	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 16.6 – Good Neighbor Policy. *For large scale logistics, warehouse and distribution Projects, address the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019, and as may be subsequently amended.*	☐	☐	☒	Not applicable. The Project does not propose logistics, warehouse, or distribution uses.
HC 16.10 – Compact Development. *Plan for compact development Projects in appropriate locations, including in existing communities and the clustering of affordable and mixed-income housing therein, that make the most efficient use of land and concentrate complementary uses close to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.*	☐	☒	☐	The Project's master land use plan proposes a mix of diverse uses for the site, including tourist commercial, commercial retail, and range of residential densities. The Project has been master planned to optimize pedestrian and bicycle travel within the Project, and includes a complimentary mix of uses that provides housing suitable to accommodate workers and guests of the horse show to reduce vehicle trips.
HC 16.14 – Sensitive Receptors, Pesticides and Fertilizers. *Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.*	☐	☒	☒	There are very few sensitive receptors in the Project vicinity, including three single-family residences on the east side of Tyler Street. Development of the site will end crop cultivation and associated use of agri-chemicals on these lands. The Project shall also comply with State and County-wide regulations regarding the dust control, potentially hazardous materials storage, handling, use, and disposal of these materials. See Air Quality and Hazardous Materials discussions in the Projects EIR.
HC 16.15 – **Site Design and *Industrial and Warehousing.*** *Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.*	☐	☐	☒	Not applicable. The Project does not propose industrial or warehouse development.

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 16.16 – Landscaping, Particulate Matter, and Air Pollution. *Apply pollution control measures such as landscaping, vegetation, and green zones (in cooperation with the SCAQMD) and other materials, which trap particulate matter or control air pollution.*	☐	☒	☐	The Project's Conceptual Landscape Plans and Design Guidelines propose to incorporate desert trees, shrubs, and ground covers/accents in the landscape design. The proposed landscaping will assist in stabilizing the soil and reduce particulate matter and air pollution.
HC 16.18 – Job Creation and Reduction of Vehicle Miles. *Promote new development that emphasizes job creation and reduction in vehicle miles traveled in job-poor areas and does not otherwise contribute to onsite emissions to improve air quality.*	☐	☒	☐	This mixed-use Project will provide 1,280-1,400 jobs to the surrounding area in hospitality, retail, food preparation, equestrian and other areas, and includes a complimentary mix of uses that provides housing suitable to accommodate workers and guests of the horse show to reduce vehicle miles traveled. In the near-term, the Project will modestly exceed County VMT thresholds but will fall within those thresholds as development continues in the area. The Project includes neighborhood-scale commercial services that will serve on-site and other local residents and visitors. See the Project's EIR for further discussion on job creation and VMT impacts.
HC 16.22 – Industr**ial** ***Water Use Discharges and Agriculture and Pesticide/ Chemical Use.*** *Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the Salton Sea and other standing bodies of water.*	☐	☐	☒	Not applicable. The Project does not propose such uses.

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 16.23 – Industrial and Agriculture Uses and Toxic Contamination. *Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.*	☐	☐	☒	Not applicable. The Project does not propose such uses.
HC 16.24 – Compatibility Criteria for Industrial, Agricultural, And Adjacent Land Uses. *Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic, and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.*	☐	☐	☒	Not applicable. The Project does not propose such uses.
HC 16.25 – Mining Projects and Compatibility. *Require the conversion of mining operations into uses that are compatible with surrounding areas in accordance with the Surface Mining and Reclamation Act.*	☐	☐	☒	Not applicable. The Project does not propose such uses.

Food Access

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 17.2 – Building Setback and Activation of Sidewalks. *Orient buildings closer to streets or provide landscaped promenades that connect buildings to bus stops with routes that provide access to shopping centers, grocery stores, and areas where farmer's markets are held.*	☐	☒	☐	Project is not located close to bus stops or transportation nodes. However, public open space and recreational amenities occur along the Project perimeter with the provision of meandering sidewalks and bike paths along each public road. Each planning area will have access to these public trails with connection to the regional trail system. Developer will cooperate with SunLine Transit regarding future bus stops that may be developed especially along Harrison Street.

***HC 17.3* – Site Design and Interior Spaces.** *Encourage site design for new development to accommodate interior spaces for recreational and other neighborhood uses, such as community gardens and farmer's markets in order to increase access to fresh and healthy foods; and to render such spaces convenient and available to neighboring streets, neighborhoods, and other nearby facilities to fill the void or lack of small grocery stores and increase access to fresh and healthy foods within EJ Communities.*	☐	☒	☐	The Project's specific plan makes provision for a neighborhood shopping center and grocery store, with areas suitable for farmer's markets. Many residential lots will be large enough for family gardens. Each of the Project's planning areas will have multi-modal access and connections to the Project's shopping areas.
***HC 17.5* – Diverse Food Establishments.** *Encourage the development of diverse food establishments prioritizing mom and pop healthy food establishments and community kitchens for homemade foods to be sold in areas with a high concentration of fast-food establishments, convenience stores, and liquor stores.*	☐	☒	☐	The Project includes a commercial retail planning area that would allow for the development of a variety of healthy restaurants, grocery stores, & mom and pop establishments among other options.
***HC 17.6* – Affordable Access to Fruits and Vegetables.** *Work with local farmers and growers to develop a program to provide affordable access to fruits and vegetables grown in the area to the EJ communities. Identify and establish the location of grocery stores, healthy corner stores, farmer's markets all of which carry a complement of healthy foods to be located in close proximity to transit nodes and other active transportation system links.*	☐	☒	☐	The Project includes a commercial retail planning area that would allow for the development of a grocery stores, farmer's markets, etc. among other options.
***HC 17.7* – Edible Landscaping and Community Gardens.** *Promote edible landscaping and community gardens for suitable public and private land as well as for residential and mixed-use Projects.*	☐	☒	☐	The Project's Specific Plan allows for amenity areas within each of the residential Planning Areas. These amenity areas would allow for a variety of uses, including edible landscaping and community gardens.

Safe and Sanitary Homes

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 18.7* – Polluting Uses *and Noticing Requirements. *Discourage industrial, agricultural, and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land-use proposals.*	☐	☐	☒	Not applicable. Project does not propose such uses. Project will be noticed per County requirements, in addition to ongoing community outreach efforts.

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 18.8 **– Design to Limit Exposure of Residential Development.** *Work with the development community including small property and mobile home park owners so new residential development, particularly for low-income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.*	☐	☒	☒	The proposed Project encompasses 619± acres bounded by arterial roadways with planned widths of 110 to 220 feet which, along with generous building setbacks, provides some isolation of the project site from near-by crop cultivation and ag- and road-related dust. The project does not include major stationary polluters such as a landfill, chemical plant or refinery. The site design provided in the Project and associated TTMs is arranged to provide distance and separation from roadways and equestrian back-of-house operations.
HC 18.9 **– Design** ***and Character of the Surrounding Area.*** *Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.*	☐	☒	☐	The Project proposes a specific plan which will provide development standards and design guidelines to encourage a high-quality master-planned development. The Project site is also surrounded by areas designated as AG and Residential and will not degrade the existing surrounding character.
a. Use of Design Standards. *Using design standards of the appropriate Area Plan land use category.*	☐	☒	☐	The Project proposes a specific plan which will provide development standards and design guidelines to encourage a high-quality master-planned development. The specific plan will allow for the creation of six planning areas, each with its own set of development standards appropriate to their proposed uses and land use category.

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
b. Codes and Regulations. *Construction of structures in accordance with the requirements of Riverside County's zoning, building, and other pertinent codes and regulations.*	☒	☐	☐	The Project will comply with the proposed specific plan's development standards, and Riverside County's zoning and building codes where applicable.
c. Landscaping Plan. *Require that an appropriate landscape plan be submitted and implemented for development Projects subject to discretionary review.*	☐	☒	☐	The Project's conceptual landscape plans and Specific Plan landscape design guidelines are climate-specific and drought-tolerant. They will also be reviewed by the County and CVWD and implemented by the Project when approved. Development in the Specific Plan area that are subject to discretionary review will be required to comply with the Specific Plan Landscape Design Guidelines.
d. Drought Resistant Landscaping. *Use of drought-tolerant landscaping that incorporates adequate drought-conscious irrigation systems.*	☐	☒	☐	Project landscape plans provide a drought tolerant design and plant pallet that meets Coachella Valley Water District's standards.
e. Energy Efficiency in Design. *Application of energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy.*	☒	☒	☐	The Project will be designed consistent with Title 24 of the California Energy Code (California Green Code) to minimize energy and utility demand. The Project's Conceptual Landscape Plan includes water conservation, consistent with County Ordinance No. 859. In addition, the Project's Specific Plan provides design guidelines that encourage landscape shading, drought tolerate landscaping, building materials that can withstand the desert environment, and building forms which promote shading.

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
f. Water Conservation. *Application of water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought-tolerant landscaping, and water recycling, as appropriate.*	☐	☒	☐	The Project's Conceptual Landscape Plan includes water conservation, consistent with County Ordinance No. 859 and these policies.
g. Innovative Design. *Encourage innovative and creative design concepts.*	☐	☒	☐	The Project proposes the development of a unique equestrian, lifestyle community with complimentary uses that match jobs, housing and recreational amenities. The Project has been master planned with a focus on pedestrian, bicycle and equestrian interconnectivity within the Project. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road.
h. Public Art. *Encourage the provision of public art that enhances the community's identity, which may include elements of historical significance and creative use of children's art.*	☒	☒	☐	The existing Project Site does not contain any public art or elements of historical significance. The equestrian development theme and the mix of on-site land uses will offer a variety of opportunities for public art to be integrated within different parts of the Project, including public art that will be viewable from the perimeter roadway.
i. Signage. *Include consistent and well-designed signage that is integrated with the building's architectural character.*	☐	☒	☐	The Project's Specific Plan design guidelines will require signage that is integrated with the site design and compatible with the surrounding area
j. Vehicular Access. *Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.*	☒	☒	☐	The Project has been master planned to provide safe and adequate vehicular access between adjacent commercial uses. The Project's Specific Plan provides a master circulation plan (with detailed

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
				road sections, access points, and standards) which would allow for safe and convenient circulation. See the Project's EIR for further discussion on transportation and traffic and associated mitigation measures.
k. Service Areas and Residential. *Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.*	☐	☐	☒	Commercial uses, site entries, and storage bays are not adjacent to residential neighborhoods.
l. Mitigation. *Mitigate noise, odor, lighting, pollution exposure, and other impacts on surrounding properties.*	☒	☒	☐	The Project will be required to follow County Ordinances for odor, lighting, and pollution exposure. As explained in the EIR, the Project will not cause any noise, odor, lighting, or pollution impacts on surrounding properties.
m. Landscaping **in Open Spaces and Parking Lots**. *Provide and maintain landscaping in open spaces and parking lots.*	☐	☒	☐	Project landscape plans provide a drought tolerant design and plant pallet that meets Coachella Valley Water District's standards. The Specific Plan also requires that the parking lot be landscaped with drought tolerant design and plant pallet that meets Coachella Valley Water District's standards and that open spaces be landscaped with a variety of plants as outlined in the Specific Plan's landscape design guidelines and consistent with County Ordinance 859.
n. Drought Tolerant Landscaping. *As feasible, maximize landscape coverage with an emphasis on drought-tolerant landscaping.*	☐	☒	☐	The Project's landscape plans and design guidelines provide a drought tolerant design and plant pallet that meets Coachella Valley Water District's standards.

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
o. Preservation of Natural Features. *Preserve, as feasible, natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.*	☐	☐	☒	The Project in current state consists of relatively flat agricultural and entirely disturbed land. No unique natural features are present on site.
p. Pedestrian Activity. *Require, as feasible, that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access, and parking, supporting functions, open space, and other pertinent elements.*	☐	☒	☐	The Project has been master planned with a focus on pedestrian, bicycle and equestrian interconnectivity within the Project. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along Harrison St, Tyler St and Ave 62. Each planning area will have access to these public trails with connection to the regional trail system.
q. Integration of Parking Lots. *Design parking lots and structures to be functionally and visually integrated and connected.*	☐	☒	☐	The Project has been master planned to allow for meaningful and efficient integration of uses, road infrastructure, and parking lots.
r. Building Access Points. *As feasible, site building access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity where such passthrough areas include wayfinding signage, street trees, grade and lateral separation from roads, all with consideration given to adequate safety lighting, and landscape screening.*	☐	☒	☐	The Project's equestrian center is intended to provide open space and recreational amenities for the Thermal Ranch community and promote an equestrian lifestyle. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road. Aforementioned pathways are to be consistent with the signage guidelines in the Specific Plan (Section 4.3) and County Ordinance 460.
s. Pedestrian Crossings. *Encourage safe and frequent pedestrian crossings and ensure that sidewalks and other pedestrian walkways provide continuity between land uses essential to a functional lifestyle, and as needed such*	☐	☒	☐	The Project's equestrian center is intended to provide open space and

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
sidewalks and pedestrian walkways should provide sufficient lighting and signage to ensure public safety.				recreational amenities for the Thermal Ranch community and promote an equestrian lifestyle. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road.
t. Human Scale. *Encourage the creation of a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.*	☐	☒	☐	The Project's equestrian center is intended to provide open space and recreational amenities for the Thermal Ranch community and promote an equestrian lifestyle. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road.
u. Recognition of Open Space. *Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas.*	☐	☐	☒	No such features are present on the site. The site has previously been operated for agricultural uses.
v. Fire Hazards. *Manage wildland fire hazards in the design of development proposals located adjacent to natural open space.*	☒	☐	☐	The Project access roads will be constructed to meet Riverside County Fire Department access standards. The Project will be required to be constructed consistent with the most current California Building Code and Riverside County Ordinance 787 to minimize the potential for structural damage from a wildfire.
HC 18.12 – Safe Affordable Housing **and Displacement.** *Prioritize the development of safe and affordable housing in EJ Communities while at the same time minimizing the displacement of existing residents consistent with Housing Element, Goal 2, Action 2.1h and as may be amended by the 6th Cycle Housing Element.*	☐	☒	☐	Workforce housing is an important and substantial component of the Project, which also provides a wide range of

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
Affordable housing Projects should include various housing types that respond to community priorities and input.				housing products. The Project site previously operated as an agricultural use, and the Project would not displace existing residents since the Project site does not have any existing residents.

Safe and Sanitary Homes

	Mitigation Measure or Condition of Approval	Compatible through Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 19.2 – Outdoor Recreation. *Develop of high-quality parks, green space, hiking trails, recreational facilities and natural environments in areas where such facilities are lacking.*	☐	☒	☐	The Project's equestrian center is intended to provide private open space and recreational amenities and promote an equestrian lifestyle. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road, as well as a new public trail along the project's southern boundary connecting Harrison St and Tyler St. Each planning area and the general public will have access to these public trails with connection to the regional trail system. The project will also comply with County Ordinance 16.20.020 (QUIMBY)
HC 19.6 – Local Trails. *Plan for a system of local trails that enhances recreational opportunities and connects with regional trails.*	☐	☒	☐	Public open space and recreational amenities occur along the Project perimeter with the provision of meandering sidewalks and bike paths along each public road. Each planning area will have access to these public trails with connection to the regional trail system.

HC 19.7 – Incorporate Recreation Opportunities. *Incorporate open space, community greenbelt separators, and recreational amenities into development areas in order to enhance recreational opportunities and community aesthetics to improve the quality of life.*	☐	☒	☐	The Project's equestrian center is intended to provide private open space and recreational amenities and promote an equestrian lifestyle. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road. Each planning area will have access to these public trails with connection to the regional trail system.

Public Facilities

	Mitigation Measure or Condition of Approval	Project Design Feature	Policy Not Applicable	Notes (250-word max per response)
HC 20.1 – Public Facilities and Supporting Infrastructure. *New development should provide for public services including but not limited to solar street lighting, shading structures at bus stops, other supporting infrastructure, and extension of trash and recyclables pickup routes.*	☒	☐	☐	The Project would be required to comply with Development Impact Fees that go towards the funding of public facilities such as fire stations, police stations, and other public buildings, parks, and facilities. In addition, the Project will extend public facilities and infrastructure to the site.
HC 20.2 – Development and Internal Pedestrian Circulation. *New development should promote convenient internal pedestrian circulation among land uses (existing and proposed) within each neighborhood and connecting with existing adjacent developed areas and as applicable consistent with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy, and amendments thereto.*	☐	☒	☐	The Project has been master planned with a focus on pedestrian, bicycle and equestrian interconnectivity within the Project. In addition, public open space and recreational amenities occur along the Project perimeter with the provision of sidewalks and bike paths along each public road. Each planning area will have access to these public trails with connection to the regional trail system.
HC 20.4 - *New development and conservation land uses should not infringe upon existing essential public facilities and public utility corridors, which include county regional landfills, fee-owned rights-of-way, and permanent easements, whose true land use is that of public facilities.*	☐	☒	☐	The Project will not infringe upon existing essential public facilities, easements, and public utility corridors

Brady, Russell

From: Taylor Brown <tatertot1712@gmail.com>
Sent: Friday, October 10, 2025 4:27 PM
To: Brady, Russell
Subject: Thermal Ranch Development

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

Greetings,

I am sending this email as a concerned citizen of the Coachella Valley, regarding the Thermal Ranch Development. This development is being portrayed as a “community partner” and a means to more dependable infrastructure for the Thermal area. This kind of facade has been offered to the area time and time again, and it is always the longterm, generational residents who end suffering. That infrastructure should be provided regardless; without contingencies that put the land, water, and air quality at risk.

As representatives of the Riverside county, I implore you to engage with your humanity(as well as take a look at the facts of the environmental impact), and block this development.
Thank you for your time,
TB

Brady, Russell

From: Mayra Zamora Cruz <zamoramayra8@gmail.com>
Sent: Wednesday, October 15, 2025 1:35 PM
To: Brady, Russell
Subject: Request for the Immediate Rejection of the Thermal Ranch Project

Dear Mr. Brady,

I urge you to stop the Thermal Ranch project.

As a resident of Rancho Mirage, and as someone who has dedicated nearly a decade to serving the underserved communities of the Eastern Coachella Valley, I have witnessed firsthand the realities that too often go unseen from behind a planning desk, families struggling daily with basic needs such as clean air, clean water, transportation, and fair wages. I have canvassed door-to-door for local leadership, including Supervisor Manuel Pérez, and have stood beside residents whose only barrier to stability is that they were not born into privilege.

This is not a partisan issue. It is a moral and administrative one.
Your position as a public servant is not to maximize private capital, but to ensure that public planning aligns with community welfare. According to the County's own Planning Department statement:

"Riverside County, like a quilt, is a composite of differing lifestyles connected together through common strands. The County's General Plan is designed to ensure that the quilt retains its core identity by guiding future growth that respects the diversity of the region..."

The Thermal Ranch project does the opposite. It fragments the quilt.

1. Project Misalignment with Department Objectives

The stated goal of the Planning Department is to "promote innovative development that effectively accommodates a balance of housing, employment, and service opportunities."
However, this project does not promote balance, it deepens disparity. It is designed for high-income newcomers while depending on low-income residents to sustain it through low-wage labor. It perpetuates a cycle where local workers build, clean, and maintain homes they will never afford, serve in clubhouses they will never enter, and care for horses they will never own.

2. Economic Reality

Thermal's median household income is **$36,087**, roughly **$17.35 per hour**, with over 93% of residents identifying as Hispanic or Latino.
Less than 10% hold college degrees, and most families are one paycheck away from homelessness. These are not statistics; they are indicators of structural inequality. Meanwhile, the **median home price in Riverside County is $650,000** nearly **18 times the median annual income in Thermal.**

No infrastructure project that inflates land value while ignoring wage disparity can claim to "serve the community." That is gentrification by definition.

