack of sensitive structures in the local area.

J. Transportation

Neither the Project nor the SPA would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; thus, impacts would be less than significant under both the Project and the SPA, and the level of impact would be similar. The SPA would result in GHG emissions that would be below the CAP screening threshold of 3,000 $MTCO_2e/yr$, which is the screening threshold also identified by the County Guidelines. Thus, the SPA would avoid the Project's significant and unavoidable impacts due to VMT. While transportation-related improvements likely would be more extensive under the SPA, all transportation-related improvements would be required to be designed to preclude potential impacts due to hazards from a geometric design feature; thus, impacts due to hazardous geometric design features would be less than significant under the Project and SPA, and the level of impact would be similar. While the introduction of an additional 98 dwelling units under the SPA could result in potential land use compatibility issues, such issues would not be related to traffic; thus, neither the Project nor the SPA would increase traffic-related hazards due to incompatible use, and the level of impact would be similar. Due to the increased intensity of transportation-related improvements, the SPA would result in an increased need for the maintenance of new roads as compared to the Project, although as with the Project such impacts would be less than significant. Both the Project and the SPA would require mitigation to reduce near-term construction-related impacts to circulation to below a level of significance, although such impacts would be increased under the SPA due to the need to implement more traffic-related improvements than would be required for the Project. Similarly, both the Project and the SPA would require mitigation to reduce near-term construction-related impacts to emergency access; however, near-term impacts to emergency access would be increased under the SPA in comparison to the Project as the SPA's construction phase likely would take much longer than the Project's construction phase. Neither the Project nor the SPA would include the construction or expansion of a bike system or bike lanes; thus, no impact would occur and the level of impact would be the same.

K. Tribal Cultural Resources

Under the SPA, there would be no substantive changes in the northern +/- 137.9 of the property, while the southern +/- 98.7 acres of the Project site would be subject to extensive grading as necessary to accommodate the development of up to 98 single-family homes. Although neither the Project nor the SPA would result in impacts to known tribal cultural resources, due to the increased intensity of grading under the SPA, the SPA would have an increased potential to result in impacts to subsurface tribal cultural resources. However, while impacts generally would be increased under the SPA in comparison to the Project, impacts to previously-undiscovered tribal cultural resources would be reduced to less-than-significant levels with implementation of mitigation measures under both the Project and SPA.

L. Utilities and Service Systems

The SPA would require more intensive construction activities than the Project, and would require more improvements than the proposed Project related to water, wastewater treatment, or stormwater drainage. Accordingly, the SPA would result in increased impacts due to new or expanded water, wastewater treatment, and stormwater drainage improvements, although such impacts would be less than significant with implementation of the mitigation measures identified throughout this EIR. In addition, the overall demand for potable water would substantially increase under the SPA in comparison to the Project; thus, impacts to water supply would be increased under the SPA, although such impacts would be less than significant under both the Project and SPA. The SPA would be associated with the generation of more wastewater than the existing uses on site, and as such the SPA would have increased impacts in comparison to the Project's less-than-significant impacts to wastewater treatment capacity, although such impacts likely would remain below a level of significance. The SPA also would result in an increase in the amount of solid waste generated on the Project site, and as such the SPA would have increased impacts to landfill capacity in comparison to the Project, although such impacts would be less than significant under both the Project and SPA. Both the Project and the SPA would be required to comply with federal, State, and local management and reduction statutes and regulations related to solid wastes including the CIWMP; thus, impacts would be less than significant, and the level of impact would be similar. Finally, the SPA would result in increased impacts due to expansion of facilities for electricity, communications facilities, roadway improvements, and drainage improvements in comparison to the Project to serve the proposed residential lots under the SPA, although as with the Project such impacts would be less than significant.

M. Wildfire

Under the SPA, the southern portions of the site would be developed with up to 98 single-family residential units, which would require more intensive construction activities than the proposed Project and would require the incorporation of provisions to address wildfire hazards, such as fuel modification zones. Neither the Project nor the SPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts would be less than significant, and the level of impact would be similar. Neither the Project nor the SPA would exacerbate wildfire hazards in the local area that could result in exposure of persons to pollutant concentrations from wildfires or due to loss, injury, or death involving wildfires, as operations under the Project would continue to be subject to the Fire Protection/Emergency Medical Services Plan portion of the existing Galway Downs Event Site & Event

Management Plan (included as part of the Project's application materials, which are available for public review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92501), while the 98 residential units under the SPA would be required to incorporate provisions to address wildfire hazards, such as fuel modification zones; thus, impacts would be less than significant under both the Project and SPA, and the level of impact would be similar. The SPA would require the installation or maintenance of associated infrastructure to address wildfire hazards, although such infrastructure would involve thinning or removal of vegetation and would not result in temporary or ongoing impacts to the environment; thus, impacts would be less than significant under both the Project and SPA, and the level of impact would be similar. Similarly, neither the Project nor the SPA would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; thus, impacts would be less than significant under both the Project and SPA, and the level of impact would be similar.

