

ITEM: 19.1 (ID # 24522)

MEETING DATE:

Tuesday, March 19, 2024

SUBJECT: RIVERSIDE UNIVERSITY HEALTH SYSTEM - BEHAVIORAL HEALTH - Public Hearing - Adopt Resolution No. 2024-073 approving a Mitigated Negative Declaration for the proposed Riverside University Health System - Behavioral Health (RUHS-BH) Mead Valley Wellness Village Project (the Project), and a Mitigation Monitoring and Reporting Program based on the findings in the Initial Study and the conclusion that with mitigation the Project will not have a significant effect on the environment; Conduct a public hearing for the issuance of bonds under the Tax Equity and Fiscal Responsibility Act of 1982; Introduce Ordinance No. 989, Authorizing a Public Leaseback to Facilitate the Financing of the Costs of Construction of the Riverside University Health System - Behavioral Health (RUHS-BH) Wellness Village; Adopt Resolution No 2024-074, a Resolution of the Board of Supervisors of the County of Riverside Declaring an Official Intent to Reimburse Itself from the Proceeds of a Lease Revenue Bond Financing for Capital Expenditures and Providing Other Matters in Connection Therewith; Approve the Second Amendment to the Pre-Development Agreement with the County and PMB, LLC not to exceed \$31,870,572; Receive and File the Mead Valley Economic Impact Analysis; and CONDUCT PUBLIC HEARING, District 1, [Total Project Cost \$500,000,000 Federal Grant Funds 14%, State Grant Funds 1%, Bond Proceeds 85%]. (Public Hearing)

RECOMMENDED MOTION: That the Board of Supervisors:

RUHS-BEHAVIORAL HEALTH:

 Adopt Resolution No. 2024-073 Approving a Mitigated Negative Declaration for the Riverside University Health System – Behavioral Health (RUHS-BH) Wellness Village Project, and a Mitigation Monitoring and Reporting Program based on the findings in the Initial Study and the conclusion that with mitigation the project will not have a significant effect on the environment;

Continued on Page 2
ACTION:Policy

FROM:

Matthew Chang, Director Chang 3/13/2024

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Jeffries, seconded by Supervisor Gutierrez and duly carried, IT WAS ORDERED that the above matter is approved as recommended and that the above Ordinance is approved as introduced with waiver of reading.

Ayes:

Jeffries, Spiegel, Washington and Gutierrez

Nays:

None

Absent:

Perez

Date:

March 19, 2024

XC:

RUHS-BH

19.1

Kimberly A. Rector

Clerk of the Board

RECOMMENDED MOTION: That the Board of Supervisors:

- 2. Conduct a public hearing under the Tax Equity and Fiscal Responsibility Act of 1982 with respect to the issuance of lease revenue bonds by the California Enterprise Development Authority in an aggregate amount not to exceed \$500,000,000 for the purpose of financing, refinancing and/or reimbursing the cost of design, development, construction, installation, furnishing and equipping Public Facilities by P3 Riverside Holdings, LLC for the benefit of the County of Riverside;
- 3. Introduce, read title and waive further reading of Ordinance No. 989, an Ordinance of the County of Riverside Authorizing a Public Leaseback to Facilitate the Financing of the Costs of the Design, Development, Construction, Installation, Furnishing, and Equipping of a Behavioral Health Facilities Campus in the Unincorporated Mead Valley Area of the County of Riverside, California;
- Approve Resolution No 2024-074, a Resolution of the Board of Supervisors of the County of Riverside Declaring an Official Intent to Reimburse Itself from the Proceeds of a Lease Revenue Bond Financing for Capital Expenditures and Providing Other Matters in Connection Therewith;
- 5. Approve the Second Amendment to the Pre-Development Agreement between County of Riverside and PMB, LLC, not to exceed \$31,870,572;
- 6. Authorize the Director of Behavioral Health, or designee, to negotiate and execute related documents and to perform any and all ministerial actions necessary to effect the purpose of the approvals, Ordinance, and the two Resolutions and complete the transaction herein authorized;
- 7. Authorize the County Executive Officer, or designee to negotiate and approve the financing terms and execute certain financing specific documents; and
- 8. Receive and File Mead Valley Economic Impact Analysis conducted by Beacon Economics.

FINANCIAL DATA	Current Fiscal Y	ear:	Next Fiscal Y	ear:	Total Cost:	Ongoing Cost
COST	\$	0	\$	0	\$ 500,000,000	\$ 0
NET COUNTY COST	\$	0	\$	0	\$0	\$ 0
SOURCE OF FUNDS: Federal Grant Funds 14%, State Grant Funds 1%, Bond Proceeds 85% Budget Adjustment: No						
For Fiscal Year: 23/24 – 59/6						

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

Riverside University Health System – Behavioral Health (RUHS-BH) has previously received Board authorization to pursue the development of a Behavioral Health Wellness Village on County-owned property located in Mead Valley, an unincorporated area of the County located west of the city of Perris (M.O. 3.48 7/11/23). The Mead Valley site was identified pursuant to direction from the County Executive Team to locate Wellness Villages on properties with

minimal development challenges, including as to site acquisition, permitting and utilities. As detailed below, the Mead Valley site provides a unique opportunity for accelerated project delivery through a Public-Private Partnership (P3) that taps into awarded State grant funding and also leverages private development expertise.

This Board action is the first phase of a two-step process. In order to meet timing requirements for grant funding, the CEQA approval must proceed now, with the Project and Financing documents to follow within the next month.

RUHS-BH is pursuing development of multiple Wellness Villages that will serve behavioral health needs in all areas of the County. The vision is to enable consumers and their families to move through the campus' continuum of care from intensive oversight and treatment activities, to decreased therapeutic contact enabling consumers to prepare them for a self-sustained recovery grounded in their own community. By delivering the right level of care at the right time and expanding service levels, this model can save cities and the County millions of dollars annually by treating clients at the appropriate level of care, diverting clients from requiring emergency services and/or law enforcement involvement, all while making a long-lasting impact on the community through complete health, balance, and societal reintegration.

Entry to the campus could be from a variety of intensive short-term facilities, such as Emergency Psychiatric Hospitals, Crisis Stabilization Units (CSU), Social Rehabilitation Programs (SRP), and Institutes for Mental Disease (IMD). Consumers may also come from untreated homeless populations who have been previously unable to connect with long-term treatment due to not having safe and sustainable housing while learning how to overcome their behavioral health challenges.

The County issued Requests for Proposals (RFPs) in February 2022; and PMB LLC (PMB or Developer) was selected as the most responsive bidder. On August 2, 2022, the Board of Supervisors approved a Pre-Development Agreement with PMB, LLC for services during the pre-development stages of the Project including due diligence, design, space planning, entitlement, and other related services. The pre-development costs provided for in the Pre-Development Agreement would be reimbursed to PMB through proceeds once the tax-exempt bonds and/or Alternate Financing for the Project were originated. In the event the proposed Bonds and/or Alternate Financing for the Project are not issued or the Pre-Development Agreement is terminated, then the Pre-Development Costs would be paid by County to PMB as reimbursement.

Pursuant to Board Resolution 2022-059, RUHS-BH applied to the Department of Healthcare Services (DHCS) for grant funding for these projects under the Behavioral Health Continuum Infrastructure Funding Program (BHCIP). RUHS-BH was awarded two rounds of funding. On February 7, 2023 (M.O. 3.23) the Board approved the acceptance of BHCIP Round 3 grant funds in the amount of \$75,954,578 and BHCIP Round 4 grant funds in the amount of \$4,523,681 to increase capacity in the County's Continuum of Care by building a Wellness Village to serve as a full-service Behavioral Health Campus that provides a safe, monitored, and

therapeutic community and living space while simultaneously delivering high quality, personfirst, mental health and Substance Use Disorder (SUD) treatment.

The Wellness Village Project would be developed in a partnership with a nonprofit corporation formed to assist the County with design, development, construction, installation, furnishing and equipping of the campus. The County will enter into a ground lease and facilities lease with the nonprofit entity to allow for project construction, as a public leaseback pursuant to California Government Code section 54241. The nonprofit will seek issuance of tax-exempt bonds to finance the Project construction. The County's rent payments will be used to pay debt service on the bonds. The financing and other proposed financial terms are currently being negotiated.

Project Components

The proposed Mead Valley Wellness Village (Project) will develop the site with an integrated behavioral health campus serving Riverside County residents. The Project will consist of five buildings, associated living facilities for patients, 633 surface parking spaces, landscaping and walkways in a campus setting. The five buildings total approximately 450,361 square feet (s.f.). Overall, the proposed roject would develop the Project site with approximately 522 beds. The buildings would range in height from one to four stories, and include the following components:

- 1. A Community Wellness and Education Center building (approx. 99,250 s.f.).
 - a. Outpatient Services for Mental Health & Substance Use Disorder and Primary Health Care – All individuals who are in the Recovery Residence and Supportive Housing Apartments will be encouraged to participate in integrated behavioral health and primary care outpatient services during their stay at the Wellness Village.
 - b. The campus will also include a recreation area, library and Peer Resource Center, vocational services, laundry facility, animal kennel and market. These amenities will be partially operated by residents of the Wellness Village to teach and promote social and employment skills.
- 2. A Children and Youth Services building (approx. 40,854 s.f.) including 24 beds associated with the children and youth services crisis residential program and 6 beds associated with the short-term residential therapeutic program.
 - a. Children's Crisis Residential Program A residential treatment facility providing inpatient crisis stabilization, medication monitoring, and evaluation to determine the need for the type and intensity of additional services for children and teens. The facility will include a separate kitchen, recreation center, and playground. Housing and support will be available for caregivers whose children are receiving treatment.
 - b. Short Term Residential Therapeutic Program A residential treatment facility providing inpatient crisis stabilization, medication monitoring, and evaluation for our hardest to place youth and most complex cases.

- c. Children's Outpatient Clinic Services to children with severe emotional and behavioral problems. Services include psychiatric evaluations, medication services, individual and family therapy, and case management services.
- 3. An Urgent Care Services building (approx. 50,989 s.f.) including 16 beds associated with the crisis residential program and 40 beds associated with the substance use disorder residential program. This building will also include 12 "non-bed" spots associated with adult mental health urgent care services, 12 spots associated with the children's mental health urgent care services, and 15 spots associated with the sobering center.
 - a. Adult and Children's Mental Health Urgent Care Urgent care for children, teens and adults struggling with urgent emotional and/or behavioral concerns that pose a risk to their safety, or the safety of others, or significantly impair their daily lives.
 - b. Substance Use Disorder Treatment –Services include inpatient, clinically managed residential programming with a goal to monitor patients as they safely withdraw from drugs and/or alcohol, while providing motivation for change so that ongoing recovery is possible. Link and provide consumers to services for care and potential step-down to Recovery Residence on site.
 - c. Sobering Center consisting of stations or chairs as a safe place for law enforcement and paramedics to bring individuals under the influence, instead of to an emergency department or criminal justice facility. Although the Sobering Center is not intended for long-term care, the center will work as a hub to connect consumers to appropriate treatment options within the campus.
 - d. Crisis Residential Treatment Program provides inpatient crisis stabilization, medication monitoring, and evaluation to determine the need for the type and intensity of additional services within a framework of peer support and trauma-informed approaches to recovery planning. The safe, accepting environment is intended/designed to nurture the individual's process of personal growth and is essential to individuals as they work through crises at their own pace. Clients will learn daily living skills and social development using a strength-based approach that supports recovery and wellness in homelike environments.
- 4. A Supportive Transitional Housing building (approx. 192,495 s.f.) for those receiving treatment, including 76 beds associated with the recovery residence and 220 beds associated with supportive housing.
 - a. Supportive Housing Apartment style homes in a community-like setting available in single, double and family units. Surrounding grounds will include playgrounds, barbeque areas and parklike settings. Outpatient services will be provided to assist homeless persons in transitioning from homelessness, and to promote the provision of supportive housing to enable homeless persons to live as independently as possible.

- b. Recovery Residences This community-like setting is for individuals with a substance use disorder (SUD) or a co-occurring disorder. Residents will receive outpatient SUD and/or recovery services on the campus site. Single, double and family units will be available
- An Extended Residential Care building (approx. 66,773 s.f.) for those receiving treatment, including 50 beds associated with mental health rehabilitation and 90 beds associated with adult residents.
 - a. Mental Health Rehabilitation Center (MHRC) Program provides inpatient intensive support and rehabilitative services designed to assist individuals with mental disorders who would have been placed in a state hospital or another mental health facility to develop skills to become self-sufficient and capable of increasing levels of independence and functioning. The current MHRC has rehabilitated and stepped down 40 individuals to a lower level of care or home with their families within the past year.
 - b. Adult Residential Facility Provides services to clients that are 18 years of age or older and are unable to live by themselves but who do not require 24-hour nursing care. The adult residential facility provides a room, meals, housekeeping, supervision, storage and distribution of medication, and personal care assistance with basic activities like hygiene, dressing, eating, bathing and transferring.

Economic Impact

RUHS-BH contracted with Beacon Economics to conduct an economic impact analysis of the Mead Valley Wellness Village. Findings determined that the total economic impact would result in construction expenditures over a 2.5-year period of \$603.1 million, of which \$388.6 million will be generated in Supervisorial District I, where the Wellness Village is located; \$109.4 million will be generated in rest of the Riverside County (outside of District I); and \$105.1 million will be generated in the state of California (outside of Riverside County). Construction of the Wellness Village will support 2,590 direct, indirect, and induced jobs in the state of California, generating \$161.8 million in labor income during a 2.5-year construction period. Total economic impact from RUHS Behavioral Health Wellness Village on-going operation expenditures will be \$78.2 million annually. Of which \$45.8 million will be generated in Supervisorial District I, where the Wellness Village is located; \$21.5 million will be generated in rest of the Riverside County (outside of District I); and \$10.9 million will be generated in the state of California (outside of Riverside County). Operations of the Wellness Village will support 820 direct, indirect, and induced jobs annually in the state of California, generating \$38.6 million in labor income annually.

Site Location

This campus will be built on a site that is comprised of approximately 20 acres of County-owned land in Mead Valley, an unincorporated area located west of the City of Perris. Upon future approval of a subdivision map for the site, an approximately 1.4-acre portion on the northern part of the site may be removed from the campus and reserved for other future County administrative uses. The County has jurisdiction over land use and planning review/approval for

the Project, including off-site improvements and egress. This site will serve a widespread population given the location in mid-County and proximity to freeway access.

As discussed in the Initial Study/Mitigated Negative Declaration (IS/MND) for the Project, the campus will not create any land use conflicts with existing and developing uses in the site vicinity. The IS/MND affirms that the Wellness Village Project will not physically divide any established community within the Mead Valley area. In addition, the IS/MND contains an extensive analysis of the Project's potential impacts due to a conflict with any applicable land use plan, policy, or regulation. Although the Project is not subject to the zoning and land use designations of the site, the design and operation of the Wellness Village Project as a mixed-use behavioral healthcare campus is consistent with the current Business Park (BP) land use designation. The Wellness Village Project consists of medical offices and supporting uses that are specifically allowed in the Manufacturing-Service Commercial (M-SC) zoning district.

The BHCIP statute also provides that BHCIP grant-funded projects are deemed consistent and in conformity with any applicable local plan, standard or requirement. Notwithstanding that exemption, the IS/MND provides a detailed analysis that compares the Wellness Village Project to applicable land use objectives and policies. IS/MND Table 4.11.A compares the Project to 102 County General Plan policies and objectives and concludes that no conflicts would occur. Notably, that table evaluates consistency with General Plan policy Land Use (LU) 7.2, which states that public facilities operated by the County are allowed in all land use designations except Open Space-Conservation or Open Space-Conservation Habitat. LU 30.5 further notes that community-oriented facilities are allowed in industrial districts, including the M-SC district. Table 4.11.B similarly compares the Project to 23 objectives and policies of the Mead Valley Area Plan, concluding that the Wellness Village Project will not create any land use conflicts.

With regard to the future development of industrial and logistics uses in the site vicinity, the Wellness Village Project will benefit from the County's Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. The County adopted the Good Neighbor Policy to protect residences and other sensitive land uses from the construction and operations of warehouse and logistics projects. The Good Neighbor Policy provides guidance for the development of new industrial facilities, including best management practices for the construction, site and design, operations, and community benefits. By adhering to these practices, the logistics uses being developed in the site vicinity will be able to minimize their potential adverse impacts on the Wellness Village campus.

RUHS-BH and the design team worked diligently to incorporate safety features ranging from site security to mitigation of any potential environmental impacts considering the surrounding industrial and logistic uses. The site design intentionally minimizes the impact of vehicular traffic surrounding the Wellness Village. Along both Placentia Avenue and Harvill Avenue, there are many features built in that buffer environmental effects of a busy road, including a more than 20-foot-wide equestrian trail system that includes a sidewalk, landscape buffer, trail, and additional landscape area to the property line. From the property line, all buildings are set back at least 25 feet, providing for even further landscape planting to buffer between the interior uses of the site

and the street. The site also contains a boundary wall as well as a 10-foot-wide, heavily vegetated landscape planter along the adjacent property to the west that is planned to be developed into another logistics use.

The nearly 20-acre site is currently vacant and supports only minimal vegetation. It will be redeveloped to incorporate significant plantings and tree cover, increasing carbon sequestration onsite. Plant selections will consist primarily of native and adapted species. The Project will be adding approximately 5.5 acres of proposed landscape area and close to 580 new trees within the Project's boundaries plus additional proposed landscape area in street improvements around the site, with close to 60 new street trees. The landscaping elements will deliver air quality benefits by the cooling effect of their shade and by removing certain pollutants and releasing oxygen into the environment. Trees reduce evaporative emissions from vehicles and other fuel storage. Alternative transportation will be supported onsite with the addition of a bus stop, as well as short-term and long-term bicycle accommodations. Although most people receiving treatment at the Wellness village do not drive to the site, for those who drive private vehicles to the site, 5% of parking spaces will be provided with EV charging stations, and an additional 15% of spaces will be EV ready.

The Project incorporates high levels of air filtration into the building through the use of high-efficiency MERV-13 filters on outside air delivery systems for each of the buildings that remove over 90% of all dust particles and even 75% of all small micron sizes particles that impact indoor air quality and the safety of the people within our buildings. Increasing the level of air filtration has many positive impacts of individuals safety and health while in the RUHS campus facilities including better physical health, less exposure to potentially harmful pathogens and pollutants. Consumers are also able to recuperate more quickly from ailments that they may have through a better indoor environment. The Project also implements advanced ventilation systems to ensure the frequent circulation of fresh air and the removal of indoor air pollutants. Additional safety information is referenced in Attachment D.

Environmental Review

To comply with the California Environmental Quality Act (CEQA), the County as the lead agency prepared an Initial Study/Mitigated Negative Declaration (IS/MND) to disclose and evaluate the Project's potential environmental impacts. Consistent with State CEQA Guidelines Section 15073 and in accordance with the County's local California Environmental Quality Act (CEQA) procedures, a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration was sent to responsible agencies and trustee agencies in addition to various public agencies, citizen groups, and interested individuals concerned with the Project. In addition, the NOI was filed with the Riverside County Clerk and the State Clearinghouse on January 11, 2024.

The Draft IS/MND was circulated for public review for a period of at least 30 days, from January 11, 2024, to February 12, 2024. Copies of the Draft IS/MND were made available for public review at the Riverside County Facilities Management office, the Mead Valley Library, and online on the County's website. Two comment letters were received during the public review period. One comment letter was received from a utility provider (SoCal Gas), and one comment

letter was received from a State agency (California Department of Fish and Wildlife – Inland Deserts Region). Although preparation of responses to comments on an IS/MND is not required, responses were prepared and included in the Final IS/MND. The Final IS/MND was posted to the County's website on March 7, 2024.

Amendment to Predevelopment Agreement

To date, PMB and its subcontractors have committed substantial resources on the design of the Wellness Village Project, for which 100% Construction Documents are complete currently with Facilities Management and Fire for permitting. Initially, the Project was anticipated to close financing during the first quarter of the 2024 calendar year, however this timeline was pushed slightly to the second quarter. As a result, PMB is requesting an amendment to the existing Pre-Development Agreement, to allow for value engineering-related design to achieve the Guaranteed Maximum Price budget, additional design-build consultants, to include archaeologist for coordination with the Pechanga Tribe, for BIM coordination and submittals to maintain the Project schedule and budget, finalization of offsite scopes of work and associated permitting, bidding and analysis of the site scopes as the documents advance through Construction Documents, and continued oversight and management of the Design-Build team. The requested increase of \$6.2 million does not increase the overall Project budget and the Pre-Development reimbursement would only occur if the County decided not to move forward with the proposed Wellness Village or if the Developer was unable to obtain financing for the Project. Any reimbursement to the Developer would be solely for actual proven costs expended and associated with the Project. Any potential reimbursement would be limited to a not to exceed amount of \$31,870,572.

TEFRA Hearing

A public hearing is required by the federal Tax Equity and Fiscal Responsibility Act of 1982 (TEFRA) for nonprofit borrowers that intend to issue tax-exempt debt. The TEFRA hearing provides the public an opportunity to comment on the use of tax-exempt bond proceeds to finance capital needs. A notice of the hearing was published prior to the hearing.

Pursuant to the plan of finance for the Project, one or more series of lease revenue bonds would be issued, from time to time, by the California Enterprise Development Authority (the "Issuer") in an aggregate principal amount not to exceed \$500,000,000 (the "Bonds"). The proceeds of the Bonds would be applied by P3 Riverside Holdings, LLC ("P3") for the purpose of (a) financing, refinancing and/or reimbursing the cost of the design, development, construction, installation, furnishing and equipping the Wellness Village Project (b) funding a debt service reserve fund for the Bonds, if any; and (c) paying capitalized interest, costs of issuance and other related transaction costs in connection with the issuance of the Bonds. The Facilities will be leased by P3 to the County pursuant to a facilities lease. P3's sole member is P3 Foundation Inc., a North Carolina nonprofit corporation and a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, which was formed for charitable purposes including, but not limited to, furthering community development, developing and expanding healthcare facilities and community buildings, and partnering with local government entities,

such as the County, to lessen the governmental burden inherent in the planning and development of public projects.

Ordinance

Pursuant to California Government Code section 54241, a public agency leaseback of land for financing purposes must be approved by ordinance. Ordinance No. 989 would approve the County's leaseback of the Wellness Village site to the nonprofit organization P3 Riverside Holdings, LLC for the financing of the Wellness Center Project, and would approve the issuance of tax-exempt bonds by the California Enterprise Development Authority for the financing of the Project. While payments of rent by the County will be used to pay debt service on the Bonds, the Bonds will not be an obligation of the County. Upon completion of negotiations of the Ground Lease and Facilities Lease for the Project, the County would consider approving and authorizing execution of the Ground Lease and the Facilities Lease. The final schedule of base rent payments due under the Facilities Lease shall be determined and added as an exhibit to the Facilities Lease upon the issuance and sale of the Bonds.

Reimbursement Resolution

The County has expended, and expects to expend in the future, certain funds for capital expenditures related to the Wellness Village Project. Certain County expenditures are eligible for reimbursement from the proceeds of the Bonds to be issued for the financing of the Project. Resolution No. 2024-074 declares the County's intent to participate in the bond financing and to receive the reimbursement of up to \$35,000,000 in costs from the Bond proceeds. Approval of the resolution is a requirement for the County's receipt of the reimbursement. At this point the County does not plan on a significant reimbursement but this action would preserve such an option.

Resolution No. 2024-073, Resolution No. 2024-074, Ordinance No. 989, and the Amendment to the Pre-Development Agreement have been approved as to form by County Counsel.

Impact on Residents and Businesses

The Wellness Village model will provide the County with the means to provide these needed services to some of the County's most vulnerable populations including children, families, veterans, and other individuals. The Wellness Village will provide the community with new health services and other resources to promote wellness. In addition, the Wellness Village will create approximately 600 professional jobs, generate economic growth in the Mead Valley community and help provide community amenities.

In addition, the Wellness Village will have a significant economic impact resulting in construction expenditures over a 2.5-year period of \$603.1 million, of which \$388.6 million will be generated in Supervisorial District I, where the Wellness Village is located; \$109.4 million will be generated in rest of the Riverside County (outside of District I); and \$105.1 million will be generated in the state of California (outside of Riverside County). Construction of the Wellness Village will support 2,590 direct, indirect, and induced jobs in the state of California, generating \$161.8 million in labor income during a 2.5-year construction period. Total economic impact from RUHS

Behavioral Health Wellness Village on-going operation expenditures will be \$78.2 million annually. Of which \$45.8 million will be generated in Supervisorial District I, where the Wellness Village is located; \$21.5 million will be generated in rest of the Riverside County (outside of District I); and \$10.9 million will be generated in the state of California (outside of Riverside County). Operations of the Wellness Village will support 820 direct, indirect, and induced jobs annually in the state of California, generating \$38.6 million in labor income annually.

<u>Additional Fiscal Information</u>

RUHS-BH will pay the lease payments by combining funding sources including Medi-Cal reimbursement, state general fund and local funds. RUHS-BH is not requesting any General Fund support at this time. Pre-Development reimbursement would only occur if the County decided not to move forward with the proposed Wellness Village or if the Developer was unable to obtain financing for the Project. Any reimbursement to the Developer would be solely for actual proven costs expended and associated with the Project. Any potential reimbursement would be limited to a not to exceed amount of \$31,870,572, payable from local funds.

ATTACHMENTS:

- 1. Resolution No. 2024-073
- Resolution No. 2024-074
- 3. Ordinance No. 989
- 4. Attachment "A" Amendment to Pre-Development Agreement
- 5. Attachment "B" TEFRA Notice
- 6. Attachment "C" Final Initial Study and Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program
- 7. Attachment "D" Wellness Village Safety Design
- 8. Attachment "E" Economic Impact Analysis

Jacqueline Ruiz
Sacqueline Ruiz
3/14/2024

Haron Gettis
Aaron Gettis
3/14/2024



ILED/POSTED

County of Riverside Peter Aldana Assessor-County Clerk-Recorder

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Notice of Determination

To:		From:	1 - 1 - A
Office of Planning and Rese	earch	Public	
For U.S Mail:	Street Address:	Agency:	Riverside County
P.O. Box 3044	1400 Tenth St.	Address:	3450 14th Street, 3rd Floor
Sacramento, CA 95812-3044	Sacramento, CA 95814		Riverside, CA 92501
		Contact:	Mike Sullivan
		Phone:	(951) 955-8009
□ County Clerk		Lead Agenc	y (if different from above):
Riverside Cou	•	A	DMD II.C
County of: (County Clerk		Applicant	PMB, LLC
Address: 2720 Gatewa	y Drive		
Riverside, Ca	A 92507		

SUBJECT: Filing of Notice of Determination in Compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse):

2024010232

Project Title:

RUHS-BH Mead Valley Wellness Village

Project Location:

The project site is located in unincorporated Riverside County on Assessor's Parcel Number (APN) 317-260-034-0. The project site is located approximately 0.3 mile west of Interstate 215 (I 215). The project site is bounded by Placentia Avenue to the north, Harvill Avenue to the east, Water Street to the south, and a small residential parcel and vacant land to the west.

Project Description:

The proposed project would develop the project site with the Riverside University Healthcare System (RUHS) Wellness Village, consisting of five buildings, associated living facilities for patients, 633 surface parking spaces, landscaping, and walkways set in a campus setting. The five buildings would range in size from one to four stories and would include: (1) an approximately 99,250-square-foot community wellness and education center; (2) an approximately 40,854 square feet for children and youth services, which will include 24 beds associated with the children and youth services crisis residential program and 6 bed associated with the short-term residential therapeutic program, for a total of 30 beds; (3) an approximately 50,989 square feet for urgent care services, including 16 beds associated with the crisis residential program and 40 beds associated the substance use disorder residential program, for a total of 56 beds. This building would also include 12 "non-bed" spots associated with adult mental health urgent care services, 12 spots associated with the children's mental health urgent care services, and 15 spots associated with the sobering center; (4) an approximately 192,495-square-foot supportive transitional housing building for those receiving treatment, including 76 beds associated with the recovery residence and 220 beds associated with supportive housing, for a total of 296 beds; and (5) an approximately 66,773-square-foot extended residential care building for those receiving treatment, including 50 beds associated with mental health rehabilitation and 90 beds associated with adult residents, for a total of 140 beds. The five buildings would total approximately 450,361 square feet. Overall, the proposed project would develop the project site with approximately 522 beds. Of the 522 beds, 442 are expected to be used by those staying longer than 30 days. The RUHS Wellness Village provides for an entire continuum of behavioral health and wellness care, from urgent mental health treatment to supportive housing, including outpatient care, education, and social services. Services provided would also include mental health residential services for children and adults and substance use disorder residential services for adults.

In addition to the RUHS Wellness Village, the proposed project includes potential buildout of a conceptual future building that would include up to 20,000 square feet of administrative/office uses on the project site independent from the RUHS Wellness Village. Construction of the future building is not being contemplated at this time, but the County anticipates the future building will be constructed in the near future; therefore, its development is reasonably foreseeable and evaluated in the Initial Study/Mitigated Negative Declaration at the project level, to the extent feasible.

The proposed project would include off-site improvements to existing Eastern Municipal Water District (EMWD) sewer infrastructure located within improved rights of way, with one segment within an EMWD beneficial easement on private property. The existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines and connect to the existing 10-inch-diameter sewer line in West Frontage Road.

The proposed project also includes a Schedule J Tentative Map that proposes to subdivide the site into six (6) lots to facilitate financing or conveying title of separate components of the proposed project.

This is to advise that the	Riverside County Board of Supervisors approved the above project on
	□ Lead agency or □ Responsible Agency

3/19/24 (Date) and has made the following determinations regarding the above described project:

The project □ will ☒ will not have a significant effect on the environment.

□ An Environmental Impact Report and Addendum was prepared for this project pursuant to the provisions of CEQA.
 ☑ A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.