3. Environmental and Public Health Concerns

Beyond economic injustice, the project's environmental impact poses direct harm to public health — including soil contamination, increased air and water pollution, and disruption of local ecological systems. These harms will be borne not by the wealthy beneficiaries of the ranch but by the surrounding communities who already experience disproportionate exposure to environmental hazards.

4. Ethical and Administrative Accountability

As a Project Planner, your professional duty is to ensure that project scope aligns with the **Project Management Body of Knowledge (PMBOK® Guide, 7th Edition)** standards. PMBOK defines project scope management as:

"The process of ensuring that the project includes all the work required—and only the work required—to complete the project successfully while meeting stakeholder expectations and environmental constraints."

This definition requires the inclusion of **stakeholder needs, public welfare, and sustainability metrics** as measurable components of success. To meet that standard, I urge you to evaluate the Thermal Ranch proposal against three key criteria:

- **Scope Definition:** Does the project directly address the needs of the stakeholders most affected by it?
- **Scope Validation:** Has the community provided informed consent and active participation in defining success?
- **Performance Measurement Baseline:** What quantifiable outcomes justify this project as the most equitable and sustainable use of public land and resources?

Until these criteria are met, Thermal Ranch cannot be justified as an ethical, data-driven, or community-centered development.

5. A More Sustainable Vision

We do not need large developments that promise jobs but deliver dependency.
We need **community-led, self-sufficient projects** — initiatives that empower residents through skill-building, living wages, and ownership opportunities. The proverb says, *"Give a man a fish and you feed him for a day; teach him to fish and you feed him for a lifetime."* The residents of Thermal are not asking for charity; they are asking for the tools to sustain themselves with dignity.

6. Closing Appeal

You have the opportunity to leave a legacy of integrity by rejecting a project that threatens to displace, exploit, and divide. The choice before you is simple: either uphold the principles your department claims to represent, or stand by a development that turns local residents into servants for the wealthy few.

I trust you will choose leadership that values people over profit and justice over convenience.

Respectfully,

Ivette Zamora Cruz
Rancho Mirage Resident
Your regular Riverside County resident & advocate for environmental justice

October 15, 2025
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
Attn: Russell Brady, Project Planner

Sent via email: rbrady@rivco.org

Re: ECV Community Response to the Thermal Ranch Final Environmental Impact Report (FEIR)

Dear Russell Brady and Planning Commissioners,

On behalf of Semillas de Resistencia, a resident-led group committed to environmental justice and advocating for development that meets the community's real needs, and residents of the Eastern Coachella Valley (ECV), Leadership Counsel for Justice and Accountability ("Leadership Counsel") writes to express strong opposition to the proposed Thermal Ranch Specific Plan Project ("The Project").

Lack of Access to Decision-Making and Meaningful Participation

Residents continue to face systemic barriers that limit their ability to participate meaningfully in the planning process. The Planning Commission hearing for this project will be held at Riverside County Administrative Center (4080 Lemon St, Riverside, CA 92501), over 83.3 miles from Thermal,[1] making attendance extremely difficult for residents without reliable transportation. Public transit is inconsistent, and many households do not have access to private vehicles. Furthermore, the median per capita income in the Thermal community is approximately $15,603 per year,[2] meaning missing a workday to attend a hearing imposes significant economic hardship. Hearings often begin at 9:00 a.m., a time when most residents are working which further restricts participation.

Recognizing these barriers, both the community and individual Planning Commissioners submitted formal requests to move hearings closer to the ECV to ensure residents could meaningfully participate. On August 28, 2025, members of Semillas de Resistencia met with

[1] 33° 52' 21.1775" N 116° 45' 9.7157" W
[2] *Census Profile: Thermal, CA*. Census Reporter. (n.d.). https://censusreporter.org/profiles/16000US0678456-thermal-ca/

commissioners, where residents asked if they could request that the Planning Commission hearing be held closer to the ECV. Commissioners agreed, and on September 29 confirmed via email that he had submitted the request to the Supervisor's Office - only a few days after the County released public notice for the FEIR which was on September 24, 2025. On October 7, Leadership Counsel also submitted a formal written request via email to relocate the hearing to the ECV. In response, the County stated that while the request was received, the meeting location had already been set in Riverside and publicly noticed, and therefore could not be changed. Despite the community's efforts, the decision to keep the hearing in Riverside makes it difficult for residents to have their voices heard in decisions that shape the future of their community, preventing equitable participation in decisions that directly impact their health, environment, and future.

Community Engagement and Participation

For the past year, residents of the ECV have mobilized extensively to make their opposition to The Project clear. Residents have joined community council meetings and requested to meet with county officials to share their concerns directly. More than 200 residents have signed a petition opposing this project due to its significant, harmful, and unavoidable impacts.[3]

Residents have actively participated in Oasis/Thermal Community Council (Council) meetings to raise concerns directly with the project representatives. On May 27, 2025, an action item requested a letter of support for The Project from project representatives. More than 20 residents attended that meeting to provide public comment, urging the Council not to issue the letter due to The Project's potential impacts on air quality, water resources, and other critical environmental resources. A follow-up Council meeting was arranged to allow residents who could not attend to provide public comment at a special meeting. On June 16, 2025, a special meeting was held with over 50 residents in attendance. Residents delivered an hour and a half of heartfelt public comments. They made it clear that they want responsible growth, but not development that would come at the expense of their health, water, or air and deepen inequality. One resident said, "the horses will have air conditioning in the summer and heat in the winter. That's more than some of us who work in the fields have."[4] Another resident shared, "Why is it that horses will have access to safe drinking water, while our families don't."

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[3] Leadership Counsel for Justice and Accountability. (2025, March 17). *Oppose Thermal Ranch: No to Luxury Developments in the ECV! | ¡Opóngase a Thermal Ranch: No al desarrollo de lujo en el ECV!* bit.ly/StopThermalRanch.

[4]Lemus, C. (2025). Community voices: Luxury developments in the eastern coachella valley have negative consequences for nearby residents. Coachella Valley Independent. https://cvindependent.com/2025/02/community-voices-luxury-developments-in-the-eastern-coachella-valley-have-negative-consequences-for-nearby-residents/

Residents emphasized that they are not opposed to all development, but strongly oppose projects that worsen air quality, strain limited water resources, and add to the environmental burdens of a community already facing environmental racism. Over 70 residents formally signed the comment letter for the Draft Environmental Impact Report submitted on January 10, 2025, showing clear and widespread opposition to The Project moving forward as proposed. Despite this persistent and deeply expressed community voice, the Council ultimately approved the letter of support for the project at the Oasis/Thermal Community Council meeting on June 16, 2025.

Lack of Community Benefits

On December 16, 2024, Leadership Counsel met with project representatives, Jeremy Smith, Juan de Lara, and Martin Magaña (collectively, Project Representatives), to discuss the proposed Thermal Ranch development. During this meeting, Leadership Counsel asked about the tangible benefits this luxury project would bring to the surrounding community. Project Representatives stated that one of the project's main benefits would be the creation of new job opportunities but were not able to provide details as to what types of employment and growth opportunities would be available to nearby residents.

Furthermore, promises of job opportunities are contradicted by the practices of the existing equestrian operation, DIHP, which is one of the largest equestrian facilities in North America[5] and has hosted approximately 18 weeks of horse shows each year since 2019.[6]. During an Oasis/Thermal Community Council Meeting on June 16, 2025, Project Representatives admitted that DIHP pays for housing and transportation for outside workers to come and work at the DIHP. They also stated that "the community doesn't have the skills" to serve as judges in equestrian events, a comment that deeply offended many residents in attendance. These statements highlight a troubling inconsistency between the benefits being promised and the experience of ECV residents.

Leadership Counsel also raised concerns expressed by community members about farmworkers who may face barriers in transitioning into new forms of employment such as hospitality or equestrianism. Project Representatives did not provide specific programs or commitments to support this workforce or its transition. They further stated that the project's amenities would be "mid-range" in price, yet provided no explanation of how such amenities would be accessible or affordable for ECV residents.

Project Representatives have also publicly claimed that a major benefit is that the project will be "open to the public." However, real accessibility goes beyond physical entry, it requires that spaces serve, include, and reflect the people who actually live in the area. For ECV

[5] About Desert International Horse Park. (n.d). https://deserthorsepark.com/about/
[6]International Athlete Concierge. Desert International Horse Park. (n.d.). https://deserthorsepark.com/international-athlete-concierge/

residents, accessibility involves affordability, cultural inclusion, and relevance to community needs. Even if a luxury development technically allows public access, barriers such as high costs, social exclusivity, and the absence of culturally relevant spaces can make it unwelcoming or even inaccessible for local families.

The DIHP contributes to over $260 million in annual economic impact, as stated by Project Representatives.[7] Despite these claims, residents have not seen meaningful community investment or improvements in areas such as safe drinking water, infrastructure, workforce development, or accessible public spaces. Residents have questioned where this annual economic impact is being directed. If the DIHP, promoted as a model of economic success, has failed to deliver visible or equitable benefits to the local community, there is little reason to believe that the proposed Thermal Ranch development will produce different results.

Historic Disinvestment in the Eastern Coachella Valley

The ECV is home to thousands of hardworking agricultural workers from the unincorporated communities of Mecca, Northshore, Oasis, and Thermal, who, a large majority of residents are agricultural worker families and they represent the local labor force that contributes approximately $700 million a year in agriculture to the region.[8] Yet despite their essential labor, most residents are low- or very low-income and live in communities that have been overlooked and underinvested in for decades.

For generations, ECV residents have fought and advocated relentlessly for the most basic necessities: clean water, safe and habitable housing, and reliable infrastructure.[9] These are families and individuals who deserve to live with dignity and respect, not have to live in the shadows of neglect, and not carrying the burden of projects that prioritize outside interests over community well-being. The main sources of affordable housing are polanco parks and mobile home parks.[10] Many of which are unpermitted.[11] These homes are often in very poor condition

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[7] Daniels, M. (2025, March 24). *Reins of change: A proposal to build out an equestrian community in the Eastern Coachella Valley promises badly needed infrastructure-but could lead to gentrification*. Coachella Valley Independent. https://cvindependent.com/2025/03/reins-of-change-a-proposal-to-build-out-an-equestrian-community-in-the-eastern-coachella-valley-promises-badly-needed-infrastructure-but-could-lead-to-gentrification

[8] *About PUCDC*. Pueblo Unido CDC. (n.d.). https://pucdc.org/about/

[9] Leadership Counsel for Justice and Accountability. (2023). *#ECV resident: Rosalba de la Cruz*. Facebook. https://www.facebook.com/lcjacalifornia/videos/ecv-residents-like-rosalba-de-la-cruz-deserve-a-community-thats-safe-affordable-/7074884482602642/

[10] Facio-Krajcer, A. (2022). When there's arsenic in the water, but 'we have nowhere to go' . https://www.nytimes.com/2022/07/31/us/oasis-mobile-home-park-coachella.html

[11] Coachella Valley Mobile Home Park - RCAC. (2015, March 29). https://www.rcac.org/success-stories/coachella-valley-mobile-home-park/

and lack the infrastructure needed to withstand the region's extreme temperatures, which can reach up to 100°F in the summer.[12] Across the ECV, several mobile home parks rely on private domestic wells and septic systems leaving residents without access to safe and reliable water or sanitation.[13]

One of the most urgent examples is Oasis Mobile Home Park, where residents continue to live under an EPA emergency order due to dangerously high levels of arsenic contamination in their drinking water.[14] Tests in Oasis have shown levels several times higher than that limit posing serious health risks to residents. Arsenic is toxic to humans regardless of age or health. Long-term exposure can damage nearly every major organ system in the body, including the heart, liver, kidneys, lungs, and nervous system.[15] These are the lived realities of many families in the ECV. As one elementary school student from Oasis Mobile Home Park shared:

> *"Something that I do not like about here is the water. It smells really bad, and I'm always very itchy when I'm done showering. Most of the time, I come out red with rashes. I wish I could shower and come out with my skin looking normal."*

This is the heartbreaking reality that no child should have to live.

Residents are exhausted and heartbroken by the continuous arrival of luxury developments that promise "growth" but instead drain the limited resources this community has left - its water, land, and air without delivering any real benefits to those who have built their lives here. Past luxury development projects like the Thermal Club[16] and the Thermal Beach Club[17] have both committed funding to community benefits but have failed to follow through on these commitments. The Thermal Club promised to build a community park for Thermal and set aside only $159,000 for future community facilities which is an insignificant amount compared to the millions these developments generate.[18] They claimed to offer opportunities for public

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[12] Zacarias, P. (2025). *High temperatures are making California homes dangerously hot. It's time state laws caught up*. CalMatters. https://calmatters.org/commentary/2025/09/high-temperatures-california-homes/

[13] The Desert Sun. (2022, April 15). *East Coachella Valley mobile home parks: arsenic water, sewage pits*. The Desert Sun. https://www.desertsun.com/story/news/environment/2022/04/15/east-coachella-valley-mobile-home-parks-arsenic-water-sewage-pits/7296117001/https://www.desertsun.com/story/news/environment/2022/04/15/east-coachella-valley-mobile-home-parks-arsenic-water-sewage-pits/7296117001/

[14] U.S. Environmental Protection Agency. (2025). *Oasis Mobile Home Park Public Water System; Thermal, CA*. https://www.epa.gov/pacific-southwest-media-center/oasis-mobile-home-park

[15] World Health Organization. (2022). *Arsenic*. https://www.who.int/news-room/fact-sheets/detail/arsenic

[16] The Thermal Club. (n.d.). *Home*. https://www.thermal.cc/

[17] Thermal Beach Club. (n.d.). *Home*. https://www.thermalbeachclub.com/

[18] DiPierro, A. (2018, March 19). *Behind the 18-foot wall of the Thermal Club, an oasis for car lovers in a desert farming town*. The Desert Sun.

involvement, yet their race track events have ticket prices starting at $2,000, making them completely inaccessible to most residents. To this day, there has been no community development from the Thermal Club. The Project representatives of the Thermal Beach Club promised to support affordable housing and even committed in writing to including affordable housing within their project.[19] They also pledged to create a $750,000 fund to pay for water hook-ups for future affordable housing developments in the ECV. However, just like before, the community has yet to see any of these commitments fulfilled. The community is tired of the ongoing false promises made by project representatives and the County's inability to enforce their commitments.

Air Quality Impacts

Community residents have repeatedly shared that they live with asthma, allergies, and chronic respiratory illnesses that are made worse by constant exposure to dust, diesel emissions, pesticides and pollutants carried from the Salton Sea.[20] The ECV is formally recognized under Assembly Bill 617 as a community overburdened by air pollution and environmental health risks.[21] Despite this recognition, the project will generate emissions that would result from years of construction, increased vehicle traffic, and manure management. Construction alone is expected to span eight to ten years, with completion projected by 2032, releasing large quantities of dust and diesel emissions that would further degrade air quality in an area already struggling with particulate pollution.

Community members describe a pattern of worsening respiratory health from years of exposure to local pollution. One resident shared, "Since we arrived here, my husband, my mother-in-law, my children, in fact also me, we have suffered more constantly from allergies or respiratory problems. It was something that before… we had not suffered." Another explained, "Nowadays there is a lot of asthma, many problems with [constricted airways]. Many people suffer."[22] These experiences reflect a lived reality where poor air quality has become a persistent health threat for families across the ECV.

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https://www.desertsun.com/story/money/real-estate/2018/03/19/behind-18-foot-wall-thermal-club-oasis-car-lovers-desert-farming-town/432851002/

[19] Daniels, M. (2020). *Thermal Beach Club approved despite resident opposition*. The Desert Sun. https://www.desertsun.com/story/news/2020/10/28/thermal-beach-club-approved-despite-resident-opposition/3756109001/

[20] Reyes-Velarde, A. (2024, August). Coachella Valley air pollution: Tracking health and environmental impacts. CalMatters. https://calmatters.org/environment/2024/08/coachella-valley-air-pollution/

[21] South Coast Air Quality Management District. (n.d.). Eastern Coachella Valley AB617. https://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/eastern-coachella-valley

[22] Desert Healthcare District. (2024). East Coachella Valley environmental health report (Final Report). https://www.dhcd.org/media/3154/EH%20Report%20East%20CV%20Final%20Report%207-22-2024.pdf

Despite this, access to healthcare remains extremely limited. The only hospital serving the area, John F. Kennedy Memorial Hospital in Indio, is located more than 13 miles from Thermal, and local clinics such as Innercare Mecca and Centro Medico Oasis face long wait times or lack affordable services. Residents frequently report waiting weeks to see a doctor or being placed on extended waitlists.

For families already coping with chronic health conditions, any additional pollution presents serious and preventable risks. Yet there is a lack of strong and enforceable mitigation measures included in The Project's design. Without these measures, The Project would add more pollution to a community already overburdened and medically underserved.

Noise Impacts to Nearby Communities

Noise impacts are one of the most distressing concerns for families across the ECV, especially for those raising young children near the proposed Thermal Ranch project site. Residents of the nearby Polanco Parks (Figure 1), located just two minutes away, have already endured years of constant noise from the Thermal Club, another development that caters to outside interests while leaving local families to bear the daily consequences. One resident who lives in Polanco Park across the street from the Thermal Club shared that the noise is so loud and constant that their walls shake and they often lose sleep. Residents say the noise is so intense that it makes it hard for their families to rest or feel comfortable in their own homes. Many now fear that the Thermal Ranch project will bring even more years of construction noise, truck traffic, and amplified events that will travel through their homes, schools, and neighborhoods.

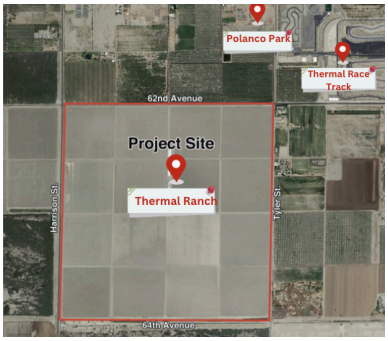

Figure 1

Within a two-mile radius of the project are several schools such as Las Palmitas Elementary, Toro Canyon Middle School, and Desert Mirage High School, serving children as young as five years old through teenagers preparing to graduate. These are classrooms filled with

children who already struggle to focus through heat, poverty, and environmental burdens.[23] This project will generate years of loud, continuous noise that will affect students' ability to learn, concentrate, or feel safe in their own schools. The potential noise impact on children could be severe. For young students in the ECV, many of whom already face barriers to learning due to poverty and limited resources, these added burdens are unconscionable. Noise pollution has also long been recognized as a public health hazard, linked to sleep disturbance, hypertension, heart disease, and cognitive decline[24] which can further impact individuals in the ECV. Families do not want their children to be impacted by this.

Traffic and Safety Impacts

This project poses serious traffic and safety risks. Local roads, including Avenue 62, Harrison Street, and Tyler Street are not designed to handle the large volumes of heavy construction vehicles and project-related traffic and street improvements will occur over the next several years. These streets are already unsafe for pedestrians and children walking to nearby schools.

Residents have shared that during the construction of the Thermal Club, traffic became extremely difficult to manage, with frequent road blockages and increased congestion that made it hard for families to get to work and for students to arrive at school safely and on time. They have also noted that Tyler Street is not built to accommodate such heavy use, and because many of these roads are not two lanes (**Figure 2**), congestion worsens significantly during school drop-off and pick-up hours. Parents worry that increased truck traffic will make already unsafe crossings even more dangerous for children walking to school.