N. Conclusion

Implementation of the SPA would have the same or similar impacts in comparison to the Project under the issues of noise (operational-related) and wildfire. Implementation of the SPA would result in increased impacts in comparison to the Project under the issue areas of agriculture and forestry resources; air quality; biological resources; cultural resources; energy; hydrology/water quality; land use/planning; noise (construction- and traffic-related); tribal cultural resources; and utilities/service systems. Implementation of the SPA would avoid the Project's significant and unavoidable impacts due to GHG emissions, due to a conflict with the County's CAP, and due to VMT.

The SPA would fail to meet several of the Project's objectives. The SPA would meet the Project's objective to accommodate physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs and would accommodate continued operation of equestrian events, and so would meet the Project's objectives to make physical improvements and operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs. Under the SPA, there would be no non-equestrian sports events allowed; thus, the SPA would fail to meet the Project's objective to align past and current uses that occur at Galway Downs under Riverside County Ordinance No. 348 and the Temecula Wine Country Community Plan. The SPA would not allow for the Project's proposed Wine Country Equestrian Park Model Lodging, and as such the SPA would fail to meet the Project's objective to provide expanded opportunities for equestrian-related lodging. Because non-equestrian sports events at the facility would not be allowed, the SPA would fail to meet the Project's objective to allow multi-sports field activities as secondary uses, primarily on weekends, to help cover obligations to equestrian uses. The SPA would entail the construction of the off-site sewer connection to the new sewer line in De Portola Road, and as such the SPA would meet the Project's objective to eliminate reliance on septic systems for sewage disposal. The SPA would include the Project's proposed Exception No. 9 to Riverside County Noise Ordinance No. 847 to allow for exterior sound amplification, and thus would meet the Project's objective to reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source. The SPA would not entail any new requirements related to traffic management, and as such the SPA would

fail to meet the Project's objective to establish procedures and protocols for the management of special occasion traffic generated by Galway Downs. The SPA would not entail any revisions to Riverside County Ordinance No. 348 for the "Wine Country – Equestrian (WC-E)" zoning classification, and as such the SPA would fail to meet the Project's objective to clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone. Because the Wine Country Equestrian Park Model Lodging, Equestrian Recreational Vehicle Park, and additional Employee Housing would not be accommodated under the SPA, the SPA would not entail revision to Ordinance No. 348 to establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks as permitted use, and thus the SPA would fail to meet the Project's objective to establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.

6.3.5 Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6 requires the identification of the environmentally superior alternative. As discussed herein, implementation of the NPA would result in no physical environmental impacts beyond those that have already occurred on the property and would not allow for an expansion of uses on site beyond what currently is allowed under existing permits, including CUP 02303. Thus, the NPA comprises the "no project alternative" under CEQA. Because the NPA would avoid the majority of the Project's less-than-significant impacts (with or without mitigation), it warrants consideration as the "environmentally superior alternative." However, pursuant to State CEQA Guidelines Section 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Residential Only Alternative (ROA), as discussed above in subsection 6.3.3, is identified as the Environmentally Superior Alternative pursuant to State CEQA Guidelines Section 15126.6. The ROA only would entail the redevelopment of the Project site with up to 24 single-family homes on minimum 10-acre lot sizes, which would result in a substantial reduction in vehicular traffic as compared to existing conditions at the site and would result in corresponding decreases in the Project's traffic-related impacts to air quality, energy, and due to greenhouse gas (GHG) emissions and noise. Additionally, the ROA would completely avoid the Project's significant and unavoidable impacts due to GHG emissions, due to a conflict with the County's CAP, and due to VMT. While it is acknowledged that the ROA would result in an increase in construction-related impacts to the environment as compared to the proposed Project, such as construction-related air quality and noise impacts, these construction-related impacts would be less than significant with implementation of the mitigation measures identified throughout this EIR. Because the ROA would result in the generation of only 218 vehicular trips-ends per day as compared to the 120 and 11,514 trip-ends per day generated by the site's existing land uses, the reduction in operational-related vehicular impacts to the environment would more than off-set the slight increase in construction-related impacts. Thus, despite the slight increase in construction-related impacts, and because the ROA would avoid the Project's significant and unavoidable impacts, the ROA has been selected as the Environmentally Superior Alternative as required by State CEQA Guidelines Section 15126.6.