3. Mitigation measures \(\subseteq \text{were } \subseteq \text{were not made a condition of the approval of the project.} \)

4. A Mitigation reporting or monitoring plan

was □ was not adopted for this project.

5. A statement of Overriding Considerations □was ☒ was not adopted for this project.

This is to certify that the Final Initial Study with comments and responses and record of project approval, and/or the Mitigated Negative Declaration, is available to the General Public at:

County of Riverside
Facilities Management-Mike Sullivan
3450 14th Street, Suite 303,
Riverside, CA 92501 (951) 955-8009
msullivan@rivco.org

Mead Valley Library 21580 Oakwood Street Mead Valley, California 92571

Available online at: https://rivcofm.org/Environmental

Signature:

Millell

le: Senior Environmental Planner

Date: 3/

3/19/24

Date received for filing at OPR:

3/20/2024

Authority cited: Sections 21083, Public Resources Code. Reference Section 21000-21174, Public Resources Code.

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FORM APPROVED COUNTY COUNSEL

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RESOLUTION NO. 2024-073

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE RIVERSIDE COUNTY ADOPTING THE MITIGATED NEGATIVE DECLARATION AND A MITIGATION MONITORING AND REPORTING PROGRAM PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT FOR THE MEAD VALLEY WELLNESS VILLAGE PROJECT

WHEREAS, the County of Riverside, by and though its Riverside University Health System Behavioral Health Department ("County" or "RUHS-BH") is the lead agency in the development of the Mead Valley Wellness Village Project ("Project") within Riverside County and has allocated Quimby Fees from the Economic Development Agency to develop and construct the Project; and,

WHEREAS, the COUNTY served as the lead agency for the Project pursuant to the requirements of the California Environmental Quality Act ("CEQA"); and,

WHEREAS, the Project consists of approximately 450,000 square foot behavioral health facilities campus on an approximately 19.41-acre parcel of real property owned by the County located at the northwest corner of Harvill Avenue and Water Avenue, south of the City of Riverside and west of the city of Perris in the unincorporated Mead Valley area of the County that is currently identified as APN 317-260-034; and

WHEREAS, the County, as lead agency, prepared an Initial Study and a Mitigated Negative Declaration ("MND") to assess the potential environmental impacts associated with the proposed Project,

WHEREAS, the Initial Study and MND concluded that all impacts were either less than significant or could be reduced to a less than significant level with appropriate mitigation measures and/or regulatory compliance measures, and a Mitigation Monitoring and Reporting Program ("MMRP") was prepared for the Project; and

WHEREAS, the Initial Study and MND for the Project (State Clearinghouse Number 2024010232), including the Notice of Intent to Adopt a Mitigated Negative Declaration and MMRP, we made available

for a 30-day public review period commencing on January 11, 2024 and ending on February 12, 2024 and were posted on the Facility Management Department's website and made available for public review at the Mead Valley Library; and,

WHEREAS, the Final Initial Study and MND have been independently reviewed and reflects the independent judgment and analysis of the Board of Supervisors and are deemed adequate for the purposes of making decisions on the merits of the Project;

WHEREAS, all of the findings and conclusions made by the Board of Supervisors pursuant to this resolution are based upon the oral and written evidence presented to it as a whole and not based solely on the information provided in this resolution; and

WHEREAS, all procedures of CEQA have been met and all other legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, BE IT RESOLVED, DETERMINED AND ORDERED THAT the Board of Supervisors of the County of Riverside assembled in regular session on March 19, 2024, in the meeting room of the Board of Supervisors located on the 1st floor of the County Administrative Center, 4080 Lemon Street, Riverside, California, at or after 9:00 a.m., based upon the evidence and testimony presented on the matter, both written and oral, including the Mitigated Negative Declaration, as it relates to the Project, does hereby make the following findings and resolutions:

SECTION 1. Incorporation of Recitals. The above recitations constitute findings of the Board of Supervisors are incorporated herein.

SECTION 2. CEQA Actions

(a) Consideration of the Mitigated Negative Declaration and Adoption of Findings Regarding CEQA Compliance. As the decision-making body for the County, and in the County's role as the lead agency under CEQA, County has received, reviewed, and considered the information contained in the Initial Study and Mitigated Negative Declaration for the Mead Valley Wellness Village Project, including all comment letters, and other related documents. The Initial Study/Mitigated Negative Declaration and associated Mitigation Monitoring and Reporting Program were prepared, processed, and noticed in accordance with the California Environmental

Quality Act (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.). The County finds that, as to those potential environmental impacts within County powers and authorities as lead agency, that the Initial Study and Mitigated Negative Declaration for the Project contains a complete, objective, and accurate reporting of those potential impacts and reflects the independent judgment and analysis of the County.

- (b) CEQA Findings on Environmental Impacts. The County finds that the mitigation measures imposed on the Project are sufficient to reduce all potential significant physical environmental impacts caused by the construction or operation of the Project to a level of less than significant.
- (c) Adoption of Mitigation Monitoring and Reporting Program. The Mitigation Monitoring and Reporting Program is designed to ensure compliance during Project implementation in that changes to the Project and/or mitigation measures have been incorporated into the Project and are fully enforceable through permit conditions, agreements or other measures as required by Public Resources Code Section 21081.6 and therefore the Board of Supervisors hereby approves and adopts the Mitigation Monitoring and Reporting Program as it relates to the Project.

SECTION 3. Adoption of the MND and Approval of the Project. Therefore, based on the entire record, the Board of Supervisors for the County of Riverside hereby **ADOPTS** the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program for the Project, concluding that on the basis of the whole record and with mitigation measures implemented, there is substantial evidence that the Project will not cause significant environmental impacts and **APPROVES** the Project.

BE IT FURTHER RESOLVED, DETERMIEND AND ORDERED that the Board of Supervisors hereby direct staff to file a Notice of Determination with the Riverside County Clerk and also with the Governor's Office of Planning and Research within five (5) working days of the approval of the Project.

BE IT FURTHER RESOLVED, DETERMINED AND ORDERED that the documents and

1	materials th	at constitute the recor	rd of proceedings	on which these	e findings a	re based are lo	cated at the
2	offices of th	ne RHUS- BH locate	at the County of l	Riverside Facil	ities Manag	ement located a	at 3450 14 th
3	Street, River	rside, California.					
4	21 (28) 21						
5	ř.						
6	ROLL CAI	LL:					
7	Ayes:	Jeffries, Washington	on, Spiegel, and G	utierrez			
8	Nays:	None					
10	Absent:	Perez					
11	e pe la						
12		ing is certified to be a son the date therein se		olution duly add	opted by said	l Board of	
13	57.	Y A. RECTOR, Clerk					
14	Ma	Man 1					
15	By: V	ity /	- P - 1				
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FORM APPROVED COUNTY COUNSEL BY RRISTINE BELL-VALDEZ

RESOLUTION NO. 2024-074

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY
OF RIVERSIDE DECLARING AN OFFICIAL INTENT TO REIMBURSE
ITSELF FROM THE PROCEEDS OF A LEASE REVENUE BOND
FINANCING FOR CAPITAL EXPENDITURES AND PROVIDING
CERTAIN OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the County of Riverside (the "County") has determined that it is in the public interest to facilitate the design, development, construction, installation, furnishing and equipping of an approximately 450,000 square foot behavioral health facilities campus and related improvements, including parking lots, off-site improvements and other facilities (collectively, the "Facilities"), on an approximately 19.41 acre parcel of real property owned by the County, located at the northwest corner of Harvill Avenue and Water Avenue, south of the City of Riverside and west of the City of Perris, in the unincorporated Mead Valley area of the County, and currently identified as APN 317-260-034 (the "Land"); and

WHEREAS, P3 Riverside Holdings, LLC, a California limited liability company ("P3"), whose sole member is P3 Foundation Inc., a North Carolina nonprofit corporation and a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended (the "Code"), has agreed to undertake the design, development, construction, installation, furnishing and equipping of the Facilities (the "Project") and to lease the Facilities to the County pursuant to the terms of a facilities lease agreement (the "Facilities Lease"); and

WHEREAS, the County will lease the Land to P3 pursuant to the terms of a ground lease agreement to facilitate the Project; and

WHEREAS, pursuant to the provisions of the Joint Exercise of Powers Act, comprising Articles 1, 2, 3 and 4 of Chapter 5 of Division 7 of Title 1 (commencing with Section 6500) of

03/19/2024 19.1

the Government Code of the State of California (the "Act"), the cities of Eureka, Lancaster and Selma (the "Members") entered into a joint exercise of powers agreement (the "Agreement") pursuant to which the California Enterprise Development Authority (the "Authority") was organized, for the purpose of promoting economic and community development, and in order to exercise any powers common to the Members and associate members, including the issuance of bonds, notes or other evidences of indebtedness; and

WHEREAS, the County is an associate member of the Authority; and

WHEREAS, the Authority is authorized to issue and sell revenue bonds for the purpose, among others, of financing or refinancing the construction of public capital projects; and

WHEREAS, P3 has requested that the Authority participate in the issuance, from time to time, pursuant to a plan of finance, of its lease revenue bonds for the purpose of (a) financing the cost of designing, developing, constructing, installing, furnishing and equipping the Facilities; (b) funding a debt service reserve fund for the Bonds, as defined below, if necessary; and (c) paying capitalized interest, costs of issuance and other related transaction costs in connection with the issuance of the Bonds; and

WHEREAS, to provide such financing for the Project, the Authority proposes to issue its lease revenue bonds in an aggregate original principal amount of not to exceed \$500,000,000 (the "Bonds") under the provisions of Act, including Article 4 (commencing with Section 6584) of Act, which are proposed to be payable from lease payments to be paid by the County pursuant to the Facilities Lease; and

WHEREAS, the County has expended, and reasonably expects to expend in the future, certain funds for capital expenditures related to the Project; and

WHEREAS, the County currently intends and reasonably expects to participate in a lease revenue bond financing to finance the Project, including an amount of not to exceed \$35,000,000

for reimbursing the County for capital expenditures made by the County for the Project prior to the date when funds for the Project are available from the issuance and sale of the Bonds by the Authority; and

WHEREAS, except for expenditures covered by 26 C.F.R. § 1.150-2(f), the initial expenditure of funds of the County for the Project for which the County desires reimbursement occurred on a date that is within 60 days prior to the date hereof but before the issuance of the Bonds; and

WHEREAS, the reimbursement allocation shall occur within 18 months of either the date that the County first expended funds for the Project or the date that the Project is placed in service, whichever is later (but in no event more than three years after the date of the original expenditure of the County's funds for the Project); and

WHEREAS, the Board of Supervisors of the County hereby desires to declare its official intent, pursuant to 26 C.F.R. § 1.150-2, to reimburse the County for the expenditure of the County's funds for the Project from the proceeds of the Bonds;

NOW THEREFORE, BE IT RESOLVED, DETERMINED AND ORDERED by the Board of Supervisors of the County of Riverside as follows:

Section 1. Dates of Capital Expenditures. All of the capital expenditures covered by this Resolution were or will be made not earlier than 60 days prior to the date of this Resolution.

Section 2. Declaration of Official Intent. The County presently intends and reasonably expects to participate in a lease revenue bond financing within 18 months of either the date of the first expenditure of funds by the County for the Project or the date that the Project is placed in service, whichever is later (but in no event more than three years after the date of the original expenditure of the County's funds for the Project), and to allocate an amount not to exceed

\$35,000,000 of the proceeds thereof to reimburse the County for its expenditures in connection with the Project.

<u>Section 3.</u> <u>Resolution Number</u>. This is the first resolution of the County declaring its intent to reimburse itself for the Project from proceeds of the Bonds.

Section 4. Confirmation of Prior Acts. All prior actions of the officials, employees and agents of the County that are in conformity with the purpose and intent of this Resolution and in furtherance of the Project shall be and the same hereby are in all respects ratified, approved and confirmed.

Section 5. <u>Effective Date of Resolution</u>. This Resolution shall take effect immediately upon its adoption.

- 1		
1	THE FOR	REGOING RESOLUTION is approved and adopted by the Board of Supervisors
2	of the County of	Riverside this March 19, 2024, by the following vote:
3	ROLL CALI	J:
5	Ayes:	Jeffries, Washington, Spiegel, and Gutierrez
6	Noes:	None
7	Absent:	Perez
8		Juck Wat
9		Chuck Washington, Chair (Board of Supervisors
10		
11	ATTEST:	
12	Kimberly Rector Clerk of the Boar	
13		
14	D. Mamu	1.
15	Deputy	
16	100	
17		
18		
19		
20	The foregoing	is certified to be a true copy of a resolution duly adopted by said Board of
21	Supervisors on	the date therein set forth.
22	KIMDEDIA	A. RECTOR, Clerk of said Board
23	KINIDEKLY F	1. RECTOR, CICIK Of Salu Board
24	By: Naom	W. A
25	Deputy	A M.
26		
27		

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SECOND AMENDMENT, AMENDMENT OF PRE-DEVELOPMENT AGREEMENT

THIS AMENDMENTAMENDMENTOF PRE-DEVELOPMENT AGREEMENT (this "<u>Amendment</u>") is made as of the <u>March 19, 2024</u> (the "<u>Effective Date</u>"), by and between The COUNTY OF RIVERSIDE, a political subdivision of the State of California ("County") PMB MEAD VALLEY LLC, a Delaware limited liability company ("<u>PMB Mead Valley</u>"), PMB Mead Valley and County are cumulatively referred to herein as the "Parties").

RECITALS

- A. PMB Mead Valley's predecessor in interest, PMB LLC, a California limited liability company ("PMB") and County are parties to that certain Pre-Development Agreement, dated as of August 2, 2022 (the "Agreement"), pursuant to which PMB agreed to perform certain pre-development activities with respect to the development of a behavioral health facility (the "Project") on certain real property located in the County of Riverside, California, as more particularly described in the Agreement (the "Pre-Development Activities"). All capitalized terms used, but not defined, in this Amendment shall have the meaning set forth in the Agreement.
- B. The Agreement provides that County will (subject to the terms, conditions and limitations of the Agreement) reimburse PMB for Pre-Development Costs incurred by PMB for the Pre-Development Activities under the Agreement in the event the County does not move forward with the Project.
- C. PMB has caused to be formed PMB Mead Valley, a wholly owned subsidiary of PMB, for the purposes of obtaining financing from Morgan Stanley to fund the Pre-Development Costs incurred in performance of the Pre-Development Activities (the "Financing").
- D. In the Amendment, Acknowledgement and Assignment and Assumption of Predevelopment Agreement dated as of July 11, 2023, between PMB, the County, and PMB Mead Valley, PMB assigned to PMB Mead Valley, and the County approved the assignment of, the rights and obligations of PMB under the Agreement (the "Amendment").
- E. Due to a delay in the closing of the Financing until the second quarter of 2024, the Parties desire to allow for PMB Mead Valley's continued work related to the Project under the Agreement, including engaging and coordination of (i) consultants for value engineering-related design to achieve the Guaranteed Maximum Price budget, for BIM coordination and submittals to maintain the Project schedule and budget, finalization of offsite scopes of work and associated permitting, bidding and analysis of the site scopes as the documents advance through construction documents, and continued oversight and management of the design-build team, and (ii) an archaeologist for coordination with the Pechanga Tribe.
- F. In consideration of the additional services described in Paragraph E. above, the Parties further intend to increase the Pre-Development Costs (as defined in the Agreement) by an

amount equal to Six Million Two Hundred Thousand Dollars (\$6,200,000.00) for a total maximum Pre-Development Cost of Thirty-One Million Eight Hundred Seventy Thousand Five Hundred Seventy-Two Dollars (\$31,870,572.00).

- G. Pursuant to the Action of the Board of Supervisors of the County of Riverside, State of California, effective July 7, 2023, Item (ID #22410); 3.48 Item 3.23 (ID #19862) approving the Agreement ("Action"), the Behavioral Health Director, or designee, has the authority to execute amendments to the Agreement in the form approved by County Counsel that do not change the substantive terms of the Agreement.
- H. The Parties now desire to further amend the Agreement to increase the approved Pre-Development Costs incurred prior to the date of this Amendment, to increase the maximum Pre-Development Costs under the Agreement, and make certain other changes set forth below.

NOW, THEREFORE, in consideration of the foregoing recitals, and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

- 1. <u>Recitals</u>. The above recitals are hereby incorporated as if fully set forth herein.
- Pre-Development Services and Pre-Development Costs. References in the Agreement, as amended, to "Pre-Development Services" and "pre-development services" are hereby amended to include the services described in Paragraph E. above. The County hereby represents and warrants to PMB Mead Valley that the Pre-Development Services performed prior to the date of this Amendment with respect to the Project in the total amount of \$18,926,725.50, are valuable to and benefit the County, constitute Predevelopment Services as defined in the Agreement, have been approved by County in accordance with Section 2 of the Agreement and are continued to be deemed approved by County, shall be deemed "Pre-Development Costs" as defined in Section 3 of the Agreement ("Updated Approved Reimbursement Amounts"), and shall be reimbursed to PMB Mead Valley as provided in Sections 3, 6 and 7 of the Agreement. Any demand made in writing by PMB Mead Valley for reimbursement of all or a portion of the Updated Approved Reimbursement Amounts shall be paid by the County within sixty (60) days after demand therefor without setoff in accordance with the procedures set forth in Section 7 of the Agreement. Furthermore, any and all Predevelopment Services performed upon and after the date of this Amendment which have obtained the prior written approval of County pursuant to Section 2 of the Agreement are also valuable to and benefit the County, shall also constitute Predevelopment Services as defined in the Agreement, the cost of which shall be deemed "Pre-Development Costs" as defined in Section 3 of the Agreement, and shall be reimbursed to PMB Mead Valley in accordance with Sections 3, 6, 7 and 8 of the Agreement. Neither PMB nor PMB Mead Valley shall be deemed to have waived its rights, and expressly is not waiving its rights, with respect to the Approved Reimbursement Amounts and the right to require performance by the County of any provision of the Agreement, including Section 6, and such failure to insist on performance by the County of any provision or terms or conditions of the Agreement shall not be construed as a waiver

of the foregoing, and in no way affects the right to require such performance at any time hereafter.

- 3. <u>Maximum Cost</u>. Section 8 of the Agreement is hereby amended to delete the reference to "twenty-five million six hundred seventy thousand dollars (\$25,670,000.00)" and replace it with the reference to "thirty-one million eight hundred seventy thousand five hundred seventy-two dollars (\$31,870,572.00).
- 4. <u>Counterparts</u>. This Amendment may be executed in any number of counterparts, each of which when so executed and delivered shall be an original, but all of which shall together constitute one and the same instrument.
- 5. Governing Law. This Amendment shall be governed by the laws of the State of California.
- Severability; Survival. If any term or provision of this Amendment is determined to be 6. invalid, illegal, or unenforceable, or is determined to render the application of, or coordination with, this Amendment and the Agreement invalid or illegal, by any court of competent jurisdiction, such term or provision shall be severed from this Amendment and shall not affect the continuing validity of the Agreement, which Agreement shall remain in full force and effect, or affect any other term or provision of this Amendment or the remaining provisions of the Amendment's application of, or coordination with, the Agreement, and, further, any such term or provision shall not presumptively be deemed to be invalid, illegal, or unenforceable in any other jurisdiction; provided, however, on such determination(s) described above, prior to severing such term or provision from this Amendment, the Parties to this Amendment shall negotiate in good faith to modify or replace such term or provision, or a court of competent jurisdiction shall reasonably modify or replace such term or provision, so as to effect the original intent of the Parties as closely as possible in a mutually acceptable or reasonable manner in order that the transactions contemplated may hereby be consummated as originally contemplated to the greatest extent possible. In the event of a challenge to this Amendment, the Agreement or the Project contemplated by the Agreement, the Parties, to the extent permitted by law, shall in good faith cooperate with each other, with no obligation to expend any sums, to maintain the viability of the Project and mitigate (a) any impact to the development of the Project as provided for in, and contemplated by, in the Agreement, and (b) any conflict with this Amendment and/or the Agreement, or frustration of the intent or purpose of this Amendment and/or the Agreement. The provisions of Sections 3, 4, 6, 8, 9, and 15 of this Amendment shall survive any termination or invalidation of this Amendment.
- 7. Continuing Rights. Except as amended by this Amendment, the Agreement shall continue unmodified and in full force and effect. Except as expressly provided in this Amendment, nothing in this Amendment shall reduce, diminish or otherwise limit the Parties' continuing rights under the Agreement (collectively, the "Continuing Rights"). The Continuing Rights shall include, without limitation, (a) PMB Mead Valley's rights under Section 6 of the Agreement to terminate the Agreement if County fails to provide written assurance that it is proceeding with the Project (as defined therein) within thirty (30) days after written request therefor by PMB Mead Valley, and PMB Mead Valley reasonably believes that County has abandoned the Project, as provided in Section 6 of the Agreement, and (b) PMB Mead Valley's rights under Section 7 of the Agreement

to receive reimbursement of Predevelopment Costs upon termination of the Agreement in accordance with and subject to the requirements of Section 7 of the Agreement and in the amount set forth in Section 8 of this Amendment. The Parties expressly agree that each Party shall maintain the Continuing Rights under the Agreement notwithstanding anything to the contrary. All terms not separately defined herein shall have the meanings as defined in the Agreement.

8. <u>Cumulative Remedies.</u> All rights and remedies provided herein and in the Agreement are cumulative and not exclusive, and the exercise by any Party of any right or remedy does not preclude the exercise of any other rights or remedies that may now or subsequently be available at law, in equity, by statute, in any other agreement between the Parties, or otherwise.

[Signatures appear on following pages.]

IN WITNESS WHEREOF, this Amendment has been executed on the date and year first above written.

PMB MEAD VALLEY:				
PMB Mead Valley LLC, a Delaware limited liability company				
By: PMB Mead Valley Intermediary LLC, its Man				
	PMB LLC, a California limited liability company, its Manager			
	By:			

[Signatures continue on following page.]

COUNTY:

COUNTY OF RIVERSIDE,
a political subdivision of the State of California
By: Juck Wat
Name: Chuck Washington
Title: Chair, Board of Supervisors
Date: March 19 , 2024
ATTEST:
Kimberly Rector
Clerk of the Board
By: Marmy Li
Deputy /
APPROVED AS TO FORM:
County Counsel
By: XMV
Name: Kristine Bell-Valdez
Title: Deputy County COunsel
Date: March 13 , 2024

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THE PRESS-ENTERPRISE

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3512 14 Street Riverside, California 92501 (951) 368-9229 neller@scng.com

> County of Riverside - Clerk of the Board PO Box 1147 Riverside, California 92502

Account Number:

5209148

Ad Order Number:

0011654532

Customer's Reference/PO Number:

Publication:

The Press-Enterprise

Publication Dates:

03/12/2024

Total Amount:

\$546.02

Payment Amount:

\$0.00

Amount Due:

\$546.02

Notice ID:

gela86n8IDvwSTkEgEny

Invoice Text:

NOTICE OF PUBLIC HEARING WITH RESPECT TO THE ISSUANCE OF LEASE REVENUE BONDS BY THE CALIFORNIA ENTERPRISE DEVELOPMENT AUTHORITY IN AN AGGREGATE AMOUNT NOT TO EXCEED \$500.000.000 FOR THE PURPOSE OF FINANCING, REFINANCING AND/OR REIMBURSING THE COST OF DESIGN, DEVELOPMENT, CONSTRUCTION, INSTALLATION, FURNISHING AND EQUIPPING OF PUBLIC FACILITIES BY P3 RIVERSIDE HOLDINGS, LLC FOR THE BENEFIT OF THE COUNTY OF RIVERSIDE NOTICE IS HEREBY GIVEN that at 9:30 a.m., or as soon thereafter as the matter may be heard, on March 19, 2024, at 4080 Lemon Street, First Floor, Board Chambers, Riverside, California, 92501, the Board of Supervisors of the County of Riverside (the "Board") will conduct a public hearing (the "Public Hearing") at which the Board will hear and consider information concerning the issuance, from time to time, pursuant to a plan of finance, of one or more series of lease revenue bonds by the California Enterprise Development Authority (the "Issuer") in an aggregate principal amount not to exceed \$500,000,000 (the "Bonds"). The proceeds of the Bonds will be applied by P3 Riverside Holdings, LLC, a California limited liability company ("P3") for the purpose of (a) financing, refinancing and/or reimbursing the cost of the design, development, construction, installation, furnishing and equipping of an approximately 450,000 square foot behavioral health facilities campus and related improvements, including parking lots, off-site improvements and other facilities on an approximately 19.41 acre parcel of real property owned by the County of Riverside (the "County"), located at the northwest corner of Harvill Avenue and Water Avenue, south of the City of Riverside

THE PRESS-ENTERPRISE

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The Press-Enterprise 3512 14 Street Riverside, California 92501 (951) 368-9229

County of Riverside - Clerk of the Board PO Box 1147 Riverside, California 92502

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011654532

FILE NO. 0011654532

PROOF OF PUBLICATION

I am a citizen of the United States. I am over the age of eighteen years and not party to or interested in the aboveentitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper of general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case-Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

03/12/2024

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Date: March 12, 2024. At: Riverside, California

Signature

NOTICE OF PUBLIC HEARING WITH RESPECT TO THE ISSUANCE OF LEASE REVENUE BONDS BY THE CALIFORNIA ENTERPRISE DEVELOPMENT AUTHORITY IN AN AGGREGATE AMOUNT NOT TO EXCEED S500,000,000 FOR THE PURPOSE OF FINANCING, REFINANCING AND/OR REIMBURSING THE COST OF DESIGN, DEVELOPMENT, CONSTRUCTION, INSTALLATION, FURNISHING AND EQUIPPING OF PUBLIC FACILITIES BY P3 RIVERSIDE HOLDINGS, LLC FOR THE BENEFIT OF THE COUNTY OF RIVERSIDE

NOTICE IS HEREBY GIVEN that at 9:30 a.m., or as soon thereafter as the matter may be heard, on March 19, 2024, at 4080 Lemon Street, First Floor, Board Chambers, Riverside, California, 92501, the Board of Supervisors of the County of Riverside (the "Board") will conduct a public hearing (the "Public Hearing") at which the Board will hear and consider information concerning the Issuance, from time to time, pursuant to a plan of finance, of one or more series of lease revenue bonds by the California Enterprise Development Authority (the "Issuer") in an aggregate principal amount not to exceed \$500,000,000,000 (the "Bonds"). aggregate principal amount not to exceed \$500,000,000 (the "Bonds"). The proceeds of the Bonds will be applied by P3 Riverside Holdings, LLC, a California limited liability company ("P3") for the purpose of (a) financing, refinancing and/or reimbursing the cost of the design, development, construction, installation, furnishing and equipping of an approximately 450,000 square foot behavioral health facilities campus and related improvements, including parking lots, off-site improvements and other facilities on an approximately 19.41 acre parcel of real property owned by the County of Diversible of the Woorld of County of County of Diversible of the Woorld of County of Co approximately 19.41 acre parcel of real property owned by the County' of Riverside (the "County"), located at the northwest corner of Harvill Avenue and Water Avenue, south of the City of Riverside and west of the City of Perris, in the unincorporated Mead Valley area of the Riverside County, California, and currently identified as APN 317-260-034 (the "Facilities"); (b) funding a debt service reserve fund for the Bonds, if any; and (c) paying capitalized interest, costs of Issuance and other related paying capitalized interest, costs of Issuance and other related transaction costs in connection with the Issuance of the Bonds. The Facilities will be leased by P3 to the County pursuant to a facilities lease. P3's sole member is P3 Foundation Inc., a North Carolina nonprofit corporation and a tax-exempt charitable organization under Section 501 (c) of the Internal Revenue organization under Section 501 (c) (3) of the Internal Revenue Code of 1986, as amended, which was formed for charitable purposes including, but not ilmited to, furthering community development, developing and expanding healthcare facilities and community buildings, and partnering with local government entitles, such as the County, to lessen the governmental burden inherent in the planning and Inherent in the planning and

development of public projects.

development of public prolects.

The Public Hearing is intended to comply with the public approval requirements of Section 147(f) of the Internal Revenue Code of 1986, as amended, and the public hearing requirement of Article 4 (commencing with Section 6584) of Chapter 5 of Division 7 of Title 1 of the Government Code of the State of California. Interested persons wishing to express their views on the Issuance of the Bonds or on the nature and location of the Facilities proposed to be financed may attend the public hearing or, prior to the time of the hearing, submit written comments. Additional information concerning the above matter may be obtained from, and written comments should be addressed to: County of Riverside, Clerk of the Board of Supervisors, 4080 Lemon Street, 1st Floor, Riverside, California 92501, (951) 955-1069, Email: cob@rivco.org, or may be submitted at https://www.rivcocob.org/webcomments.

Accommodations under the Americans with Disabilities Act are available upon request. Requests must be made at least 72 hours prior to the meeting. Later requests will be accommodated to the extent feasible. Please call the Clerk of the Board of Supervisors office at (951) 955-1069, from 8:00 a.m. to 5:00 p.m., Monday through Friday.