Figure 2

[23] Roth, S. (2015). *East Valley students lobby for tougher smog standard*. The Desert Sun. https://www.desertsun.com/story/news/environment/2015/02/02/east-valley-students-lobby-tougher-smog-standard/22776217/

[24] World Health Organization, Europe. (2024). How much does environmental noise affect our health? WHO updates methods to assess health risks. https://www.who.int/europe/news/item/04-08-2024-how-much-does-environmental-noise-affect-our-health--who-updates-methods-to-assess-health-risks

Community members also want to clarify that when project representatives claim to "invest in infrastructure," those improvements typically benefit only the development itself and its immediate surroundings. Residents point to the Thermal Club as an example, where roads are smoothly paved, sidewalks and streetlights are installed (**Figure 3)**, but just a short drive away, the same streets remain unpaved, lack sidewalks, and have no safe space for pedestrians. These visible disparities highlight how nearby community residents continue to be left behind, even as new luxury projects promise "regional improvements."



Figure 3

<u>Water Quality Impacts and Lack of Access to Reliable Drinking Water</u>

Access to safe drinking water and access to water & sewer remains one of the most urgent and longstanding challenges in the ECV. Across the ECV, many mobile home parks and Polanco Parks rely on private wells or small water systems, several of which are already contaminated with arsenic which continue to pose serious health risks to families. Residents are deeply concerned that the proposed project will further strain already limited groundwater resources, worsening inequities in access to safe and reliable water. Specifically, the expansion of the CVWD Middleton Reservoir and projected use of water at The Project site could threaten water quality and reliability for residents in the ECV, especially those residents reliant on domestic wells and small water systems.

For example, the nearby Polanco Park, located just two minutes from the project site, still relies on private wells. Residents have shared that they sometimes cannot even shower because the water comes out with sand and dirt. The dirty water has also damaged household pipes, which residents have had to pay to repair out of pocket. One resident explained that the problem is so constant that they have had to replace their washing machine multiple times because the dirt in the water ruins it. Residents have repeatedly raised concerns that "water is not a luxury," and have called attention to the ongoing reality that some families in the area still live with arsenic-contaminated water. While long-term solutions such as water system consolidation could eventually provide relief, these processes are extremely costly and can take years to complete. In

the meantime, families continue to bear the consequences of unsafe and unreliable water access while watching large-scale developments move forward with guaranteed water infrastructure.

Additionally, as discussed below, large amounts of manure will threaten the region's water quality.

Manure Management Impacts

Manure is also one of the most serious concerns for ECV families, especially the sensitive receptors of this project. The development could house up to 2,700 horses and generate nearly 140,000 pounds of manure every day which residents have raised urgent worries about odor, air pollution, and groundwater contamination. Residents have been clear that the smell and health risks from such a massive amount of horse waste are unacceptable for a community already struggling with poor air quality and unsafe water.

Families living in nearby Polanco Parks have shared that even now, during the DIHP season, they can smell manure from their homes. They fear that with Thermal Ranch located even closer, the smell will be constant, especially during hot weather when wind carries odors farther. Parents in the community have expressed major concern that their children will be forced to breathe air filled with manure odors and emissions, saying they should not have to grow up surrounded by those conditions. A resident who wished to remain anonymous but has previously worked at the DIHP shared that manure disposal at the existing facility is poorly managed, with waste often left exposed for long periods and lacking proper containment. Another resident has shared that there were times where they would dig holes into the ground and store the manure there.

Residents have also raised concerns that the project fails to clearly explain how the manure will be disposed of or monitored. Community members worry about the lack of clarity on how potential spills, runoff, or leachate will be prevented along transport routes, especially given the proximity of homes and schools. Experts have documented that horse manure releases ammonia, which can irritate the eyes, throat, and lungs.[25] Residents have shared that they do not want their children, elders, or themselves to be exposed to these harms, especially in a community already vulnerable to asthma and poor air quality.

Residents say this is not simply about odor, it is about public health and basic dignity. They question how a luxury development can move forward producing hundreds of thousands of pounds of waste each day, while nearby neighborhoods, many of which are only minutes away,

[25]Wyer, K. E., Kelleghan, D. B., Blanes-Vidal, V., Schauberger, G., & Curran, T. P. (2022). Ammonia emissions from agriculture and their contribution to fine particulate matter: A review of implications for human health. *Journal of Environmental Management,* https://www.sciencedirect.com/science/article/pii/S0301479722018588

will have to live with the consequences. One parent shared; our children deserve clean air, not the smell of manure every day.

Lack of Energy Infrastructure Benefits

Finally, residents have emphasized the need for transparency about a proposed substation's capacity and purpose. They want confirmation that it will improve energy reliability for existing residents, many of whom already face frequent outages and limited access to affordable power, rather than only supplying the 21 million kWh annual demand of the project. If the Thermal Ranch substation is being built primarily to meet The Project's energy demand, it constitutes project-dependent infrastructure, and its costs must therefore be borne entirely by the developer, not IID ratepayers. If future plans include IID funding the substation, residents insist the developer ensure it is designed to benefit the broader community, including local affordable housing projects and existing residents who face frequent power outages.

Conclusion

Approving this project would continue a pattern of environmental injustice in the ECV. Residents already face multiple health and environmental burdens, including poor air quality, unsafe water, inadequate infrastructure, lack of affordable housing, and limited access to essential services. The Thermal Ranch project would exacerbate these conditions, prioritizing profit over the well-being of the community. The County cannot continue approving developments that ignore the voices, needs, and safety of residents while contributing to further environmental and social harm. ECV residents demand that any future development center community health, equity, and meaningful participation, rather than repeating a cycle of neglect and harm.

Sincerely,

Ivanna Uriarte
Housing and Land Use Policy Advocate
Leadership Counsel for Justice and Accountability

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October 15, 2025
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
Attn: Russell Brady, Project Planner

Sent via email: rbrady@rivco.org

Re: Community Response to Oasis/ Thermal Community Council Letter of Support for the Thermal Ranch Project

On behalf of residents of the Eastern Coachella Valley (ECV) and the resident-led group, Semillas de Resistencia, Leadership Counsel for Justice and Accountability ("Leadership Counsel") writes in response to the June 30, 2025 letter from the Oasis/Thermal Community Council expressing conditional support for the proposed Thermal Ranch Specific Project.

During the Oasis/Thermal Community Council special meeting on June 16, 2025, residents voiced strong opposition to the Thermal Ranch development. One resident stated, "this project will take more from our community than it will ever give. We cannot let this happen." Another added, "the so-called 'benefits' are vague promises, we need real investments, not annual reports we might never see." Yet another asked, "Why are the horses going to have safe drinking water but not us?" Over 200 residents have signed a petition opposing the project.[1] The community's demand remains clear and consistent: **Stop the Thermal Ranch development.** Residents have seen this pattern before; promises of jobs and infrastructure improvements that go unfulfilled or only benefit the projects inside and outskirts, while their air becomes harder to breathe and their access to safe water remains uncertain. This project poses serious threats to public health, air quality, traffic, housing and water resources in a community already vulnerable to vast environmental and economic burdens.

Residents are also deeply concerned about the lack of transparency and meaningful participation in the Council's process of drafting the letter. During a community meeting on July 9, 2025, a Council member shared that the letter of support for the Thermal Ranch project was still being drafted and was expected to be brought to the Council for consideration in September. Community members followed up consistently and requested, on more than eight occasions, the opportunity to review and provide input on the letter before it was submitted. Despite these repeated requests, residents were ultimately told that the Council had already submitted the letter to the County. Residents were especially upset that the scheduled Oasis/Thermal Community

[1]Leadership Counsel for Justice and Accountability. bit.ly/StopThermalRanch

Council meeting on September 29, 2025, did not include the agenda item that was intended to discuss and share the draft letter with the community for feedback. This continued exclusion and lack of transparency have caused significant frustration, leaving residents feeling sidelined in a process that directly impacts their community.

Additionally, the Council's letter of "conditional support" does not reflect community priorities or needs. The proposed conditions such as developer reports on air quality, job creation, or education programs lack measurable commitments, accountability, and enforcement. Two annual reports are not meaningful accountability. These vague conditions reveal exactly why residents oppose the project because it follows the same pattern of empty promises and "benefits" that have left the ECV behind for decades. The community has seen this before with the Thermal Beach Club, assurances on paper that never translate into real change.[2] Thermal Ranch is not a solution; it is a continuation of the neglect and inequity residents are fighting to end.

Alternatively or in addition, the Council also noted that property taxes on this project should directly support the ECV Enhanced Infrastructure Financing Districts (EIFD), with legally binding commitments and that funds remain within and benefit the Thermal community. Regarding the EIFD, statements made from developers claiming that an additional 25% projected property tax revenue from Thermal Ranch would be earmarked for public infrastructure in Thermal is incorrect. The EIFD is funded from the County's portion of incremental property tax revenue within the EIFD boundaries. Property tax increments are based on increases in assessed property values compared to a base year, and the County receives approximately 12.97% of the 1% ad valorem property tax increment, plus 100% of Vehicle License Fee revenue tied to this increment. The County has committed a maximum of 20% of its property tax and VLF increment annually to the EIFD for a term of 45 years. There is no mechanism to earmark a specific percentage of funds for Thermal, given that EIFD was developed to serve community driven projects to the communities of Thermal, Mecca, Northshore, and Oasis. EIFD staff have confirmed this. Any statement otherwise is factually incorrect and misleading.

For decades, luxury developers have made promises to ECV residents - promises of opportunity, investment, and respect that have repeatedly been broken. This project continues that legacy. It was designed without the community, it disregards the environmental and health realities of those who live closest to it, and it prioritizes private profit over public wellbeing. Residents remain firmly opposed to the project. While they have reviewed the conditions outlined in the Council's letter, these measures fail to address the deep and ongoing harms this project would cause. No amount of vague or unenforceable promises can outweigh the

[2] Daniels, M. (2020). *Thermal Beach Club approved despite resident opposition*. The Desert Sun. https://www.desertsun.com/story/news/2020/10/28/thermal-beach-club-approved-despite-resident-opposition/3756109001/

environmental and health risks that residents will face. The community's position is clear: the Thermal Ranch project should not move forward. We urge Planning Commissioners to take the ECV community's concern into consideration before voting on this project.

Sincerely,

Ivanna Uriarte
Housing and Land Use Policy Advocate
Leadership Counsel for Justice and Accountability

Semillas de Resistencia

COACHELLA VALLEY WATER DISTRICT
Established in 1918 as a public agency

GENERAL MANAGER
Jim Barrett

CLERK OF THE BOARD
Sylvia Bermudez

ASSISTANT GENERAL MANAGER
Robert Cheng

ASSISTANT GENERAL MANAGER
Dan Charlton

November 20, 2025

VIA EMAIL

Kelly Clark
KCLARK@TERRANOVAPLANNING.COM
Terra Nova Planning & Research
42635 Melanie Place, Suite 101
Palm Desert, CA 92211

Dear Ms. Clark:

Re: Water Supply Verification for the Thermal Ranch Specific Plan

The subject Water Supply Verification (WSV) for the Thermal Ranch Specific Plan (Project) provides an assessment and verification of the availability of sufficient water supplies during normal, single-dry, and multiple-dry years over a 20-year projection to meet the projected demands of the Project, in addition to existing and planned future water demands of the Coachella Valley Water District (CVWD). CVWD determined that this WSV demonstrates sufficient water supplies exist, or will exist based on current water planning assumptions, to meet the projected demands of the Project, in addition to current and future projected water demands within CVWD's service area in normal, single-dry, and multiple-dry years over a 20-year projection. This verification is based on the substantial evidence contained in the Water Supply Assessment prepared for the Project and previously approved by the CVWD Board on July 13, 2023, the 2020 Coachella Valley Urban Water Management Plan, and the other reports referenced in the approved Water Supply Assessment. This WSV was approved by the CVWD Board of Directors in its regular meeting on November 18, 2025.

Consistent with the provisions of SB 221, neither this WSV nor its approval shall be construed to create a right or entitlement to water service or any specific level of water service, and shall not impose, expand, or limit any duty concerning the obligation of CVWD to provide certain services to its existing customers or to any future potential customers.

This WSV does not constitute an agreement to provide water service to the Project, and does not entitle the Project, Project applicant, or any other person or entity to any right, priority, or allocation in any supply, capacity, or facility. To receive water service, the Project will be subject to an agreement with CVWD, together with any and all applicable fees, charges, plans and specifications, conditions, and all other applicable CVWD requirements in place and as

amended from time to time. Nor does anything in this WSV prevent or otherwise interfere with CVWD's discretionary authority to declare a water shortage emergency in accordance with the Water Code.

Sincerely,

Joanne Y. Le
Director of Environmental Services

cc: Russell Brady
rbrady@rivco.org
Project Planner
County of Riverside

JL: sb\Env Srvs\WR\2025\Nov\Thermal Ranch
File: 19782.00008

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Por: Naomy Sicra, asistente de secretaria de Junta
11/26/2025

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Please do not use this form for payment remittance.

VICKY FELTY
Notary Public
State of Wisconsin

REVISED NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on Tuesday, December 16, 2025 at 10:00 A.M. or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006. The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Planning
12/16/2025
23.1

Dated: November 20, 2025 Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el martes 16 de diciembre de 2025 a las 10:00 a. m. o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

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Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

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Envíe toda la correspondencia escrita a: secre-

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Dated: November 20, 2025 Kimberly A. Rector, Clerk of the Board

By: Naomy Sicra, Clerk of the Board Assistant

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El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

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Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025 Kimberly A. Rector, secretaria de Junta

Por: Naomy Sicra, asistente de secretaria de Junta

11/26/2025

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PO Box 1147
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Invoice Text:	REVISED NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on Tuesday, December 16, 2025 at 10:00 A.M. or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006. The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family,

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

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011766211

FILE NO. 0011766211

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 above-entitled 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:

11/26/2025

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

Date: November 26, 2025.
At: Riverside, California

Christine Gonzalez
Signature

REVISED NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

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FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

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If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 20, 2025 Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 16 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006.** El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaría de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025
Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaría de Junta
The Press-Enterprise
Published: 11/26/25

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

Account Number:	5209148
Ad Order Number:	0011766211
Customer's Reference/PO Number:	
Publication:	The Press-Enterprise
Publication Dates:	11/26/2025
Total Amount:	$2128.90
Payment Amount:	$0.00
Amount Due:	$2128.90
Notice ID:	A78MZZNZLSk3PzaIzG16
Invoice Text:	REVISED NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on Tuesday, December 16, 2025 at 10:00 A.M. or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006. The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family,

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PO Box 1147
Riverside, California 92502

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011766211

FILE NO. 0011766211

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 above-entitled 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:

11/26/2025

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

Date: November 26, 2025.
At: Riverside, California

Christine Gonzalez
Signature

REVISED NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 16, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 20, 2025 Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 16 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006**.

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaría de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025
Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaría de Junta
The Press-Enterprise
Published: 11/26/25

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Account Number:	5209148
Ad Order Number:	0011764991
Customer's Reference/PO Number:	
Publication:	The Press-Enterprise
Publication Dates:	11/16/2025
Total Amount:	$2118.30
Payment Amount:	$0.00
Amount Due:	$2118.30
Notice ID:	WMtetO4Ccj8IF4lfiwJu
Invoice Text:	NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on Tuesday, December 9, 2025 at 10:00 A.M. or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006. The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family,

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~~12/09/2025~~ 12/11/2025

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

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011764991

FILE NO. 0011764991

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 above-entitled 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:

11/16/2025

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

Date: November 16, 2025.
At: Riverside, California

Christine Gonzalez
Signature

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 13, 2025
Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006.** El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaría de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 13 de noviembre de 2025
Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaría de Junta
The Press-Enterprise
Published: 11/16/25

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

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Notice ID:	WMtetO4Ccj8IF4lfiwJu
Invoice Text:	NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on Tuesday, December 9, 2025 at 10:00 A.M. or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006. The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family,

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

Publication: The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc: 0011764991

FILE NO. 0011764991

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 above-entitled 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:

11/16/2025

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

Date: November 16, 2025.
At: Riverside, California

Christine Gonzalez

Signature

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

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Dated: November 13, 2025
Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006.** El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

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Fecha: 13 de noviembre de 2025
Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaría de Junta
The Press-Enterprise
Published: 11/16/25

GANNETT

AFFIDAVIT OF PUBLICATION

Naomy Sicra
Riverside County-Board Of Sup.
4080 Lemon ST # 127
Riverside CA 92501-3609

STATE OF WISCONSIN, COUNTY OF BROWN

The Desert Sun, a newspaper published in the city of Palm Springs, Riverside County, State of California, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

PDS desertsun.com 11/17/2025
PDS Palm Springs Desert Sun 11/17/2025

and that the fees charged are legal.
Sworn to and subscribed before on 11/17/2025

Legal Clerk

Notary, State of WI, County of Brown

9.19.29

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State of Wisconsin

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

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Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 13, 2025

Planning
12/16/2025

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

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Dated: November 13, 2025 Kimberly A. Rector, Clerk of the Board

By: Naomy Sicra, Clerk of the Board Assistant

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas

interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006.** El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 13 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta

Por: Naomy Sicra, asistente de secretaria de Junta

November 17,2025

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AFFIDAVIT OF PUBLICATION

Naomy Sicra
Riverside County-Board Of Sup.
4080 Lemon ST # 127
Riverside CA 92501-3609

STATE OF WISCONSIN, COUNTY OF BROWN

The Desert Sun, a newspaper published in the city of Palm Springs, Riverside County, State of California, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

PDS desertsun.com 11/17/2025
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Sworn to and subscribed before on 11/17/2025

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Planning
12/11/2025

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Fecha: 13 de noviembre de 2025
Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta
November 17,2025

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

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On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

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El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

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NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006**. The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

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Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 13, 2025 Kimberly A. Rector, Clerk of the Board

By: Naomy Sicra, Clerk of the Board Assistant

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas

interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006.** El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

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Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 13 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta

Por: Naomy Sicra, asistente de secretaria de Junta

November 17,2025

51 x 2 = 102

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Hearing Date: December 9, 2025

To: Clerk of the Board of Supervisors

From: Planning Department – Riverside (Planner: Russell Brady)

MinuteTraq #: 29140

Project Description:

TRANSPORTATION AND LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING ON SPECIFIC PLAN NO. 401, GENERAL PLAN AMENDMENT NO. 230001, CHANGE OF ZONE NO. 2300003, TENTATIVE TRACT MAP NO. 38578, PLOT PLAN NO. 240016, PLOT PLAN NO. 230005, PLOT PLAN NO. 230006–Intent to Certify an EIR–Applicant: Thermal Ranch, LLC–Representative: MSA Consulting–Fourth District–Eastern Coachella Valley Area Plan: Agriculture (AG)–Zoning: Heavy Agriculture, 10 acre minimum (A-2-10), Controlled Development Areas (W-2)–Location: east of Harrison, south of 62nd, west of Tyler, north of 64th – 619.1 acres – REQUEST: The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres.–APNs 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010 – Project Planner: Russell Brady at (951) 955-3025 or email at rbrady@rivco.org

The attached item(s) require the following action(s) by the Board of Supervisors:

- ☐ Place on Administrative Action
  - ☐ Receive & File
  - ☐ EOT
  - ☐ Labels provided If Set For Hearing
    - ☐ 10 Day ☐ 20 Day ☐ 30 day
- ☐ Place on Consent Calendar
- ☐ Place on Policy Calendar (Resolutions; Ordinances; PNC)
- ☐ Place on Section Initiation Proceeding (GPIP)
- ☒ Set for Hearing (Legislative Action Required; CZ, GPA, SP, SPA)
- ☒ Publish in Newspaper:
  (4th Dist) Desert Sun and Press Enterprise
- ☒ Environmental Impact Report
  - ☐ 10 Day ☒ 20 Day ☐ 30 day
- ☒ Notify Property Owners (app/agencies/property owner labels provided)