Table 6-1 Alternatives to the Proposed Project – Comparison of Environmental Impacts

Environmental Topic/ Project Objective	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives			
		No Project Alternative (NPA)	No Construction Alternative (NCA)	Residential Only Alternative (ROA)	Specific Plan Alternative (SPA)
Agriculture and Forestry Resources	Less than Significant	Reduced	Similar	Reduced	Increased
Air Quality	Less than Significant	Reduced	Reduced	Construction: Increased Operational: Reduced	Increased
Biological Resources	Less than Significant	Reduced	Reduced	Increased	Increased
Cultural Resources	Less than Significant	Reduced	Reduced	Increased	Increased
Energy	Less than Significant	Reduced	Reduced	Construction: Increased Operational: Reduced	Increased
Greenhouse Gas Emissions	Less than Significant	Reduced to Less-than-Significant Levels	Reduced to Less-than-Significant Levels	Reduced to Less-than-Significant Levels	Increased
Hydrology and Water Quality	Less than Significant	Most Issues: Reduced Operational-Related Erosion: Slightly Increased	Most Issues: Reduced Operational-Related Erosion: Slightly Increased	Increased	Increased
Land Use and Planning	Less than Significant	Similar	Similar	Increased	Increased/Significant and Unavoidable Impact
Noise	Less than Significant	Reduced	Reduced	Construction: Increased Operational: Reduced	Increased/Significant and Unavoidable Impact
Transportation	Less than Significant	VMT: Reduced to Less-than-Significant Levels Most Other Issues: Reduced Hazardous Geometric Design Features: Increased	VMT: Reduced to Less-than-Significant Levels Most Other Issues: Reduced Hazardous Geometric Design Features: Increased	Reduced to Less-than-Significant Levels	Reduced to Less-than-Significant Levels
Tribal Cultural Resources	Less than Significant	Reduced	Reduced	Increased	Increased
Utilities and Service Systems	Less than Significant	Reduced	Reduced	Construction: Increased Operational: Reduced	Increased
Wildfire	Less-than-Significant	Reduced	Reduced	Similar	Similar
Objective A: To make physical improvements that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.		No	No	No	Yes
Objective B: To make operational changes that would attract higher level of competition for equestrian events that can be hosted at Galway Downs.		No	Yes	No	Yes

Environmental Topic/ Project Objective	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives			
		No Project Alternative (NPA)	No Construction Alternative (NCA)	Residential Only Alternative (ROA)	Specific Plan Alternative (SPA)
Objective C: To align past and current uses that occur at Galway Downs under Riverside County Ordinance 348 and the Temecula Wine Country Community Plan.		No	Yes	No	No
Objective D: To provide expanded opportunities for equestrian-related lodging.		No	No	No	No
Objective E: To allow multi-sports field activities as secondary uses, primarily on weekends, to help cover obligations to equestrian uses.		No	Yes	No	No
Objective F: To eliminate reliance on septic systems for sewage disposal.		No	No	Yes	Yes
Objective G: To reduce or eliminate the recurring need to secure one-by-one approvals for exterior sound amplification at Galway Downs that is audible more than 200 feet from the sound source.		No	Yes	No	Yes
Objective H: To establish procedures and protocols for the management of special occasion traffic generated by Galway Downs.		No	No	No	No
Objective I: To clarify and refine the list of definitions, list of conditionally permitted uses, and development standards for the "Wine Country – Equestrian (WC-E)" zone.		No	Yes	No	No
Objective J: To establish Wine Country Equestrian Park Model Lodging and Equestrian Recreational Vehicle Parks land uses as new permitted uses under Article XIVd (Wine Country Zones [WC]) of Riverside County Ordinance No. 348.		No	No	No	No

7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

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7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Galway Downs EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502.

Appendix A	Notice of Preparation (NOP), Initial Study, and NOP Comments
Appendix B1	Air Quality Impact Analysis (AQIA)
Appendix B2	Construction Health Risk Assessment (HRA)
Appendix C1	Biological Resources Technical Report
Appendix C2	Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis
Appendix D	Cultural Resources Technical Report
Appendix E	Energy Analysis (EA)
Appendix F	Greenhouse Gas Analysis (GHGA)
Appendix G	Water Quality Management Plan (WQMP)
Appendix H	Noise Impact Analysis (NIA)
Appendix I	Level-of-Service Based Traffic Analysis Report
Appendix J	Vehicle Miles Traveled (VMT) Screening Evaluation
Appendix K	Analysis of Applicability of Wine Country Community Plan Program EIR Mitigation Measures

7.3 DOCUMENTS AND WEBSITES CONSULTED

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed.

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