Dated: March 7, 2024

Kimberly A. Rector, Clerk of the Board

7, 2024

By: Clindy Fernandez,
Clerk of the Board
Assistant
The Press-Enterprise
Published: 3/12/24

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ORDINANCE NO. 989

AN ORDINANCE OF THE COUNTY OF RIVERSIDE AUTHORIZING A PUBLIC LEASEBACK TO FINANCE THE COSTS OF THE DESIGN, DEVELOPMENT, CONSTRUCTION, INSTALLATION, FURNISHING AND EQUIPPING OF A BEHAVIORAL HEALTH FACILITIES CAMPUS IN THE UNINCORPORATED MEAD VALLEY AREA OF THE COUNTY OF RIVERSIDE, CALIFORNIA

The Board of Supervisors of the County of Riverside ordains as follows:

Section 1. FINDINGS. The Board of Supervisors of the County of Riverside finds that:

- a. The County of Riverside (the "County") is the owner of an approximately 19.41 acre parcel of real property located at the northwest corner of Harvill Avenue and Water Avenue, south of the City of Riverside and west of the City of Perris, in the unincorporated Mead Valley area of Riverside County, California (the "Land").
- b. P3 Riverside Holdings, LLC ("P3"), the sole member of which is P3 Foundation Inc., a North Carolina nonprofit corporation, has been formed as a limited liability company for the purpose of assisting the County in the design, development, construction, installation, furnishing and equipping of a behavioral health facilities campus and related facilities on the Land (the "Project"), for use by the County.
- c. The County, as the owner of the land on which the Project will be constructed, will enter into a ground lease of the Land with P3 (the "Ground Lease").
- d. In order to finance the Project, P3 has requested that the California Enterprise Development Authority (the "Authority") issue tax-exempt bonds, to be designated as the "Lease Revenue Bonds (Riverside County Mead Valley Wellness Village Project), Series 2024" or similar designation in an aggregate principal amount to be determined (the "Bonds").
- e. P3 proposes to enter into a Facilities Lease Agreement (the "Facilities Lease") under which P3 will undertake the Project and lease the Leased Premises (as such term is defined in the Facilities Lease) to the County.

- f. Payments by the County of rent under the Facilities Lease will be used to pay debt service on the Bonds, but the Bonds will not in any way constitute an obligation or debt of the County.
- g. The Project is necessary to meet the County's needs for facilities to provide behavioral health services to residents of Riverside County.
- h. The County does not wish to undertake directly the governmental burden associated with the Project and has determined that the proposal by P3 is the most efficient means for managing the financing and construction of the Project.
- The transaction as proposed constitutes a public leaseback that the County wishes to approve in accordance with Section 54241 of the California Government Code.
- j. Environmental review pursuant to the California Environmental Quality Act ("CEQA"), Public Resources Code Section 21000, et seq., has been completed for the Project. The County will adopt a Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program concurrently with approval of this ordinance, finding that that there is no substantial evidence that the Project will have a significant effect on the environment.
- <u>Section 2</u>. PURPOSE. The purpose of this ordinance is to authorize a public leaseback to finance the costs of the Project in the unincorporated Mead Valley area of Riverside County.
- Section 3. AUTHORITY. This ordinance is adopted pursuant to California Government Code Section 54241.
- <u>Section 4</u>. AUTHORIZATION OF PUBLIC LEASEBACK. The public leaseback as set forth in this ordinance is authorized.
 - a. Upon completion of negotiations of the Ground Lease and Facilities Lease, the County shall consider approving and authorizing execution of the Ground Lease and the Facilities Lease. The final schedule of base rent payments due under the Facilities Lease shall be determined and added as an exhibit to the Facilities Lease upon the issuance and sale of the Bonds.
 - b. The County hereby requests that P3 lease the Land pursuant to the anticipated Ground Lease and undertake the Project, and thereby relieve the

County of the governmental burden thereof. The County hereby approves P3 solely for the purposes of approving the issuance by the Authority of the Bonds to finance the Project under applicable tax law. The Bonds shall not be an obligation of the County or any other agency or subdivision of the State of California, subject to entering into the Ground Lease and Facilities Lease. The County further agrees to accept title to the Project financed by the Bonds, including any additions to the Leased Premises, when the Bonds are discharged. At such time, title to the Project financed by the Bonds will be transferred to the County at no additional cost.

- c. To the extent necessary to meet the conditions of paragraph (d)(2) of United States Securities and Exchange Commission Rule 15c2-12, as applicable to a participating underwriter for the Bonds, the County is hereby authorized to enter into an undertaking in a form acceptable to the participating underwriter.
- d. All appropriate officers of the County are authorized to take any actions and to execute documents as in their judgment may be necessary or desirable in order to carry out the terms of, and complete the transactions contemplated by, this action. All acts taken and all approvals and agreements previously made pursuant to the authority of this action but prior to the effective date hereof are hereby ratified and confirmed.
- e. This ordinance shall be published before the expiration of fifteen (15) days after its passage and adoption pursuant to California Government Code Section 25124.

Section 5. SEVERABILITY. If any provision, clause, sentence or paragraph of this Ordinance or the application thereof to any person or circumstances shall be held invalid, such invalidity shall not affect the other provisions of this ordinance which can be given effect without the invalid provision or application, and to this end, the provisions of this ordinance are hereby declared to be severable.

1	Section 6. EFFECTIVE DATE. This ordinance shall take effect thirty (30) days after
2	its adoption.
3	BOARD OF SUPERVISORS OF THE COUNTY OF RIVERSIDE, STATE OF
4	CALIFORNIA
5	
6	By: Chuck Washington, Chair
7	
8	ATTEST:
9	KIMBERLY RECTOR
10	CLERK OF THE BOARD OF SUPERVISORS
11	The state of the s
12	By: Deputy
13	
14	APPROVED AS TO FORM:
15	County Counsel
16	March 13, 2024/
17 18	By:
19	Kristine Bell-Valdez Supervising Deputy County Counsel
20	
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22	
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1	STATE OF CALIFORNIA)	
2	COUNTY OF RIVERSIDE)	
3	I HEREBY CERTIFY that a	at a regular meeting of the Board of Supervisors of said county
4	held on March 19, 2024, the foreg following vote:	going ordinance consisting of 6 Sections was adopted by the
5	AYES:	
6	NAYS:	
7 8	ABSENT:	
9	DATE:, 2024	KIMBERLY RECTOR
10		CLERK OF THE BOARD OF SUPERVISORS
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12	seal	By: Deputy
13		Deputy
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NOTICE OF PUBLIC HEARING WITH RESPECT TO THE ISSUANCE OF LEASE REVENUE BONDS BY THE CALIFORNIA ENTERPRISE DEVELOPMENT AUTHORITY IN AN AGGREGATE AMOUNT NOT TO EXCEED \$500,000,000 FOR THE PURPOSE OF FINANCING, REFINANCING AND/OR REIMBURSING THE COST OF DESIGN, DEVELOPMENT, CONSTRUCTION, INSTALLATION, FURNISHING AND EQUIPPING OF PUBLIC FACILITIES BY P3 RIVERSIDE HOLDINGS, LLC FOR THE BENEFIT OF THE COUNTY OF RIVERSIDE

NOTICE IS HEREBY GIVEN that at 9:30 a.m., or as soon thereafter as the matter may be heard, on March 19, 2024, at 4080 Lemon Street, First Floor, Board Chambers, Riverside, California, 92501, the Board of Supervisors of the County of Riverside (the "Board") will conduct a public hearing (the "Public Hearing") at which the Board will hear and consider information concerning the issuance, from time to time, pursuant to a plan of finance, of one or more series of lease revenue bonds by the California Enterprise Development Authority (the "Issuer") in an aggregate principal amount not to exceed \$500,000,000 (the "Bonds"). The proceeds of the Bonds will be applied by P3 Riverside Holdings, LLC, a California limited liability company ("P3") for the purpose of (a) financing, refinancing and/or reimbursing the cost of the design, development, construction, installation, furnishing and equipping of an approximately 450,000 square foot behavioral health facilities campus and related improvements, including parking lots, off-site improvements and other facilities on an approximately 19.41 acre parcel of real property owned by the County of Riverside (the "County"), located at the northwest corner of Harvill Avenue and Water Avenue, south of the City of Riverside and west of the City of Perris, in the unincorporated Mead Valley area of the Riverside County, California, and currently identified as APN 317-260-034 (the "Facilities"); (b) funding a debt service reserve fund for the Bonds, if any; and (c) paying capitalized interest, costs of issuance and other related transaction costs in connection with the issuance of the Bonds. The Facilities will be leased by P3 to the County pursuant to a facilities lease. P3's sole member is P3 Foundation Inc., a North Carolina nonprofit corporation and a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, which was formed for charitable purposes including, but not limited to, furthering community development, developing and expanding healthcare facilities and community buildings, and partnering with local government entities, such as the County, to lessen the governmental burden inherent in the planning and development of public projects.

The Public Hearing is intended to comply with the public approval requirements of Section 147(f) of the Internal Revenue Code of 1986, as amended, and the public hearing requirement of Article 4 (commencing with Section 6584) of Chapter 5 of Division 7 of Title 1 of the Government Code of the State of California. Interested persons wishing to express their views on the issuance of the Bonds or on the nature and location of the Facilities proposed to be financed may attend the public hearing or, prior to the time of the hearing, submit written comments. Additional information concerning the above matter may be obtained from, and written comments should be addressed to: County of Riverside, Clerk of the Board of Supervisors, 4080 Lemon Street, 1st Floor, Riverside, California 92501, (951) 955-1069, Email: cob@rivco.org, or may be submitted at https://www.rivcocob.org/web-comments.

Accommodations under the Americans with Disabilities Act are available upon request. Requests must be made at least 72 hours prior to the meeting. Later requests will be accommodated to the extent feasible. Please call the Clerk of the Board of Supervisors office at (951) 955-1069, from 8:00 a.m. to 5:00 p.m., Monday through Friday.

Date: March ____, 2024 COUNTY OF RIVERSIDE

By: <u>/s/ Kimberly Rector</u>
Clerk of the Board of Supervisors

FINAL

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

MEAD VALLEY WELLNESS VILLAGE PROJECT UNINCORPORATED RIVERSIDE COUNTY, CALIFORNIA SCH# 2024010232



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FINAL

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

MEAD VALLEY WELLNESS VILLAGE PROJECT UNINCORPORATED RIVERSIDE COUNTY, CALIFORNIA SCH# 2024010232

Prepared by:

LSA 1500 Iowa Avenue, Suite 200 Riverside, California 92507 (951) 781-9310

Project No. PMB2201



BY KRISTINE BELL-VALDEZ

February 2024

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APPENDIX

A: DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION



LIST OF ABBREVIATIONS AND ACRONYMS

CDFW California Department of Fish and Wildlife

CEQA California Environmental Quality Act
CNDDB California Natural Diversity Database

County of Riverside

dBA A-weighted decibels

Developer PMB LLC

District San Bernardino Valley Water Conservation District (also SBVWCD)

IS/MND Initial Study/Mitigated Negative Declaration

MBTA Migratory Bird Treaty Act

MM Mitigation Measure

MMRP Mitigation Monitoring and Reporting Program

MSHCP Western Riverside County Multiple Species Habitat Conservation Plan

NCCP Natural Community Conservation Plan

NOD Notice of Determination

NOI Notice of Intent

PRC Public Resources Code

Project Riverside University Health System Mead Valley Wellness Village Project

RCM Regulatory Compliance Measure

RUHS Riverside University Health System

SoCalGas Southern California Gas Company



1.0 INTRODUCTION

This section comprises the comments and the responses to comments received on the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Riverside University Health System (RUHS) Mead Valley Wellness Village Project (proposed project) in unincorporated Riverside County, California. The purpose of this document is to respond to all comments received by the County of Riverside (County) regarding the environmental information and analyses contained in the IS/MND.

Consistent with *State CEQA Guidelines* Section 15073 and in accordance with the County's local California Environmental Quality Act (CEQA) procedures, a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration was sent to responsible agencies and trustee agencies in addition to various public agencies, citizen groups, and interested individuals concerned with the project. In addition, the NOI was filed with the Riverside County Clerk and the State Clearinghouse on January 11, 2024.

The Draft IS/MND was circulated for public review for a period of at least 30 days, from January 11, 2024, to February 12, 2024. Copies of the Draft IS/MND were made available for public review at the Riverside County Facilities Management office located at 3403 Tenth Street, Suite 400, Riverside, CA 92501 and online on the County's website at htps://rivcofm.org/Environmental. Two comment letters were received during the public review period. One comment letter was received from a utility provider and one comment letter was received from a State agency.

The County is the Lead Agency under CEQA and is required to consider agency and public comments on the IS/MND. Although preparation of responses to comments on an IS/MND is not required, responses have been prepared.

Table 1.A provides a list of the agencies and interested parties that commented on the IS/MND prior to the close of the public comment period. The comments received have been organized in a manner that facilitates a particular comment or set of comments. Each comment letter received is indexed with an alphanumeric code below.

Table 1.A: Comment Letter Index

Comment Code	Signatory	Date	
Interested Party			
I-1	Southern California Gas Company (SoCalGas)	January 26, 2024	
State Agency			
S-1	California Department of Fish and Wildlife (CDFW) Inland Deserts Region	February 9, 2024	

Responses focus on comments that pertain to the analysis in the Draft IS/MND or to other aspects pertinent to the potential effects of the proposed project on the environment pursuant to CEQA. Comments that address topics beyond the purview of the Draft IS/MND or CEQA are noted as such. Where comments have triggered changes to the Draft IS/MND, these clarifications appear as part of the specific response and are consolidated in Chapter 3.0, Errata, to the Draft IS/MND, where they are listed in the order that the clarifying text would appear in the Draft IS/MND document.



1.1 FORMAT OF RESPONSE TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment letter index numbers are provided in the upper right-hand corner of each comment letter, and individual comments within each letter are numbered along the right-hand margin of each letter. The County's responses to each comment letter immediately follow the letter and are referenced by index numbers in the margins.



2.0 RESPONSE TO COMMENTS

2.1 INTERESTED PARTIES

Comment I-1

From: Liao, William <WLiao@socalgas.com>
Sent: Friday, January 26, 2024 10:14 AM
To: Sullivan, Michael <MSullivan@rivco.org>

Cc: Wildey, Paul L. < PWildey@socalgas.com>; Leone-Wesolowski, Becky E < BLeone-Wesolowski@socalgas.com>

Subject: RE: Riverside University Healthcare System Mead Valley Wellness Village Project

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

Hi Michael.

I received a packet via interoffice mail regarding the Riverside University Healthcare System Mead Valley Wellness Village Project.

A quick review shows that we have a medium pressure gas main within the right-of-way of Harvill Avenue. Please help us ensure everyone's safety and make sure Developer contacts USA / DigAlert prior to any excavation activities so we can get out to Locate & Mark.

If Developer requires gas service for the project, please have them reach out to our Builder Services team to begin the application process, at https://www.socalgas.com/for-your-business/builder-services

Please let me know if you have any questions.

Sincerely,

Will Liao

Region Planning Supervisor Redlands HQ / Southeast Region Mobile: 840-213-5899 1-1-4



2.1.1 I-1 Southern California Gas Company (SoCalGas)

Letter Code: I-1

Commenter: Will Liao, Region Planning Supervisor, Southeast Region

Date: January 26, 2024

Response to Comment I-1-1

This comment is introductory and indicates that SoCalGas has received the Draft IS/MND prepared for the proposed project.

The County acknowledges this comment. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

Response to Comment I-1-2

This comment states there is a medium pressure gas main within the Harvill Avenue right-of-way and requests that the project developer contact USA/DigAlert prior to any excavation activities so that Southern California Gas Company (SoCalGas) can locate and mark the gas main.

The County acknowledges this comment. Prior to any excavation activities, the Developer shall contact USA/DigAlert in order to locate and mark the gas main located in the Harvill Avenue right-of-way. The identification of this gas main does not constitute significant new information and does not change the conclusions of the environmental analysis contained in the Draft IS/MND, including the analysis presented in Section 4.19, Utilities and Service Systems. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

Response to Comment I-1-3

This comment states that if the proposed project will require gas service, the project developer shall contact the SoCalGas Builder Services team to begin the application process.

The County acknowledges this comment. Because the proposed project would require natural gas service as discussed in Section 4.19.1, Utilities and Service Systems, of the Draft IS/MND, the Developer shall coordinate with the SoCalGas Builder Services team regarding natural gas service at the project site. As discussed in Section 4.19, Utilities and Service Systems, of the Draft IS/MND, operation of the proposed project would increase annual natural gas consumption in the SoCalGas service area and Riverside County by less than 0.01 percent and less than 0.1 percent, respectively. Consequently, the proposed project's anticipated natural gas usage would be negligible (less than 1 percent) compared to Riverside County's current natural gas usage, and impacts associated with an increase in natural gas usage at the project site would be less than significant. Given that the comment does not raise any specific environmental issues nor specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.



Response to Comment I-1-4

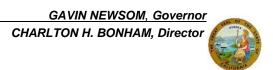
This comment provides concluding remarks and indicates that SoCalGas is available to answer any questions.

The County acknowledges this comment. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

2.2 STATE AGENCIES



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



February 9, 2024

Michael Sullivan Senior Environmental Planner County of Riverside 3450 14th Street Riverside, CA 92501 msullivan@rivco.org

Subject: Draft Mitigated Negative Declaration, Riverside University Health System Mead Valley Wellness Village Project, State Clearinghouse No. 2024010232, County of Riverside

Dear Michael Sullivan:

The California Department of Fish and Wildlife (CDFW) received a Mitigated Negative Declaration (MND) from the County of Riverside (County), as the Project Applicant/Proponent, for the Riverside University Health System Mead Valley Wellness Village Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

S-1-1

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

CDFW ROLE

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

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

Michael Sullivan County of Riverside February 9, 2024 Page 2 of 22

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

S-1-2 cont.

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as per Section 2800, et seq., of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. CDFW is providing the following comments as they relate to the Project's consistency with the MSHCP and CEQA.

PROJECT DESCRIPTION AND SUMMARY

Description: The County of Riverside (County; Lead Agency), on behalf of PMB, LLC (the Project Applicant), are proposing the Riverside University Health System Mead Valley Wellness Village Project (Project). The proposed Project will consist of the construction and operation of five buildings that would total approximately 450,361 square feet, associated living facilities for patients, 633 surface parking spaces, landscaping, and walkways. The proposed project will include approximately 11,958 square feet of off-site landscaped area and 180,599 square feet of on-site landscaping (approximately 21 percent of the project site).

Site preparation will disturb approximately 20 acres, and grading activities would excavate and/or fill approximately 180 acres of material, resulting in approximately 6,000 cubic yards of cut material to export from the project site. The Project would interconnect to existing utility connections located within the surrounding street rights-of-way, including Placentia Avenue and Water Street.

Location: The Project site is located south of Placentia Avenue, west of Harvill Avenue, north of Water Street, and east of a small residential parcel and vacant land in unincorporated Riverside County, California, in Section 13, Township 4 South, Range 4 West, of the U.S. Geological Survey Perris 7.5", California topographic quadrangle map within Assessor Parcel Number 317-260-034.

The Project is located within Subunit 1 (Motte/Rimrock) of the Mead Valley Area Plan that forms the Proposed Noncontiguous Habitat Block 4 of Criteria Cell 2529 of the MSHCP.

Michael Sullivan County of Riverside February 9, 2024 Page 3 of 22

COMMENTS AND RECOMMENDATIONS

Based on the documents for review, CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

S-1-4

Specific Comments

Comment #1: Burrowing Owl

Issue: The Project may have a significant impact on burrowing owl (*Athene cunicularia*), a Species of Special Concern (SSC).

Specific impacts: Project construction and activities may result in injury or mortality of burrowing owl, disrupt natural burrowing owl breeding behavior, and reduce reproductive capacity. Also, the Project may impact breeding, wintering, and foraging habitat for the species. Habitat loss could result in local extirpation of the species and contribute to local, regional, and State-wide declines of burrowing owl.

Why impacts would occur: The MND and Appendix B identifies that the Project site was evaluated for burrowing owl habitat, and at least one potentially suitable burrow was found. Additional details (the survey dates, times, etc.) were provided regarding the burrowing owl habitat surveys mentioned within the MND. However, the MND states that "however, the one burrow detected during the survey contained no burrowing owl or their sign" but then states in the next sentence states that "no suitable burrowing owl burrows were observed during the focused surveys." CDFW recommends that the text in the MND be revised to clarify which of these statements is correct.

Burrowing owls could react to low level disturbances such as surveys, drive by, or minimal ground disturbance/excavation (Environment Canada 2009). The Project could generate noise and ground vibrations more consistent with medium to high level disturbance. Project construction would generate noise and ground vibrations during daytime and nighttime earthmoving activities, demolition, tunneling, spoils hauling, and operation of large machinery. These types of disturbances could result in burrowing owls abandoning active nests, potentially causing loss of eggs or developing young, and noise could cause birds to avoid suitable nesting habitat.

There is insufficient information provided to determine if the proposed avoidance and minimization measures will mitigate Project impacts below a level of significance. BIO-1 states that "passive relocation activities during the non-breeding season (September 1 through January 31) may be authorized in consultation with CDFW, which would include

Michael Sullivan County of Riverside February 9, 2024 Page 4 of 22

preparation, approval, and implementation of a Burrowing Owl Exclusion Plan in accordance with protocol described in the CDFW Staff Report on Burrowing Owl Mitigation". The CDFW Staff Report on Burrowing Owl Mitigation states that "exclusion in and of itself is not a take avoidance, minimization or mitigation method. Eviction of burrowing owls is a potentially significant impact under CEQA." (CDFW 2012), and the potential impacts to burrowing owl have yet to be mitigated to below a level of significance.

Evidence impact would be significant: Burrowing owl is an SSC, an SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2022b). CEQA provides protection not only for ESA and CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). In addition, migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.

In California, burrowing owls are in decline primarily because of habitat loss, as well as disease, predation, and drought. Burrowing owls require specific soil and microhabitat conditions, occur in few locations within a broad habitat category of grassland and some forms of agricultural land, require a relatively large home range to support their life history requirements, occur in relatively low numbers, and are semi-colonial.

Recommended Potentially Feasible Mitigation Measure(s):

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Mitigation Measure #1: To avoid take of active burrowing owl burrows (nests), CDFW requests the County include the following mitigation measures in the MND per below (edits are in strikethrough and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program."

MM-BIO 1: Burrowing Owl. Since suitable habitat is present, preconstruction survey for burrowing owl will be required within 30 days prior to any ground-disturbing activities to avoid take of burrowing owls and occupied burrowing owl nests (MSHCP Species Specific Objective 6). If survey results are negative for burrowing owls during the 30 day preconstruction survey, project activities can proceed.

If survey results are positive and burrowing owl is found within the project site, the project proponent will need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately. An experienced biologist will need to verify if any burrowing owls within the project site are breeding or wintering, and a nondisturbance buffer no less than 500 feet will be implemented and centered on the burrow(s) utilized. Burrowing owls should be allowed to leave the project site on their own accord if possible. Additional avoidance and minimization measures are not anticipated to be required by the wildlife resource agencies if non-disturbance buffers are maintained and burrowing owl are allowed to leave on their own accord. If burrowing owls cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) will need to be prepared and submitted to the CDFW and USFWS for approval prior to ground disturbing activities. Additionally, a Burrowing Owl Protection and Relocation Plan will need to be prepared detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Protection and Relocation Plan will need to be submitted to CDFW and USFWS for approval prior to initiating ground disturbance within the project site. The Burrowing Owl Plan shall describe proposed avoidance, monitoring, relocation, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed.

If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation

S-1-5 cont. Michael Sullivan County of Riverside February 9, 2024 Page 6 of 22

method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat consistent with the "Mitigation Impacts" section of the 2012 Staff Report and shall implement CDFW-approved mitigation prior to initiation of Project activities. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval. Take of active burrowing owl nests shall be avoided during the nesting season (March 1—August 31).

S-1-5 cont.

If burrowing owls are observed within the project site at any time during project activities, the wildlife agencies CDFW and USFWS shall be notified immediately, and a Burrowing Owl Plan will be prepared as described above. Additional avoidance and minimization measures could be required by the wildlife resource agencies during the notification/document review process (e.g., exclusionary buffers, monitoring, or implementation of appropriate mitigation strategy).

Comment #2: Nesting Bird

Issue: The Project may have a significant impact on nesting birds, including Species of Special Concern and fully protected species, that are subject to Fish and Game Code section 3513 and the Migratory Bird Treaty Act of 1918.

Specific impact: Project implementation could result in the loss of nesting and/or foraging habitat for passerine and raptor species from the removal of vegetation onsite.

Why impacts would occur: Project activities could result in temporary or long-term loss of suitable nesting and foraging habitats. Construction during the breeding season of nesting birds could potentially result in the incidental loss of breeding success or otherwise lead to nest abandonment. Noise from road use, generators, and heavy equipment may disrupt nesting bird mating calls or songs, which could impact reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009), and songbird abundance and density was significantly reduced in areas with high levels of noise (Bayne et al. 2008). Additionally, noise exceeding 70 dB(A) may affect feather and body growth of young birds (Kleist et al. 2018). In addition to construction activities, residential development and increased human presence in the Project site could contribute to nesting bird impacts.

The timing of the nesting season varies greatly depending on several factors, such as

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the bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). CDFW staff have observed that changing climate conditions may result in the nesting bird season occurring earlier and later in the year than historical nesting season dates. CDFW recommends the completion of nesting bird survey regardless of time of year to ensure compliance with all applicable laws pertaining to nesting and to avoid take of nests.

The duration of a pair to build a nest and incubate eggs varies considerably, therefore, CDFW recommends surveying for nesting behavior and/or nests and construction within three days prior to start of Project construction to ensure all nests on site are identified and to avoid take of nests. Without appropriate species-specific avoidance measures, biological construction monitoring may be ineffective for detecting nesting birds. This may result in take of nesting birds. Project ground-disturbing activities such as grading and grubbing may result in habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. In addition, the Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat.

Evidence impacts would be significant: It is the Project proponent's responsibility to avoid Take of all nesting birds. Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.). Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. These regulations apply anytime nests or eggs exist on the Project site.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To address the above issues and help the Project applicant avoid unlawfully taking of nesting birds, CDFW requests the County include the following mitigation measures in the MND per below (edits are in strikethrough and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program".

MM BIO-2: Nesting Bird Surveys. Project activities requiring ground disturbance, construction activities, removal and/or trimming of vegetation suitable for nesting birds shall occur outside of the general bird breeding season to the greatest extent feasible. In the event that vegetation removal To ensure Project activities (i.e., earthwork, clearing, and grubbing) take place during are avoided or minimized during the bird nesting season (i.e., February 1-August 31), a qualified biologist shall

S-1-6 cont. Michael Sullivan County of Riverside February 9, 2024 Page 8 of 22

conduct a nesting bird survey within 3 days prior to any construction activities beginning to ensure that birds are not engaged in active nesting within and around the project site. If construction is inactive for more than three days, an additional survey shall be conducted. The results of the pre-construction survey shall be documented by the qualified biologist and shall be provided to County. The Project Applicant shall adhere to the following:

- 1. Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
- 2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer based on their best professional judgement and experience (i.e., up to 500 feet depending on the circumstances and specific bird species) within which no construction activities or other disturbances are allowed to occur until after the birds have fledged from the nest or the nest is confirmed to no longer be active. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned. The Designated Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities

S-1-6 cont.

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(e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. The qualified biologist shall halt all construction activities within proximity to an active nest if it is determined that the activities are harassing the nest and may result in nest abandonment or take. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds. Work can resume within these avoidance areas when no other active nests are found. The results of the survey shall be documented and filed with the Environmental Permitting Department prior to construction.

S-1-6 cont.

Comment #3: Noise Pollution

Issue: Construction may result in substantial noise through road use, equipment, and other Project-related activities.

Specific Impacts: The proposed Project activities may result in a substantial amount of noise through road use, equipment, and other project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 dB (Barber et al. 2009).

Why Impact Would Occur: Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise can also affect predator prey relationships as many nocturnal animals such as bats and owls primarily use auditory cures (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011).

S-1-7

Evidence Impact Would Be Significant: Construction may result in substantial noise through road use, equipment, and other Project-related activities. The MND (Section 3.13) states construction noise would occur due to the use of equipment that includes a combination of trucks, power tools, rock drills, and Impact Pile Drivers that when combined can reach high levels, but includes no analysis of the impacts of construction noise on biological resources. The MND indicates noise levels have the potential to reach 77 to 91 dBA during the hours when construction is permitted, which exceeds exposure levels that may adversely affect wildlife species. CDFW is concerned about impacts to wildlife from noise generated during Project activities.

The Project is located within Subunit 1: Motte/Rimrock of the Mead Valley Area Plan that forms the Proposed Noncontiguous Habitat Block 4 of Criteria Cell 2529 of the MSHCP and is also adjacent to proposed conserved lands associated with the Motte /

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Rimrock Reserve the southwest. Per the MSHCP, wildlife adjacent to MSHCP Conservation Areas should not be subject to noise that would exceed residential noise standards. However, the MND only has the generic language from the MSHCP and does provide specific details on the types of measures that will be implemented to reduce noise impacts to the adjacent Conservation Area. CDFW recommends that MM BIO-XX is included to provide specific measures to address noise impacts from the development to reduce edge effects from noise on the adjacent Conservation area. These measures should establish existing noise levels in the Conservation Area and post-project monitoring to evaluate the noise levels in the Conservation Area during construction and after the Project is complete.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To address the above issues and help the Project applicant avoid impacts from noise, CDFW requests the County include the following mitigation measures in the MND per below (edits are in strikethrough and **bold**), and also included in Attachment 1"Mitigation Monitoring and Reporting Program".

MM BIO-XX: Prior to approval of the Final Design, a Noise plan shall be submitted to County of Riverside for review and approval. The Noise Plan shall identify noise generating land uses that may affect the MSHCP Conservation Area and shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. The Noise Plan shall include monitoring during construction and post-project to demonstrate noise levels in the Conservation Area do not exceed residential standards. If noise standards are exceeded, the Project Applicant is responsible for immediate implementation of remedial actions to reduce noise levels to acceptable levels.

Comment #4: Lighting and Light Pollution

Issue: Artificial lighting that does not conform to wildlife-friendly lighting guidelines often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife.

Specific Impacts: Artificial lighting and the resulting light pollution alter ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; and the detection of resources and natural enemies and navigation (Gatson et al. 2013). Many species use photoperiod cues for communication (e.g., bird song; Miller 2006), determining when to

S-1-7 cont.

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begin foraging (Stone et al. 2009), behavior thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004). Phototaxis, a phenomenon which results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004). Further, many of the effects of artificial nighttime lightning on population- or ecosystem-level processes are still poorly known.