RECEIVED RIVERSIDE COUNTY CLERK/BOARD OF SUPERVISORS
2025 NOV 0 4 P 3:36

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

Desert Office · 77-588 Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7040

Designate Newspaper used by Planning Department for Notice of Hearing:
(4th Dist) Desert Sun and Press Enterprise

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

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Dated: November 13, 2025

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By: Naomy Sicra, Clerk of the Board Assistant

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Fecha: 13 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

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On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 20, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 16 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ITEM:
(ID # 29140)
MEETING DATE:
Tuesday, December 09, 2025

FROM : TLMA-PLANNING

SUBJECT: TRANSPORTATION AND LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING ON SPECIFIC PLAN NO. 401, GENERAL PLAN AMENDMENT NO. 230001, CHANGE OF ZONE NO. 2300003, TENTATIVE TRACT MAP NO. 38578, PLOT PLAN NO. 240016, PLOT PLAN NO. 230005, PLOT PLAN NO. 230006–Intent to Certify an EIR–Applicant: Thermal Ranch, LLC–Representative: MSA Consulting–Fourth District–Eastern Coachella Valley Area Plan: Agriculture (AG)–Zoning: Heavy Agriculture, 10 acre minimum (A-2-10), Controlled Development Areas (W-2)–Location: east of Harrison, south of 62nd, west of Tyler, north of 64th – 619.1 acres – REQUEST: The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres.–APNs 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010

RECOMMENDED MOTION: That the Board of Supervisors:

1. **ADOPT a Resolution CERTIFYING the ENVIRONMENTAL IMPACT REPORT (EIR) (SCH2023050624)**, adopting environmental findings pursuant to the California Environmental Quality Act, and adopting a Mitigation Monitoring and Reporting Program; and

2. **TENTATIVELY APPROVE GENERAL PLAN AMENDMENT NO. 230001**, which establishes the Specific Plan within the General Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan (SP00401) which are Commercial Tourist (CT), Very Low Density Residential (VLDR), Medium High Density Residential (MHDR), Highest Density Residential (HDR), and Commercial Retail (CR), updates Figure 3 of the Eastern Coachella Valley Area Plan

and other related tables and figures to reflect the Specific Plan No. 401 and its land use designations, in accordance with Exhibit 6, based on the findings and conclusions incorporated in this staff report, and pending final adoption of the General Plan Cycle Resolution by the Board of Supervisors; and

3. **TENTATIVELY APPROVE SPECIFIC PLAN NO. 401** to establish a Specific Plan with a land use plan and specific plan text for subject project site, subject to the attached advisory notification document and conditions of approval, and based on the findings and conclusions incorporated in this staff report, and pending final adoption of the General Plan Cycle Resolution for GPA No. 230001 and SP No. 401 by the Board of Supervisors; and,

4. **TENTATIVELY APPROVE CHANGE OF ZONE NO. 2300003** to rezone the properties involved from Heavy Agriculture, 10 acre minimum (A-2-10) and Controlled Development Areas (W-2) to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan, based upon the findings and conclusions provided in this staff report, and pending final adoption of the General Plan Cycle Resolution for GPA No. 230001 and SP No. 401 and zoning ordinance for Change of Zone No. 2300003 by the Board of Supervisors; and

5. **TENTATIVELY APPROVE TENTATIVE TRACT MAP NO. 38578**, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report, pending the Board of Supervisors' final adoption of the General Plan Cycle Resolutions for GPA No. 230001 and SP No. 401, and the zoning ordinance for Change of Zone No. 2300003; and

6. **TENTATIVELY APPROVE PLOT PLAN NO. 240016**, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report, pending the Board of Supervisors' final adoption of the resolutions for the General Plan Cycle Resolution for GPA No. 230001 and SP No. 401, and the zoning ordinance for Change of Zone No. 2300003; and,

7. **TENTATIVELY APPROVE PLOT PLAN NO. 230005**, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report, pending the Board of Supervisors' final adoption of the General Plan Cycle Resolution for GPA No. 230001 and SP No. 401 and the zoning ordinance for Change of Zone No. 2300003; and,

8. **TENTATIVELY APPROVE PLOT PLAN NO. 230006**, subject to the attached advisory notification document and conditions of approval, and based upon the findings and conclusions provided in this staff report, pending the Board of Supervisors' final adoption of the General Plan Cycle Resolution for GPA No. 230001 and SP No. 401, and the zoning ordinance for Change of Zone No. 2300003.

ACTION:

MINUTES OF THE BOARD OF SUPERVISORS

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	$ N/A	$ N/A	$ N/A	$ N/A
NET COUNTY COST	$ N/A	$ N/A	$ N/A	$ N/A
SOURCE OF FUNDS: Applicant Fees 100%			Budget Adjustment: No	
			For Fiscal Year: N/A	

C.E.O. RECOMMENDATION: [CEO use]

BACKGROUND:

Summary

On October 22, 2025, the Planning Commission recommended that the Board of Supervisors approve the project by a vote of 3-1. As part of the Planning Commission's action, they recommended addition of a condition of approval to more clearly specify the capacity of the IID substation proposed on the project site to confirm the project's added benefits of providing roughly double the capacity needed by the project itself. During staff's presentation at Planning Commission it was also noted that a Fire Department condition of approval be added to require the project's annexation into the Countywide CFD for public safety. Both conditions have been added to the conditions of approval for the Tentative Tract Map that are included in the attachments.

The day prior to the Planning Commission meeting a number of written public comments in opposition were received. These were provided to the Planning Commission via memo for their consideration. While many are general opposition, some include comments on the adequacy of the CEQA analysis through the EIR. Responses to these CEQA oriented comment letters have been provided and are included in the attachments.

Proposed Specific Plan

The proposed Specific Plan is primarily oriented around a large equestrian facility with ancillary residential and commercial development. The Specific Plan totals approximately 619 acres, would allow for up to 1,362 dwelling units, 85,000 square feet of building area within the equestrian facility, and 200,000 square feet of building area within the other commercial areas. One of the primary intents of the Specific Plan is to provide residential uses near the equestrian facility that users and employees of the facility would live in as well as providing for commercial uses that serve daily residents and also potential tourist oriented uses.

Equestrian Facility

The main equestrian facility, known as the Desert International Horse Park, would be relocated from its existing nearby location and encompass approximately 223 acres of the overall Specific

Plan area. Much of this area would include over 2.5 million square feet of riding space across 19 competition rings, stables for up to 2,800 horses, riding paths, pastures, and showfields.

Events at the equestrian facility would be oriented to the competition season that generally occurs from October through March. Live music is planned to be included for certain equestrian events in the central area of the equestrian center and is ancillary and part of the equestrian event and not a standalone use. No other non-equestrian events like weddings are proposed for the equestrian facility. It is estimated at maximum that up to 8,100 people a day will visit the facility with approximately 40% that equates to 3,240 people on the site at a given time based on equestrian event programming. The facility is anticipated to primarily operate during the day, but at nighttime, some areas will include lighting for evening riding classes that would conclude by 10 p.m. Each riding arena will include an amplified public address system that would be limited to 75 dB typically so not only will it not affect surrounding properties but also so announcing and directions are not confused between different riding areas onsite.

An estimated maximum of 300 employees would work each horse show event. Most employees will be seasonal due to the seasonal nature of the events, but approximately 20 to 30 employees will be year-round for maintenance of the facility during the non-competition season.

The facility includes 47 barns for keeping of horses and supplies and a veterinary clinic. Located at the center of the facility is the Grand Prix Barn and Plaza that includes retail and dining services for event attendees. A number of other buildings and outdoor service areas help support the regular operation of the facility including administration, deliveries, storage, and disposal operations.

As a unique type of use with events, the standard required parking rates pursuant to Ordinance No. 348 Section 18.12 don't directly relate to the equestrian facility. The traffic study prepared for the project included an analysis of parking demand for the equestrian facility. This analysis utilized the existing Desert International Horse Park facility for evaluation of peak events there to determine the appropriate amount of parking required for the new equestrian facility. The analysis determined that a rate of 0.18 per daily guest is appropriate to provide adequate parking, which has been incorporated into the development standards for the subject Planning Area 1 in the Specific Plan Zoning Ordinance. Based on the maximum 8,100 daily guests proposed, this would result in 1,371 parking spaces being required for the facility. The Plot Plan provides 1,372 parking spaces with standard asphalt paved parking (including accessible and electric vehicle parking) and 248 parking spaces within a decomposed granite paved overflow parking area for a total of 1,620 parking spaces, which far exceeds the parking requirements.

In addition to regular vehicle spaces, the horse park use also requires trailer and RV spaces to accommodate for the storage of such vehicles that are used for transporting horses. The parking analysis determined that a rate of 0.14 trailer or RV spaces should be provided for each horse stall. Based on the 2,700 horse stalls proposed, this would require 378 trailer or RV spaces. The Plot Plan proposes 378 trailer and RV spaces. To note, these trailer and RV

parking spaces do not accommodate for direct overnight stays as overnight trailer or RV use would be via the RV Park component of the project.

Residential Uses

Other than the core equestrian facility, the majority of the Specific Plan accommodates for a variety of residential use types and densities across 4 Planning Areas for a total of 1,362 dwelling units. The first is in Planning Area 2 in the northern portion of the Specific Plan with 110 units of larger lot residential development with a minimum lot size of 20,000 square feet. Development here is more traditional large lot, semi-rural development consistent with typical desert design. A central amenity area proposed to include a community building and recreation amenities for residents in this area. On the east side of the Specific Plan within Planning Area 3 is more suburban type density residential with up to 353 units with a planned mix of standard residential lots with a minimum lot size of 5,000 square feet and also condominium attached townhome type residential units. This area also similarly has a central amenity area that is anticipated to include a community building and recreation amenities for residents in this area.

In the southern portion of the Specific Plan in Planning Area 4a is a higher density residential with up to 500 units. This Planning Area is proposed to include more affordably priced and efficient units intended for employees for the equestrian facility during the competition season (generally, from October to March) and then available to non-employees when outside of the competition season (generally, from April to September). Units here are anticipated to be modular housing to assist in providing housing that is more affordable. No specific household income affordability requirement is included for those units.

Also in the southern portion of the Specific Plan is Planning Area 4b that is for an RV Park type development with up to 300 spaces that is also intended to provide affordable housing options for employees that have trailers or RVs that would be used during competition season for those employees as well as for visitors of the facility that often travel in RVs and provide an area for them to reside temporarily around and during events to be onsite. During competition and non-competition season, the RV Park would be open to non-employees to use for short or long term lodging.

The concurrent Tentative Tract Map and Plot Plans include specific implementing development of these residential use Planning Areas.

Commercial Uses

Planning Area 5 (Commercial Tourist) and Planning Area 6 (Commercial Retail) are planned for future commercial uses to support and accommodate visitors to the equestrian facility and residents of the Specific Plan. No specific development is proposed at this time, but permitted and anticipated uses in Planning Area 5 include more hospitality type uses such as hotels,

dining, and entertainment. Planning Area 6 would include more community oriented retail and services.

Substation

In coordination with Imperial Irrigation District (IID), based on general electrical infrastructure in the area, the project includes an area for 2.3 acre area in the southeast portion of the project for an anticipated substation to serve the proposed project and surrounding area. Permitting and development of this substation will be up to IID. The project EIR does incorporate the analysis of the impacts of the substation generally as part of the overall project EIR analysis.

Impact on Residents and Businesses

All potential project impacts have been studied under CEQA and noticed to the public pursuant to the requirements of the County. The project is within an identified Environmental Justice Community was subject to the applicable General Plan policies. The project is consistent with the applicable policies as included in the respective checklist that is attached.

Additional Fiscal Information

All fees are paid by the applicant; there is no General Fund obligation.

ATTACHMENTS:

A. Responses to Planning Commission CEQA Comments
B. Planning Commission Report of Actions
C. Planning Commission Memo
D. Planning Commission Resolution No. 2025-006
E. Planning Commission Staff Report
F. GIS Exhibits
G. Specific Plan Document
H. Specific Plan Zoning Ordinance
I. TTM38578 Exhibits
J. PPT240016 Exhibits
K. PPT230005 Exhibits
L. PPT230006 Exhibits
M. PPT230006 Operations Manual
N. Fiscal Impact Analysis
O. Project Outreach Summary
P. Draft EIR
Q. Final EIR
R. Specific Plan Conditions of Approval
S. TTM38578 Conditions of Approval
T. PPT240016 Conditions of Approval

U. PPT230005 Conditions of Approval
V. PPT230006 Conditions of Approval
W. Environmental Justice Checklist
X. Public Comments with Planning Commission Staff Report

PROPERTY OWNERS CERTIFICATION FORM
SP00401

I, Russell Brady, certify that on
(Print Name)
9/22/25 the attached property owners list
(Date)
was prepared by County of Riverside / GIS
(Print Company or Individual's Name)
Distance Buffered: 1,500'

Pursuant to application requirements furnished by the Riverside County Planning Department; Said list is a complete and true compilation of the owners of the subject property and all other property owners within 600 feet of the property involved, or if that area yields less than 25 different owners, all property owners within a notification area expanded to yield a minimum of 25 different owners, to a maximum notification area of 2,400 feet from the project boundaries, based upon the latest equalized assessment rolls. If the project is a subdivision with identified off-site access/improvements, said list includes a complete and true compilation of the names and mailing addresses of the owners of all property that is adjacent to the proposed off-site improvement/alignment.

I further certify that the information filed is true and correct to the best of my knowledge. I understand that incorrect or incomplete information may be grounds for rejection or denial of the application.

NAME: Russell Brady

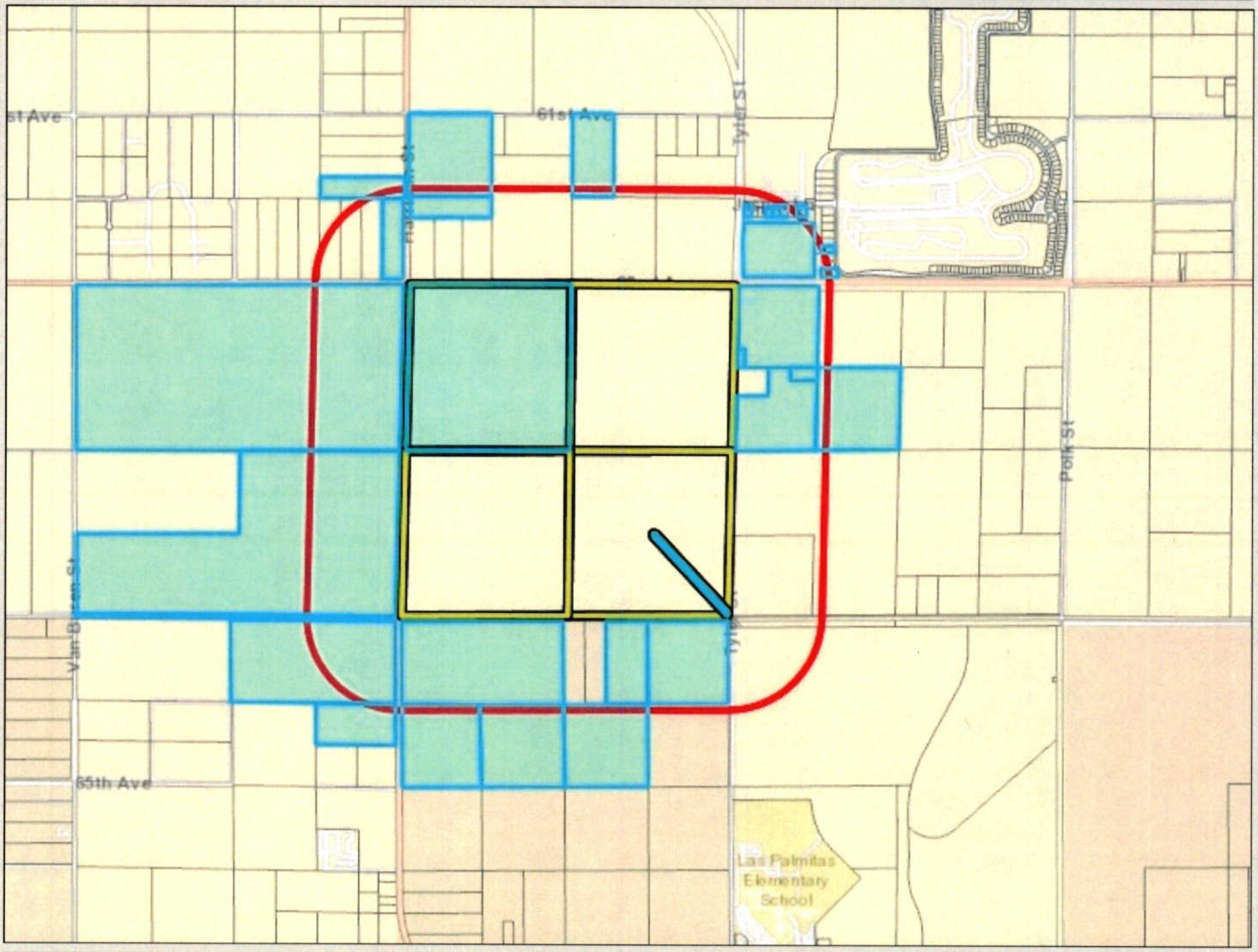
TITLE/REGISTRATION Project Planner

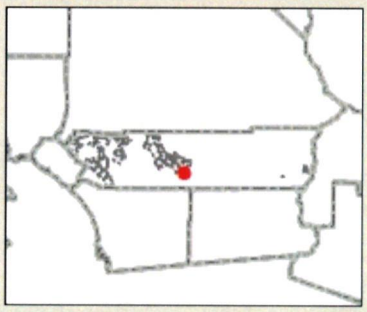
ADDRESS: 4080 Lemon Street, 12th Floor

Riverside, CA 92501

TELEPHONE (8 a.m. – 5 p.m.): (951) 955-3025

Riverside County GIS Mailing Labels





Legend

- County Boundary
- Cities
- Parcels
- World_Street_Map

Notes

0 3,009 6,019 Feet

IMPORTANT Maps and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness of any of the data provided, and assumes no legal responsibility for the information contained on this map. Any use of this product with respect to accuracy and precision shall be the sole responsibility of the user.