Why Impact Would Occur: The MND identifies that light and glare from interior and exterior building lighting, safety and security lighting, and vehicular traffic accessing the site will occur once the site is in operation and would introduce a new source of light into the adjacent proposed Conservation Area. Nighttime lighting has the potential to indirectly affect wildlife use and activity in adjacent proposed Conservation Area. Shielded lighting will produce a glow, and with enough lights, may increase the ambient light level in the area at night. Species may be subject to increased predation from diurnal predators foraging for longer periods due to light from the adjacent development as well as increased visual acuity of nocturnal predators. The MND does not identify species that may be more vulnerable to increased predation from increased visibility and other impacts of adjacent lighting.

The MND identifies that the proposed Project would be developed in accordance with the MSHCP requirements and that must comply with the County's requirements that lighting be restricted to the Project site through shielding and directing light downward. However, the MND provides limited detail on shielded lighting and lacks specific, technical details on the type of lighting along the proposed Conservation Area boundary. The MND does not provide data on existing ambient lighting conditions and does not analyze the impacts of the lighting on the adjacent proposed Conservation Areas. The MND does not contain any measure that could be sufficient to offset the impacts of Project-related lighting on the Conservation Area. To ensure that any building, traffic, or parking area lighting would not significantly impact species within the proposed Conservation Area and would comply with MSHCP urban wildlife interface guidelines, recommend the Project is conditioned to provide a Lighting Plan that identifies existing ambient lighting conditions, analyzes the lighting impacts on the adjacent conservation area, and demonstrates that the proposed lighting plan will not significantly increase the lighting on the proposed Conservation Area.

Evidence Impact Would Be Significant: A significant source of artificial nighttime lighting with the potential to impact wildlife in adjacent conservation areas may come from lighting associated with the Project. Although the CEQA document indicates that all lightning will be shielded and directed away from wildlife areas, CDFW recommend that lightning analysis before Project construction and operations is needed to determine that existing lighting levels and to demonstrate that potential lightning impacts to wildlife using adjacent conserved area will be less than significant. To determine if artificial nighttime lighting associated with Project construction and operations will result in minimal to no increase from existing lighting levels to all areas of proposed Conservation Area, CDFW recommend that lighting and glare impacts are evaluated

S-1-8 cont.

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before, during, and after Project construction and operations. CDFW request the inclusion of the following new measures in the MND:

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To address the above issues and help the Project applicant avoid impacts from light and light pollution, CDFW requests the County include the following mitigation measures in the MND per below, and also included in Attachment 1"Mitigation Monitoring and Reporting Program".

MM BIO-XX: To reduce nighttime artificial lighting-related impacts to wildlife using conservation areas, the Project shall take lightning measurements before, during, and post construction operations to determine impacts of nighttime artificial lightning on adjacent conservation areas and the wildlife it supports. To protect wildlife using conserved areas, project construction and operations shall result in no net increase to preconstruction ambient night-time levels to all conservation areas. If light or glare impacts to conservation areas exceed this threshold, the Project shall make changes to their operations and/or adopt landscape shielding, dimming, lighting curfews or other appropriate measures that result in the Project causing minimal to no glare to all conserved.

S-1-8 cont.

Additional Recommendations

Weed Management Plan. A weed management plan should be developed for the Project site and implemented during the duration of this Project. On-going soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established. The Projects site should be monitored via mapping for new introductions and expansions of non-native weeds.

S-1-9

Mitigation and Monitoring Reporting Plan

CDFW recommends updating the MND's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [(Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the County in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The County is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with

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a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1). S-1-10 cont.

ENVIRONMENTAL DATA

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

S-1-11

ENVIRONMENTAL DOCUMENT FILING FEES

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

S-1-12

CONCLUSION

CDFW appreciates the opportunity to comment on the MND for the Riverside University Health System Mead Valley Wellness Village Project, State Clearinghouse No. 2024010232 to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. CDFW requests that the County of Riverside address CDFW's comments and concerns prior to adoption of the MND for the Project.

S-1-13

Questions regarding this letter or further coordination should be directed to Katrina Rehrer, Environmental Scientist, at katrina.rehrer@wildlife.ca.gov.

Sincerely,

Docusigned by:

kim Fruburn

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

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ec: California Department of Fish and Wildlife

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Santa Ana Regional Water Quality Control Board Claudia Tenorio Claudia.Tenorio@waterboards.ca.gov

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

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https://www.wrcca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf

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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

www.wildlife.ca.gov Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)				
Mitigation Measure (MM)		Timing	Responsible Party	
Burrowing Owl	MM-BIO 1: Burrowing Owl. Since suitable habitat is present, pre-construction survey for burrowing owl will be required within 30 days prior to any ground-disturbing activities to avoid take of burrowing owls and occupied burrowing owl nests (MSHCP Species Specific Objective 6). If survey results are negative for burrowing owls during the 30 day preconstruction survey, project activities can proceed. If survey results are positive and burrowing owl is found within the project site, the project proponent will need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately. An experienced biologist will need to verify if any burrowing owls within the project site are breeding or wintering, a Burrowing Owl Protection and Relocation Plan will be prepared detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Protection and Relocation Plan will need to be submitted to CDFW and USFWS for approval prior to initiating ground disturbance within the project site.	Prior to commencin g ground- or vegetation disturbing activities	Project Proponent	

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The Burrowing Owl Plan shall describe proposed avoidance, monitoring, relocation, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed.

If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat consistent with the "Mitigation Impacts" section of the 2012 Staff Report and shall implement CDFW-approved mitigation prior to initiation of Project activities. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

If burrowing owls are observed within the project site at any time during project activities, the CDFW and USFWS shall be

	notified immediately, and a Burrowing Owl Plan will be prepared as described above. MM BIO-2: Nesting Bird Surveys. Project activities		
Nesting Birds	requiring ground disturbance, construction activities, removal and/or trimming of vegetation suitable for nesting birds shall occur outside of the general bird breeding season to the greatest extent feasible. To ensure Project activities (i.e., earthwork, clearing, and grubbing) are avoided or minimized during the bird nesting season, a qualified biologist shall conduct a nesting bird survey within 3 days prior to any construction activities beginning to ensure that birds are not engaged in active nesting within and around the project site. If construction is inactive for more than three days, an additional survey shall be conducted. The results of the preconstruction survey shall be documented by the qualified biologist and shall be provided to County. The Project Applicant shall adhere to the following: 1. Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy	Prior to commencin g ground- or vegetation disturbing activities	Project Proponent

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of implemented avoidance and minimization measures.

2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer based on their best professional judgement and experience within which no construction activities or other disturbances are allowed to occur until after the birds have fledged from the nest or the nest is confirmed to no longer be active. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been

	unsuccessful or abandoned. The Designated Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. The qualified biologist shall halt all construction activities within proximity to an active nest if it is determined that the activities are harassing the nest and may result in nest abandonment or take. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds. Work can resume within these avoidance areas when no other active nests are found. The results of the survey shall be documented and filed with the Environmental Permitting Department prior to construction.		
Noise	MM BIO-XX: Prior to approval of the Final Design, a Noise plan shall be submitted to County of Riverside for review and approval. The Noise Plan shall identify noise generating land uses that may affect the MSHCP Conservation Area and shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. The Noise Plan shall include monitoring during construction and post-project to demonstrate noise levels in the Conservation Area do not exceed residential standards. If noise standards are exceeded, the Project	Prior to commencin g ground- or vegetation disturbing activities	Project Proponent

	Applicant is responsible for immediate implementation of remedial actions to reduce noise levels to acceptable levels.		
Lighting	MM BIO-XX: To reduce nighttime artificial lighting-related impacts to wildlife using conservation areas, the Project shall take lightning measurements before, during, and post construction operations to determine impacts of nighttime artificial lightning on adjacent conservation areas and the wildlife it supports. To protect wildlife using conserved areas, project construction and operations shall result in no net increase to pre-construction ambient night-time levels to all conservation areas. If light or glare impacts to conservation areas exceed this threshold, the Project shall make changes to their operations and/or adopt landscape shielding, dimming, lighting curfews or other appropriate measures that result in the Project causing minimal to no glare to all conserved.	Prior to commencin g ground- or vegetation disturbing activities	Project Proponent

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2.2.1 S-1 California Department of Fish and Wildlife (CDFW) Inland Deserts Region

Letter Code: S-1

Commenter: Kim Freeburn, Environmental Program Manager

Date: February 9, 2024

Response to Comment S-1-1

This comment indicates that the CDFW has received the Draft IS/MND and has provided comments and recommendations regarding project activities that may affect California fish and wildlife. In addition, comments have been provided regarding aspects of the proposed project that CDFW may be required to carry out or approve through the exercise of its own regulatory authority under the California Fish and Game Code.

The County acknowledges this comment. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

Response to Comment S-1-2

This comment details the CDFW's role as a Trustee Agency for fish and wildlife resources and as a Responsible Agency under CEQA. This comment also states that CDFW issued Natural Community Conservation Plan (NCCP) approval and take authorization in 2004 for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and is providing comments as they relate to the proposed project's consistency with the MSHCP and CEQA.

The County acknowledges this comment. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

Response to Comment S-1-3

This comment provides a summary of the proposed project and its location, and states that the project site is located within Subunit 1 (Motte/Rimrock) of the Mead Valley Area Plan that forms the Proposed Noncontiguous Habitat Block 4 of Criteria Cell 2529 of the MSHCP.

The County acknowledges this comment. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

Response to Comment S-1-4

This comment states that the CDFW has provided comments and recommendations to assist the County in adequately identifying, avoiding, and/or mitigating the proposed project's potential impacts on biological resources. The comment recommends that the measures and clarifying text provided in the subsequent comments be included in a science-based monitoring program containing adaptive management strategies as part of the proposed project's Mitigation, Monitoring and Reporting Program (MMRP).

The County acknowledges this comment and has provided responses to the specific comments and recommendations provided by the CDFW. Given that the comment does not raise any specific issues regarding the Draft IS/MND, or the analysis contained therein, no further response is necessary.

Response to Comment S-1-5

This comment requests clarifying text to the Draft IS/MND to clarify whether the project site includes suitable burrowing owl burrows. The comment also provides recommended clarifying text to the burrowing owl mitigation measure (Mitigation Measure [MM] BIO-1).

Recommended clarifying text suggested by this comment has been incorporated into Section 4.4.1.a of the Draft IS/MND. As clarified in Chapter 3.0, Errata, of this Final IS/MND, the one burrow detected on the project site during the focused burrowing owl survey contained no burrowing owl or their sign. Additionally, this burrow was deemed to be unsuitable habitat for burrowing owl due to its small diameter and the presence of overgrown vegetation during the time of the focused burrowing owl surveys. The text of MM BIO-1 has been amended to provide details regarding the components of a Burrowing Owl Protection and Relocation Plan if the pre-construction survey for burrowing owl results are positive and burrowing owl is found within the project site. Amendments to MM BIO-1 in response to this comment clarify specifics for the Burrowing Owl Plan and do not constitute significant new information, change the conclusions of the environmental analysis, or warrant recirculation of the Draft IS/MND. No further response is necessary.

Response to Comment S-1-6

This comment claims that the proposed project may have a significant impact on nesting and/or foraging habitat for passerine and raptor species and recommends that clarifying text be added to the nesting bird mitigation measure (MM BIO-2).

Section 4.4, Biological Resources, of the Draft IS/MND analyzes the proposed project's potential impact on nesting birds and provides that tree removal could result in a potentially significant impact if nesting birds are present. Acknowledging that nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA), the Draft IS/MND prescribes MM BIO-2, which requires that nesting bird surveys be completed prior to commencement of construction activities. Recommended clarifying text to MM BIO-2 suggested by this CDFW comment (including requiring additional nesting bird surveys if construction is temporarily halted on the project site, a nesting bird survey prior to the start of work despite the time of the year that construction occurs, and details regarding the pre-construction nesting bird surveys) has been incorporated into Section 4.4.1.d of the Draft IS/MND. Amendments to MM BIO-2 in response to this comment clarify specifics for the nesting bird surveys and do not constitute significant new information, change the conclusions of the environmental analysis, or warrant recirculation of the Draft IS/MND. No further response is necessary.

Response to Comment S-1-7

This comment claims that the proposed project may result in a substantial amount of anthropogenic noise through road use, equipment, and other project-related activities that could adversely affect wildlife species on the project site and in surrounding areas. The comment recommends inclusion of



a mitigation measure that requires preparation of a Noise Plan to ensure that consistency with the MSHCP is included in the Draft IS/MND.

The proposed project prepared a *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency and Biology Report*, incorporated as Appendix B of the Draft IS/MND, which determined consistency with the MSHCP. In addition, Section 4.13, Noise, of the Draft IS/MND analyzed project construction noise and determined that "while construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site sensitive uses west of the project [approximately 580 feet away] would be 69 dBA L_{eq}. These predicted noise levels would only occur when all construction equipment is operating simultaneously and would therefore be conservative in nature." Accordingly, estimated construction noise in the Motte/Rimrock Reserve to the southwest, which is approximately 1,300 feet away, would be less given the distance from the project site and less than the County's residential thresholds.

Clarifying text to Section 4.4.1.a of the Draft IS/MND reiterate the findings of the *Western Riverside County MSHCP Consistency and Biology Report* that indirect impacts, including noise, are not significant due to the existing disturbances currently ongoing in the project's vicinity and distance from MSHCP Conservation Areas. The Draft IS/MND was updated to clarify, amplify, and supplement the analysis to clarify that the project would have less than significant impacts on wildlife from construction and operational noise. Recommended clarifying text suggested by this comment, including the addition of a condition of approval as Regulatory Compliance Measure (RCM) BIO-1 requiring preparation of a Noise Plan, has been incorporated into Section 4.4.1.a of the Draft IS/MND. Additional revisions to Section 4.4.1.a of the Draft IS/MND includes a noise plan measure as a precaution and do not constitute significant new information, change the conclusions of the environmental analysis, or warrant recirculation of the Draft IS/MND. No further response is necessary.

Response to Comment S-1-8

This comment claims that lighting that does not conform to wildlife-friendly lighting guidelines may result in light pollution that could adversely affect fish and wildlife. This comment also recommends that the County clarify the Draft IS/MND analysis related to light pollution and include a mitigation measure to limit artificial lighting-related impacts to wildlife in conservation areas.

The Draft IS/MND identifies that the proposed project would be developed in accordance with the MSHCP requirements and that it must comply with the County's requirements that lighting be restricted to the project site through shielding and directing light downward. Clarifying text in Section 4.4.1.a of the Draft IS/MND reiterates the findings of the *Western Riverside County MSHCP Consistency and Biology Report* that indirect impacts, including lighting, are not significant due to the existing disturbances currently ongoing in the project's vicinity and distance from MSHCP Conservation Areas. The Draft IS/MND was updated to clarify, amplify, and supplement the analysis to clarify that the project would have less than significant impacts on wildlife from the addition of new sources of artificial light. Recommended clarifying text suggested by this comment, including the addition of a condition of approval as RCM BIO-2 to ensure that the proposed project stays consistent with the MSHCP requirement regarding lighting, has been incorporated into Section 4.4.1.a of the Draft IS/MND. Additional revisions to Section 4.4.1.a of the Draft IS/MND includes an

artificial lighting analysis measure as a precaution and do not constitute significant new information, change the conclusions of the environmental analysis, or warrant recirculation of the Draft IS/MND. No further response is necessary.

Response to Comment S-1-9

This comment recommends that a weed management plan be developed prior to project implementation and that it be maintained for the duration of the project.

The proposed project would be developed in compliance with the County of Riverside Guide to California Friendly Landscaping (General Plan Land Use Policy 18.1), which includes provisions for weed abatement and management. Recommended clarifying text suggested by this comment have been incorporated into Chapter 2.0, Project Description, of the Draft IS/MND and no further response is necessary.

Response to Comment S-1-10

This comment states that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments.

The County acknowledges this comment. If the project is approved, the County will adopt the Draft IS/MND and MMRP. Through approval by the Board of Supervisors, the mitigation measures will be enforceable as project requirements. Furthermore, the County will ensure this through adoption of conditions of approval for the project. Given that the comment does not raise any specific environmental issues regarding the Draft IS/MND, or the analysis contained therein, no further response is necessary.

Response to Comment S-1-11

This comment notes that special-status species and natural communities reporting is required under CEQA.

Although the comment does not raise any specific environmental issues regarding the Draft IS/MND, or the analysis contained therein, the special-status species and natural communities reporting to the California Natural Diversity Database (CNDDB) suggested by this comment have been incorporated into MM BIO-1 and MM BIO-2. No further response is necessary.

Response to Comment S-1-12

This comment claims that the project, as currently proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination (NOD) by the County and are required in order for the project approval to be operative, vested, and final.

As discussed above, the Draft IS/MND has been revised to incorporate the recommendations provided by the CDFW. The additional regulatory compliance measures (i.e., RCM BIO-1 and RCM BIO-2) do not address new or previously unidentified impacts, but instead provide better consistency with the MSHCP. Language in MM BIO-1 and MM BIO-2 has been clarified, and potential



impacts to burrowing owl and nesting birds would be less than significant with implementation of mitigation measures as detailed in the Draft IS/MND. Although the Draft IS/MND identified less than significant impacts associated with noise, lighting, and native habitat with implementation of the proposed project, RCM BIO-1 and RCM BIO-2 have been incorporated into the Draft IS/MND as a precaution. Potential impacts to biological resources through noise, lighting, and weed management would remain less than significant as detailed in the Draft IS/MND. In addition, the County would pay all applicable CDFW filing fees with the submittal of the NOD.

Response to Comment S-1-13

This comment provides concluding remarks and indicates that CDFW staff are available for further consultation regarding biological resources and strategies to minimize potential impacts. This comment also requests that the County address the CDFW's comments and concerns prior to adoption of the Draft IS/MND.

The County acknowledges this comment and has provided responses to the specific comments and recommendations provided by the CDFW, as discussed above. Given that the comment does not raise any specific environmental issues or specific questions about the analysis or information in the Draft IS/MND, no further response is necessary.

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3.0 ERRATA

This section of the Final IS/MND provides text changes to the Draft IS/MND that have been made to clarify, amplify, or make minor edits to the Draft IS/MND text for the proposed RUHS Mead Valley Wellness Village Project (proposed project). Such changes are a result of County staff-initiated updates as well as further review of and public comments related to the Draft IS/MND. The changes described in this section are minor changes that do not constitute significant new information, change the conclusions of the environmental analysis, or require recirculation of the document (*State CEQA Guidelines* Section 15073.5). The information presented in the Draft IS/MND and this document support this determination by the County.

Changes to the Draft IS/MND are indicated in this section under the appropriate Draft IS/MND section. Deletions are shown with strikethrough and additions are shown with underline. All figures are provided at the end of this chapter.

3.1 CHAPTER 2.0, PROJECT DESCRIPTION, SECTION 2.2.1.1 LANDSCAPING

As a result of regular discing, the vegetation on the project site consists of nonnative grassland. Two native California fan palm (*Washingtonia filifera*) trees were present within the project site. Additionally, several nonnative trees were observed within the project site (e.g., Peruvian pepper tree [*Schinus molle*], olive [*Olea europaea*], and Chinese elm [*Ulmus parvifolia*]). Dominant plant species include Russian thistle (*Salsola tragus*), common Mediterranean grass (*Schismus barbatus*), ripgut brome (*Bromus diandrus*), and London rocket (*Sisymbrium irio*). The existing trees are not designated as historic or landmark trees and would be removed with implementation of the project.

The proposed project would develop the site with four gardens, including a succulent garden, a butterfly/hummingbird garden, a meadow garden, and a shade/fern garden. An approximately 8-foot-tall concrete masonry unit (CMU) wall would be constructed along the western property line, and would include barrier trees and a 10-foot planter in order to add visual appeal. Overall, the proposed project would include approximately 11,958 square feet of off-site landscaped area and 180,599 square feet of on-site landscaping (approximately 21 percent of the project site). In addition, 62,023 square feet of the project site (at the location of the future 20,000-square-foot administrative/office building) would be irrigated and hydroseeded; however, this landscaped area would be removed with development of the future building and associated parking. All landscaping would be drought tolerant, and a weed management plan would be developed and implemented to ensure that nonnative weeds are prevented from becoming established during the duration of the project. Figure 2-4 depicts the conceptual landscape plan.

3.2 CHAPTER 2.0, PROJECT DESCRIPTION, SECTION 2.2.1.4, ROAD IMPROVEMENTS AND UTILITIES

The proposed project would include the half-width widening of the southern portion of Placentia Avenue, the northern portion of Water Street, and the western portion of Harvill Avenue along the project frontage, as shown on Figure 2-7. In addition, the proposed project would pave the existing southern portion of Water Street, which is currently unpaved, and perform necessary roadway maintenance on Harvill Avenue, including repaying and restriping the roadway. All roadway



improvements would occur within the project site or existing rights-of-way, which were previously disturbed during construction of the existing roadways, and would be in accordance with the Mead Valley Area Plan roadway designations. As such, the implementation of these improvements would not result in any new disturbance that may cause a significant environmental impact. The proposed project would also perform restriping of the northbound through left to northbound left through right at the intersection of the I-215 Northbound Ramps/Placentia Avenue and would optimize signal timing at this intersection as depicted on Figure 2-8 and discussed further in Section 4.17, Transportation. A new traffic signal would also be installed at the southeast intersection of Water Street and Harvill Avenue as part of a separate, adjacent project (i.e., Ares Project), as depicted on Figure 2-9. However, if the Ares Project fails to construct the traffic signal, then the traffic signal will be installed as part of the proposed project concurrent with the improvements to Water Street and Harvill Avenue.

The project would interconnect to existing utility connections located within the surrounding street rights-of-way, including Placentia Avenue and Water Street. Existing Eastern Municipal Water District (EMWD) sewer <u>and domestic water</u> infrastructure in the surrounding area does not have the capacity to serve the proposed project. As such, the proposed project would include off-site improvements to existing EMWD sewer <u>and domestic water</u> infrastructure. The existing 8-inch-diameter sewer lines in Placentia Avenue, Water Street, and along West Frontage Road between Placentia Avenue and Water Street would be replaced with 10-inch-diameter sewer lines and would connect to the existing 10-inch-diameter sewer line in West Frontage Road. <u>In addition, the existing 8-inch-diameter domestic water line in Placentia Avenue would be replaced with a 12-inch-diameter domestic water line along the project site's frontage.</u> The upgrades would occur predominantly within existing rights-of-way, with one segment <u>of the sewer line</u> within an EMWD beneficial easement on private property. These areas have been previously disturbed during construction of the existing pipelines and would not result in any new disturbance that may cause a significant environmental impact. Figure 2-6 2-5 depicts the on- and off-site utility improvements.

The project site would also receive run-on flows from a separate proposed project (i.e., Orden Project) located west of the project site. Both the run-on stormwater flows from the Orden Project and flows from the project site would be collected on the project site and discharged to a new 60-inch-diameter storm drain that is proposed as part of the Ares Project along the project site's frontage within the northern half of Water Street and the western half of Harvill Avenue to satisfy conditions of approval for the Ares Project. Figure 2-5 depicts the proposed on-site stormwater facilities, and Figure 2-10 provides an illustration of this storm drain improvement, which is being processed for approval by the Riverside County Flood Control District (IP 22057, PPT-220002, Perris Valley MDP Line H-10, Harvill Avenue from Water Street to Placentia Avenue). The Ares Project has indicated that it will construct this storm drain improvement in Spring 2024. However, if the Ares Project fails to construct this storm drain improvement, then the storm drain improvements will be completed as part of the proposed project concurrent with Water Street and Harvill Avenue improvements, and thus would not result in any new disturbance that may cause a significant environmental impact.



3.3 SECTION 4.4, BIOLOGICAL RESOURCES

Revisions to Section 4.4, Biological Resources, of the Draft IS/MND incorporate the recommended clarifying text and recommended measures provided by CDFW. The additional regulatory compliance measures (RCM BIO-1 and RCM BIO-2) and the revisions to existing mitigation measures (MM BIO-1 and MM BIO-2) do not address new or previously unidentified impacts, but instead provide better consistency with the Western Riverside MSHCP. Although the Draft IS/MND identified less than significant impacts associated with noise, lighting, and native habitat with implementation of the proposed project, the additional regulatory compliance measures are included as a precaution while revisions to the existing measures include clarifications and changes to species specific survey methods.

4.4.1.a. 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?

Less Than Significant with Mitigation Incorporated. As described in the MSHCP Consistency and Biology Report, the project site is currently undeveloped and highly disturbed due to discing. Based on historical aerial imagery, the project site was regularly mowed and/or disced for fire suppression and/or weed control from at least the late 1950s through the present.

As a result of regular discing, the vegetation on the project site consists of nonnative grassland. Two native California fan palm trees were present within the project site. Additionally, several nonnative trees were observed within the project site (e.g., Peruvian pepper tree, olive, and Chinese elm). Dominant plant species include Russian thistle (*Salsola tragus*), common Mediterranean grass (*Schismus barbatus*), ripgut brome (*Bromus diandrus*), and London rocket (*Sisymbrium irio*).

As described above, the project site does not contain any native habitat.

Despite this, it provides suitable habitat for burrowing owl (Athene cunicularia) in the form of sparse, ruderal vegetation. Burrowing owl is found in open, dry grasslands, agricultural and rangelands, and desert habitats often associated with burrowing animals. It can also inhabit grass, forb, and shrub stages of pinyon and ponderosa pine habitats. It nests in abandoned burrows of ground squirrels or other animals, in pipes, under piles of rock or debris, and in other similar features. In addition, the project site is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) survey area for burrowing owl. Focused burrowing owl surveys were conducted during the appropriate breeding season for this species (March 1-August 31). Four surveys were conducted from July 12 to August 4, 2023. The surveys were conducted by walking approximately 30-meter-wide transects throughout areas of suitable habitat to look for burrowing owls, potential burrows (burrows greater than 11 centimeters in diameter and 150 centimeters deep), and signs of burrowing owls. Burrows encountered during the survey were examined for owl sign (e.g., feathers, pellets, whitewash, and prey remnants). However, the one burrow detected during the survey contained no burrowing owl or their sign. Additionally, this burrow was deemed unsuitable habitat for burrowing owl due to its small diameter and the presence of overgrown vegetation during the time of the focused burrowing owl surveys. Therefore, no suitable burrowing



owl burrows were observed during the focused surveys. Even though the focused burrowing owl surveys indicated that the burrowing owl is currently absent from the site and habitat on the site is poor and isolated, there is a possibility that burrowing owl could visit the site from better habitat in the vicinity, or that conditions on the site could improve and burrowing owl could subsequently occupy the site. Therefore, impacts to burrowing owls could be significant without mitigation incorporated. As such, a measure requiring a preconstruction survey within 30 days prior to the beginning of project-related ground disturbance would ensure avoidance of any potential impact to burrowing owls. If burrowing owl is found during the preconstruction survey, the project proponent would need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately prior to initiating ground disturbance.

As specified in **Mitigation Measure (MM) BIO-1**, impacts will be avoided through pre-construction surveys and <u>preparation of a Burrowing Owl Protection and Relocation Plan</u> avoidance or relocation if active burrows are located. With implementation of **MM BIO-1**, impacts to burrowing owl would be reduced to a less than significant level, and no additional mitigation is required.

The project site is bounded by Placentia Avenue to the north and Harvill Avenue to the east. Vacant undeveloped lands are located to the east of Harvill Avenue, and to the west and south of the project site. These undeveloped lands appear to be regularly disced/mowed since at least the late 1950s to the present day. These areas are part of the MSHCP Criteria Cell 2529 and do not contain coastal sage scrub that would meet the conservation requirement for this cell. However, this area could provide habitat to wildlife species that could be impacted by anthropogenic noise generated during construction and operation.

As discussed in Section 4.13, Noise, while construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site sensitive uses west of the project would reach 69 dBA Leg. These predicted noise levels are conservative and would only occur if all construction equipment operates simultaneously, which is unlikely to occur. Although the noise generated by project construction activities would be higher than the ambient noise levels and may result in a temporary increase in the ambient noise levels, construction noise would stop once project construction is completed. Additionally, the project would be required to comply with the construction hours allowed under the County's Code of Ordinances and best construction practices. Best construction practices include: (a) limiting construction activities to between the hours of 6:00 a.m. and 6:00 p.m. during the months of June through September and between the hours of 6:00 a.m. and 7:00 p.m. during the months of October through May, pursuant to Sections 9.52.020(H) and 9.52.020(I) of the County's Code of Ordinances; (b) equipping all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards; (c) locating equipment staging in areas that will create the greatest distance between construction-related noise sources and the noise-sensitive receptors nearest the project site during all project construction; and (d) placing all stationary construction equipment so that the emitted noise is directed away from the sensitive receptors nearest the project site. The closest boundary of the Motte Rimrock Preserve is located more than 1,300 feet away from the project site. As provided in Table 3.13.D, Potential Construction Noise Impacts at the Nearest Receptor, construction noise at Motte Rimrock Reserve is expected to be 62 dBA Lea, which is less



than the FTA construction daytime noise level standard of 80 dBA L_{eq} and the County's Municipal Code residential use daytime and nighttime noise standard of 65 dBA L_{eq}.

Table 3.13.D: Potential Construction Noise Impacts at the Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L _{eq}) at 50 feet	Distance (feet)	Composite Noise Level (dBA L _{eq})
Residences (West)		580	69
Industrial (Southeast)		1,030	64
Residences (Southwest)	91	1,090	64
Industrial (Northeast)		1,090	64
Motte Rimrock Reserve		1,300	<u>62</u>

Source: Compiled by LSA (2023).

dBA = A-weighted decibels

Leq = equivalent continuous sound level

As further discussed in Section 4.13, Noise, operation of the project is not expected to exceed the County's Municipal Code residential use daytime and nighttime noise standards at the closest noise sensitive receptor, which is a vacant residence west of the project site. This is consistent with Section 6.1.4 of the MSHCP, which recommends that wildlife within the MSHCP Conservation Area not be exposed to noise exceeding residential noise standards. To ensure that construction and operations of the project remain consistent with the MSHCP guidelines pertaining to urban/wildlands interface, the County will include a condition of approval, as detailed in RCM BIO-1, that requires preparation of a Noise Plan prior to approval of final design of the project.