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THERMAL CA 92274

751030007
VALENZUELA FAMILY LIVING TRUST U/A DTD 2/25/25
62800 TYLER ST
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751030009
MORIN FAMILY TRUST DATED 09/30/2019
82687 SMOKETREE AVE
INDIO CA 92201

751030010
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11812 SAN VICENTE BLVD STE 510
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751070016
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12370 ELLIOTT AVE
EL MONTE CA 91732

751070022
USA 751
P O BOX 2245
PALM SPRINGS CA 92262

759120012
SIDRONION DIAZ
P O BOX 755
THOUSAND PLMS CA 92276

759120046
COPPER LEAF
109 OLIVER RD
SANTA BARBARA CA 93109

759140001
NLN PROP
2632 WILSHIRE BLVD STE 442
SANTA MONICA CA 90403

759140006
GV1 HOLDINGS
1412 VIA CORONEL
PALOS VERDES ESTATES CA 90274

759140016
JERNIGAN SPORTING GOODS
82740 MILES AVE
INDIO CA 92201

759300001
JTM LAND CO
1983 W 190TH ST STE 100
TORRANCE CA 90504

759300004
SHANE SENEVIRATNE
411 W MAPLE AVE
MONROVIA CA 91016

759300005
CUSICK DONALD J & CAROLYN F FAMILY TRUST 2007 DTD 9/6/07
1602 VILLA RICA DR
HENDERSON NV 89052

759300006
INDIGO PVS RACING
13801 N FREEWAY
HOUSTON TX 77090

759300013
THERMAL MOTORSPORTS
8833 W OLYMPIC BLV
BEVERLY HILLS CA 90211

759300016
10-TENTHS RACING
2901 E CAMEL BACK RD STE 200
PHOENIX AZ 85016

759300028
TOWER ENERGY GROUP
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759300035
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Applicant:
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Engineer:
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Applicant:
Thermal Ranch, LLC
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Coachella Valley Water District
75-519 Hovley Lane East
Palm Desert, CA 92211

Coachella Valley Water District
75-519 Hovley Lane East
Palm Desert, CA 92211

Coachella Valley Unified School District
87225 Church Street
Thermal, CA 92274

Coachella Valley Unified School District
87225 Church Street
Thermal, CA 92274

City of Coachella
53990 Enterprise Way
Coachella, CA 92236

City of Coachella
53990 Enterprise Way
Coachella, CA 92236

California Air Resources Board – Stanley Armstrong
1001 I Street
Sacramento, CA 95814

California Air Resources Board – Stanley Armstrong
1001 I Street
Sacramento, CA 95814

Imperial Irrigation District
81600 Avenue 58
La Quinta, CA 92253

Imperial Irrigation District
81600 Avenue 58
La Quinta, CA 92253

City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

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NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 13, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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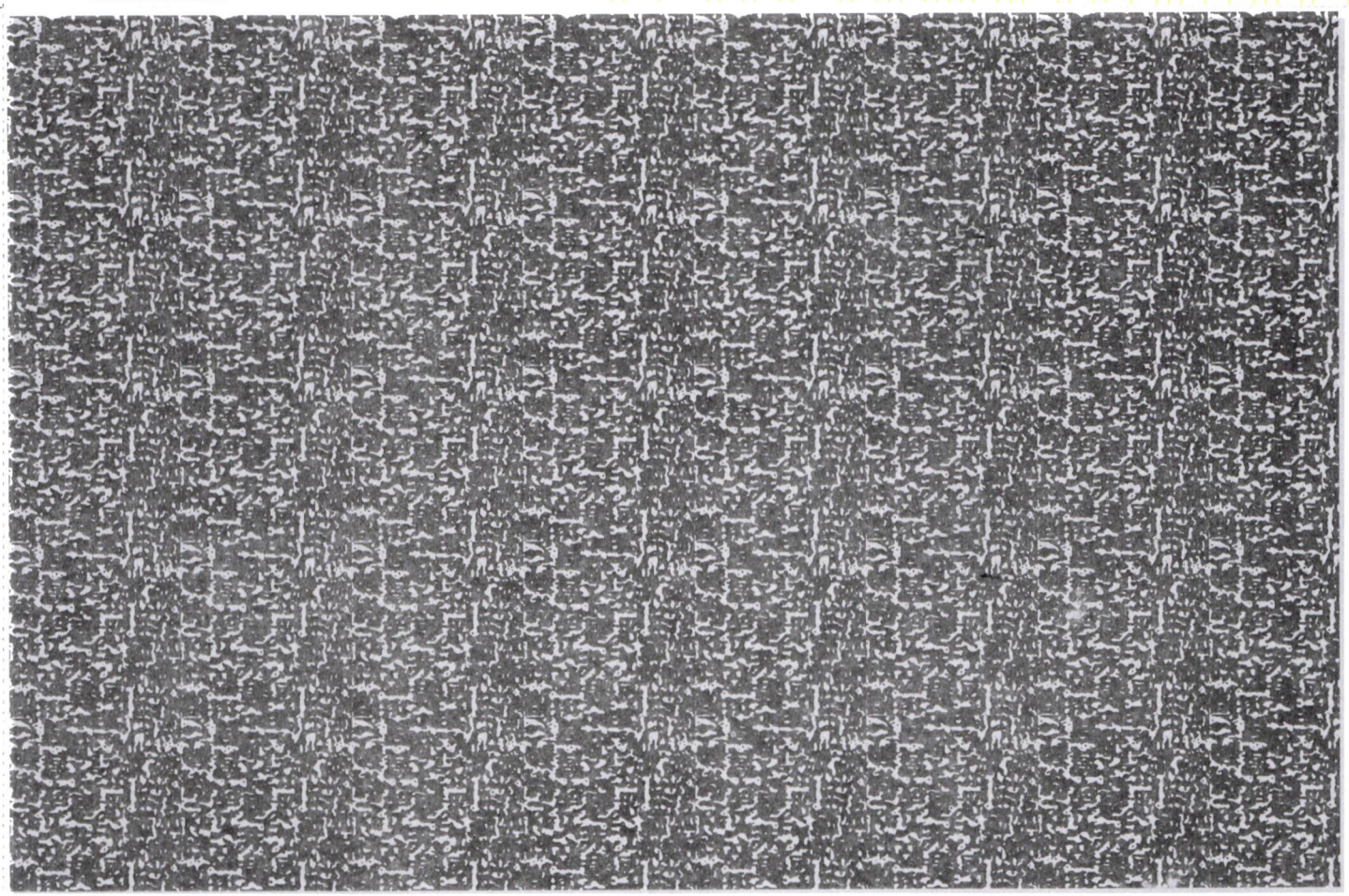

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910 NFE 1260924I0011/16/25
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LEARY
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STEVENSVILLE MT 59870-6665

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92502-1147

AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO D RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO D ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUART DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 13 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

8549033 8549080
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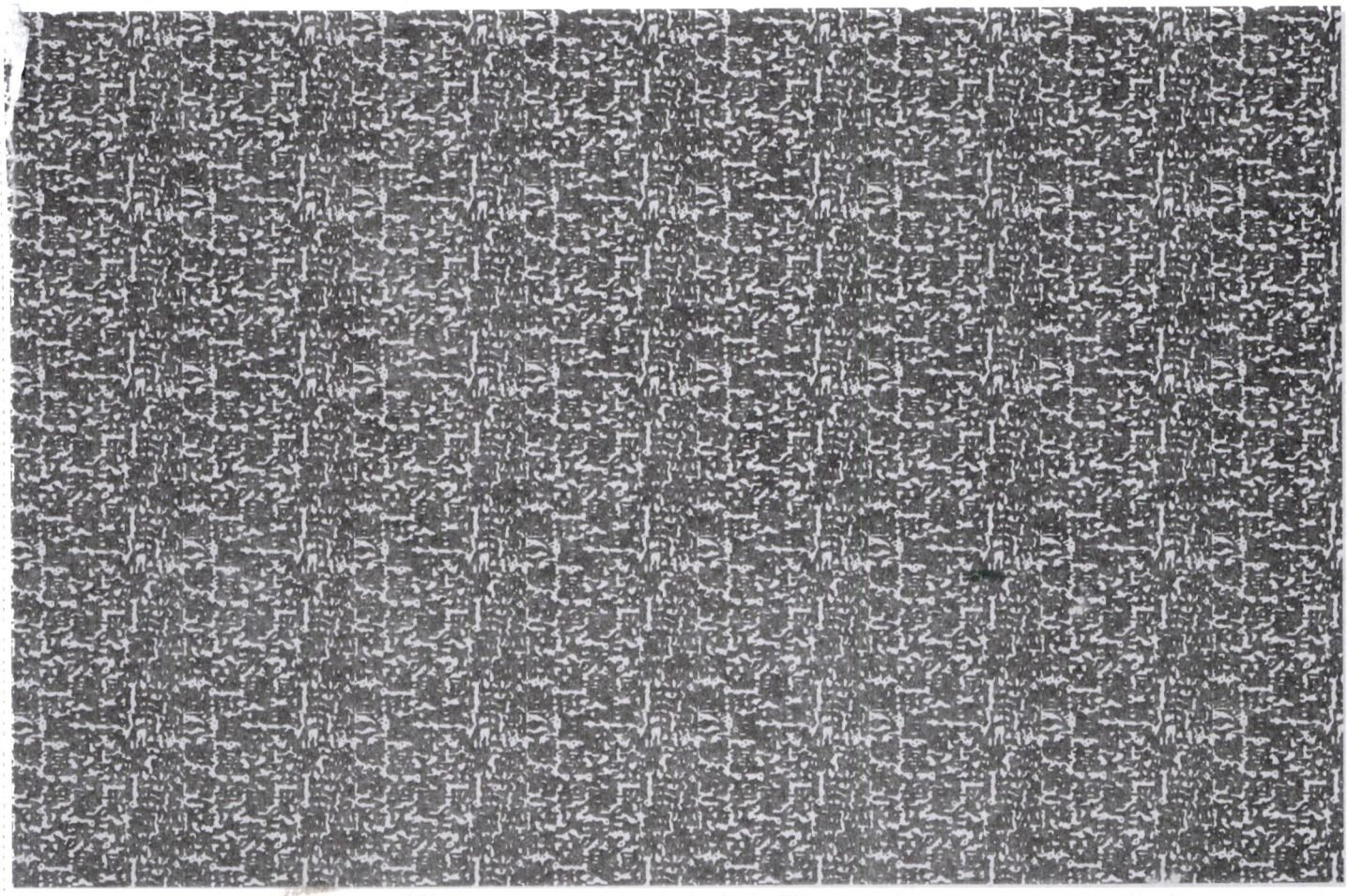

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POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

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Fecha: 13 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

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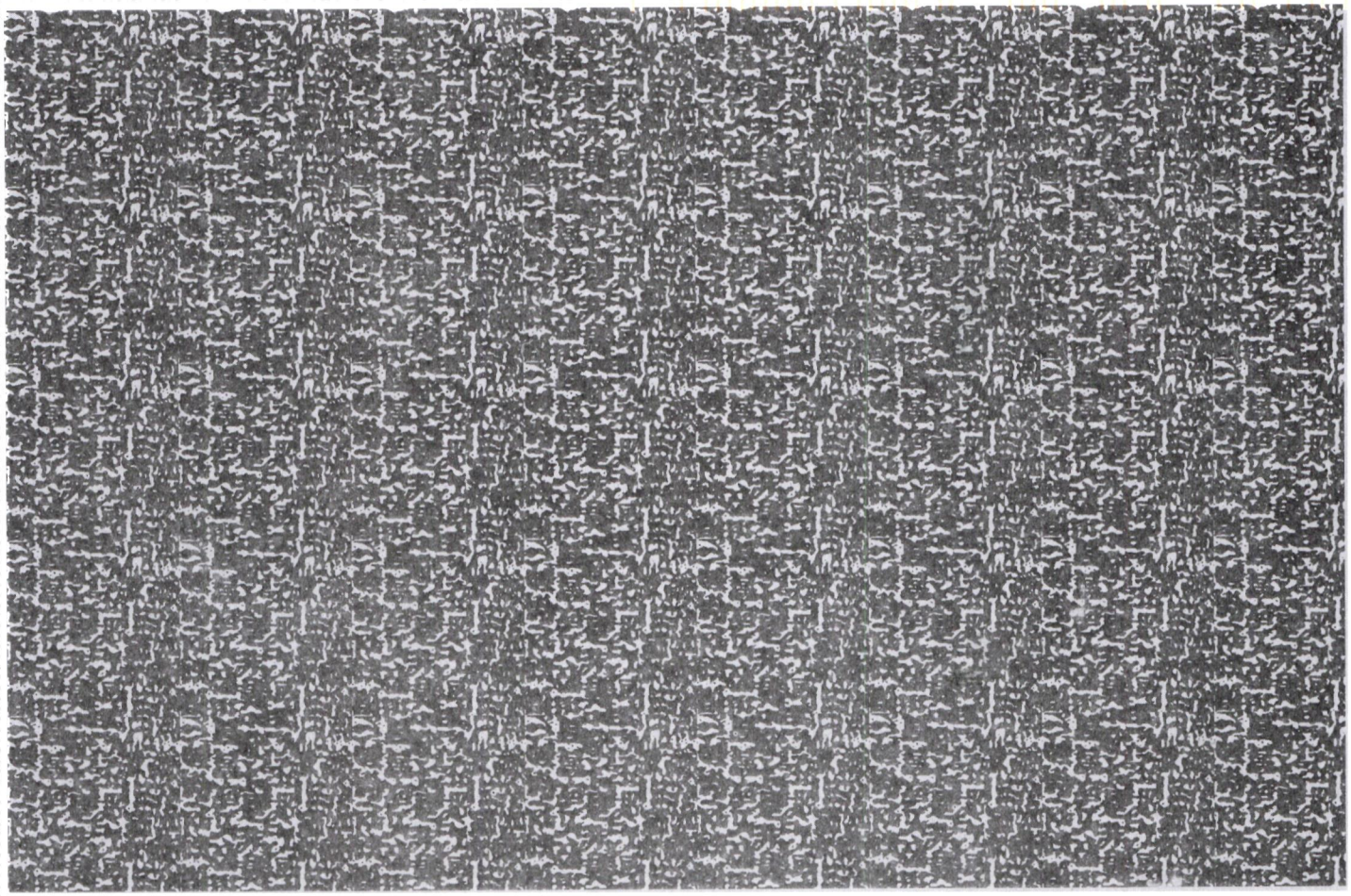

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NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

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FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

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Dated: November 13, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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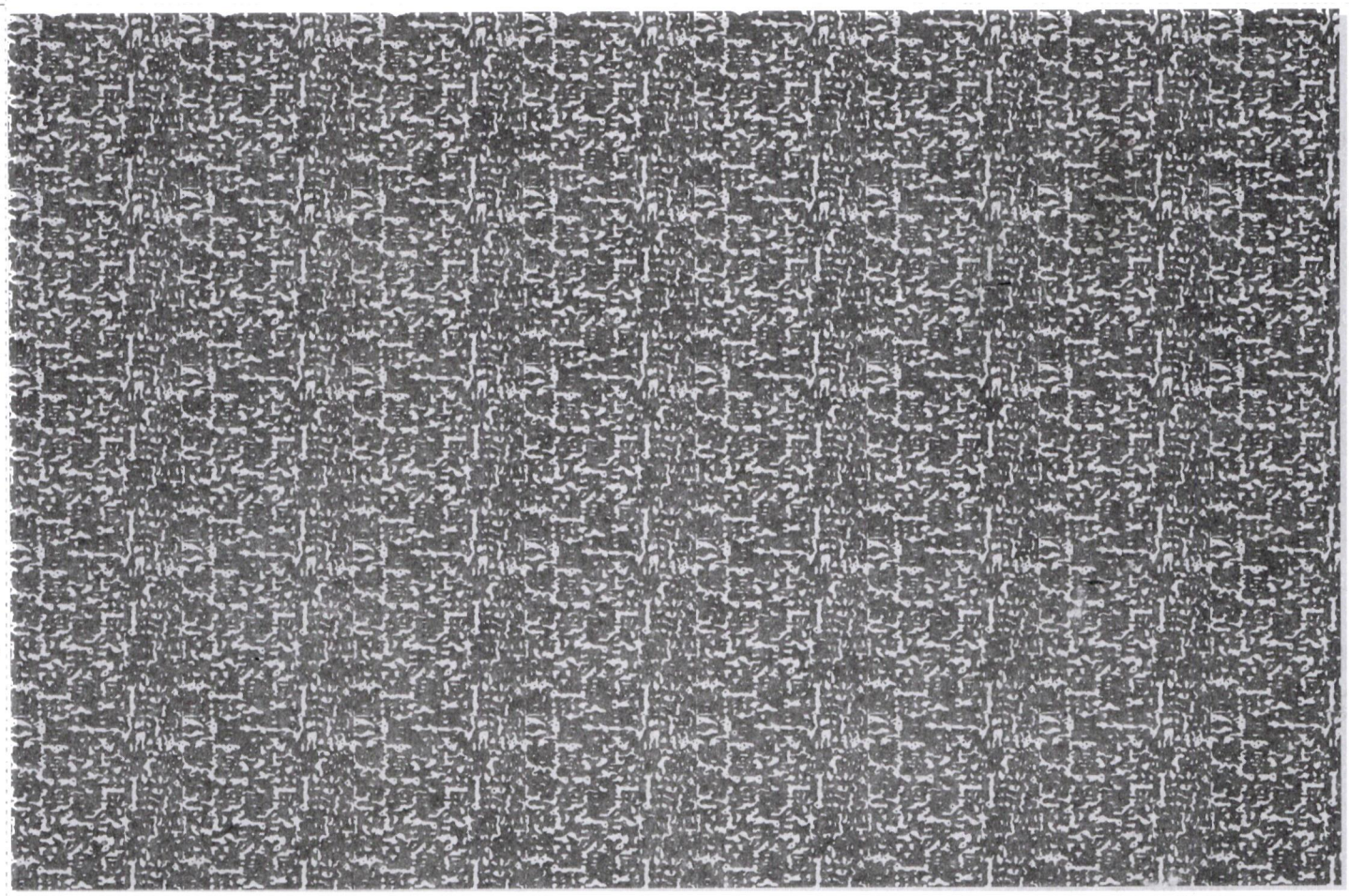

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P. O. Box 1147
Riverside, CA 92502-1147

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Imperial Irrigation District
81600 Avenue 58
La Quinta, CA 92253

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NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

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Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 13, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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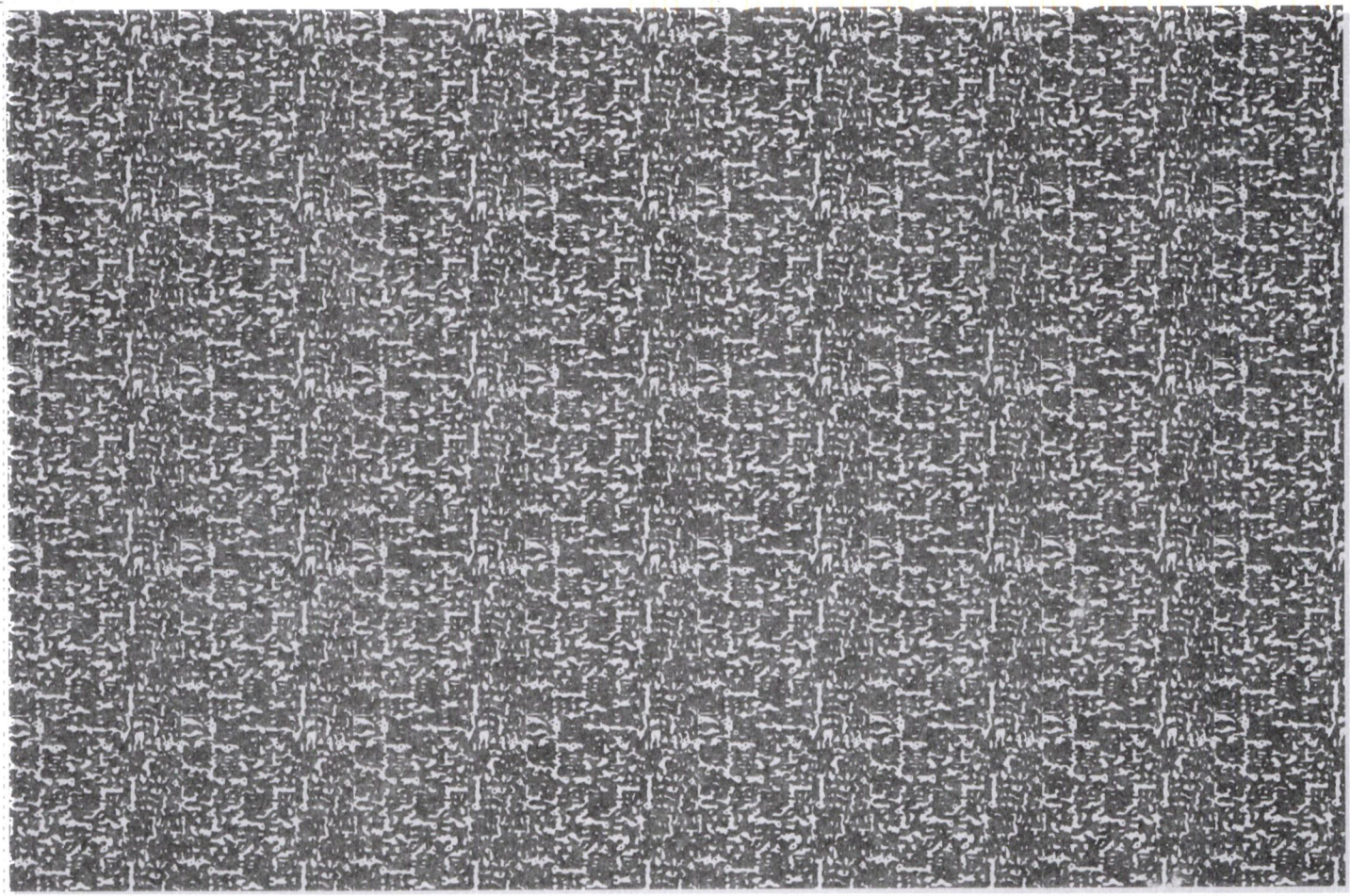

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County Administrative Center
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Dated: November 13, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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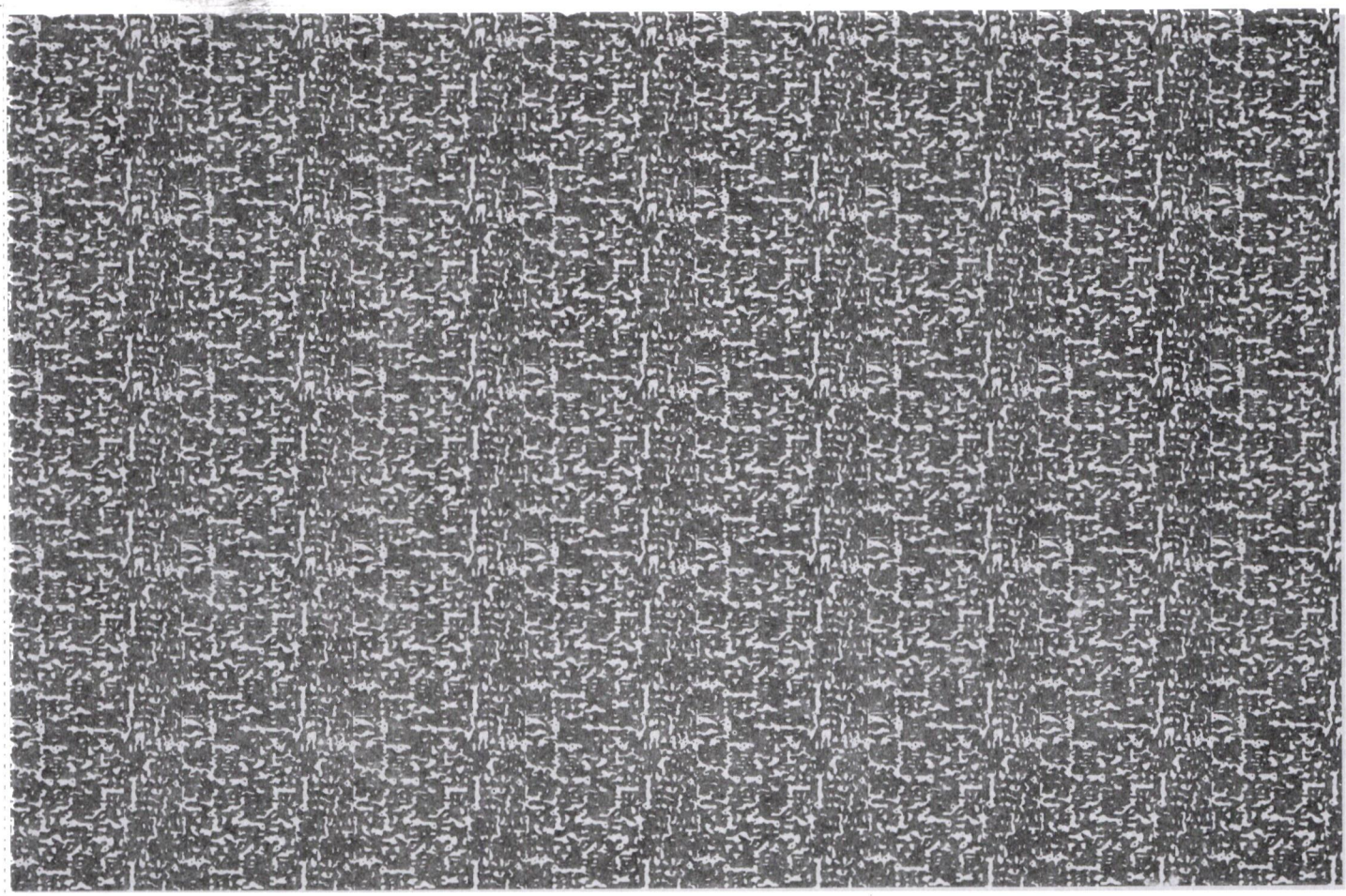

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REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 16 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.
Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.
Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.
Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

8549033 8549080 PSEMPV

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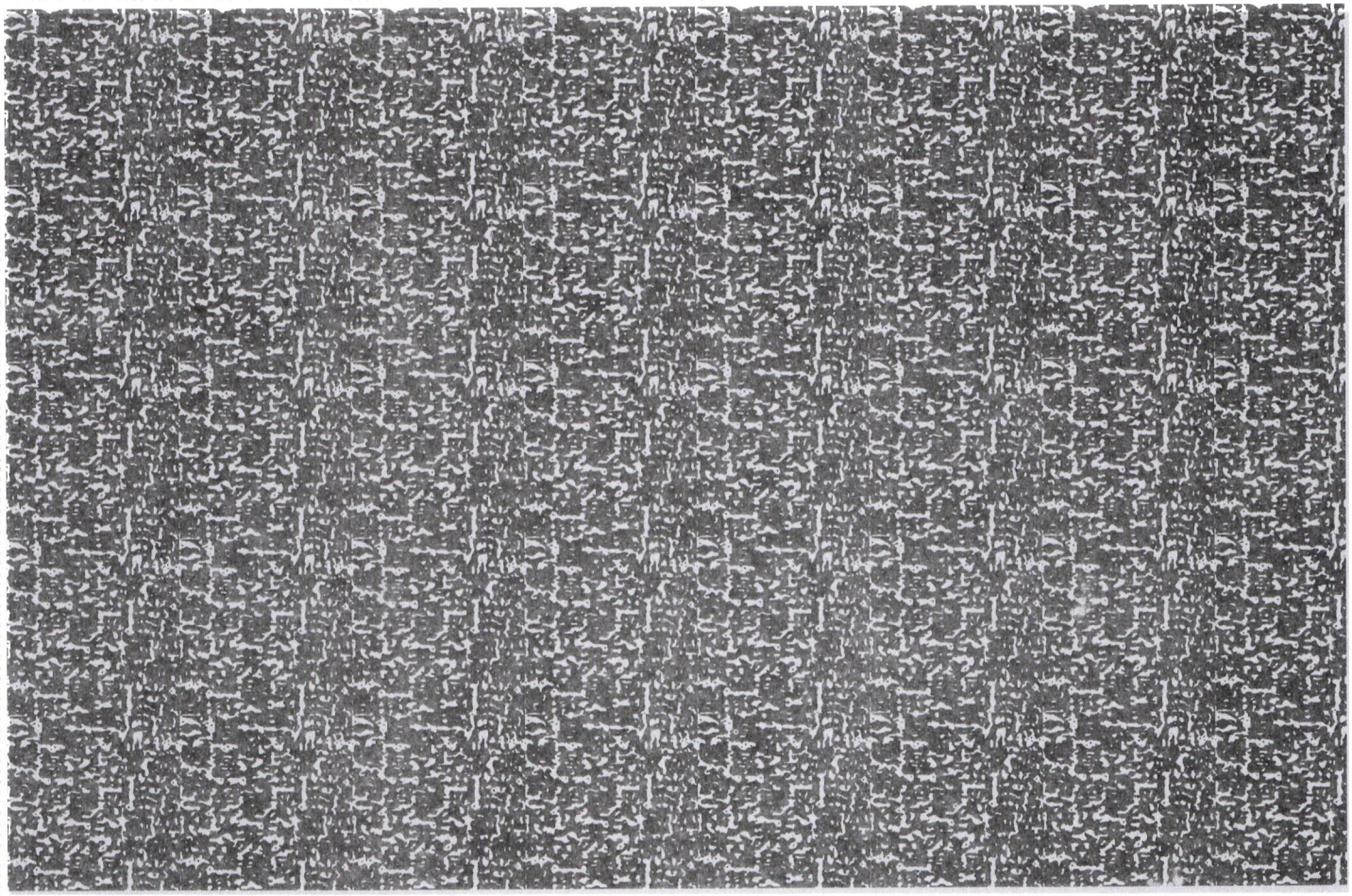

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J B. LEARY
PO BOX 333
STEVENSVILLE MT 59870

910 NFE 1270924I0011/23/25
FORWARD TIME EXP RTN TO SEND
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641 HILLTOP DR
STEVENSVILLE MT 59870-6665

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Dated: November 20, 2025

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By: Naomy Sicra, Clerk of the Board Assistant

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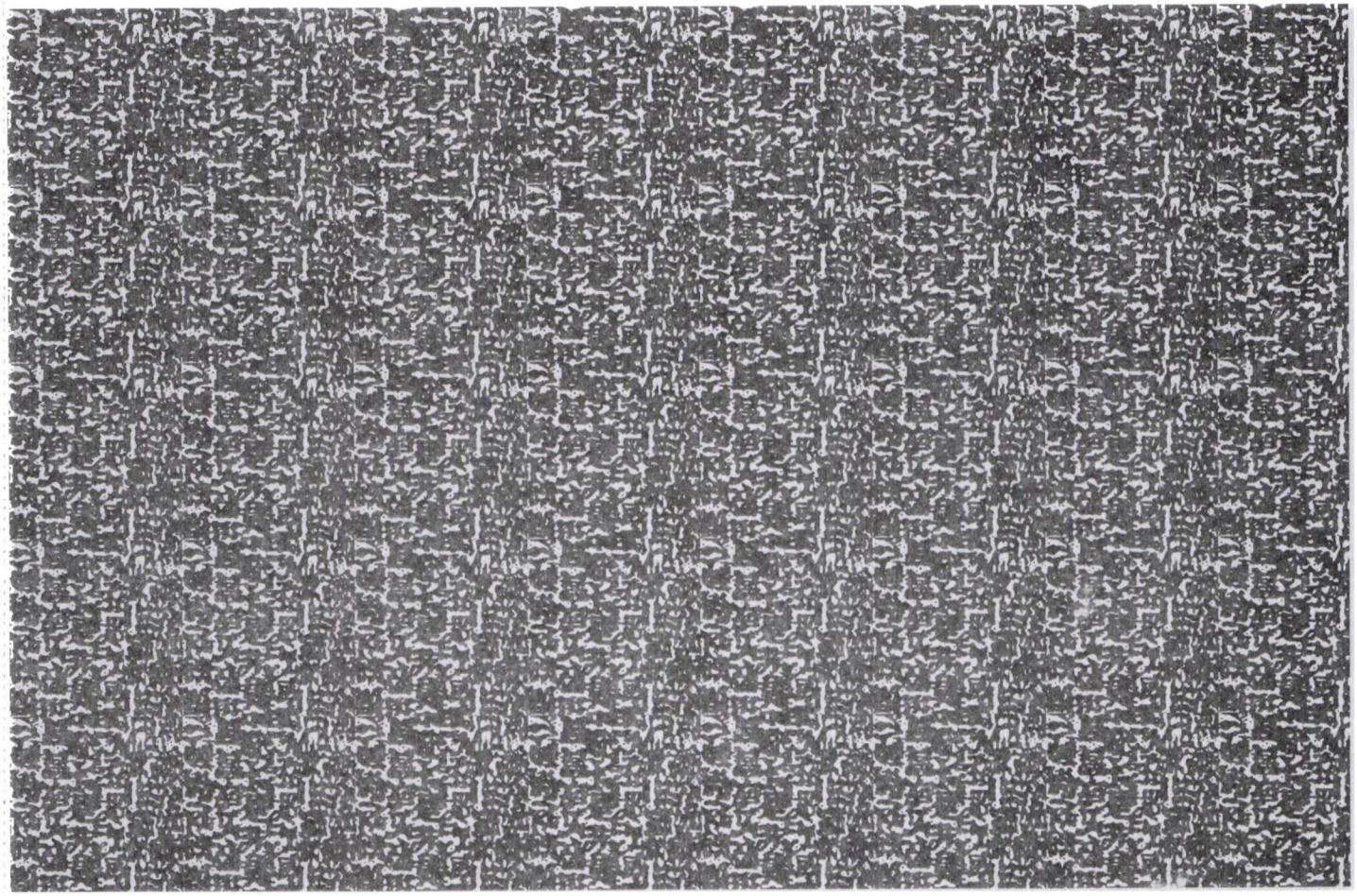

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751030001
J B. LEARY
PO BOX 333
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92502>1147

REVISED NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 16, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 20, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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THEN FOLD AND TEAR THIS STUB ALONG PERFORATION

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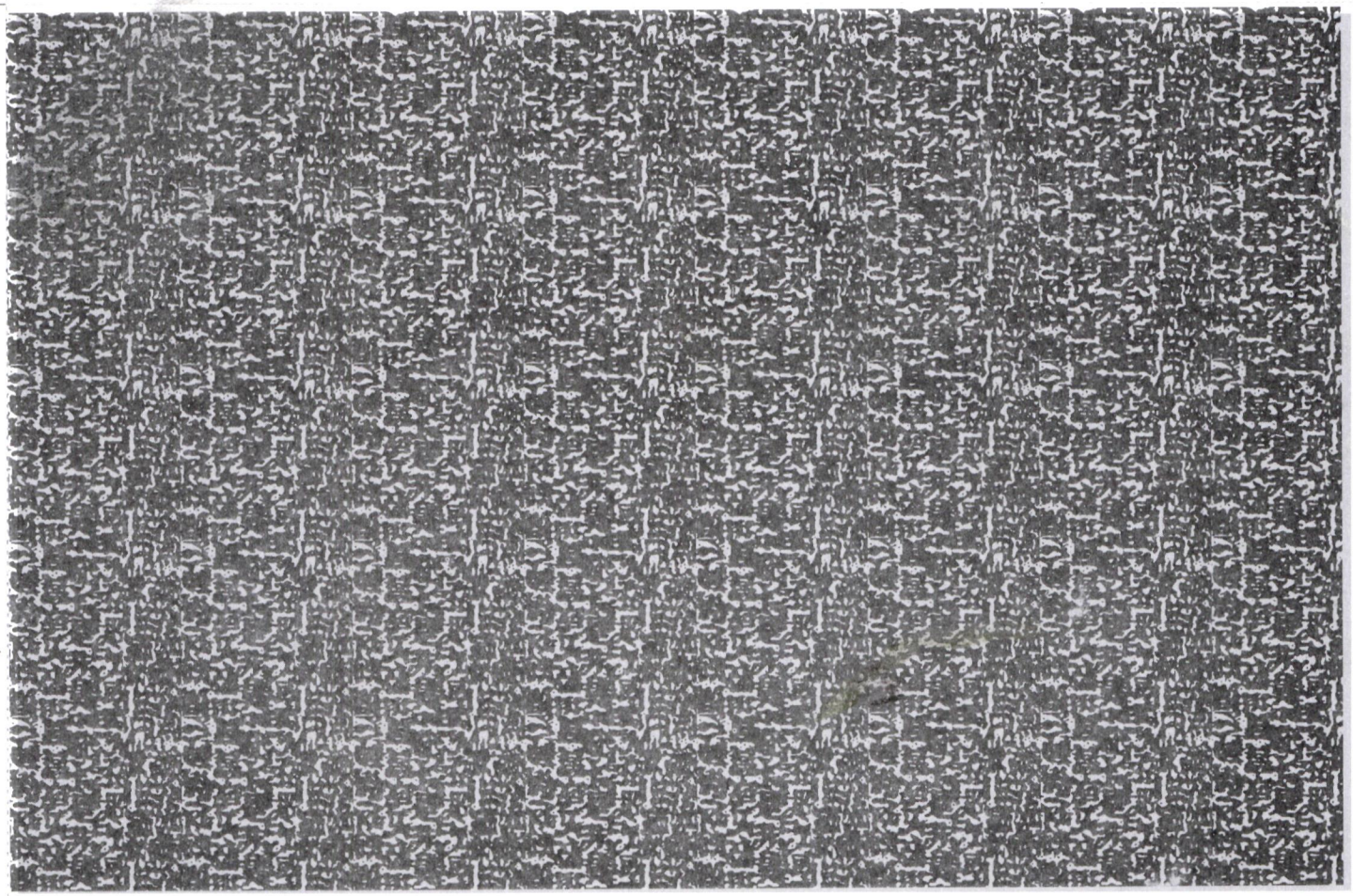

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4080 Lemon Street, 1st Floor Annex
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Riverside, CA 92502-1147

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REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 16 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.
Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.
Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.
Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

8549033 8549080
PSEMPV

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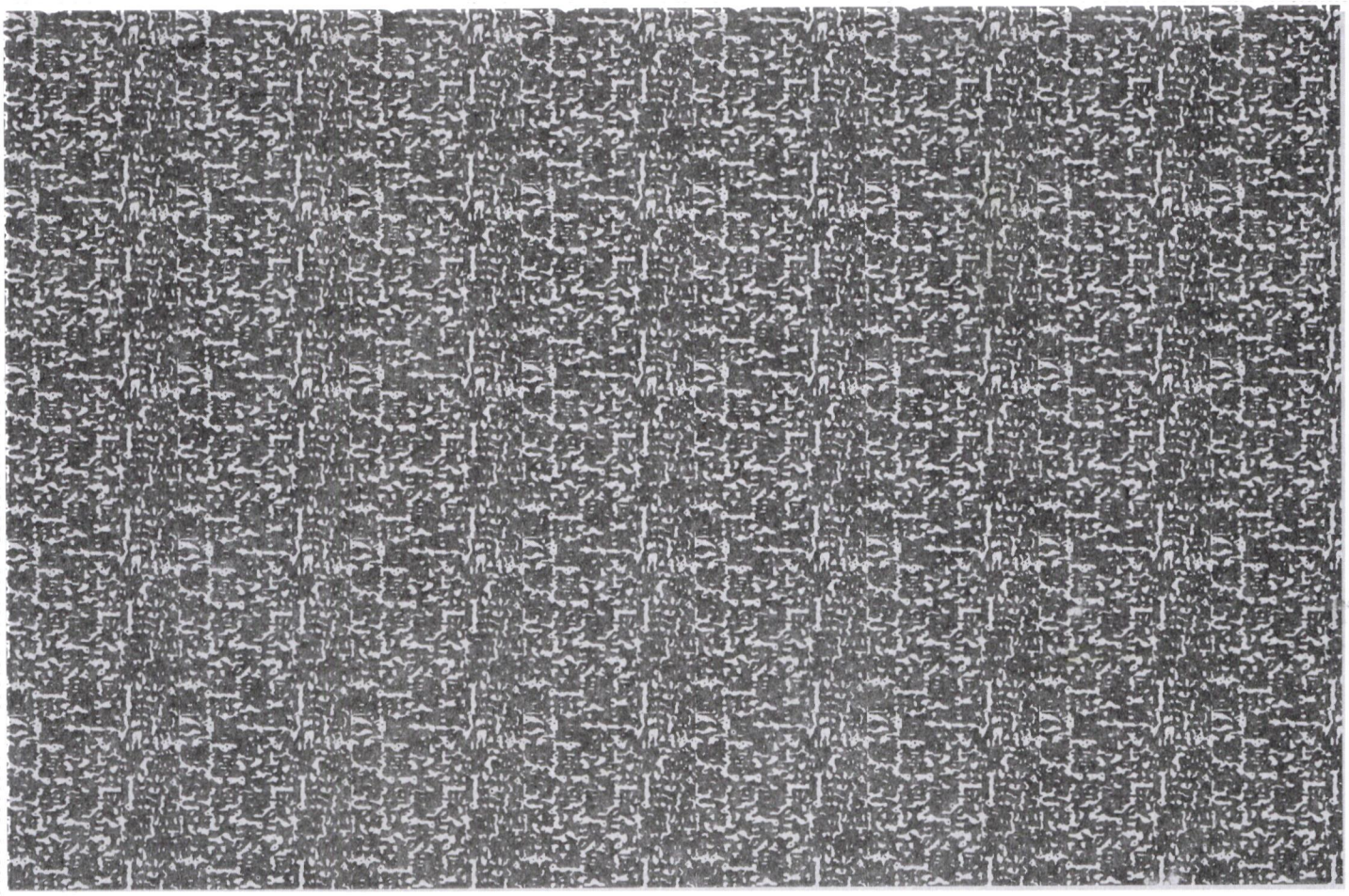

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Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 2:20 PM
To: jmontanez30@hotmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Jesus

Last Name
Montanez

Address (Street, City and Zip)
85701 Middleton St

Phone
7606254646

Email
jmontanez30@hotmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
FE:2735

State your position below

23.1

Support

Do you need a Spanish translator?
Yes

Comments
Full support of the project.