As noted in Section 11.8 of the Western Riverside County MSHCP Consistency and Biology Report prepared for the proposed project, indirect impacts to surrounding areas as a result of the project may include an increase in dust, noise, lighting, traffic, and stormwater runoff. Because the project is proposed for a landscape that is already highly disturbed or developed, substantial indirect impacts to sensitive biological resources are not anticipated. Additionally, substantial indirect impacts to Proposed Noncontiguous Habitat Block 4 of Criteria Cell 2529 of the MSHCP are not anticipated due to these areas occurring approximately 750 feet to the west of the project site.

The project would also introduce new sources of artificial lighting to the project site and surrounding area. As discussed in Section 4.11, Land Use and Planning, of the Draft IS/MND, the proposed project would comply with the standards in Riverside County Ordinance No. 655, which are intended to limit light leakage and spillage that may interfere with operations of the Mount Palomar Observatory. Interior lighting would be designed to prevent direct illumination beyond the building envelope, and all on-site exterior lighting would be shielded and aimed toward specific areas to prevent direct illumination beyond the project site. Low-level exterior lights would also be located along pathways and near buildings to serve security and wayfinding purposes, as well as to accent signage, architectural features, and landscaping features. The proposed lighting would have specialized optics and glare control to ensure compliance with regulations and guidelines, preventing adverse lighting impacts on neighboring properties. This is consistent with Section 6.1.4 of the MSHCP, which recommends that shielding be incorporated in project designs to ensure that



ambient lighting in the MSHCP Conservation Area is not increased. Additionally, the County will include a condition of approval **RCM BIO-2**, which ensures that the project stays consistent with MSHCP requirements.

MM BIO-1

Burrowing Owl. Since suitable habitat is present, a pre-construction survey for burrowing owl will be required within 30 days prior to any ground-disturbing activities to avoid take of burrowing owls and occupied burrowing owl nests (MSHCP Species Specific Objective 6). If survey results are negative for burrowing owls during the 30 day preconstruction survey, project activities can proceed.

If survey results are positive and burrowing owl is found within the project site, the project proponent shallwill need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately. An experienced biologist shall will need to verify if any burrowing owls within the project site are breeding or wintering, and a non-disturbance buffer no less than 500 feet will be implemented and centered on the burrow(s) utilized. Burrowing owls should be allowed to leave the project site on their own accord if possible. Additional avoidance and minimization measures are not anticipated to be required by the wildlife resource agencies if non-disturbance buffers are maintained and burrowing owl are allowed to leave on their own accord. If burrowing owls cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) will need to be prepared and submitted to the CDFW and USFWS for approval prior to ground-disturbing activities. Additionally, a Burrowing Owl Protection and Relocation Plan shall will need to be prepared detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Protection and Relocation Plan shall-will need to be submitted to the CDFW and USFWS for approval prior to initiating ground disturbance within the project site. The Burrowing Owl Protection and Relocation Plan shall describe proposed avoidance, monitoring, relocation, minimization, and/or mitigation actions. The Burrowing Owl Protection and Relocation Plan shall include the number and location of occupied burrowing owl sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed.

If impacts to occupied burrowing owl habitat or burrows cannot be avoided, the Burrowing Owl Protection and Relocation Plan shall also describe minimization and compensatory mitigation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated because exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. The Burrowing Owl Protection and Relocation Plan shall identify compensatory mitigation for the temporary or permanent loss of occupied burrow(s) and habitat consistent with the "Mitigation Impacts" section of the 2012 Staff Report and shall implement CDFW-approved mitigation prior to initiation of project activities. If



impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval. Take of active burrowing owl nests shall be avoided during the nesting season (March 1-August 31). If burrowing owls are observed within the project site at any time during project activities, the wildlife agencies CDFW and USFWS shall be notified immediately, and a Burrowing Owl Protection and Relocation Plan shall be prepared as described above. Additional avoidance and minimization measures could be required by the wildlife resource agencies during the notification/document review process (e.g., exclusionary buffers, monitoring, or implementation of appropriate mitigation strategy). Lastly, any special-status species and natural communities detected during project surveys must be reported to the California Natural Diversity Database (CNDDB).

RCM BIO-1

Noise Plan. Prior to the issuance of a grading permit, a Noise Plan shall be submitted to the Director of Riverside County Facilities Management, or designee, for review and approval. The Noise Plan shall identify noise-generating land uses (if any) that may affect the MSHCP Conservation Area and appropriate noise control measures 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 purposes of this mitigation measure, the MSHCP Conservation Area consists of Proposed Noncontiguous Habitat Block 4 beginning to the west of Tobacco Road and continues north, northwest, southwest, and south of MSHCP Criteria Area #2529. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. The Noise Plan shall include monitoring during construction and post-project to demonstrate that noise levels in the Conservation Area do not exceed residential standards. If noise standards are exceeded, the Project Applicant shall be responsible for immediate implementation of remedial actions to reduce noise levels to acceptable levels.

RCM BIO-2

Artificial Lighting. Prior to the issuance of a certificate of occupancy, a lighting plan shall be submitted to the Director of Riverside County Facilities Management, or designee, for review and approval. To reduce nighttime artificial lighting-related impacts to wildlife using conservation areas, the project shall take lighting measurements before, during, and after construction operations to determine impacts of nighttime artificial lightning on adjacent conservation areas and the wildlife it supports. For purposes of this mitigation measure, the MSHCP Conservation Area consists of Proposed Noncontiguous Habitat Block 4 beginning to the west of Tobacco Road and continuing north, northwest, southwest, and south of MSHCP Criteria Area #2529. To protect wildlife using conserved areas, project construction and operations shall result in no net increase to pre-construction



ambient night-time levels to all conservation areas. If light or glare impacts to conservation areas exceed this threshold, the project shall make changes to their operations and/or adopt landscape shielding, dimming, lighting curfews, or other appropriate measures that result in the project causing minimal to no glare to all conservation areas.

4.4.1.d. 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?

Less Than Significant with Mitigation Incorporated. As described in the MSHCP Consistency and Biology Report, the project site and surrounding area do not contain any open bodies of water that could support aquatic species. Due to the highly disturbed nature of the site and the surrounding area, it is unlikely that the project site functions as a wildlife linkage or migratory wildlife corridor. However, the few existing native and nonnative trees (California fan palm, Peruvian pepper tree, olive, and Chinese elm) on the project site may provide habitat suitable for nesting migratory birds. All of the existing on-site ornamental trees would be removed during construction. Therefore, project implementation has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. This tree removal could result in a potentially significant impact if nesting birds are present in the trees at the time of removal. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code [USC], Section 703 et seq., see also Title 50, Code of Federal Regulations [CFR], Part 10) and Section 3503 of the California Fish and Game Code. Therefore, implementation of the proposed project would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests. Project implementation must be accomplished in a manner that avoids impacts to active nests-during the breeding season. Therefore, if project construction occurs between February 1 and August 31, impacts to nesting birds may be significant if construction occurs when birds are nesting on the site. As such, a qualified biologist shall conduct a nesting bird survey prior to ground- and/or vegetationdisturbing activities to confirm the absence of nesting birds, regardless of the time of year that construction commences. As specified in MM BIO-2, avoidance of impacts would occur through a variety of means, including establishing suitable buffers around any active nests. With implementation of MM BIO-2, along with RCM BIO-1 and RCM BIO-2, impacts to nesting birds would be reduced to less than significant, and no additional mitigation is required.

MM BIO-2

Nesting Bird Surveys. Project activities requiring ground disturbance, construction activities, removal and/or trimming of vegetation suitable for nesting birds shall occur outside of the general bird breeding season to the greatest extent feasible. In the event that vegetation removal takes place To ensure project activities (i.e., earthwork, clearing, and grubbing) are avoided or minimized during the bird-nesting season (i.e., February 1–August 31), a qualified biologist shall conduct a nesting bird survey within 3 days prior to any construction activities beginning to ensure that birds are not engaged in active nesting within and around the project site. If construction is inactive for more than seven (7) consecutive days, an additional survey shall be conducted. The results of the pre-construction survey shall be



documented by the qualified biologist and shall be provided to the County. The Project Applicant shall adhere to the following:

- 1. Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.
- 2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of project activities. Surveys shall encompass all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the project site; density and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected are complete and accurate.

If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer based on their best professional judgement and experience (i.e., up to 500 feet depending on the circumstances and specific bird species) within which no construction activities or other disturbances are allowed to occur until after the birds have fledged from the nest. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned. The Designated Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage) to determine the efficacy of the buffer. The qualified biologist shall halt all construction activities within proximity to an active nest if it is determined that the activities are harassing the nest and may result in nest abandonment or take. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds. Work can resume within these avoidance areas when no other active nests are found. The results of the survey shall be documented and filed with the Environmental Permitting Department prior to construction. Additionally, any special-status species and natural communities detected during project surveys must be reported to the California Natural Diversity Database (CNDDB).



3.4 SECTION 4.10, HYDROLOGY AND WATER QUALITY

4.10.1.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, in a manner which would: (i) Result in substantial erosion or siltation on or off site; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?

Under existing conditions, stormwater from the project site sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (the northeast corner of the project site) where it enters storm drains that flow into the San Jacinto River, which discharges into Canyon Lake. Canyon Lake ultimately discharges into Lake Elsinore. With implementation of the proposed project, the project site would be divided into five drainage areas (i.e., DA 1 through DA 5) to manage stormwater runoff. The proposed project would also implement LID BMPs, including six bioretention basins on site, one modular wetland, and one underground detention basin. The five drainage areas are discussed below.

- DA 1 would manage stormwater runoff from the southwestern corner of the project site that includes the proposed Extended Residential Care building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 1 would be directed to the modular wetland located north of the Extended Residential Care building. Overflows from the modular wetland (stormwater runoff volume that exceeds the storage volume of the modular wetland) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.
- DA 2 would manage stormwater runoff from the western middle portion of the project site, between DA 1 and DA 3, which includes the Supportive Transitional Housing building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 2 would be directed to proposed inlets with storm filters and discharged into two of the six bioretention basins. Flows from the bioretention basins (stormwater runoff volume that exceeds the storage volume of the bioretention basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.
- DA 3 would manage stormwater runoff from the northwestern corner of the project site that includes the Urgent Care Services building. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 3 would be directed to proposed inlets with storm filters and discharged into three of the six bioretention basins. Flows from the bioretention basins (stormwater runoff volume that exceeds the storage volume of the bioretention basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

Personal communication with Kyle Koivuniemi, P.E. at Kimley-Horn on October 17, 2023.



- DA 4 would manage stormwater runoff from the southeastern portion of the project site that
 includes the Children and Youth Services building. Stormwater runoff from impervious areas
 (e.g., concrete, asphalt, and roofs) within DA 4 would be directed to proposed inlets with storm
 filters and discharged into two of the six bioretention basins. Flows from the bioretention basins
 (stormwater runoff volume that exceeds the storage volume of the bioretention basins) would
 be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in
 Placentia Avenue.
- DA 5 would manage stormwater runoff from the northeastern portion of the project site. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DA 5 would be directed to proposed inlets with storm filters and discharged into one of the six bioretention basins or the proposed underground detention basin. Flows from the bioretention basin and the underground detention basin (stormwater runoff volume that exceeds the storage volume of the basins) would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

The project site would also receive run-on flows from a separate proposed project (i.e., Orden Project) located west of the project site. Both the run-on stormwater flows from the Orden Project and flows from the project site would be collected on the project site and discharged to a new 60-inch-diameter storm drain that is proposed as part of the Ares Project in the Spring of 2024. Figure 2-10 provides an illustration of this storm drain improvement, which is being processed for approval by the Riverside County Flood Control District (IP 22057, PPT-220002, Perris Valley MDP Line H-10, Harvill Avenue from Water Street to Placentia Avenue). The 60-inch-diameter storm drain would be appropriately sized such that anticipated operational impacts from increased stormwater flows on the project site would not exceed existing conditions. These improvements would be located in the northern half of Water Street and western half of Harvill Avenue. However, if the Ares Project does not complete the storm drain work, the proposed project will complete the work concurrently with proposed improvements in Water Street and Harvill Avenue. These areas have been previously disturbed and would not result in any new disturbance that may cause a significant environmental impact.

The six bioretention basins, modular wetland, and underground detention basin within discharge areas DA 1 through DA 5 would be designed to store and infiltrate the entire DCV for the project site, including run-on flows from the Orden Project to the west, in accordance with the County's technical guidance for WQMPs. The DCV is the volume of stormwater runoff that requires capture and treatment by stormwater BMPs.

4.10.1.c.(iii) 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; or

Less Than Significant Impact.

Stormwater Drainage System Capacity. Stormwater at the project site would be directed to six onsite bioretention basins, a modular wetland, and an underground detention basin. The modular wetland, bioretention basins, and underground detention basin have been appropriately sized to



store and infiltrate the entire DCV for the project site, including run-on flows from the Orden Project to the west. Both the run-on stormwater flows from the Orden Project and flows from the project site would be collected on the project site and discharged to a new 60-inch-diameter storm drain that is proposed as part of the Ares Project in Spring 2024, but will be constructed as part of the proposed project if the Ares Project fails to complete the storm drain improvements. The 60-inch-diameter storm drain would be appropriately sized such that anticipated operational impacts from increased stormwater flows on the project site would not exceed existing conditions. In addition to addressing the rate and volume of stormwater runoff, the on-site bioretention basins, modular wetland, and underground detention basin would target and reduce pollutants of concern in stormwater runoff.

Therefore, the proposed project would not contribute to an exceedance of existing or planned stormwater drainage systems, and impacts would be **less than significant**. No mitigation is required.

Polluted Runoff. Implementation of BMPs to reduce pollutants of concern in stormwater runoff in compliance with the CGP, MS4 Permit, and applicable County ordinances, as detailed in **RCM HYD-1** through **RCM HYD-4**, would ensure that the proposed project would result in less than significant impacts related to discharge of polluted runoff during project construction and operations. As detailed in **RCM HYD-1** through **RCM HYD-4**, BMPs for erosion and sediment control, site management/housekeeping/waste management, management of non-stormwater discharges, runon and runoff controls, and BMP inspection/maintenance/repair activities would be required during construction, and BMPs for Source Control, Pollution Prevention, Site Design, LID implementation, and Structural Treatment Control would be required during operation. Therefore, the proposed project would not contribute additional sources of polluted runoff, and impacts would be **less than significant**. No mitigation is required.

3.5 SECTION 4.19, UTILITIES AND SERVICE SYSTEMS

4.19.1.a. 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?

Less Than Significant Impact.

Water. Water service for the proposed project would be provided by the EMWD. EMWD provides potable water and recycled water services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County, including the project site. The project site is located in a rapidly developing area of Riverside County with existing EMWD-owned water lines in the surrounding roads, including Placentia Avenue and Water Street. Development of the proposed project would require two water line connections, one to each of the respective existing water lines located in Placentia Avenue and Water Street. As indicated by EMWD, the existing water lines in Placentia Avenue, Water Street, and the surrounding area are sufficiently sized to serve the proposed project's expected water demand. However, the existing 8-inch-diameter water line in Placentia Avenue would be replaced with a 12-inch-diameter water line along the project site's frontage in

order to serve the project site and future development in the area. Proposed improvements and interconnections to water lines in Placentia Avenue and Water Street would occur within existing rights-of-way and would be installed simultaneously with grading activities and required roadway frontage improvements for the project site. As a result, proposed improvements and interconnection to the existing utilities surrounding the site would occur in areas that have been previously disturbed during construction of the existing pipelines and would not result in substantial disturbance of native habitat or soils, or existing roadways or utilities. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the project's construction and operational footprint, and therefore already identified, disclosed, and subject to all applicable mitigation measures, as well as local, State, and federal regulations, as part of this IS/MND.

Because the proposed project could be served by existing water supplies and no additional supply would be required, as discussed in further detail in Response 3.19(b), below, and the <u>proposed upgrades to the water line in Placentia Avenue would occur within previously disturbed rights-of-way, the proposed project would not result in any significant environmental impacts associated with the construction of new or expanded water infrastructure. existing water infrastructure in the surrounding area is adequately sized to serve the proposed project, the proposed project would not require upgraded or expanded infrastructure, the construction of which would result in significant environmental effects. Therefore, the proposed project would result in less than significant impacts associated with water facilities, and no mitigation would be required.</u>

Stormwater Drainage. Under existing conditions, stormwater from the project site sheet flows to an existing catch basin at the corner of Placentia Avenue and Harvill Avenue (i.e., the northeast corner of the project site), where it then enters storm drains that flow into the San Jacinto River and discharges into Canyon Lake. Canyon Lake ultimately discharges into Lake Elsinore.²

The project site is currently undeveloped. Development of the proposed project would result in an increase in impervious surfaces on the project site from approximately 0 acre to approximately 14.4 acres (approximately 74 percent of the project site), which could decrease on-site infiltration and increase the amount of stormwater entering the surrounding stormwater drainage system. With implementation of the proposed project, the project site would be divided into five drainage areas (i.e., DA 1 through DA 5) to manage stormwater runoff. The proposed project would also implement LID BMPs, including six bioretention basins, one modular wetland, and one underground detention basin. Flows from the bioretention basins, modular wetland, and underground detention basin would be directed off site via a storm drain pipe and discharged into an existing storm drain pipe in Placentia Avenue.

The project site would also receive run-on flows from a separate proposed project (i.e., Orden Project) located west of the project site. Both the run-on stormwater flows from the Orden Project and flows from the project site would be collected on the project site and discharged to a new 60-inch-diameter storm drain that is proposed as part of the Ares Project in the Spring of 2024. Figure 2-10 provides an illustration of this storm drain improvement, which is being processed for approval by the Riverside County Flood Control District (IP 22057, PPT-220002, Perris Valley MDP

Personal communication with Kyle Koivuniemi, P.E. at Kimley-Horn on October 17, 2023.

Line H-10, Harvill Avenue from Water Street to Placentia Avenue). The 60-inch-diameter storm drain would be appropriately sized such that anticipated operational impacts from increased stormwater flows on the project site would not exceed existing conditions. These improvements would be located in the northern half of Water Street and western half of Harvill Ave. However, if the Ares Project does not complete the storm drain work, the proposed project will complete the work concurrently with proposed improvements in Water Street and Harvill Avenue. As discussed above, these areas have been previously disturbed and would not result in any new disturbance that may cause a significant environmental impact.

The proposed drainage facilities would be designed in compliance with the MS4 Permit as detailed in **RCM HYD-3**. As discussed further in Section 4.10, Hydrology and Water Quality, the proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized such that drainage facility capacity would not be exceeded during a design storm. In addition, construction activities associated with the proposed drainage facilities and BMPs have been analyzed as part of the proposed project. As discussed throughout this IS/MND, construction of the proposed project, which includes the proposed drainage facilities and BMPs, would not result in any significant environmental impacts with incorporation of mitigation. Therefore, the proposed project would not result in an exceedance of planned or existing stormwater drainage systems, and impacts would be **less than significant**. No mitigation would be required.

3.6 CHAPTER 6.0, MITIGATION MONITORING AND REPORTING PROGRAM, SECTION 6.2 MITIGATION MONITORING PROCEDURES

The mitigation monitoring and reporting program has been prepared in compliance with Public Resources Code (PRC) Section 21081.6. It describes the requirements and procedures to be followed by the County to ensure that all mitigation measures adopted as part of the proposed Mead Valley Wellness Village Project will be carried out as described in the Final IS/MND.

Table 6.A lists each of the mitigation measures (MM), regulatory compliance measures (RCM), and standard conditions (SC) specified in the Draft IS/MND and identifies the party or parties responsible for implementation and monitoring of each measure.



Draft IS	/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
4.1: Aestheti	ics			
The propose	d project would not result in any significant adverse impacts related to aesthetics. No mitigati	on is required.		
4.2: Agricult	ural and Forestry Resources			
The propose	d project would not result in any significant adverse impacts related to agriculture and forestr	ry resources. No mitigation	is required.	
4.3: Air Qual	lity			
The propose	d project would not result in any significant adverse impacts related to air quality. No mitigati	on is required.		
4.4: Biologica	al Resources			
MM BIO-1	owl will be required within 30 days prior to any ground-disturbing activities to avoid take of burrowing owls and occupied burrowing owl nests (MSHCP Species Specific Objective	Qualified Biologist / Director of Riverside County Facilities Management, or designee	Within 30 days prior to any ground-disturbing activities.	
	If survey results are positive and burrowing owl is found within the project site, the project proponent shall will need to inform the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) immediately. An experienced biologist shall will need to verify if any burrowing owls within the project site are breeding or wintering, and a non-disturbance-buffer-no-less-than-500 feet will be implemented and centered on the burrow(s) utilized. Burrowing owls should be allowed to leave the project site on their own accord if possible. Additional avoidance and minimization measures are not anticipated to be required by the wildlife resource agencies if non-disturbance buffers are maintained and burrowing owl are allowed to leave on their own accord. If burrowing owls cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) will need to be prepared and submitted to the CDFW and USFWS for approval prior to ground disturbing activities. Additionally, a Burrowing Owl Protection and Relocation Plan shall will need to-be be prepared detailing passive (e.g., use of one-way doors and collapse of burrows) and/or active (e.g., capturing owls, relocating to a new site, and collapse of burrows) relocation methods. The Burrowing Owl Protection and Relocation Plan shall will need to-be be submitted to the CDFW and USFWS for approval prior to initiating ground disturbance within the project site. heavoidance , monitoring, relocation, minimization, and/or mitigation actions. The Burrowing Owl Protection and Relocation Plan shall include the number and location of occupied burrowing owl sites, acres of burrowing owl habitat that will be impacted,			

Draft IS	MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	details of site monitoring, and details on proposed buffers and other avoidance measures			
	if avoidance is proposed.			
	If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Protection and Relocation Plan shall also describe minimization and			
	compensatory mitigation actions that will be implemented. Proposed implementation of			
	burrow exclusion and closure should only be considered as a last resort, after all other			
	options have been evaluated because exclusion is not in itself an avoidance,			
	minimization, or mitigation method and has the possibility to result in take. The			
	Burrowing Owl Protection and Relocation Plan shall identify compensatory mitigation for			
	the temporary or permanent loss of occupied burrow(s) and habitat consistent with the			
	"Mitigation Impacts" section of the 2012 Staff Report and shall implement CDFW-			
	approved mitigation prior to initiation of project activities. If impacts to occupied			
	burrows cannot be avoided, information shall be provided regarding adjacent or nearby			
	suitable habitat available to owls. If no suitable habitat is available nearby, details			
	regarding the creation and funding of artificial burrows (numbers, location, and type of			
	burrows) and management activities for relocated owls shall also be included in the			
	Burrowing Owl Protection and Relocation Plan. The Project proponent shall implement			
	the Burrowing Owl Plan following CDFW and USFWS review and approval. Take of active			
	burrowing owl nests shall be avoided during the nesting season (March 1-August 31). If			
	burrowing owls are observed within the project site at any time during project activities,			
	the wildlife agencies CDFW and USFWS shall be notified immediately, and a Burrowing			
	Owl Plan will be prepared as described above. Additional avoidance and minimization			
	measures could be required by the wildlife resource agencies during the			
	notification/document review process (e.g., exclusionary buffers, monitoring, or			
	implementation of appropriate mitigation strategy). Lastly, any special-status species and			
	natural communities detected during project surveys must be reported to the California			
	Natural Diversity Database (CNDDB).			
MM BIO-2	Nesting Bird Surveys. Project activities requiring ground disturbance, construction	Qualified Biologist /	Within 3 days prior	
	activities, removal and/or trimming of vegetation suitable for nesting birds shall occur	Director of Riverside	to the initiation of	
	outside of the general bird breeding season to the greatest extent feasible. In the event	County Facilities	any construction	
	that vegetation removal takes place To ensure project activities (i.e., earthwork, clearing,	Management, or designee	activities.	
	and grubbing) are avoided or minimized-during the bird-nesting season (i.e., February 1			
	August 31), a qualified biologist shall conduct a nesting bird survey within 3 days prior to			
	any construction activities beginning to ensure that birds are not engaged in active			
	nesting within and around the project site. <u>If construction is inactive for more than seven</u>			



Draft IS/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
days, an additional survey shall be conducted. The results of the pre-construction survey			
shall be documented by the qualified biologist and shall be provided to the County. The			
Project Applicant shall adhere to the following:			
Applicant shall designate a biologist (Designated Biologist) experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.			
2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected are complete and accurate.			
If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer based on their best professional judgement and experience (i.e., up to 500 feet depending on the circumstances and specific bird species) within which no construction activities or other disturbances are allowed to occur until after the birds			
have fledged from the nest. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient			
conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned. The Designated Biologist			
shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage) to determine the efficacy of the buffer. The qualified biologist shall			
halt all construction activities within proximity to an active nest if it is determined that the activities are harassing the nest and may result in nest abandonment or take. The			

Draft IS/	MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	biological monitor may modify the buffer or propose other recommendations in order to			
	minimize disturbance to nesting birds. Work can resume within these avoidance areas			
	when no other active nests are found. The results of the survey shall be documented and			
	filed with the Environmental Permitting Department prior to construction. Additionally,			
	any special-status species and natural communities detected during project surveys must			
	be reported to the California Natural Diversity Database (CNDDB).			
RCM BIO-1	Noise Plan. Prior to approval of the Final Design, a Noise Plan shall be submitted to	Qualified Biologist /	Prior to approval of	
	County of Riverside for review and approval. The Noise Plan shall identify noise-	<u>Director of Riverside</u>	the Final Design.	
	generating land uses (if any) that may affect the MSHCP Conservation Area and	County Facilities		
	appropriate noise control measures to minimize the effects of noise on MSHCP	Management, or designee		
	Conservation Area resources pursuant to applicable rules, regulations, and guidelines			
	related to land use noise standards. For purposes of this mitigation measure, the MSHCP			
	Conservation Area consists of Proposed Noncontiguous Habitat Block 4 beginning to the			
	west of Tobacco Road and continues north, northwest, southwest, and south of MSHCP			
	Criteria Area #2529. For planning purposes, wildlife within the MSHCP Conservation Area			
	should not be subject to noise that would exceed residential noise standards. The Noise			
	Plan shall include monitoring during construction and post-project to demonstrate that			
	noise levels in the Conservation Area do not exceed residential standards. If noise			
	standards are exceeded, the Project Applicant is responsible for immediate			
	implementation of remedial actions to reduce noise levels to acceptable levels.			
RCM BIO-2	Artificial Lighting. Prior to occupancy, a lighting plan shall be submitted to County of	Qualified Biologist /	Prior to occupancy.	
	Riverside for review and approval. To reduce nighttime artificial lighting-related impacts	<u>Director of Riverside</u>		
	to wildlife using conservation areas, the project shall take lighting measurements before,	County Facilities		
	during, and after construction operations to determine impacts of nighttime artificial	Management, or designee		
	lightning on adjacent conservation areas and the wildlife it supports. For purposes of this			
	mitigation measure, the MSHCP Conservation Area consists of Proposed Noncontiguous			
	Habitat Block 4 beginning to the west of Tobacco Road and continuing north, northwest,			
	southwest, and south of MSHCP Criteria Area #2529. To protect wildlife using conserved			
	areas, project construction and operations shall result in no net increase to pre-			
	construction ambient night-time levels to all conservation areas. If light or glare impacts			
	to conservation areas exceed this threshold, the project shall make changes to their			
	operations and/or adopt landscape shielding, dimming, lighting curfews, or other			
	appropriate measures that result in the project causing minimal to no glare to all			
	conservation areas.			



Draft IS	/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
4.5: Cultural	Resources			
MM CUL-1	In the event previously undocumented archaeological resources are identified during earthmoving activities, further work in the area (within a 100-foot buffer) should be halted until a qualified archaeologist has assessed the nature of the find(s) and has determined the appropriate treatment.	Qualified Archaeologist/ Director of Riverside County Facilities Management, or designee	During earthmoving activities	
RCM CUL-1	Human Remains. In the event that human remains are encountered on the project site, work within 100 feet of the discovery shall be redirected and the County of Riverside (County) Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC and use commercially reasonable efforts to reach agreement upon a plan for treatment and protection or disposition of the remains. Prior to the issuance of grading permits, the County shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.	Construction Contractor and County Coroner / Director of Riverside County Facilities Management, or designee	During construction activities.	
4.6: Energy				
	d project would not result in any significant adverse impacts related to energy. No mitigation	is required.		
4.7: Geology				
SC GEO-1	The Contractor shall provide evidence to the County of Riverside Plan Review Inspection for review and approval that on-site structures, features, and facilities have been designed and will be constructed in conformance with applicable provisions of the California Building Code (CBC) in effect at the time of construction and the recommendations cited in Section 6 of the project-specific Geotechnical Investigation (Appendix D 1 of this document). Geotechnical recommendations include, but are not limited to, the following:	Construction Contractor / County of Riverside Deputy Building Official, or designee.	Prior to the approval of grading and/or building permits.	

Draft IS	/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	 Excavations will be required to remove undocumented fill and a portion of natural soils within the proposed building pads. 			
	 In areas to receive pavements and hardscape, it is recommended that the upper 1 foot be removed and replaced as properly compacted fill to provide uniform support. In addition, prior to placement of fill the subgrade should be scarified, moisture conditioned, and compacted. 			
	This condition shall be implemented to the satisfaction of the County of Riverside Deputy Building Official or designee.			
MM PAL-1	Prior to ground-disturbing activities, a qualified professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology (SVP) shall be retained to develop and implement a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall be reviewed and approved by the County of Riverside (County). The PRIMP shall adhere to the performance standards and practices from the SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. These procedures shall include the methods that will be used to protect unique paleontological resources in the event of an unanticipated discovery within the project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of ground disturbance.	Qualified Paleontologist / Director of Riverside County Facilities Management, or designee	Prior to ground- disturbing activities.	
MM PAL-2	Ground-disturbing activities in deposits with high paleontological sensitivity (i.e., Very Old Alluvial Fan Deposits) shall be monitored by a qualified paleontological monitor following the PRIMP. No monitoring is required for excavation in deposits with no paleontological sensitivity (i.e., Artificial Fill). If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction in a 50-foot radius of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and the paleontologist or paleontological monitor contacted to assess the find for scientific significance. If determined to be scientifically significant, the fossil shall be collected from the field. The qualified paleontological monitor shall follow the SVP's 2010 Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources if the resource requires salvage.	Qualified Paleontologist / Director of Riverside County Facilities Management, or designee	During ground- disturbing activities.	



Draft IS,	MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
MM PAL-3	Collected resources shall be prepared to the point of identification, identified to the	Qualified Paleontologist/	Conclusion of the	
	lowest taxonomic level possible, catalogued, and curated into the permanent collections	Director of Riverside	monitoring program.	
	of a museum repository. At the conclusion of the monitoring program, a report of	County Facilities		
4 0. Cusanha	findings shall be prepared to document the results of the monitoring program.	Management, or designee		
	use Gas Emissions	iana Na mitimatian is nasuri		
	d project would not result in any significant adverse impacts related to greenhouse gas emiss	ions. No mitigation is requi	rea.	
	and Hazardous Materials	0		
MM HAZ-1	The Contractor shall provide evidence to the County of Riverside for review and approval that the proposed project would implement the recommendations cited in the Phase I Environmental Site Assessment (ESA) prepared for the project site (Appendix F-1 of this document) as necessary. Recommendations include the following:	Construction Contractor/ County of Riverside Deputy Building Official, or designee.	Prior to the approval of grading and/or building permits.	
	 Implement a soil management plan to ensure that if the gasoline UST and/or petroleum impacted soils are encountered during construction of the proposed project, they are handled in accordance with State and local regulations. 			
	 If the former residential septic system is discovered during construction of the proposed project, it should be abandoned in accordance with State and local regulations. 			
	This measure shall be implemented to the satisfaction of the County of Riverside Deputy Building Official or designee.			
4.10: Hydrol	ogy and Water Quality			
RCM HYD-1	Prior to the commencement of any land-disturbing activities, the Construction Contractor shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Planning Manager of the Riverside County Planning Department or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the County of Riverside (County), or designee.	Construction Contractor/ Director of Riverside County Facilities Management, or designee	Prior to the commencement of any land-disturbing activities.	

Draft IS,	MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit. These include: BMPs for erosion and sediment control, site management/housekeeping/waste management, management of non-stormwater discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction.			
	The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.			
	Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.			
RCM HYD-2	During construction activities, the Construction Contractor shall implement BMPs to prevent or reduce the discharge of pollutants directly or indirectly into waters of the United States consistent with the requirements of Riverside County Ordinance No. 754.	Construction Contractor/ Director of Riverside County Facilities Management, or designee	During construction activities.	
RCM HYD-3	Prior to issuance of a grading permit, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the County for review and approval. The project shall implement project design features identified in the Final WQMP. The Final WQMP shall demonstrate that any proposed on-site development plan includes Best Management Practices (BMPs) for Source Control, Pollution Prevention, Site Design, Low Impact Development (LID) implementation, and Structural Treatment Control. BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure that post-development stormwater runoff volume or time of concentration does not exceed pre-development stormwater runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order No. R8-2010-0033, NPDES Permit No. CAS618033, as amended by Order No. R8-2013-0024 (Municipal Separate Storm Sewer System [MS4] Permit. The proposed LID BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to	Applicant / Director of	Prior to issuance of a	



Draft IS	/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	the County for review and approval. Periodic maintenance of any required BMPs and			
	landscaped areas during project occupancy and operation shall be in accordance with the			
	schedule outlined in the Final WQMP.			
RCM HYD-4	Prior to the commencement of any operational business activities, the Applicant shall	Applicant / Director of	Prior to issuance of a	
	register with the County's Business Storm Water Compliance Program for stormwater	Riverside County Facilities	grading permit.	
	compliance, pursuant to Riverside County Ordinance No. 857.	Management, or designee		
4.11: Land U	se and Planning			
The propose	d project would not result in any significant adverse impacts related to land use and planning	. No mitigation is required.		
4.12 Minera	Resources			
The propose	d project would not result in any significant adverse impacts related to mineral resources. No	mitigation is required.		
4.13: Noise				
The propose	d project would not result in any significant adverse impacts related to noise. No mitigation is	required.		
	ition and Housing	'		
	d project would not result in any significant adverse impacts related to population and housir	ng. No mitigation is required	d.	
4.15: Public				
The propose	d project would not result in any significant adverse impacts related to public services. No mi	tigation is required.		
4.16: Recrea		<u> </u>		
The propose	d project would not result in any significant adverse impacts related to recreation. No mitigat	ion is required.		
4.17: Transp		,		
SC TRA-1	During construction activities that would temporarily restrict vehicular traffic (e.g., lane	Construction Contractor /	During construction	
	closures or partial lane closures) would be required to implement adequate and	Director of Riverside	activities that would	_
	appropriate measures consistent with County of Riverside (County) requirements to	County Facilities	temporarily restrict	
	facilitate the passage of persons and vehicles through/around any required road closures.	Management, or designee	vehicular traffic.	
	Standard traffic control devices consistent with County requirements include, but are not	, ,		
	limited to, warning signs, warning lights, and flaggers. These measures would be utilized			
	as applicable to minimize obstructions and ensure the safe passage of emergency vehicles			
	as necessary for the purposes of coordinating efforts during local, State, and/or federal			
	emergency events, including response to hazardous materials incidents.			
4.18: Tribal	Cultural Resources			
MM TCR-1	Prior to the issuance of a grading permit, the Developer shall retain a professional	Project Archaeologist /	Prior to the issuance	
	archaeologist to conduct monitoring of all grading and trenching activities that may impact	Consulting Tribe(s)	of grading permits.	
	native soils on the project site. The Project Archaeologist shall have the authority to	· · ·		
	temporarily halt and redirect earthmoving activities within a minimum of 100 feet of the			
	affected area in the event that suspected archaeological resources are unearthed during			
	project construction. The project archeologist and the Consulting Tribes shall attend a pre-			

Draft IS	6/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	grading meeting with the County, the construction manager, and any contractors, and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The training will include: (a) a brief review of the cultural sensitivity of the project and the surrounding area; (b) what resources could potentially be identified during earthmoving activities; (c) the requirements of the monitoring program; (d) the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the project following the initial training must take the Cultural Sensitivity Training prior to beginning work, and the Project Archaeologist and Consulting Tribe shall make themselves available to provide the training on an as-needed basis.			
MM TCR-2	Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians (Pechanga) for tribal monitoring. The County of Riverside (County) is also required to provide a minimum of 30 days advance notice to Pechanga of all grading and trenching activities that may impact native soils. The Pechanga Tribal Representatives shall have the authority to temporarily halt and redirect earthmoving activities within a minimum of 100 feet of the affected area in the event that suspected archaeological resources are unearthed during project construction. Upon discovery of in situ archaeological resources, the parties shall promptly meet and confer, limit the closure area to the smallest reasonable area (including the possibility of reducing the stop-work radius to 50 feet after initial evaluation), and engage in good faith collaboration to execute the protocols outlined in the Cultural Resource Monitoring Plan (CRMP) for handling such unearthed resources.	Developer / Pechanga Tribal Representatives	Prior to the issuance of a grading permit.	
MM TCR-3	Prior to the issuance of the grading permit, a CRMP is to be developed and provided to the Consulting Tribe for review. The Project Archaeologist, in consultation with the Consulting Tribe, the Contractor, and the County, shall develop a CRMP to address the details, timing, and responsibility of all activities on the project site that may impact archaeological and tribal cultural resources. A Consulting Tribe is defined as a Tribe that initiated the Assembly Bill (AB) 52 tribal consultation process for the project, has not opted out of the AB 52 consultation process, and has completed AB 52 consultation with the County as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB 52. Details in the Plan shall include: a) Project description and location; b) Project grading and development scheduling;	Project Archaeologist / Consulting Tribe(s)	Prior to the issuance of the grading permit.	



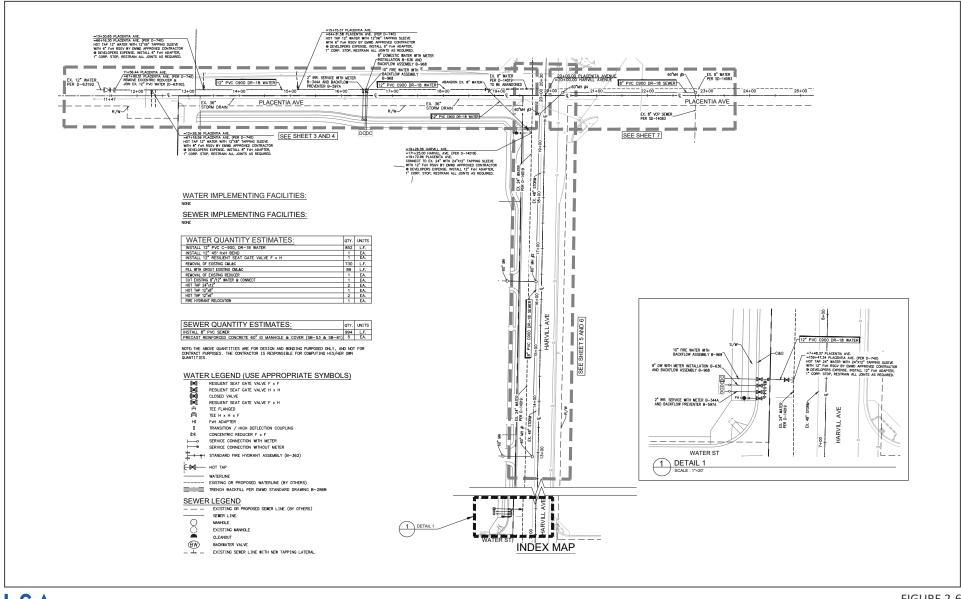
Draft IS	MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	 c) Roles and responsibilities of individuals on the Project; d) The pre-grading meeting and Cultural Resources Worker Sensitivity Training details; e) The protocols and stipulations that the contractor, County, Consulting Tribe (s) And Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resource's evaluation; f) The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; g) Contact information of relevant individuals for the Project. 			
MM TCR-4	The County shall verify that the following note is included on the Grading Plan: "If any suspected archaeological resources are discovered during ground— disturbing activities and the Project Archaeologist or Pechanga Tribal Representative are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Pechanga Tribal Representative to the site to assess the significance of the find."	Applicant / Director of Riverside County Facilities Management, or designee		
MM TCR-5	If during ground-disturbance activities, unanticipated unique archaeological resources are inadvertently discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. This mitigation shall apply to inadvertent discoveries of resources, including those with multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Consulting Tribe.	Construction Contractor and Project Archaeologist / Consulting Tribe(s)	During all ground- disturbing activities.	
	 All ground disturbance activities within 100 feet of the discovered resources shall be halted until a meeting is convened between the Developer, the Project Archaeologist, the Pechanga Tribal Representative, and the County of Riverside Facilities Management to discuss the significance of the find. 			
	b. At the meeting, the significance of the discover(ies) shall be discussed and after consultation with the Pechanga Tribal Representative and the Project Archaeologist, a decision shall be made, with the concurrence of the County of Riverside, as to the appropriate process (documentation, recovery, avoidance, etc.) for the resources, including whether the stop-work radius from the discovered resource can be reduced to 50 feet.			

Draft IS	6/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
	c. Further ground disturbance, including but not limited to, grading and trenching, shall not resume within the determined stop-work radius area of the discovery until the protocols for handling the resources has been established by all parties pursuant to the CRMP. Work shall be allowed to continue outside of the stop-work radius area and shall be monitored by Pechanga Tribal Monitors, if needed.		J	
	d. Treatment and avoidance protocols for the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with Pechanga. These protocols may include avoidance of the resources through project design, in-place preservation of resources located in native soils and/or re-burial on the Project site with procedures so they are not subject to further disturbance in perpetuity as identified in Non-Disclosure of Reburial Condition/Mitigation Measures.			
	e. If the find is determined to be unique and significant and avoidance of the area cannot be feasibly achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Consulting Tribe, and shall be submitted to the County for their review and approval prior to implementation of the said plan.	1		
	f. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Developer, Project Archaeologist and the Consulting Tribe cannot agree on the significance of or the treatment for the archaeological or cultural resources, these issues shall be presented to the County of Riverside for decision. The County of Riverside shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the Project Archeologist and shall consider the cultural and religious principles and practices of the Consulting Tribe. Notwithstanding any other rights available under the law, the decision of the County of Riverside shall be appealable to the County Board of Supervisors. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.			
MM TCR 6	In the event that Native American tribal cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:	Construction Contractor, Qualified Archaeologist, and Pechanga Tribal Representatives /	During grading activities.	



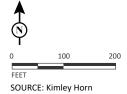
Draft IS/MNI	D Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
a.	One or more of the following treatments, in order of preference, shall be employed with Pechanga. Evidence that these procedures have been followed shall be provided to the County of Riverside:	Director of Riverside County Facilities Management, or designee		
	 Preservation in place of the tribal cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources. 			
	2. Reburial of the resources on the project property. The measures for reburial shall include, at least, measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to Public Records Request.			
	3. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at 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. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to County of Riverside upon the completion of a treatment plan and final report detailing the significance and treatment finding.			

Draft IS	/MND Mitigation Measure, Regulatory Compliance Measures, or Standard Conditions	Responsible Party/ Approving Agency	Timing for Mitigation Measure	Tracking
MM TCR-7	If human remains are discovered, no further disturbance shall occur within a minimum of 100 feet of the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California NAHC shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the Most Likely Descendant (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains (Calif. Pub. Res. Code § 5097.98). (GP Objective 23.3, CEQA).	Construction Contractor and County Coroner / Director of Riverside County Facilities Management, or designee	During construction.	
MM TCR-8	It is understood by all parties that 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 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).	County Coroner / Director of Riverside County Facilities Management, or designee	During and after reburial activities.	
MM TCR-9	Upon completion of ground-disturbing activities that impact native soils, the Project Archeologist shall submit two (2) copies of the Phase IV Cultural Resources Monitoring Report that complies with County of Riverside requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. Portions of the Phase IV Report may be confidential. The County shall review the reports to determine adequate treatment compliance. Provided the reports are adequate, the County shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside, and one (1) copy shall be submitted to the Pechanga Cultural Resources Department.	Project Archeologist / Director of Riverside County Facilities Management, or designee	Upon completion of ground-disturbing activities that impact native soils.	
4.19: Utilitie	s and Service Systems			
The propose	d project would not result in any significant adverse impacts related to utilities and service sy	stems. No mitigation is requ	uired.	
4.19: Wildfir	e			
The propose	d project would not result in any significant adverse impacts related to wildfire. No mitigation	n is required.		



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FIGURE 2-6



Mead Valley Wellness Village **Utility Improvements**

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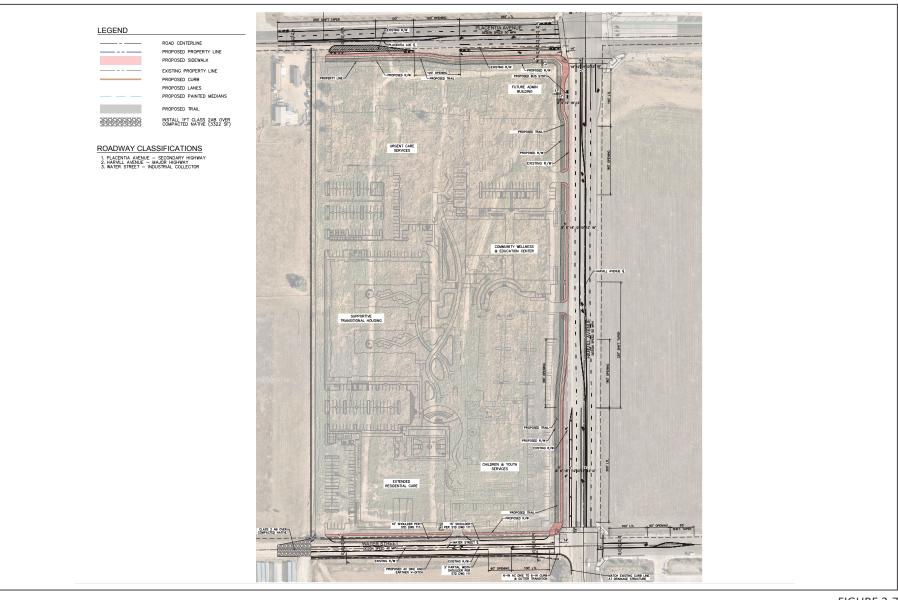
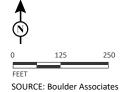


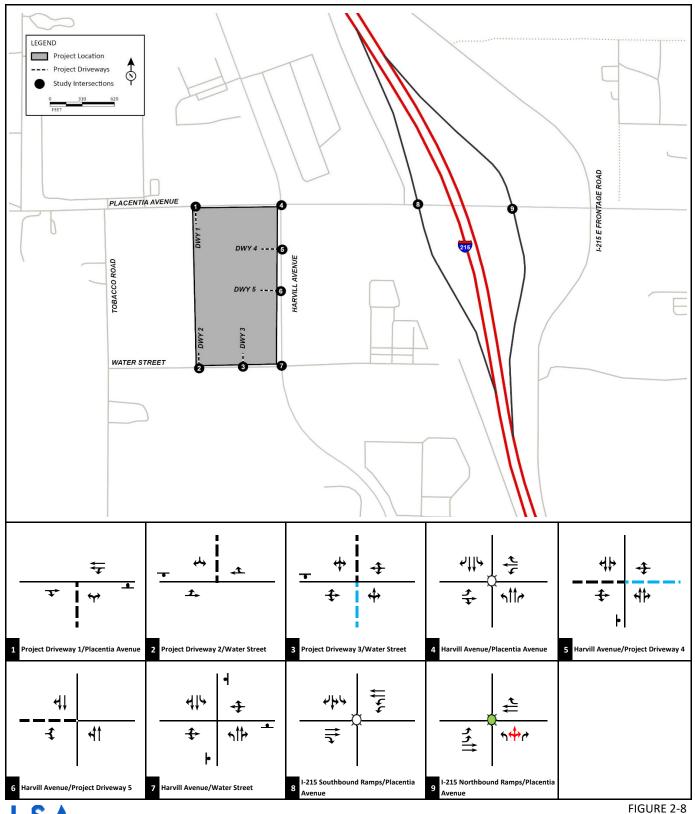


FIGURE 2-7



Mead Valley Wellness Village
Roadway Improvements

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LSA

↑ Recommended Improvements in all Scenarios

☐ Signal **D** De-Facto Right Turn

- - Project Driveways

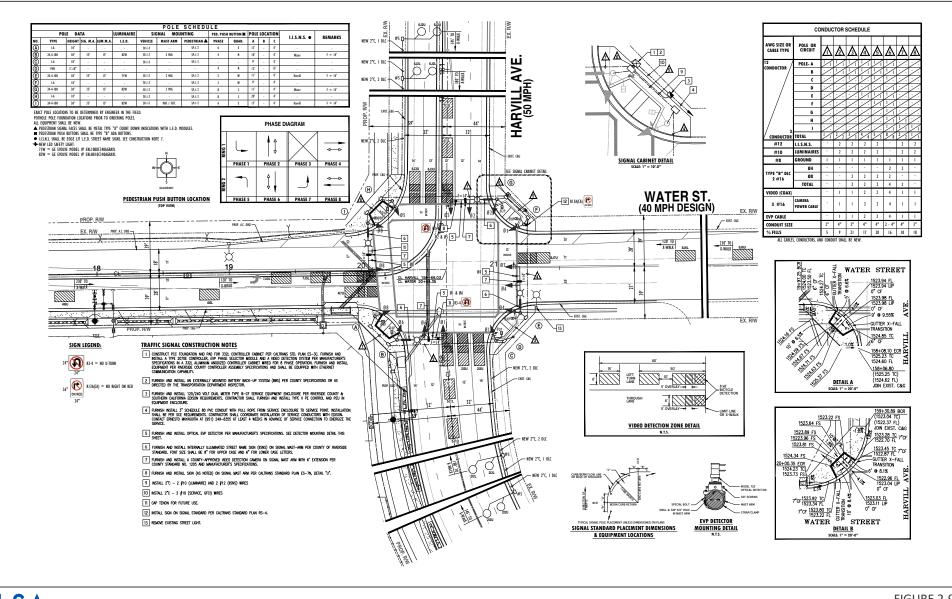
Stop Sign

F Free Right Turn -- Future Driveways

Mead Valley Wellness Village Project

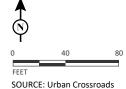
Plus Project with Improvements Study Intersection Geometrics and Traffic Control

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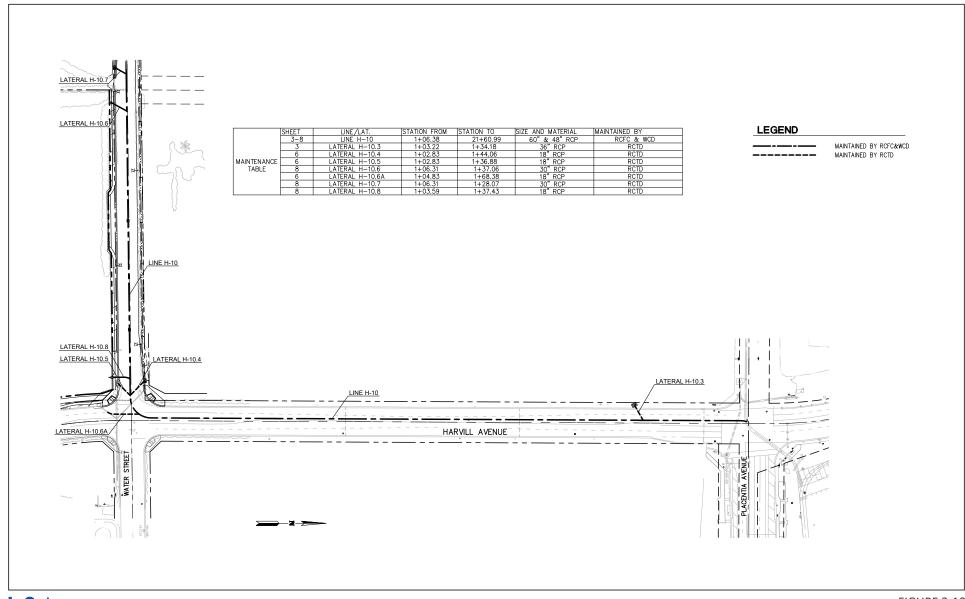




Mead Valley Wellness Village

Traffic Signal at Harvill Avenue and Water Street

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LSA

FIGURE 2-10



NO SCALE

SOURCE: Huitt Zollers

Mead Valley Wellness Village
Ares Project Storm Drain Improvements

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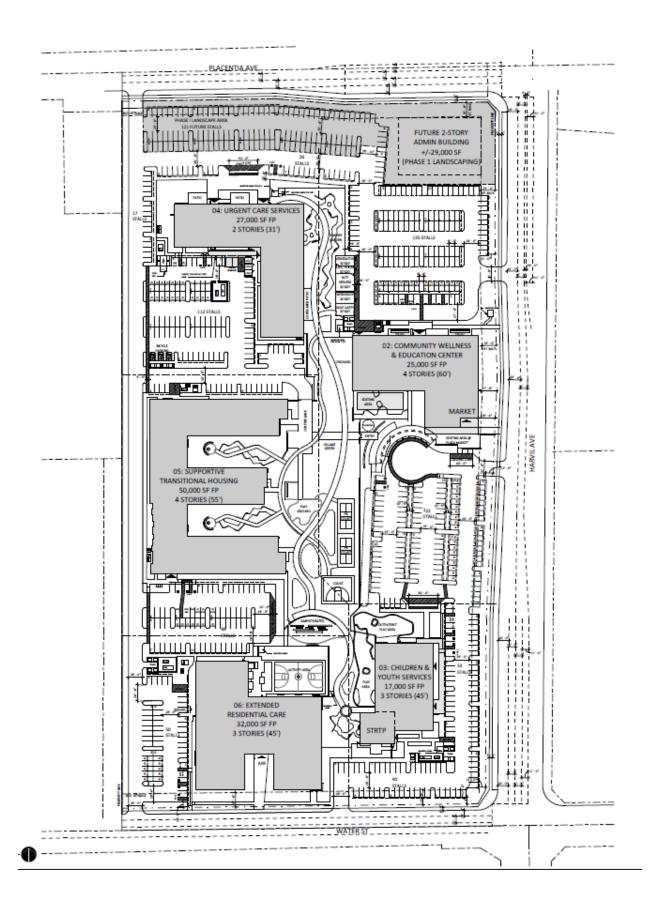


APPENDIX A

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Attachment E Wellness Village Safey Narrative



Safety in Site Design:

The RUHS Wellness Village Project (Project) is a group of neighborhoods that offers a helping hand to support individuals and families in their journey to a healthy lifestyle. The Village provides for an entire continuum of behavioral health and wellness care, from urgent treatment to supportive housing, including outpatient care, education, and social services. This innovative and unique campus – nearly 20 acres and five buildings with various park settings, activity areas, and outdoor gathering areas – connects the community with the outdoors. Amenities include a community market, café, sensory garden, and sports courts. The Village is peaceful and supportive, encouraging the ability to grow in mind, body, and soul. The Village is a place for all, regardless of age, race, or sexuality. Here, you can feel safe and supported, for the whole health of you.

The new Wellness Village is situated in Mead Valley, near the Lake Perris State Recreation Area. The surrounding environment is both rural and industrial in nature, with a variety of freight and logistics warehouses (such as FedEx etc.) surrounding the site. The site is bound by Placentia Avenue, Harvill Avenue and Water Street on three sides, with the fourth, western, side containing a private drive acting as a buffer from the adjacent property and supporting circulation through the Village site. The site design intentionally minimizes the impact of vehicular traffic surrounding the Wellness Village. Along both Placentia Avenue and Harvill Avenue, there are many features built in that buffer environmental effects of a busy road, including a more than 20-foot-wide equestrian trail system that includes a sidewalk, landscape buffer, trail, and additional landscape area to the property line. From the property line, all buildings are set back at least 25 feet, providing for even further landscape planting to buffer between the interior uses of the site and the street. A large setback of 110 feet from Placentia in the north allows for a potential small administrative building and associated parking to be added later in the Project, which places the closest planned building nearly 200 feet away from the street. The southern edge of the property along Water Street is also heavily buffered with landscape, with the nearest building to that property line set back 40 feet from the street. Our site contains a boundary wall as well as a 10foot-wide, heavily vegetated landscape planter along the adjacent property to the west that is planned to be developed into another logistics use. The adjacent site to the west is also sloped to elevate approximately 15 feet above our site, elevating any activity on that site outside of our active plane.

Landscape and Atmospheric Safety:

The Project will be adding approximately 5.5 acres of proposed landscape area and close to 580 new trees within the Project's boundaries plus additional proposed landscape area in street improvements around the site, with close to 60 new street trees. All of this new landscape area will feature low and moderate water-use tree and plant species that are adaptable to the local climate and that are grouped into hydrozones. All landscape areas will further utilize the latest technology and methodologies in irrigation to reduce and track water consumption. Items like subsurface dripline irrigation, deep root tree bubblers, and weather tracking smart irrigation controllers shall all be implemented to keep irrigation water usage as low as possible.

Strategically placed throughout the campus, a series of themed garden areas will provide interest as well as opportunities for small groups and individual introspection. Meandering decomposed granite trails punctuated with decorative boulders and mounded planter areas will provide a more informal, separated feel to the spaces while a combination of both comfortable and sculptural seating will provide opportunities for seating amongst the specialized zones. At the north end of the campus a pollinator garden focused on butterflies and hummingbirds will strongly feature a variety of flowering shrubs and succulents best suited to attracting a multitude of both. Nestled between the wings of the Supportive Housing Building will be a pair of shady gardens appropriate

for the tighter, shadier confines. A more lush, peaceful, textural plant palette will be used to guide the user to the end of the pathway and the focal seating element hidden at the end. Finally, to the south of the campus beginning at the Amphitheater will be a succulent garden. A variety of rock mulches and boulders will enhance the colorful, geometric appeal of the succulent palette while punctuations of flower color will provide additional emphasis at different times of the year.

All of the landscaping will deliver air quality benefits by the cooling effect of their shade and by removing certain pollutants and releasing oxygen into the environment. Trees reduce evaporative emissions from vehicles and other fuel storage. By cooling the buildings, trees reduce power generation emissions, reducing the Project's need for mechanical cooling.

Sustainability and Environmental Safety:

The RUHS Wellness Village in Perris, CA has been designed to meet LEED-NC v4 Silver standards. The nearly 20-acre site is currently vacant and supports only minimal vegetation. It will be redeveloped to incorporate significant plantings and tree cover, increasing carbon sequestration onsite. Plant selections will consist primarily of native and adapted species. Irrigation use will be reduced by over 50% for the site's peak watering month as calculated using the EPA's WaterSense Water Budget Tool, and the landscaping will be metered separately so that water use can be easily tracked. Stormwater management systems have been designed to treat water onsite via bioretention areas, and flow to an underground detention system that will limit outflow up to the 100-year storm to match existing conditions, so that the site development does not affect the downstream system.