Flores, Kate

From: Robert Kohl <robert@rakohl.com>
Sent: Tuesday, December 16, 2025 2:46 PM
To: Clerk of the Board
Subject: In support of Thermal Horse Park Development

Dear Honorable Supervisor Perez:

We are writing to express our strong support for the proposed equestrian center known as Thermal Horse Park, including its residential and commercial elements, to be located in Thermal. This ambitious project represents a unique opportunity to enhance our community, create jobs, and attract visitors from near and far. Please support this development in our community.

Sincerely,

Clark Pellett and Robert Kohl
561 Camino Norte
Palm Springs CA

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 8:51 AM
To: luzdodgers1@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Luz

Last Name
Gallegos

Phone
9514438458

Email
luzdodgers1@gmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

Do you need a Spanish translator?
No

Flores, Kate

From: Carla Rocha <rochacarla341@gmail.com>
Sent: Tuesday, December 16, 2025 9:47 AM
To: Clerk of the Board; PBRADY@rivco.org
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

As the rich play their pastime luxury games- the real people of the valley will suffer from mass pollution, displacement and destruction of native land. May those who approve pay the moral consequences for eternity.

Flores, Kate

From: John Pena <john.pena@outlook.com>
Sent: Tuesday, December 16, 2025 9:28 AM
To: Clerk of the Board
Subject: Thermal Equestrian Development

To Riverside County Planning Commission,

As a lifelong Coachella Valley resident and current elected official in a neighboring city, I am writing to express my personal support and not on behalf of any government or business affiliation I am involved in for the proposed 622-acre equestrian development project in the Thermal area.
This project represents a crucial investment in an area that urgently requires economic revitalization and infrastructure improvements. The creation of new jobs is especially critical, offering valuable employment opportunities for local residents and fostering economic growth within the community.
Beyond job creation, the planned infrastructure upgrades will enhance the quality of life, potentially improving transportation, utilities, and public spaces for all who live here. This development is not just a building project; it is a vital step toward sustainable economic development and a more prosperous future for our entire east valley area.
I urge you to approve this project and allow our community to reap the significant benefits it will bring to the area.

Sincerely,

John Pena

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:37 AM
To: ben@oe-ca.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Ben

Last Name
Olson

Address (Street, City and Zip)
81955 Highway 111, Suite 201

Phone
7607744520

Email
ben@oe-ca.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below

Support

Do you need a Spanish translator?
No

Comments
Total support for Thermal Ranch. Applicant has several years of successful experience owning and operating the existing horse park 3 miles North of this new site. The existing site on RivCo's Thermal Airport property has grown over 20% per year over the past 5 years. He will employ local engineers, contractors and several hundred workers, with low income housing at the facility. Thermal Ranch will be a very positive economic impact for the Valerie Jean area of Thermal, Eastern Coachella Valley.

Flores, Kate

From: George Tudor <georgetudor@tudorranch.com>
Sent: Tuesday, December 16, 2025 9:35 AM
To: Clerk of the Board
Subject: Thermal Ranch

To whom it may concern,

I am writing in support of the Thermal ranch project on Harrison Street in Oasis. I am a Coachella Valley resident and own Tudor Ranch located in Mecca. I believe this project will improve many aspects of life in the community where it is planned. It will bring much needed infrastructure to an area that otherwise would struggle to get the funds for that infrastructure to be installed. It will also provide jobs and create valuable tax dollars for the surrounding area. It also creates another tourist destination for the East Valley, which is a benefit for the whole Coachella Valley.

Regards,

George J Tudor
Tudor Ranch, Inc
93-400 Hammond Rd
Mecca CA 92254
760 396-2134

Flores, Kate

From: Jesse Nunez <jesse@pacificdates.com>
Sent: Tuesday, December 16, 2025 9:35 AM
To: Clerk of the Board
Subject: Thermal Horse Park

Hello Clerk of the Board of Supervisors

I grew up one mile away form the Thermal Horse Park on Middleton Street in Thermal , CA on a date farm. I'm the CEO/President of Pacific Date Corporation, Located at 84435 Ave 58 Thermal, CA 92274. We currently employ over 150 team members from the east valley.

The Thermal Horse Park is an excellent project in an ideal location for this type of venue. It will bring much-needed tax revenue to help improve an otherwise undeveloped area. I fully support this project and believe it will provide significant benefits while having a low and manageable impact on the surrounding community. Thank you for your consideration

Sincerely,

Jesse S Nunez

CEO/President

Pacific Date
CONVENTIONAL & ORGANIC DATE PRODUCTS

https://sunlovinfoods.com/collections/sun-lovin-dates

84-435 Ave 58
Thermal, CA 92274
Office (760) 399-1161
Cell (760) 427-9121

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:38 AM
To: jp6786343@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Julian

Last Name
Plascencia

Address (Street, City and Zip)
73500 Polk St

Phone
7608639325

Email
jp6786343@gmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below

Oppose

Do you need a Spanish translator?
No

Comments
Hi my name is Julian plascencia, I have been living in thermal for 30yrs, I'm opposing to the thermal ranch project, because the place where it want to be built on is close to our kids schools and ther will be more air pollution and water damage!,please say no to 23.1 the thermal ranch project

Flores, Kate

From: Lee Frankel <lfrankel520@gmail.com>
Sent: Tuesday, December 16, 2025 9:40 AM
To: Clerk of the Board
Subject: Thermal Ranch Specific Plan/SP No. 00401, General Plan Amendment Case No. GPA No. 230001, Change of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan Nos. 230035 and 230038

Dear Honorable Supervisor Perez:

Thank you for your service for the district. I am a year round resident of La Quinta.

I am writing to express my strong support for the proposed 622-acre equestrian center that includes residential and commercial development in Thermal.

We need more types of projects beyond the typical golf course resort communities to support our economy and workforce. This project can enhance our community, build our tax base, provide better economic opportunities for residents in the area, and attract additional visitors that would otherwise be unlikely to come and spend in our area.

Regards,

Lee Frankel

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 2:22 PM
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Stephanie

Last Name
Ambriz

Phone
4424002534

Agenda Date
12/16/2025

Agenda Item # or Public Comment
General Public Comment t

Do you need a Spanish translator?
No

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 1:41 PM
To: Timothy.Maurier@gcinc.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Tim

Last Name
Maurier

Address (Street, City and Zip)
38000 Jefferson parkway

Phone
9498927929

Email
Timothy.Maurier@gcinc.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
31

State your position below

Support

Do you need a Spanish translator?
No

Comments
None

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 1:11 PM
To: killmewithcuteness@gmail.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Nancy

Last Name
Ocegueda

Address (Street, City and Zip)
8809 Ramona Trl Morongo Valley, ca 92256

Phone
5038903677

Email
killmewithcuteness@gmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below

Oppose

Do you need a Spanish translator?
No

Comments
I oppose because a business cannot guarantee the public the infrastructure they are putting in place will benefit the community of Thermal.

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 1:21 PM
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
america

Last Name
noriega

Address (Street, City and Zip)
91290 5th st mecca

Phone
4424561546

Agenda Date
12/16/2025

Agenda Item # or Public Comment
thermal ranch

State your position below
Oppose

Do you need a Spanish translator?
No

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 10:15 AM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
Olivia

Last Name
Rodriguez Mendez

Phone
7602969302

Agenda Date
12/16/2025

Agenda Item # or Public Comment
Agenda Item 23.1.

State your position below
Oppose

Comments
As a community member of Thermal, I oppose this project. It is deeply upsetting to see a Supervisor who was raised by a farmworking community choose to support a project that harms that same community. It is shameful that there is urgency to ensure horses have a place in the desert, while the people of Thermal

23.1

and the Eastern Coachella Valley continue to live without safe water to drink, bathe in, or cook with.

I speak not only in principle, but from personal experience. I am one of many community members who has been repeatedly disrespected and dismissed. Let the record reflect that our community has shown up time and time again, requesting meetings, attending hearings, and participating in spaces that are often inaccessible to us, to oppose plans that harm our communities and our environment.

These plans serve to profit from our land, our labor, the people and the animals while ignoring the basic human needs of those who live here. How dare you prioritize profit and optics over dignity and public health?

To the mothers of Thermal, to the Eastern Coachella Valley community, and to our allies: may we raise better sons, sons who are worthy of being our representatives and who will lead with accountability, humility, and care for the people they serve.

Flores, Kate

From: Carla Rocha <rochacarla341@gmail.com>
Sent: Tuesday, December 16, 2025 9:47 AM
To: Clerk of the Board; PBRADY@rivco.org
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

As the rich play their pastime luxury games- the real people of the valley will suffer from mass pollution, displacement and destruction of native land. May those who approve pay the moral consequences for eternity.

Flores, Kate

From: Acquia Mail
Sent: Monday, December 15, 2025 9:32 AM
To: frances.esparza@cvusd.us
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 15, 2025

Submitted values are:

First Name
Dr. Frances

Last Name
Esparza

Address (Street, City and Zip)
87-225 Church Street

Phone
760-848-1162

Email
frances.esparza@cvusd.us

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23

State your position below

23.1

Support

Do you need a Spanish translator?
No

Flores, Kate

From: Acquia Mail
Sent: Monday, December 15, 2025 11:07 AM
To: brian@lozeaudrury.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 15, 2025

Submitted values are:

First Name
Brian

Last Name
Flynn

Address (Street, City and Zip)
1939 Harrison Street, Suite 150

Phone
508-380-4151

Email
brian@lozeaudrury.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below

23.1

Oppose

Do you need a Spanish translator?
No

Flores, Kate

From: Acquia Mail
Sent: Friday, December 12, 2025 2:15 PM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 12, 2025

Submitted values are:

First Name
Jacqueline

Last Name
Gutierrez

Phone
7605242378

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

23.1

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:31 AM
To: Clerk of the Board
Subject: Public Comments Web Submission

The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
Kevin

Last Name
Hernandez

Address (Street, City and Zip)
83149 Date Avenue, Indio California

Phone
7606981043

Email
NA@gmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below

23.1

Oppose

Comments
As a resident of Coachella Valley, I oppose the Thermal Beach Club, which has significant health impacts for all communities, especially communities of color.

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:29 AM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
Kailah

Last Name
Rose

Phone
6196516269

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1 Thermal Ranch

State your position below
Oppose

Comments
As a resident of the Coachella Valley, I strongly oppose the Thermal Ranch Specific Plan Project. "The East Coachella Valley is formally recognized under Assembly Bill 617 as a community overburdened by air pollution and environmental health risks. Despite this recognition, the project will generate emissions

that would result from years of construction, increased vehicle traffic, and manure management. Construction alone is expected to span eight to ten years, with completion projected by 2032, releasing large quantities
of dust and diesel emissions that would further degrade air quality in an area already struggling with particulate pollution." - Leadership Counsel for Justice & Accountability

Flores, Kate

From: John Pena <john.pena@outlook.com>
Sent: Tuesday, December 16, 2025 9:28 AM
To: Clerk of the Board
Subject: Thermal Equestrian Development

To Riverside County Planning Commission,

As a lifelong Coachella Valley resident and current elected official in a neighboring city, I am writing to express my personal support and not on behalf of any government or business affiliation I am involved in for the proposed 622-acre equestrian development project in the Thermal area.
This project represents a crucial investment in an area that urgently requires economic revitalization and infrastructure improvements. The creation of new jobs is especially critical, offering valuable employment opportunities for local residents and fostering economic growth within the community.
Beyond job creation, the planned infrastructure upgrades will enhance the quality of life, potentially improving transportation, utilities, and public spaces for all who live here. This development is not just a building project; it is a vital step toward sustainable economic development and a more prosperous future for our entire east valley area.
I urge you to approve this project and allow our community to reap the significant benefits it will bring to the area.

Sincerely,

John Pena

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:27 AM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
Julia

Last Name
Almeida

Address (Street, City and Zip)
82053 Wells Lane Thermal, CA 92274

Phone
7608993703

Email
acevesj627@gmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
Agenda Item 23.1.

State your position below
Oppose

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:07 AM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
Jose

Last Name
Mendoza

Phone
7605500750

Agenda Date
12/16/2025

Agenda Item # or Public Comment
2735

State your position below
Support

Comments
Good for community and for new jobs.

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:02 AM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
Maria

Last Name
O

Phone
7607995418

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

Comments
Resident will be proving a comment via zoom with the support of LCJA

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 9:03 AM
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Maria

Last Name
O

Phone
7607995418

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

Do you need a Spanish translator?
Yes

Flores, Kate

From: Juan Moreno <jmoreno.edu@gmail.com>
Sent: Tuesday, December 16, 2025 8:59 AM
To: Clerk of the Board
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

Good morning.

My name is Juan José Moreno Ibarra, and I am a community member from the Eastern Coachella Valley. I am here to ask the supervisors to think carefully about the Thermal Ranch project.

Please consider the people who live near this project. Many families in our community already struggle to get basic needs like clean water. Too often, our community is ignored, even though we have lived here for most of our lives.

I am concerned about how this project could harm our environment and our neighborhood. As a former student in the Coachella Valley and now a working professional, I have seen how decisions like this affect students and families. Parents in our community continue to face limited resources in the Coachella Valley Unified School District. While students in the West Valley have more opportunities, students in the East Valley are still waiting for fairness.

Our community has not always spoken up, not because there is no problem, but because many people do not understand how this process works. We are often focused on getting throughe each day and do not feel heard.

I ask you to think about how this project can truly help our community instead of adding more problems to the Eastern Coachella Valley. Please protect our environment, our families, and our future.

Thank you for listening.

Juan Jose

Sent from my iPhone Please excuse errors and short messages!

Flores, Kate

From: Yolanda Moreno Avila <ymoreno93590@gmail.com>
Sent: Tuesday, December 16, 2025 9:00 AM
To: Clerk of the Board; pbrady@rivco.org
Subject: Comment for item 23.1- NO to Thermal Ranch

Dear Chair and Members of the Riverside County Board of Supervisors,

I am writing to submit a public comment for Item 23.1 to express my opposition to the Thermal Ranch project. As someone who grew up in the community of Mecca and who continues to reside in Riverside County, I urge you to stand with the residents you serve and oppose yet another luxury development.

Approving an additional luxury development does not address the pressing needs of our local communities, many of which continue to face challenges related to housing affordability, environmental impacts, and access to essential resources. Projects of this nature disproportionately benefit a small segment of the population while placing long-term burdens on surrounding communities.

I respectfully ask that you consider the voices of longtime residents and prioritize development that is equitable, sustainable, and responsive to the needs of working families in the Eastern Coachella Valley and throughout Riverside County.

Thank you for your time and consideration.

Sincerely,
Yolanda Moreno

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 8:59 AM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 16, 2025

Submitted values are:

First Name
JOSEPH

Last Name
Alcon

Address (Street, City and Zip)
84112 Avenida nerium

Phone
7604858531

Email
hi2joseph@yahoo.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
Fw# 2735

State your position below

Support

Comments
Would like to express that as a resident of more than 20 years in riverside County, Thermal Ranch has been a good organization in supporting residents and other local businesses. Wish we had more businesses like them.

Flores, Kate

From: Greg Willsey <gwillsey@desertvalleydate.com>
Sent: Tuesday, December 16, 2025 8:38 AM
To: Clerk of the Board
Subject: Thermal Ranch Specific Plan/SP No. 00401, General Plan Amendment Case No. GPA No. 230001, Change of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan Nos. 230035 and 230038.

Dear Honorable Supervisor Perez,

I am writing to express my strong support for the proposed 622-acre equestrian center that includes residential and commercial development in Thermal.

This ambitious project represents a unique opportunity to enhance our community, create jobs, and attract visitors from near and far.

Thank you in advance for your time.

Best,

Greg Willsey

Greg Willsey
Co-Founder
Desert Valley Date LLC | gwillsey@desertvalleydate.com

Flores, Kate

From: George Jeffrey <george@pacificdates.com>
Sent: Tuesday, December 16, 2025 8:56 AM
To: Clerk of the Board
Subject: 100% support of the Thermal horse park

Hello Clerk of Board,

I am sending this in support of the Thermal horse park. I moved to Thermal in 1966 and have worked here ever since. The Thermal horse park would bring much needed tax dollars and improvements to our underdeveloped area. Thermal is a great area with a great location for just this sort of thing. I 100% back this project. I grew up less than one mile away from this project and feel there would be no impact to the area but only benefits.

Thanks- George

Cell (760) 275-5066
Office (760) 399-1161





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Flores, Kate

From: Acquia Mail
Sent: Monday, December 15, 2025 9:11 PM
To: Clerk of the Board
Subject: Public Comments Web Submission
Attachments: public-comment-for-agenda-item-23.1---thermal-ranch-12.16.25.docx



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 15, 2025

Submitted values are:

First Name
Allyson

Last Name
Jeffredo

Phone
7609891309

Email
a.jeffredo2@gmail.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
Agenda Item 23.1 – Thermal Ranch

State your position below
Oppose

23.1

Comments
Dear County Supervisors,

I am writing to express my concerns and opposition to the Thermal Ranch Project as a lifelong resident of the Eastern Coachella Valley currently residing in Indio. The project has seen overwhelming opposition from the Thermal and neighboring communities since its proposal. This opposition was reflected when Commissioner Savage voted against the project at the Planning Commission in October.

Based on the Environmental Impact Report, the project poses substantial threats to the Thermal and larger communities. The report itself states in numerous areas that the cumulative impacts of this project cannot be fully understood without exposing the Thermal community to significant risk. Noteworthy impacts include but are not limited to:

- Threats to the environment with increased traffic and vast amounts of animal waste
- Strains on public utilities infrastructure, such as water, waste management, roads, and electricity
- Risks of gentrification in an underserved and underresourced community

Though each of these points is concerning, of most concern is the final point. This development proposes an equestrian ranch, over 1,300 dwelling units, and a 150-room hotel that will drastically change the landscape of the primarily agricultural and rural Eastern Coachella Valley. This project is geared toward a wealthy audience that will create a deeper divide in access, resources, and ultimately equity as we have seen in other parts of the Coachella Valley.