Alternative transportation will be supported onsite with the addition of a bus stop, as well as short-term and long-term bicycle accommodations. For those who drive private vehicles to the site, 5% of spaces will be provided with EV charging stations, and an additional 15% of spaces will be EV ready.

The buildings and their systems have been designed to provide user comfort and enhanced indoor environmental quality while simultaneously maximizing energy efficiency. They will be served by VRF mechanical systems and dedicated outdoor air units (DOAS). Spectrally selective low-e glazing will be utilized to significantly reduce solar heat gain through the windows, while providing ample daylight and views to the occupants. Roofing solar reflectance indices (SRIs) will exceed code requirements so that the roofs return the majority of solar energy to the atmosphere rather than allowing it to enter the structures, reducing the heat island effect. Plumbing fixtures have been selected to reduce restroom water use and water heating energy by implementing WaterSense labelled fixtures. Residential clothes washers and dishwashers will be EnergyStar certified.

Energy cost is being modelled using ASHRAE 90.1 -2010 and is anticipated to be 29% below this standard. A 335 kW solar photovoltaic array will be incorporated via carports and is anticipated to offset a minimum of 12% of the energy used by the buildings, for an overall energy cost reduction of 38% below ASHRAE 90.1-2010. The buildings and solar photovoltaic arrays will be commissioned to ensure that they meet the design intent. Exterior light fixtures have been chosen to minimize light pollution.

Interior materials such as paints, coatings, floorings, ceilings, acoustical treatments and insulation are being carefully selected to meet the California Department of Public Health requirements as well as South Coast Air Quality Management District VOC limits (where applicable). Many products will also hold Cradle-to-Cradle certifications for their holistic sustainability attributes, or have transparency documentation such as Declare labels, Environmental Product Declarations

(EPDs) or Health Product Declarations (HPDs). Indoor air quality will be further supported by air handling units that employ MERV-8 prefilters and MERV-13 final filters to filter outdoor air being supplied to occupied spaces.

During construction, a minimum of 65% of nonhazardous demolition and construction waste will be recycled or salvaged and 100% of trees, stumps, rocks and associated vegetation will be collected for reuse. Ducts will be sealed during construction to maintain cleanliness, and returns will be covered with filters whenever the air handling units are in use.

Mechanical/Electrical Safety:

The Project incorporates high levels of air filtration into the building through the use of high-efficiency MERV-13 filters on outside air delivery systems for each of the buildings that remove over 90% of all dust particles and even 75% of all small micron sizes particles that impact indoor air quality and the safety of the people within our buildings. Increasing the level of air filtration has many positive impacts of individuals safety and health while in the RUHS campus facilities including better physical health, less exposure to potentially harmful pathogens and pollutants. Consumers are also able to recuperate more quickly from ailments that they may have through a better indoor environment. The Project also implements advanced ventilation systems to ensure the frequent circulation of fresh air and the removal of indoor air pollutants.

The new emergency power generator systems for the campus are equipped with highly efficient exhaust filtration systems in compliance with the stringent regulations of the Southern California Air Quality Management District (SCAQMD). These regulations are some of the most restrictive in the country which result in a cleaner engine discharge and minimal impact to the surrounding buildings on the campus. This keeps the ambient air cleaner and allows the people on the campus to move about safely.

Biophilic, Healing and Safe Design:

The RUHS Wellness Village encourages wellness and the evolving individual journey. The campus embraces the natural environment and echoes local influences, evoking tranquility, comfort, and a space for personal identity. A place where nature is the heart of the community enveloped by buildings designed for healing. The design will respect the people and community by providing protected, supportive and quality behavioral and physical health care. It will respect the design language of the region, help shape the future of the surrounding area by creating opportunities for reintegration and community engagement. The Project represents compassionate design that reflects all levels of human state and ability and includes elements that foster self-sufficiency, internal growth, courage in the face of challenges, and security, with the ultimate goal of destigmatizing and remobilizing behavioral health care and patients. The design of the campus is at a scale that relates to, and can integrate into, the surrounding site context. Comfortable and calming, the Wellness Village includes an abundance of natural elements connecting the outdoors to the interior environment. Ample natural light promotes behavioral, spiritual, and physical healing. The campus provides spaces and experiences that enhance the Healthy Places Index and meet the Village's sustainability goals. Architectural elements provide solutions for heat and sun exposure while fostering human connection, while also promoting wellbeing and reducing discomfort in the overall experience by providing clear destinations interconnected by paths that nurture interaction. The Project creates spaces that bring people together and foster a comfortable environment and sense of community.

Directional Safety:

Exterior signage can play a pivotal role in enhancing safety. Through clear and concise messaging, signage provides essential information to pedestrians, motorists, and emergency

responders alike, guiding them with precision and confidence through the Project. Project centered monuments, wayfinding directionals, and effective communication help to mitigate confusion, reduce u-turns, and prevent accidents. By ensuring that vital information is easily discernible and universally understood, exterior signage fosters a safer environment, where individuals can navigate with assurance and peace of mind, ultimately reducing the risk of harm and promoting the well-being of all who visit the Wellness Village. Thoroughly developed interior signage guides clients with clarity through the building, identifying appropriate paths of travel.

Physical Safety:

The Project has been designed by an integrated team of designers, contractors, and behavioral health professionals to be a safe place in every sense. Applicable codes and Authority Having Jurisdiction (AHJ) standards, regulations, and guidelines include:

- · 2022 CALIFORNIA BUILDING CODE (CBC)
- 2022 CALIFORNIA MECHANICAL CODE (CMC)
- · 2022 CALIFORNIA PLUMBING CODE (CPC)
- · 2022 CALIFORNIA ELECTRICAL CODE (CEC)
- · 2022 CALIFORNIA FIRE CODE (CFC)
- 2022 CALIFORNIA ENERGY CODE
- · 2022 CALIFORNIA GREEN BUILDING STANDARDS (CAL Green)
- National Fire Protection Association Pamphlets, latest edition
- ASHRAE 55, 90.1, 62.2, 15, and all other applicable ASHRAE Standards
- Titles 8, 19, and 24 California Code of Regulations
- National Fire Protection Association Standards NFPA 13, 45, 50, 72, 90A, 92A, 99 and 101 as referenced in the applicable sections of Title 19 and 24, CMC, CBC and CPC
- · California State Fire Marshall Regulations including applicable provisions of NFPA 101
- Environmental Protection Agency (EPA)
- Local Air Quality Management District Requirements
- · Americans with Disabilities Act
- County of Riverside Municipal Code
- All other applicable State and Local codes and ordinances
- Owner's Project Requirements (OPR)

All buildings have been designed to be non-combustible and fully sprinklered, with provisions for fire alarm, and notification systems in full accordance and collaboration with the County Fire Department, serving as the local fire authority. Fully integrated security systems including state-of-the-art network-connected camera observation, alliance with local law enforcement and private security programs have all been developed for this Project. Access control systems to restrict access to areas for the benefit of both the patients on the campus and any individuals that may compromise the safety of the facility itself have been developed for each building and the site at large. Months of review with the RUHS Behavioral Health Team, operator feedback, and preliminary licensing reviews have yielded plans that have been vetted for anti-ligature security as well as operational compliance with applicable regulations, requirements, and best practices.

Acoustical Safety:

Utilizing the latest computer modelling technology as well as acoustical measurements taken from the site, a full acoustical study has been completed on the Project, and a series of reports had been produced to assist in the physical design of the buildings on campus. These reports predict the exterior noise levels Projected to the construction of the Project, and using this information, interior noise levels were calculated. From that analysis, construction types had been proposed

then analyzed for their effectiveness of noise mitigation. Following local requirements and Facilities Guidelines Institute, the Project team then developed the appropriate façade materials and wall assemblies to appropriately mitigate the sound levels for the Project both from exterior and interior impacts.

Economic, Fiscal, and Social Impact of Riverside University Health System's Wellness Village

January 2024







Executive Summary

The construction and operation of Riverside University Health System Behavioral Health (RUHS BH) Wellness Village will have substantial economic, fiscal, and social impacts on the Riverside County region and beyond. The following study reports the economic impact of the RUHS BH Wellness Village on Riverside County Supervisorial District I (which includes Mead Valley), Riverside County, and the state of California. Additionally, it provides the fiscal impact of the Wellness Village on local, state and federal tax income, as well as an examination of the Social Impacts that are expected from the Behavioral Health facility. All figures are reported in 2023 real U.S. dollar terms and take inflation into account.

Economic Impacts

• Total economic impact from RUHS Behavioral Health Wellness Village construction expenditures over a 2.5-year period will be \$603.1 million. Of which \$388.6 million will be generated in

Supervisorial District I, where the Wellness Village is located; \$109.4 million will be generated in rest of the Riverside County (outside of District I); and \$105.1 million will be generated in the state of California (outside of Riverside County).

\$603.1M

Economic Impact From Construction

• Construction of the Wellness Village will support 2,590 direct, indirect, and induced jobs in the state of California, generating \$161.8 million in labor income during a 2.5-year construction period.







Table 1: Total Economic Impact of RUHS Behavioral Health Wellness Village Construction, 2024 to 2026

Impact Type	Total Employment	Average Annual	Labor Income (\$M)	Output (\$M)
	(Job-Year)	Employment ¹	Labor Income (\$W)	
Direct	1,449	580	\$86.6	\$363.9
Indirect	622	249	\$45.3	\$149.6
Induced	518	207	\$29.9	\$89.6
Totals	2,590 jobs	1,036 jobs	\$161.8 million	\$603.1 million

Source: Riverside University Health System, Bureau of Economic Analysis. Analysis by Beacon Economics.

• Total economic impact from RUHS Behavioral Health Wellness Village on-going operation ex penditures will be \$78.2 million annually. Of which \$45.8 million will be generated in Superviso-

\$78.2M

Economic Impact From Operations

rial District I, where the Wellness Village is located; \$21.5 million will be generated in rest of the Riverside County (outside of District I); and \$10.9 million will be generated in the state of California (outside of Riverside County).

¹ Average number of jobs supported annually over the 30-month construction period from 2024 to 2026.







• Operations of the Wellness Village will support 820 direct, indirect, and induced jobs annually in the state of California, generating \$38.6 million in labor income annually.

Table 2: Total Economic Impact of RUHS Behavioral Health Wellness Village operations, Annual

Impact Type	Total Employment (Annual)	Labor Income (\$M)	Output (\$M)
Direct	609	\$26.9	\$43.7
Indirect	115.5	\$6.3	\$18.3
Induced	95.5	\$5.4	\$16.2
Totals	820 jobs	\$38.6 million	\$78.2 million







Fiscal Impacts

• Construction of the RUHS Behavioral Health Wellness Village will generate \$23.15 million at the state and local level, and \$29.4 million at the federal level, an overall impact of \$52.5 million during the 2.5-year construction period.

Table 3: Total Fiscal Impacts of RUHS Behavioral Health Wellness Village Construction, 2024 to 2026

Тах Туре	State and Local Taxes(\$M)	Federal Taxes (\$M)	Total (\$M)
Direct	\$6.1	\$17.0	\$23.1
Indirect	\$10.5	\$5.6	\$16.0
Induced	\$6.6	\$6.8	\$13.4
Total	\$23.15 million	\$29.4 million	\$52.5 million





• Ongoing operations of the Wellness Village will contribute \$2.21 million annually in state and local taxes and \$5.78 million in federal taxes, for an overall fiscal impact of \$7.99 million per year.

Table 4: Total Fiscal Impacts of RUHS Behavioral Health Wellness Village Operations, Annual

Тах Туре	State and Local Taxes(\$M)	Federal Taxes (\$M)	Annual Total (\$M)
Direct	\$0.10	\$3.56	\$3.66
Indirect	\$0.72	\$1.25	\$1.97
Induced	\$1.39	\$0.97	\$2.36
Total	\$2.21 million	\$5.78 million	\$7.99 million







Social Impacts

- Mental Health issues are on the rise in the United States. From 2008 to 2021, the number of adults aged 18 or older with a mental illness increased nearly 46% from 40 million to 58 million.
- Mental illness is a prevalent health concern in California. Approximately 1 in 7 adults in the state deals with a mental illness, and about 1 in 26 adults has a severe mental illness that makes it difficult to perform daily tasks. Among children, 1 in 14 experiences an emotional disturbance that impairs functioning within family, school, or community settings.²
- This is true in Riverside County as well. Approximately 54% of adults living in Riverside County stated that they had obtained help for emotional or mental health or substance abuse issues between 2020 and 2021.
- RUHS-BH offers diverse programs and services at 79 RUHS-operated sites and 140 community organizations. It also establishes Friday Night Live chapters in over 100 schools. Community-focused Initiatives like the SoCal Crisis Helpline and innovative programs like the 24/7 Mobile Crisis Response contribute to enhancing behavioral health support in the Riverside County. Additionally, RUHS-BH secures funding for sustainable housing projects such as Vista de La Sierra, addressing the ongoing need for supportive housing. Furthermore, RUHS BH has opened 162 new units through No Place Like Home (NPLH) funding, with plans to add 428 NPLH units and 611 affordable housing units by 2026.
- State policies enacted in recent years make Behavioral Health a higher healthcare priority and will encourage mental health treatment, further increasing the demand for the Wellness Village services.

2 California Health Care Foundation. 2022 Edition – Mental Health in California. July 29, 2022. Retrieved from: https://www.chcf.org/publication/2022-edition-mental-health-california/





Introduction

Riverside University Health System has provided health and wellness care in Riverside County since 1893. The RUHS Behavioral Health (RUHS BH) Wellness Village aims to achieve four key community goals:

- Promoting economic development for better job opportunities, enhancing the community's tax base.
- Supporting community success by optimizing resources for maximum citizen benefit.
- Managing community growth through environmental protection and efficient use of public infrastructure.
- Improving quality of life by addressing the root causes of crime.3

The 13-acre campus will encompass five buildings with various activity areas and outdoor gathering areas that connects the community with the outdoors. Aside from addressing critical healthcare needs, the RUHS BH Wellness Village also has the potential to stimulate economic growth, attract investment, create jobs, and enhance the overall quality of life of southern California residents. This report quantifies the economic and fiscal benefits that the construction and operations of the Wellness Village will have and explores the potential social impacts of the Wellness Village by discussing the broader social issues with Behavioral Health.





The Riverside Record. 'Nothing But Positives': RUHS Behavioral Health Wellness Village Location Moved from Hemet to Mead Valley'. July 17,2023. Assessed Nov 20, 2023. Available at: https://riversiderecord.org/noth-ing-but-positives-ruhs-wellness-village-location-moved-from-hemet-to-mead-valley/

Methodology

Beacon Economics assessed future construction and operational expenditures of Riverside University Health System's Wellness Village to determine the impact on cities in Riverside County Supervisorial District I and the surrounding area. This analysis focused primarily on California, Riverside County, and District I. All amounts are reported in 2023 real U.S. dollars.

Beacon Economics uses IMPLAN (Impact for Planning), a state-of-the-art multi-regional input-out-put (MRIO) modeling system that estimates how certain expenditures correlate and affect other industries in the economy to generate total economic and fiscal impacts. This study categorizes economic impacts into three effects:

- **Direct effect** is the additional output of goods and/or services resulting from immediate spending. For example, payments to employees are direct effects.
- **Indirect effect** is the additional output of goods and/or services generated by business-to-business interaction with supplies of direct purchases.
- Induced effect is the additional output of goods and/or services resulting from increased spending by individuals as household incomes rise. For example, an induced effect occurs when RUHS employees spend money earned on goods and services in Mead Valley.

The indirect and induced effects are also referred to as 'ripple' or 'multiplier' effects. The combination of indirect and induced effects is referred to as **secondary impacts**. The initial direct expenditures lead to sequential spending in the respective economy. Altogether, the direct, indirect, and induced effects add up to the **total impact**. The following metrics were used to report the impacts of current facility operations:

• Employment represents the number (head count) of part-time, full-time, and temporary jobs supported through spending by the Wellness Village across Riverside County Supervisorial District I. Jobs 'supported' includes jobs generated, and existing jobs that have been supported by this spending.





- Labor income represents the value of all employment income generated through Wellness Village facility operations, including fringe benefits such as healthcare, retirement, etc.
- Output refers to the total value of production generated by Wellness Village facility operations, including the value of intermediate inputs (goods and services used in the production of equipment, energy, and other production inputs).

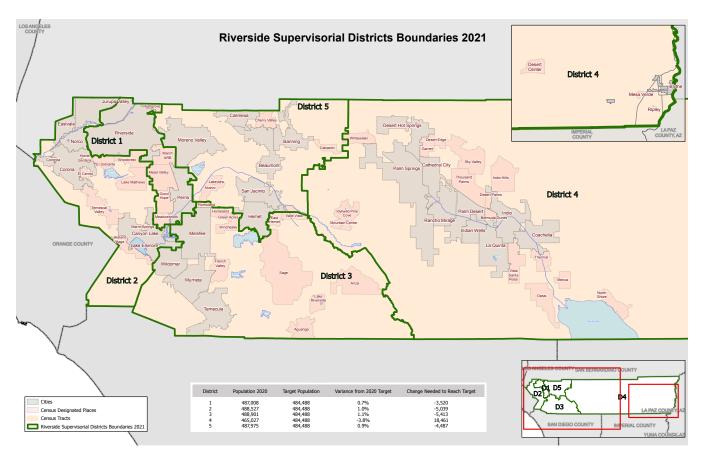
The following map shows the geographic boundaries of Riverside's Supervisorial Districts. The Wellness Village will be located in District I, which is the first geographic level that impact results are reported for on the next page.







Figure 1 – Geographic Reference Map Riverside Supervisorial Districts Boundaries 2021⁴



Source: The County of Riverside. Analysis by Beacon Economics.

The Board of Supervisors is the governing body of the County, certain special districts, and the Housing Authority. Riverside County supervisorial districts are made up of five separate boundaries. The boundaries are set based on population and other factors set forth by state and federal law. Every 10 years, the district lines are redrawn. For more information, visit https://rivco.org/board-supervisors.





Expenditures Overview

This expenditures overview consolidates the expenditure details for the RUHS Wellness Village facilities. Beacon Economics extracted the expenditures information from the total expenses provided by RUHS and estimated the total economic impact of construction and operation of RUHS Wellness Village using IMPLAN model. All amounts reported are in real 2023 U.S. dollars.

The construction expenditures of the RUHS wellness Village include direct construction costs, developer/management fees, professional fees, furniture, fixtures, equipment, legal fees, insurance fees, permitting, utility, and city fees, as well as other construction-related costs. These expenditures are estimated to reach a total of \$563.0 million during the 30-month construction period. Additionally, the construction labor wage and compensation will generate significant economic impact to the surrounding regions in Mead Valley, the rest of Riverside County, and Border California regions.

Post-construction, the operational expenditures for RUHS Wellness Village are estimated to reach a total of \$45.0 million annually. This covers employee compensation, maintenance, utility costs, groundskeeping, and other ongoing operational requirements.

The following sections report the size of the economic impact of these construction and operations expenditures. It reports these impacts at the district level, the county level, and then the state level.





District One Impacts

Construction Impacts

From 2024 to 2026, total direct economic impact of RUHS BH's Wellness Village construction expenditures in District I will be around \$363.9 million. Direct spending on construction will ripple through the local economy and help bolster industries from indirect and induced spending.

In total, the economic output from construction of the Wellness Village in District I is estimated to be \$388.6 million, with approximately \$93.5 million output from labor income (\$37.4 million per year) that will support 629 jobs annually for the duration of construction.

Table 5: Economic Impact of Construction, Riverside County Supervisorial District I, 2024 to 2026

Impact Type	Total Employment	Average Annual	Labor Income (\$M)	Output (\$M)
	(Job-Year)	Employment ⁵		
Direct	1,449.0	580.0	\$86.6	\$363.9
Indirect	100.0	40.0	\$5.8	\$21.4
Induced	22.0	9.0	\$1.1	\$3.3
Total	1,571.0 jobs	629.0	\$93.5 million	\$388.6 million







Over 2.5-years, the Wellness Village project will provide substantial employment opportunities across various industries, thereby enhancing overall industry output. The largest workforce will be in construction, supporting 1,449 job-years, equivalent to around 580 jobs annually over the 2.5-year period.

As expected, direct impacts at \$363.9M, will constitute the most substantial portion of all impact types in Mead Valley (District I). The indirect and induced impacts are approximately 6.4% of the total economic impact.

The construction of the new behavioral health facility – RUHS BH Wellness Village will impact many different industries. Not surprisingly, construction is the industry most impacted, with an annual average of \$145.6 million in economic output. Other industries supported by the economic effects will include wholesale trade in other durable goods merchant wholesalers (\$4.0 million in total 2.5 years), other real estate (\$3.0 million in total 2.5 years), and wholesale trade in household appliances and electrical and electronic goods (\$1.8 million in total 2.5 years). Additionally, sectors such as truck transportation, employment services, and commercial and industrial machinery and equipment rental and leasing will be supported economically by the Wellness Village construction at over \$1 million on average per year.





Table 6: Economic Output Generated by Direct Construction of RUHS Behavioral Health Wellness Village, Riverside County Supervisorial District I, 2024 to 2026

Industry	Total Economic Output (\$M)	Annual Average Output (\$M)
Construction of new health care structures	363.9	145.6
Wholesale – Other durable goods merchant wholesalers	4.0	1.6
Other real estate	3.0	1.2
Wholesale – Household appliances and electrical and electronic goods	1.8	0.7
Truck transportation	1.5	0.6
Employment services	1.1	0.5
Commercial and industrial machinery and equipment rental and leasing	1.0	0.4
Other local government enterprise	0.7	0.3
Owner-occupied dwellings	0.6	0.3
Wholesale – Machinery, equipment, and supplies	0.5	0.2
Warehousing and storage	0.5	0.2
Insurance carriers, except direct life	0.5	0.2
Retail - Building material and garden equipment and supplies stores	0.4	0.2
Wholesale - Other nondurable goods merchant wholesalers	0.4	0.1
Architectural, engineering, and related services	0.3	0.1
Hospitals	0.3	0.1
Engineered wood member and truss manufacturing	0.2	0.1







In addition to the significant economic impacts in Riverside County Supervisorial District I, various forms of spending will generate considerable fiscal impacts. State and local taxes in the district will total \$6.1 million, while federal taxes will total almost \$17.0 million.

Table 7: Fiscal Impacts of Construction, Riverside County Supervisorial District I, 2024 to 2026

Tay Typo	State and Local	Federal Taxes (\$M)	Total (\$M)
Tax Type	Taxes (\$M)	rederal laxes (\$WI)	
Direct	\$4.2	\$16.3	\$20.5
Indirect	\$1.7	\$0.6	\$2.3
Induced	\$0.2	\$0.1	\$0.3
Total	\$6.1 million	\$17.0 million	\$23.1 million





Operations Impacts

Economic output of the Wellness Village's annual operational expenses will total \$45.8 million in Riverside County Supervisorial District I, of which \$27.7 million will be in labor income, supporting 626 jobs annually.

Table 8: Annual Economic Impact of Operations Expenditures, Riverside County Supervisorial District I

Impact Type	Employment	Labor Income (\$M)	Output (\$M)
Direct	609.0	\$26.9	\$43.7
Indirect	15.0	\$0.7	\$1.9
Induced	2.0	\$0.08	\$0.2
Total	626.0 jobs	\$27.7 million	\$45.8 million







The economic impact of the RUHS Behavioral Health Wellness Village is linked to heightened demand for behavioral healthcare services. This demand will, in turn, stimulate employment growth, notably in the employment services sector, generating an annual economic output of \$0.31 million. Moreover, operations of the Wellness Village will spur demand for ancillary services, including legal, insurance, and management consulting, creating a more localized economic ecosystem.

Table 9: Annual Economic Output Generated by Operations of RUHS Behavioral Health Wellness Village, Riverside County Supervisorial District I

Industry	Economic Output (\$ Thousands)
Outpatient care centers	43,679.0
Other real estate	323.8
Employment services	310.4
All other food and drinking places	281.8
Other local government enterprises	80.6
Management of companies and enterprises	64.2
Warehousing and storage	54.0
Services to buildings	51.8
Owner-occupied dwellings	46.9
Maintenance and repair, construction of nonresidential structures	43.5
Legal services	42.7
Insurance agencies, brokerages, and related activities	41.5
Investigation and security services	37.9
Monetary authorities and depository credit intermediation	32.7
Management consulting services	30.6
Limited-service restaurants	28.9
Accounting, tax preparation, bookkeeping, and payroll services	24.9





Operation of the Wellness Village will have a direct fiscal impact on state and local taxes amounting to \$0.1 million, while federal taxes are expected to total \$3.56 million, a combined direct tax impact of \$3.66 million. Indirect impact will contribute an additional \$0.05 million to state and local taxes and \$0.1 million to federal taxes, a total indirect tax impact of \$0.15 million. The induced impact on state and local taxes is an estimated \$0.02 million, with an additional \$0.01 million in federal taxes, a total induced impact of \$0.03 million. Considering these factors, the cumulative impact on state and local taxes totals \$0.17 million, with federal taxes showing a more substantial impact of \$3.67 million. The overall tax impact, encompassing state, local and federal taxes, is estimated at \$3.84 million.

Table 10: Annual Fiscal Impact of Operations Expenditures, Riverside County Supervisorial District I

Тах Туре	State and Local Taxes(\$M)	Federal Taxes (\$M)	Total (\$M)
Direct	\$0.10	\$3.56	\$3.66
Indirect	\$0.05	\$0.10	\$0.15
Induced	\$0.02	\$0.01	\$0.03
Total	\$0.17	\$3.67	\$3.84





Riverside County Impacts

Construction Impacts

From 2024 to 2026, total indirect and induced economic impact of RUHS BH's Wellness Village construction expenditures in Riverside County (outside of Supervisorial District I), will be approximately \$109.4 million, with \$34.5 million generated in labor income (\$13.8 million per year) that will help support 254 jobs annually for the duration of construction.

(**Note**: There are no direct effects since they are based on construction and operations, which will take place in District I).

Table 11: Economic Impact of Construction, Riverside County Outside of District I, 2024 to 2026

Total Employment Impact Type	Average Annual	Labor Income (\$M)	Output (\$M)	
	(Job-Year)	Employment ⁶	Labor income (\$W)	<u> </u>
Indirect	311.0	124.0	\$18.4	\$59.2
Induced	325.0	130.0	\$16.1	\$50.2
Total	636.0 jobs	254.0 jobs	\$34.5 million	\$109.4 million

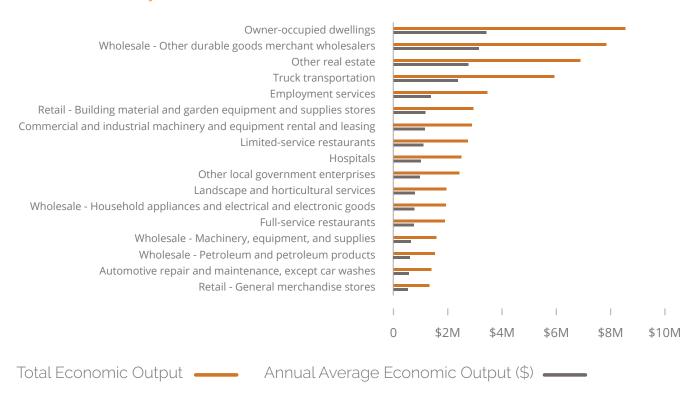
⁶ Average number of jobs supported annually over the 30-month period from 2024 to 2026.





From 2024 to 2026, construction activities for RUHS Behavioral Health Wellness Village in Riverside County (outside of Supervisorial District I) are expected to generate an indirect and induced economic impact of \$8.5 million on the owner-occupied dwellings industry. Wholesale trade sectors, particularly in other durable goods merchant wholesalers, is expected to follow with \$7.8 million, highlighting the importance of the distribution and sale of various construction-related products. The construction of the Wellness Village will also impact Logistics Sectors such as truck transportation (\$5.9 million), and employment services (\$3.5 million).

Figure 2: Economic Output Generated by Secondary Impacts of Construction, Riverside County Outside of District I, 2024 to 2026







The indirect fiscal impact of Wellness Village construction will contribute \$5.9 million to state and local taxes and \$2.8 million to federal taxes, a total indirect tax impact of \$8.7 million in Riverside County (outside of Supervisorial District I). Additionally, the induced impacts stemming from increased household income and spending associated with construction, will contribute \$4.56 million to state and local taxes and \$2.8 million to federal taxes, totaling \$7.3 million. The overall fiscal impact of construction in Riverside County (outside of Supervisorial District I), is estimated at \$10.45 million in state and local taxes and \$5.57 million in federal taxes, a total of \$16.0 million.

Table 12: Fiscal Impacts of Construction, Riverside County Outside of District I, 2024 to 2026

Тах Туре	State and Local Taxes(\$M)	Federal Taxes (\$M)	Total (\$M)
Indirect	\$5.89	\$2.81	\$8.7
Induced	\$4.56	\$2.76	\$7.3
Total	\$10.45 million	\$5.57 million	\$16.0 million





Operations Impacts

The total economic output of RUHS Behavioral Health Wellness Village's annual operational expenses in Riverside County (outside of Supervisorial District I) will amount to \$21.5 million, of which \$6.9 million will come from labor income, supporting 147 jobs annually.

Table 13: Annual Economic Impact of Operations Expenditures, Riverside County Outside of District I

Impact Type	Employment	Labor Income (\$M)	Output (\$M)
Indirect	80.0	\$3.5	\$11.1
Induced	67.0	\$3.3	\$10.4
Total	147.0 jobs	\$6.9 million	\$21.5 million

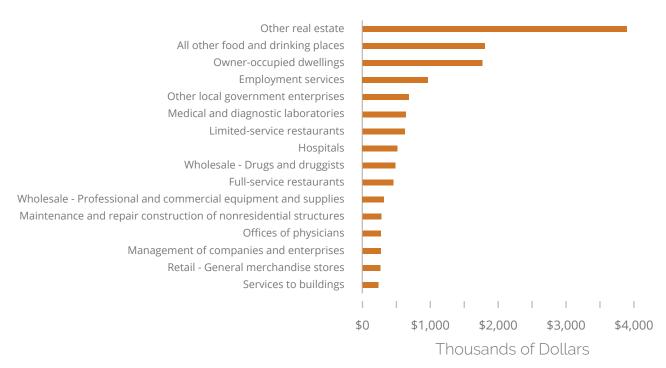






The economic impact of RUHS Behavioral Health Wellness Village's operation will stimulate employment growth for Riverside County (outside of Supervisorial District I), notably in the employment services sector, generating an annual economic output of approximately \$1.0 million. Moreover, the operations of the Wellness Village will spur demand for ancillary services, including medical and diagnostic laboratories, other local government enterprise, and limited-service restaurants, creating an economic output of \$1.8 million annually.

Figure 3: Annual Economic Output Generated by Secondary Impacts of Operations of RUHS Behavioral Health Wellness Village, Riverside County Outside of District I







The indirect fiscal impact of Wellness Village operations will contribute \$0.43 million to state and local taxes and \$0.71 million to federal taxes, resulting in a total indirect fiscal impact of \$1.14 million. Additionally, the induced fiscal impacts, stemming from increased household income and spending associated with operations will contribute \$0.94 million to state and local taxes and \$0.57 million to federal taxes, totaling \$1.51 million. The overall fiscal impact of RUHS Behavioral Health Wellness Village in Riverside County, (outside of Supervisorial District I), is estimated at \$1.37 million in state and local taxes and \$1.28 million in federal taxes, a combined total of \$2.65 million.

Table 14: Annual Fiscal Impact of Operations Expenditures, Riverside County Outside of District I

Тах Туре	State and Local Taxes(\$M)	Federal Taxes (\$M)	Total (\$M)
Indirect	\$0.43	\$0.71	\$1.14
Induced	\$0.94	\$0.57	\$1.51
Total	\$1.37 million	\$1.28 million	\$2.65 million





California Impacts

Construction Impacts

From 2024 to 2026, total indirect and induced economic impact of RUHS BH's Wellness Village construction expenditures in California (outside of Riverside County), will be approximately \$105.1 million, with \$33.9 million generated in labor income (\$13.6 million per year) that will help support 154 jobs annually for the duration of construction.

Table 15: Economic Impact of Construction, California Outside of Riverside County, 2024 to 2026

Total Employment Impact Type	Average Annual	Labor Income (\$M)	Output (\$M)	
ппрасстуре	(Job-Year)	Employment ⁷	Labor Income (\$W)	
Indirect	212.0	85.0	\$21.1	\$69.0
Induced	172.0	69.0	\$12.8	\$36.1
Total	384.0 jobs	154.0 jobs	\$33.9 million	\$105.1 million

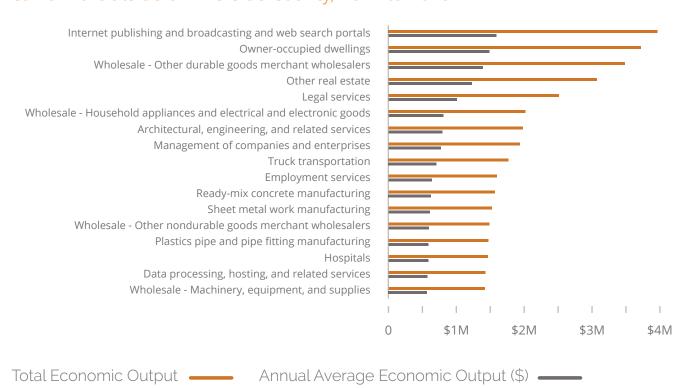
⁷ Average number of jobs supported annually over the 30-month period.





The economic output of Wellness Village construction will ripple through the economy and create \$69.0 million in indirect and \$36.1 million in induced economic output in California (outside of Riverside County). The internet publishing and broadcasting and web search portals, and owner-occupied dwellings sectors are expected to receive substantial indirect and induced economic impacts of \$4.0 and \$3.7 million (total over the 2.5-year construction period), respectively. Whole-sale trade, particularly in other durable goods merchant wholesalers, is expected to follow with \$3.5 million, highlighting the importance of the distribution and sale of various construction-related products. Construction will also impact architectural, engineering and related services (\$2.0 million) in California (outside of Riverside County).

Figure 4: Economic Output Generated by Secondary Impacts of Construction, California Outside of Riverside County, 2024 to 2026









The indirect fiscal impact of construction will contribute \$3.9 million in state and local taxes to California (outside of Riverside County), and \$4.3 million in federal taxes, a total indirect tax impact of \$8.15 million. Additionally, the induced fiscal impacts stemming from increased household income and spending associated with construction will contribute \$2.8 million to state and local taxes and \$2.5 million to federal taxes, totaling \$5.3 million. Collectively, the overall fiscal impact of construction in the region is estimated at \$6.6 million in state and local taxes and \$6.8 million in federal taxes, a combined total of \$13.4 million.

Table 16: Fiscal Impact of Construction, California Outside of Riverside County, 2024 to 2026

Total	\$6.6 million	\$6.8 million	\$13.4 million
Induced	\$2.76	\$2.53	\$5.3
Indirect	\$3.87	\$4.28	\$8.15
Тах Туре	State and Local Taxes (\$M)	Federal Taxes (\$M)	Total (\$M)





Operations Impacts

The total economic output of RUHS Behavioral Health Wellness Village's annual operational expenses in California (outside of Riverside County), will total \$10.9 million, of which \$4.0 million will come from labor income, supporting 47 jobs annually in California (outside of Riverside County).

Table 17: Annual Economic Impact of Operations Expenditures, California Outside of Riverside County

Impact Type	Employment	Labor Income (\$M)	Output (\$M)
Indirect	20.0	\$2.05	\$5.3
Induced	27.0	\$2.0	\$5.6
Total	47.0 jobs	\$4.0 million	\$10.9 million

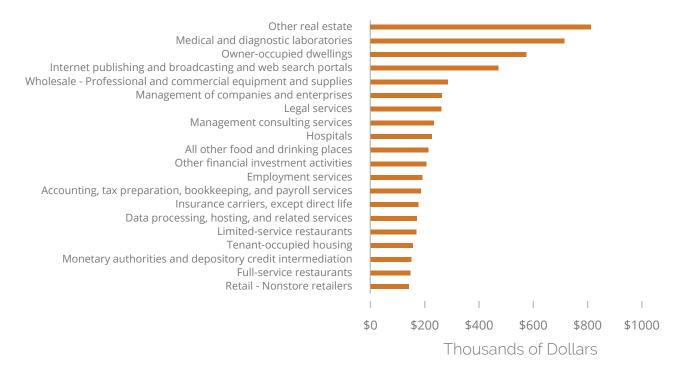






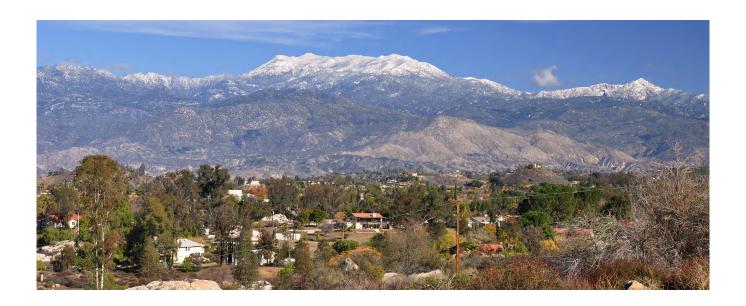
The economic impact of Wellness Village operations will stimulate employment growth for California (outside of Riverside County). Medical and diagnostic laboratories stand out with \$0.7 million total annual economic output, closely followed by owner-occupied dwellings with \$0.6 million, and various professional and commercial equipment and supplies wholesalers, which will benefit by \$0.4 million annually.

Figure 5: Annual Economic Output Generated by Secondary Impacts of Operations of RUHS Behavioral Health Wellness Village, California Outside of Riverside County









The indirect fiscal impact of Wellness Village operational activities will contribute \$0.24 million to state and local taxes and \$0.44 million to federal taxes, a total indirect fiscal impact of \$0.68 million. Additionally, the induced impacts, stemming from increased household income and spending associated with construction, will contribute \$0.43 million to state and local taxes and \$0.39 million to federal taxes, totaling \$0.82 million. Collectively, overall fiscal impacts of the Wellness Village operations in California (outside of Riverside County), are estimated at \$0.67 million in state and local taxes and \$0.83 million in federal taxes, a combined total of \$1.5 million.

Table 18: Annual Fiscal Impact of Operations Expenditures, California Outside of Riverside County

Тах Туре	State and Local Taxes(\$M)	Federal Taxes (\$M)	Total (\$M)
Indirect	\$0.24	\$0.44	\$0.68
Induced	\$0.43	\$0.39	\$0.82
Total	\$0.67 million	\$0.83 million	\$1.50 million





Social Impacts

Multiple studies have demonstrated that behavioral health issues are on the rise in the United States. ⁸, ⁹, ¹⁰ It is estimated that more than one in five adults in the U.S. live with a mental illness. From 2008 to 2021, the number of adults aged 18 or older with a mental illness increased by nearly 46% from 40 million to 58 million. Of that increase, 12.2% (over six million people), occurred between 2020 and 2021 (latest data available). This is true in California as well. Based on California Health Care Foundation's recent report, approximately 1 in 7 adults in California deals with a mental illness, and about 1 in 26 adults has a severe mental illness that makes it difficult to perform daily tasks. Among children, 1 in 14 experiences an emotional disturbance that impairs functioning within family, school, or community settings.

Approximately 54% of adults living in Riverside County stated that they had obtained help for emotional or behavioral health or substance abuse issues between 2020 and 2021. The number of adults needing and receiving behavioral healthcare services has increased 0.5% from the prior year (2019-2020), despite a decrease in the total population of Riverside County. This shows a clear need for increased behavioral health care.

The following sections explore the Behavioral Health programs that RUHS runs, how they are helping the field to innovate, and state policies that will increase the demand for the services of the Wellness Village.

- 8 https://www.nimh.nih.gov/health/statistics/mental-illness
- 9 https://www.cdc.gov/nchs/products/databriefs/db444.htm
- 10 https://news.gallup.com/poll/467303/americans-reported-mental-health-new-low-seek-help.aspx
- 11 <u>California Health Interview Survey.</u> Measurement period:2020-2021. Maintained By: Conduent Healthy Communities Institute. Data last updated at: https://www.shaperivco.org/indicators/index/view?indicatorId=51&localeId=270







Community Programs

RUHS has implemented a number of programs aimed at improving the behavioral health of Riverside communities.

SoCal Crisis Helpline: Through this initiative, RUHS BH has assisted 5,405 individuals since 2021. Although there has been a 31.7% increase in behavioral health hotline calls since 2021, they experienced no fatalities among those seeking help. Of these calls, 20% were related to suicide, and more than half addressed various behavioral health needs, including depression, grief, loneliness, emotional distress, and diagnosed behavioral health conditions requiring medication or care that could not be accessed.¹²

As the size of the population reporting behavioral health issues grows each year, there are ongoing concerns about behavioral health worker shortages not only in California but also in many parts of the United States. These shortages can be attributed to a combination of factors, including a growing demand for behavioral health services, insufficient funding, workforce burnout, and challenges in recruitment and retention.

Desert Sun. Riverside County's Suicide Prevention Coalition offers free support for residents. September 23,2023. Assessed November 30, 2023. Available at: https://www.desertsun.com/story/opinion/contributors/valley-voice/2023/09/28/river-side-countys-suicide-prevention-coalition-offers-much-needed-free-support/70965689007/





The Workforce Education and Training program is part of RUHS BH 's plan to fulfill the requirements and objectives of the Mental Health Services Act (MHSA). The MHSA, passed in California in 2004, imposes a 1% tax on personal income above \$1 million to fund behavioral health services. One prime example of RUHS's contribution to alleviating worker shortages is the Graduate Internship, Field, & Traineeship program. This program offers education and training for Masters of Social Work, Marriage Family Therapists, and Personalized Cognitive Counseling. It focuses on developing students into competent, effective, and ethical clinicians within the public behavioral health system. The program connects students to valuable resources, including job opportunities, application instructions, and relevant professional organizations (such as NASW, CAMFT, and CALPCC).

Do Novo is an Integrated Care Partnership program, targeting justice-involved individuals with behavioral health, substance use, or co-occurring disorders in Riverside County. Despite initial challenges, the program exceeded its proposed impact, serving 515 individuals beyond the planned 180.¹³ The population, primarily middle-aged males with serious mental illness (SMI) and substance use disorders, faced significant challenges such as homelessness and housing instability before receiving treatments from RUHS-Behavioral Health.

The outcomes demonstrated positive changes, including a 64% reduction in jail days, low recidivism, and notable decreases in both behavioral health emergency room use (reduced by 88%) and acute hospitalizations (reduced by 91%). Employment during program participation increased by 34%.¹⁴

- Riverside University Health System. Proposition 47 Integrated Care Behavioral Health Full-Service Partnership Program Evaluation Report for the Board of State and Community Corrections. 2021. Assessed November 20,2023. Available at: https://www.bscc.ca.gov/wp-content/uploads/Riverside-Cohort-1-final-report.pdf.
- Riverside University Health System. Proposition 47 Integrated Care Behavioral Health Full-Service Partnership Program Evaluation Report for the Board of State and Community Corrections. 2021. Assessed November 20,2023. Available at: https://www.bscc.ca.gov/wp-content/uploads/Riverside-Cohort-1-final-report.pdf.







from various regional colleges and universities. The Office of Graduate Medical Education, located at the Campus Professional Center, serves as a central hub for administrative and human resource support for these programs. These programs contribute to medical education and training, ensuring a robust pipeline of skilled healthcare professionals for the community. RUHS is in the process of implementing a comprehensive Diversity, Equity, and Inclusion (DEI) training program, which will include workshops, online modules, role-playing scenarios, guest speakers, and ongoing discussions aimed at addressing unconscious biases among staff members. While more than 150 staff members have already undergone DEI training on implicit bias, RUHS is now considering how to expand this initiative to reach all 8,000 workers within the system.¹⁵

To identify key themes reported by RUHS customers, Beacon analyzed its Reviews on Google. The following word cloud illustrates the key words used in those reviews. The larger the word, the more often it is used by customers

15 California Health Care Foundations. Reaching for Health Equity. April 17, 2023. Assessed November 30, 2023.

https://www.chcf.org/blog/reaching-health-equity/





Figure 6. Keywords Extracted from Riverside University Health System Google Review



Sources: Riverside University Health System Google Review





Innovations and Initiatives in Behavioral Health Support

In addition to the above programs, RUHS has invested in the following innovative solutions.

24/7 Mobile Crisis Response Program: Staffed by therapists, case managers, substance abuse counselors, and peer support specialists, the 24/7 Mobile Crisis Response teams by RUHS BH are equipped to address suicidal thoughts, substance use emergencies, and other behavioral health crises. RUHS BH offers discreet on-scene support with five new strategically located vans and has teamed up with Sycamores to ensure 24/7 coverage year-round.

In fiscal year 2021-22, the Mobile Crisis Response teams successfully diverted 70% of crisis contacts away from law enforcement and inpatient hospital admissions.¹⁶

A4i Pilot Program: In 2021, RUHS Behavioral Health, in partnership with California Mental Health Services Authority (CalMHSA), extended the A4i pilot program, leveraging the mobile app to support mental health services, especially for at-risk populations such as those experiencing institutionalization, homelessness, or incarceration. Preliminary findings suggest that patients who utilized the A4i app extensively also reported higher communication and engagement with their mental health providers, indicating a positive correlation between app usage and mental health treatment involvement. ¹⁷

¹⁷ RUHS Behavioral Health. UCI-A4i Evaluation report. June 2022. Retrieved from: https://www.memotext.com/
wp-content/uploads/2022/08/UCI-A4i_Document-for-Evaluation-report_Final.pdf





Record Gazette. Mobile Crisis Response goes 24/7. Jan 18, 2024. Retrieved from: https://www.recordga-zette.net/news/inland_empire/mobile-crisis-response-goes-24-7/article_0cad37a8-b62e-11ee-bda4-7f40e288c107.html

Take My Hand™ Web-Based Service: Launched in 2020 by RUHS Behavioral Health, Take My Hand™ is a web-based service that offers live support from Certified Peer Support Specialists who have personally recovered from behavioral health conditions. Users can receive judgment-free assistance, ask questions, and connect with resources anonymously through text-based conversations. Operating Monday to Thursday (8 am to 5 pm) and Friday (8 am to 4 pm), the service provides emotional support for individuals aged 16 and older facing challenges such as relationship issues, difficult habits, financial stress, or health concerns.

SET-4-School Program: In 2018, RUHS Behavioral Health initiated the SET-4-School program to enhance behavioral health access for children aged 0-5 in Riverside County. This three-year project, funded by a \$7.5 million grant from First 5 Riverside (supported by tobacco taxes from Proposition 10), collaborates with school districts in Riverside, Jurupa, Nuview, Lake Elsinore, and Perris. The program offers behavioral health screening, follow-up services, parent education, teacher support, child social skills groups, and behavioral health treatment. Partnerships with nonprofit organizations, including Catholic Charities, Family Service Association, and Victor Community Support Services, enable additional intervention programs.







Behavioral Health Research

RUHS's Research and Evaluation program allows it to assess the effectiveness of their programs and services over time. For example, in May 2022, RUHS published an Alcohol Abuse report that highlights that alcohol-related mortality increased by 91% from 2010 to 2020 in Riverside County.

18 It provides demographic insights into alcohol-related issues in the County, such as the fact that there are higher rates of binge drinking, hospitalization, and mortality rates among males. The report also emphasizes the connection between alcohol abuse and behavioral health issues in Riverside County. A significant proportion (23.8%) of alcohol-related emergency department visits involved a behavioral health disorder, suicide attempt, or suicidal ideation from 2019 to 2021.

Another example is the Fatal Overdoses Among People Experiencing Homelessness report¹⁹ published in September 2022, which finds that the number of fatal overdoses among People Experiencing Homelessness increased, with a 139% rise from 2019 to 2021. In contrast, fatal overdoses among people not experiencing homelessness (PNEH) increased by 71% during the same period. Most overdose fatalities among People Experiencing Homelessness occurred in the Northwest region of Riverside County, the most urbanized area, and a significant proportion of overdose fatalities among People Experiencing Homelessness occurred outdoors.

- Riverside University Health System Public Health. Epidemiology and Program Evaluation. Alcohol Abuse.

 Alcohol morbidity and mortality report. May 2022. Assessed December 20, 2023. Retrieved from: https://www.ruhealth.org/sites/default/files/Epidemiology%20%26%20Program%20Evaluation/Alcohol%20Report.pdf
- 19 Riverside University Health System Public Health. Epidemiology and Program Evaluation. Fatal Overdoses
 Among People Experiencing Homelessness. Sep 2022. Assessed December 20, 2023. Retrieved from:

https://www.ruhealth.org/sites/default/files/Epidemiology%20%26%20Program%20Evaluation/Overdose%20Fatalities%20Among%20
PEH%202022.pdf





Supportive Housing with Sustainability Focus

The RUHS BH department is instrumental in securing funding for Vista de La Sierra, a sustainable housing project comprising more than 39 units of permanent supportive housing.²⁰ Specifically, the project features zero net energy with rooftop solar panels and aims for LEED for Homes Gold certification. The building is signed to generate 100% of its energy needs onsite through 257 kilowatts of rooftop solar panels, exceeding California's Title 24 building energy efficiency standards.

Additionally, as the need for a lower level of care for supportive housing remains an issue, RUHS BH opened 162 new supportive housing units through No Place Like Home (NPLH) funding, and by 2026, another 428 NPLH units and 611 affordable housing units will be completed.

The Supportive Transitional Housing initiative within the Wellness Village is a central component of the comprehensive wellness program, with an extensive Gross Square Footage (GSF) of 190,249. The program budgeted a total of \$187M dollars. Supportive Transitional Housing accounts for a substantial 42% of the total budget of RUHS Wellness Village, underscoring its pivotal role in the wellness program's mission. Calculated at \$988 per square foot, the program exhibits a cost-efficient approach to providing housing care. The operational expenses, spanning 40 years, indicate a commitment to ongoing support and services.

Pacific Union Partners to Provide Sustainable Housing. August 18, 2022. Assessed December 20, 2023. Available at: https://adventistreview.org/release/pacific-union-partners-to-provide-sustainable-housing/





Behavioral Health Policies Shaping Healthcare and Community Well-Being

A number of state laws have been passed in recent years that shift priorities of care towards Behavioral Health, increasing the demand for the services that will be provided by the Wellness Village.

The Community Assistance, Recovery, and Empowerment (CARE) Act, a law aimed at addressing untreated behavioral health disorders through court-mandated behavioral health programs, was enacted in September 2022. Riverside County is one of the first seven counties to implement the CARE Act. The CARE Act enables family members and first responders to petition for a court-mandated behavioral health treatment plan for individuals diagnosed with specific disorders, including homelessness criteria.

The Mental Health Services Act (MHSA), originally enacted in 2005, focuses on improving and expanding behavioral health care. The effort is well underway with Governor Newsom's mental health system overhaul, with a focus on housing, wraparound services, and early intervention for children.²¹ Proposition 1, known as the Behavioral Health Services Act, seeks to modernize MHSA and raise \$6.2 billion in bond funding for housing and treatment beds. The proposed shift in dynamic requires that approximately \$1 billion is dedicated to housing individuals with severe mental illness and substance use disorders, expanding proven strategies like full-service partnerships. It's important to note that Californians will vote on Proposition 1 in the upcoming March 2024 ballot.

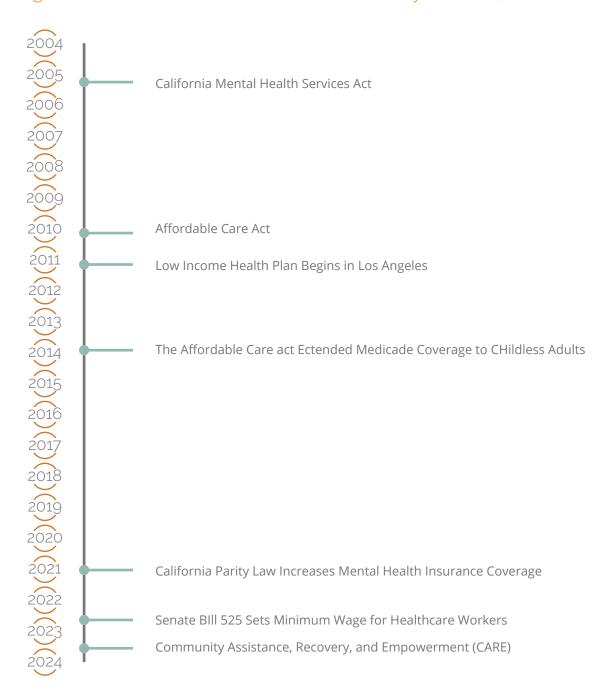
CalMatters. Shifting how California funds its mental health system is critical to getting more people off the streets. November 6, 2023. Assessed November 20, 2023. Available at: https://calmatters.org/commentary/2023/11/mental-health-services-act-update/





Other initiatives, like the California Parity Law, aim to increase access to behavioral health treatment. A timeline of relevant policies is shown below in Figure 7.

Figure 7. California Mental Health Related Policy Timeline, 2003-2023



Source: California Mental Health Services Oversight & Accountability Commission. Analysis by Beacon Economics







Conclusion

Riverside University Health System plays an important role in the Riverside County community, providing significant economic impacts that support thousands of jobs, both directly and indirectly, and generating millions of dollars in both labor income and economic output. RUHS's fiscal impacts also generate millions of dollars in local, state, and federal taxes. Most importantly, RUHS provides an invaluable service in helping the Riverside County community tackle behavioral health issues, a growing and significant problem that affects the overall wellbeing of Riverside County residents.







Riverside County Supervisorial District I

- From 2024 to 2026, the total economic output from RUHS Behavioral Health Wellness Village construction in the Riverside County Supervisorial District I is estimated to be \$388.6 million, with approximately \$93.5 million output from labor income (\$37.4 million per year) that will help support 629 jobs annually for the duration of construction.
- The overall fiscal impact of RUHS Behavioral Health Wellness Village construction in the Riverside County Supervisorial District I will generate \$6.1 million in State and local taxes. On a federal level, \$17.0 million will be generated in tax impacts, a combined total of \$23.1 million.
- The total economic output of RUHS Behavioral Health Wellness Village's annual operational expenses in the Riverside County Supervisorial District I will total \$45.8 million, of which \$27.7 million will be in labor income, supporting 626 jobs annually.
- Operation expenditures fiscal impact, encompassing both state and local as well as federal taxes, are estimated at \$3.84 million annually in the Riverside County Supervisorial District I.





Riverside County (Outside of Supervisorial District I)

- From 2024 to 2026, total indirect and induced economic impact of construction expenditures in Riverside County (outside of Supervisorial District I), will be approximately \$109.4 million, with \$34.5 million generated in labor income (\$13.8 million per year) that will help support 254 jobs annually for the duration of construction.
- The overall fiscal impact of RUHS Behavioral Health Wellness Village construction in Riverside County (outside of Supervisorial District I), are estimated at \$10.45 million in state and local taxes and \$5.57 million in federal taxes, a combined total of \$16.0 million.
- The total economic output of RUHS Behavioral Health Wellness Village's annual operational expenses in Riverside County (outside of Supervisorial District I), will amount to \$21.5 million, of which \$6.9 million will come from labor income, supporting 147 jobs annually.
- Operation expenditures fiscal impact, encompassing both state and local as well as federal taxes, are estimated at \$2.65 million annually in Riverside County (outside of Supervisorial District I).









California (Outside of Riverside County)

- From 2024 to 2026, total indirect and induced economic impact of construction expenditures in California (outside of Riverside County), will be approximately \$105.1 million, with \$33.9 million generated in labor income (\$13.6 million per year) which will help support 154 jobs annually for the duration of construction.
- The overall fiscal impact of construction in California (Outside Riverside County) is estimated at \$6.6 million in state and local taxes and \$6.8 million in federal taxes, a combined total of \$13.4 million.
- The total economic output of RUHS Behavioral Health Wellness Village's annual operational expenses in California (outside of Riverside County), will amount to \$10.9 million, of which \$4.0 million will come from labor income, supporting 47 jobs annually in California (outside of Riverside County).
- Operation expenditures fiscal impact, encompassing both state and local as well as federal taxes, are estimated at \$1.5 million annually.





Appendix

Multi-Regional Input-Output Methodology and IMPLAN

This report is based on an economic analysis technique known as Multi-Regional Input-Output (MRIO) analysis, which is a means of examining inter-industry relationships across several regions. A MRIO analysis builds on the standard Input-Output (I-O) analysis by expanding effects from monetary market transactions beyond a single region and helps capture leakages in other regions. In a MRIO analysis, the direct effect in one region triggers indirect and induced effects in others. The results of the analysis reveal the effects of a change in one or several economic activities on an entire economy, as well as the economic interdependence of regions.

IMPLAN expands on the traditional I-O approach to include transactions among industries and institutions, and among institutions themselves, thereby capturing all monetary market transactions in a given period. This specific report uses the IMPLAN web model. For more information on the IMPLAN modeling process, visit IMPLAN.com.

Although IMPLAN provides an excellent framework for conducting impact analysis, Beacon Economics takes extra precautions to ensure model results are valid, drawing on decades of experience to tailor the model to the unique demands of each economic impact analysis the firm conducts. Procedures and assumptions are thoroughly and systematically inspected for validity and individual project appropriateness before any analysis is performed.





About Beacon Economics

Founded in 2007, Beacon Economics, an LLC and certified Small Business Enterprise with the state of California, is an independent research and consulting firm dedicated to delivering accurate, insightful, and objectively based economic analysis. Employing unique proprietary models, vast databases, and sophisticated data processing, the company's specialized practice areas include sustainable growth and development, real estate market analysis, economic forecasting, industry analysis, economic policy analysis, and economic impact studies. Beacon Economics equips its clients with the data and analysis they need to understand the significance of on-the-ground realities and to make informed business and policy decisions.

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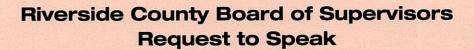




Riverside County Board of Supervisors Request to Speak

Submit request to Clerk of Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form.

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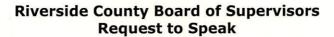
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I give my 3 minutes	10:	



Riverside County Board of Supervisors Request to Speak

Submit request to Clerk of Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form.

SPEAKER'S NAME: DORUS	De anti	NO		
Address: 35900 Bingly City: TAUNLITZ, CA	CT Zip: 929	562		
Phone #: 31-368-1327	 Agenda #	8		
PLEASE STATE YOUR POSITION BELOW:				
Position on "Regular" (non-appealed) Agenda Item:				
Support	Oppose	Neutral		
Note: If you are here for an agenda item that is filed for "Appeal", please state separately your position on the appeal below:				
Support	Oppose	Neutral		
I give my 3 minutes to:				



Submit request to Clerk of Board (right of podium), Speakers are entitled to three (3) minutes, subject Board Rules listed on the reverse side of this form.

SPEAKER'S NAME:	Maria Ali	lavade
Address: 449 6 C	alfornia Az ow-up mail respon	SE NOVO 9786 se requested)
city: Novco C	a zip: 98	2860
Phone #: <u>951-413</u>	5-842-8	
Date: 3/19/24	Agenda #	2-[
PLEASE STATE YOUR	R POSITION BELO	ow:
Position on "Regula	r" (non-appeale	d) Agenda Item:
Support _	Oppose	Neutral
Note: If you are he for "Appeal", please the appeal below:		
Support	Oppose	Neutral
I give my 3 minutes	to:	