Of other concern is the developer's open willingness to leverage the need for public infrastructure to build buy-in for the project. This approach creates a dangerous precedent that normalizes the exchange of essential public infrastructure for approval of high-risk private development. The community needs sustainable investment that will improve the community. However, this investment should not be reliant on a private investor that has no stake in the health, safety, and overall wellbeing of the residents of Thermal and surrounding communities. The Thermal Community Council themselves expressed only tentative support for similar reasons.

In summary, approving the Thermal Ranch project fails to reflect the expressed needs and priorities of the Thermal community and puts the community at further risk. I urge the County Supervisors to reject this proposal and work with the community to attract investments that truly benefit the residents of Thermal and the Eastern Coachella Valley—investments that align with the County's vision for equitable, healthy, and sustainable communities.

Attachments (Must be .pdf, .doc, or .docx)
public-comment-for-agenda-item-23.1---thermal-ranch-12.16.25.docx

Dear County Supervisors,

I am writing to express my concerns and opposition to the Thermal Ranch Project as a lifelong resident of the Eastern Coachella Valley currently residing in Indio. The project has seen overwhelming opposition from the Thermal and neighboring communities since its proposal. This opposition was reflected when Commissioner Savage voted against the project at the Planning Commission in October.

Based on the Environmental Impact Report, the project poses substantial threats to the Thermal and larger communities. The report itself states in numerous areas that the cumulative impacts of this project cannot be fully understood without exposing the Thermal community to significant risk. Noteworthy impacts include but are not limited to:

- Threats to the environment with increased traffic and vast amounts of animal waste
- Strains on public utilities infrastructure, such as water, waste management, roads, and electricity
- Risks of gentrification in an underserved and underresourced community

Though each of these points is concerning, of most concern is the final point. This development proposes an equestrian ranch, over 1,300 dwelling units, and a 150-room hotel that will drastically change the landscape of the primarily agricultural and rural Eastern Coachella Valley. This project is geared toward a wealthy audience that will create a deeper divide in access, resources, and ultimately equity as we have seen in other parts of the Coachella Valley.

Of other concern is the developer's open willingness to leverage the need for public infrastructure to build buy-in for the project. This approach creates a dangerous precedent that normalizes the exchange of essential public infrastructure for approval of high-risk private development. The community needs sustainable investment that will improve the community. However, this investment should not be reliant on a private investor that has no stake in the health, safety, and overall wellbeing of the residents of Thermal and surrounding communities. The Thermal Community Council themselves expressed only tentative support for similar reasons.

In summary, approving the Thermal Ranch project fails to reflect the expressed needs and priorities of the Thermal community and puts the community at further risk. I urge the County Supervisors to reject this proposal and work with the community to attract investments that truly benefit the residents of Thermal and the Eastern Coachella Valley—investments that align with the County's vision for equitable, healthy, and sustainable communities.

Flores, Kate

From: Jazmin Ibarra <jazmin.ibarra@email.ucr.edu>
Sent: Tuesday, December 16, 2025 7:45 AM
To: Clerk of the Board
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

Good morning,

My name is Jazmin Ibarra and I am a community member of the Eastern Coachella Valley. I want to ask the supervisors to vote NO on the building of Thermal Ranch and to please think about the community members living with the issues of these luxury projects that do not benefit them at all. We continue to be left behind, even when we have been living here for most of our life. I want to express my concern with the environmental impacts that a project like Thermal Horse Ranch would bring to our community. As a former student of CVUSD where we already have been and continue to be exposed to insufficient resources for students that many in the west side get, not only academically but something as simple as clean air. The reason why community has not complained about the smell of the current ranch, is not because there isn't an issue, but you all have to understand that our communities are not going to speak out because we do not know these procedures to do so, we are taught to just go about our day and learn how to coexist with these smells that surround us. I urge you to think about us the residents living in already deplorable situations and vote NO on Thermal Ranch.

Thank you.

Flores, Kate

From: Lorraine S. <losalas2020@gmail.com>
Sent: Tuesday, December 16, 2025 8:01 AM
To: Clerk of the Board; pbrady@rivco.org
Subject: comment for ITEM 23.1 - NO to Thermal Ranch

This email to express my unequivocal disapproval for the Thermal Ranch project. This is another example of gentrification, continuing to drive hard working residents out of their homes through the increase of water rates, electricity, rent, and housing prices.

Another issue is the scarcity of water. We are going to be quickly drying up our wells because this is another example of the gross misuse of water. There are children needing clean arsenic water at this very moment and guess who's getting priority for water lines? It's disgraceful to watch as certain people have more rights to the basic fundamental need for water over others.

Lorraine Salas

Flores, Kate

From: Anthony Bianco <abianco@anthonyvineyards.com>
Sent: Tuesday, December 16, 2025 4:55 AM
To: Clerk of the Board
Subject: Thermal Park

Hi
My name is Anthony Bianco. I live in Palm Desert. I am a local farmer and born and raised in the Coachella Valley.
I am writing in support of Thermal Park. Thermal is an area that is in need of critical infrastructure. Water, power, sewer, and roads. Also, JOBS. This development will bring all of this. Without projects like this. Thermal will remain an agricultural town forever. I would strongly urge you to approve this project. These opportunities don't come around often.
Thank You,
Anthony Bianco
Anthony Vineyards
Sent from my iPhone

Flores, Kate

From: Acquia Mail
Sent: Tuesday, December 16, 2025 12:39 AM
Cc: Clerk of the Board
Subject: Request to Speak Web Submission

Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 16, 2025

Submitted values are:

First Name
Stephanie

Last Name
Ambriz

Phone
4424002534

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below
Oppose

Do you need a Spanish translator?
No

Flores, Kate

From: Ashley Rodriguez <ashrodriguez2328@gmail.com>
Sent: Tuesday, December 16, 2025 12:37 AM
To: Clerk of the Board; pbrady@rivco.org
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

No to Thermal Ranch

Sincerely,
Ashley Rodriguez
ashrodriguez2328@gmail.com

Flores, Kate

From: Sarah Rodriguez <sarahbenitarodriguez@gmail.com>
Sent: Tuesday, December 16, 2025 12:00 AM
To: Clerk of the Board
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

Riverside County Board of Supervisors,

The proposed equestrian ranch in Thermal poses a huge risk to the health of the surrounding communities. It is imperative that choices are made in the best interest of the people who live in the community and not for the benefit of wealthy business owners.

Please protect children from the dangerous effects of this type of development.

Thank you,

Sarah Rodriguez

Flores, Kate

From: Brenda Ortiz <brendaortiz6868@gmail.com>
Sent: Monday, December 15, 2025 10:22 PM
To: Clerk of the Board; pbrady@rivco.org
Subject: Comment for Item 23.1 - NO to Thermal Ranch

Good morning, my name is Brenda Ortiz, and I am a resident of Mecca and a former resident of Thermal. I am writing to express my staunch opposition to the proposed Thermal Ranch.

As someone born and raised in the Eastern Coachella Valley, I have witnessed dozens of luxury projects being developed in our communities with the same promises of bringing in revenue and greater benefits for residents. I am 22 years old and have yet to see any of those promises fulfilled. I don't see the Thermal Ranch project being any different.

It is a shame and a slap in the face to our working-class communities to watch another exclusive project catered to the interests of rich outsiders. In a community where residents are lacking clean drinking water, struggling to afford rent, and experiencing a multitude of public health issues, how can one in good conscious build a shiny horse ranch that requires absurd amounts of water to maintain?

Our calls are clear. We don't want this project in our community.

Thank you for your time and I hope you find it in your hearts to listen to your community,

Brenda Ortiz

Flores, Kate

From: Acquia Mail
Sent: Monday, December 15, 2025 10:16 PM
To: Clerk of the Board
Subject: Public Comments Web Submission



The Clerk of the Board has received your public comments and will forward them to the Board of Supervisors. If you wish to call in and speak at the Board of Supervisors meeting, please select https://rivcocob.org/request-to-speak and fill out the request to speak form.

Thank you,
Riverside County Clerk of the Board

Submitted on December 15, 2025

Submitted values are:

First Name
America

Last Name
Montellano

Phone
7602348064

Agenda Date
12/16/2025

Agenda Item # or Public Comment
Agenda Item 23.1

State your position below
Oppose

Comments
As an active member of the Thermal community I oppose the Thermal Ranch. This project will only burden the community with its negative environmental and housing impacts. It will further strain the already exhausted and limited clean water and air that only a few residents have access to in Thermal

and the surrounding areas. The Thermal Ranch will ultimately end in the displacement of a community that is continuously ignored and marginalized. I urge you to say no to the Thermal Ranch project, our lives depend on your decision.

Flores, Kate

From: ADRIANA TORRES CEJA <adritorress@g.ucla.edu>
Sent: Monday, December 15, 2025 10:01 PM
To: Clerk of the Board; pbrady@rivco.org
Subject: Comment for ITEM 23.1 - NO to Thermal Ranch

Dear Supervisors,
My name is Adriana Torres, and I am a resident of North Shore writing to express my strong opposition to the proposed Thermal Ranch development.

This development does not serve the needs, priorities, or realities of the families who live in the Eastern Coachella Valley. Instead of creating pathways for stability, it threatens to accelerate displacement, increase living costs, and place additional strain on already limited infrastructure and community resources. The ECV is a historically underinvested community, and large-scale speculative development like this has the potential to push out the very residents who have built and sustained this place for generations.

We deserve thoughtful, community-driven planning, development that aligns with our needs, protects our residents, and ensures that families who call the ECV home today can remain and thrive here tomorrow. The Thermal Ranch proposal does not meet that standard.

--
Adriana Torres Ceja (she/her)
M.S. in Real Estate Development ('26) | UCLA
B.A. & M.A. in Public Policy ('25) | Stanford University
(760) 619-9108

Flores, Kate

From: Cecilia L <cecy.lemus1995@gmail.com>
Sent: Monday, December 15, 2025 9:48 PM
To: Clerk of the Board
Subject: Comment for Item 23.1 - NO to Thermal Ranch

I am emailing in opposition to Thermal Ranch due to inconsistencies and empty promises being made by the owner, his lawyer and even the supervisor VMP.

Flores, Kate

From: Alejandra Alarcon <ale.b.alarcon@gmail.com>
Sent: Monday, December 15, 2025 8:49 PM
To: Clerk of the Board; pbrady@rivco.org
Subject: Comment for item 23.1- NO to Thermal Ranch

Dear Chair and Members of the Riverside County Board of Supervisors,

As a Riverside County resident, I am writing to submit a public comment for Item 23.1 to state my opposition to the Thermal Ranch project.

This development raises serious concerns regarding environmental impact, public health, and equity for Eastern Coachella Valley communities that already face disproportionate environmental and infrastructure burdens. I urge the County to prioritize sustainable, community-centered planning that protects existing residents and local resources.
--

Alejandra Alarcón (She/ Her)

Flores, Kate

From: Acquia Mail
Sent: Monday, December 15, 2025 4:00 PM
To: jdelatorre@msaconsultinginc.com
Cc: Clerk of the Board
Subject: Request to Speak Web Submission



Thank you for submitting your request to speak. The Clerk of the Board office has received your request and will be prepared to allow you to speak when your item is called. To attend the meeting, please call (669) 900-6833 and use **Meeting ID # 864 4411 6015 . Password is 20251216.** You will be muted until your item is pulled and your name is called. Please dial in at 9:00 am with the phone number you provided in the form so you can be identified during the meeting.

Submitted on December 15, 2025

Submitted values are:

First Name
Julian

Last Name
DeLaTorre

Address (Street, City and Zip)
284 Strada Nova

Phone
7605782495

Email
jdelatorre@msaconsultinginc.com

Agenda Date
12/16/2025

Agenda Item # or Public Comment
23.1

State your position below

Support

Do you need a Spanish translator?
No

Comments
I am part of the applicant's team and available to answer questions if needed.

Julian A. DeLaTorre - Principal Engineer for MSA Consulting, Inc.

Flores, Kate

From: Alaura R. McGuire <amcguire@adamsbroadwell.com>
Sent: Monday, December 15, 2025 7:29 PM
To: District 4 Supervisor V. Manuel Perez; Office of 2nd District Supervisor; Supervisor Medina - 1st District; District3 Information; District 5; Clerk of the Board
Cc: Christina Caro
Subject: Agenda Item 23.1: Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624)
Attachments: 7687-013acp -12.16 BOS Hrg Comment Letter Thermal Ranch SP and Exhibits A-C.pdf

Good Evening,

Please find attached **Comments re Agenda Item 23.1: Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624)** and **Exhibits A-C.**

We are also providing a Dropbox link consisting of supporting references:
https://www.dropbox.com/scl/fo/uyoryvl3kq7r0p5npzg17/ADbnzgteKJrIRBMJ8CLa4BY?rlkey=w33l1s3ufi9pn9b37qepmzg4x&st=g5yhdgnk&dl=0

A hard copy of our Comments and Exhibits A-C will be hand delivered prior to the Board of Supervisor's Hearing.

Please contact me if you have any questions.

Thank you,
Alaura

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ISABEL TAHIR

Of Counsel
DANIEL L. CARDOZO
MARC D. JOSEPH

December 15, 2025

Via Email and Hand Delivery

Chair Manuel Perez
Vice-Chair Karen Spiegal
Supervisor Jose Medina
Supervisor Chuck Washington
Supervisor Yxstian Guitierrez
Riverside County Board of Supervisors
Emails: district4@rivco.org; district2@rivco.org; district1@rivco.org; D3Email@rivco.org; district5@rivco.org

Clerk of the Board
4080 Lemon Street, 1st Floor
P.O. Box 1147
Riverside, CA 92502-1147
Email: cob@rivco.org

Re: Agenda Item 23.1: Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624)

Dear Chair Perez, Vice-Chair Spiegal, Board Members, and Clerk of the Board:

On behalf of Californians Allied for a Responsible Economy ("CARE CA"), we submit these comments on Agenda Item 23.1 related to the Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624) ("Project") proposed by Thermal Ranch, LLC ("Applicant").

The Project's proposed entitlements include a General Plan Amendment (GPA No. 2300001), a Tentative Tract Map (TTM No. 38578), three Plot Plan applications (Plot Plan No.s 230005, -6, -16), and a Change of Zone (CZ No. 2300003) to construct a mix of residential and commercial uses centered around a 231-acre equestrian center and related show facilities, including barns, stabling and related equestrian services on a 619± acres.[1] The residential components of the Project would include a mix of residential neighborhoods ranging from seasonal and year-round workforce housing and RV park facilities to large single-family estate

[1] FEIR, p. ES-2.

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lots, single-family attached and detached homes and resort condominiums.[2] At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.67 to 27.3 units per acre and up to 320 RV spaces.[3] The commercial components of the Project would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space.[4] A 54.4±-acre mixed use resort with a 150± key resort hotel, beach club, pool and other recreational amenities, and ancillary retail is also proposed.[5] The proposed Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County.[6]

CARE CA respectfully requests that the Board of Supervisor's continue the December 16, 2025, hearing and remand the Project to Staff to revise and recirculate the EIR in compliance with the California Environmental Quality Act ("CEQA"). The County cannot certify the FEIR, adopt the Project's Mitigation Monitoring & Reporting Program ("MMRP"), adopt the Statement of Overriding Considerations, or approve the Projects entitlements based on the County's legally deficient environmental analysis and inadequate mitigation, and absent substantial evidence to support the necessary findings for Project approval.

I. EXECUTIVE SUMMARY AND BACKGROUND

On January 10, 2025, CARE CA submitted comments, supported by expert evidence, explaining that the Draft Environmental Impact Report ("DEIR") had substantial informational and evidentiary defects, and relied on unsupported conclusions to assert that the Project's impacts would be fully mitigated by the measures proposed in the Project's MMRP and conditions of approval. CARE CA's expert reports included substantial evidence demonstrating that the Project would result in potentially significant impacts on public health, noise, and agricultural resources that were not adequately disclosed, analyzed or fully mitigated in the DEIR. As a result of the DEIR's fundamental inadequacies and conclusory nature, the DEIR failed to disclose or fully mitigate many of the Project's significant impacts, resulting in an inadequate public review process.

For example, CARE CA's air quality expert demonstrated that the County improperly relied on Localized Significance Thresholds ("LSTs") to assess health

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[2] FEIR, p. ES-2.
[3] FEIR, p. ES-2.
[4] FEIR, p. ES-2.
[5] FEIR, p. ES-2.
[6] FEIR, p. 1-3.

risk, which failed to identify potentially significant health impacts from exposure of nearby residents and workers to toxic air contaminant ("TAC") emissions. CARE CA's noise expert provided substantial evidence that the DEIR underestimated operational noise impacts by failing to analyze impacts at the closest residence to the Project site and by underestimating HVAC run time. Finally, CARE CA's comments demonstrated that the DEIR lacked any mitigation for the Project's significant agricultural impacts and therefore did not provide substantial evidence to support its proposed statement of overriding considerations.

The County released the Final Environmental Impact Report ("FEIR") in September 2025, which included responses to CARE CA's comments. The Planning Commission held a hearing on October 22, 2025 to consider the FEIR and Project entitlements. On October 21, 2025, CARE CA submitted comments to the Planning Commission detailing that the FEIR still failed to comply with CEQA. CARE CA's agriculture expert provided substantial evidence demonstrating that the Project's agricultural impacts can feasibly be mitigated by an Agricultural Conservation Easement ("ACE"), which should have been implemented by the County. The Planning Commission nevertheless voted to recommend approval by the Board.

Prior to the Board hearing, Staff prepared responses to CARE CA's FEIR comments ("Responses to Comments").[7] However, neither the Responses nor the Board Staff Report resolve the FEIR's fundamental deficiencies and still fail to meaningfully respond to all of the Project's substantial evidence from CARE CA's experts. The County must revise and recirculate the EIR to comply with CEQA before the Board may consider approving the Project.

First, the County cannot certify the FEIR because it lacks substantial evidence to make the necessary CEQA Findings.[8] CEQA Findings must be supported by substantial evidence in the administrative record. The record before the Board does not contain substantial evidence demonstrating that the Project's significant environmental effects will be eliminated or substantially avoided, as required by law. In fact, substantial evidence in CARE CA's comments on the DEIR, FEIR, and expert consultant reports continue to demonstrate that the Project results in significant, unmitigated environmental impacts requiring revision and recirculation of the EIR.

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[7] Responses to Comments, pp. 1-202.
[8] Riverside County Board of Supervisors Resolution No. 2025-303, Attachment A: CEQA Findings, pp. 1-152.

Second, the County cannot adopt the MMRP because it lacks substantial evidence to conclude that the MMRP will reduce or avoid the Project's significant impacts.[9] Rather, CARE CA's expert consultant provides substantial evidence that the Project will result in significant air quality and public health impacts, notwithstanding the mitigation proposed in the MMRP, which were not addressed in the FEIR. These impacts must be analyzed and further mitigation required for any significant impacts found.

Third, the County cannot adopt the Statement of Overriding Considerations because it lacks substantial evidence to make the necessary findings.[10] The record before the Board demonstrates that there are changes or alterations that can be incorporated into the Project which would substantially lessen the significant environmental effect as identified in the FEIR. Specifically, CARE CA's expert provides substantial evidence that there are feasible mitigation measures that would substantially reduce the Project's significant impacts from the conversion of important agricultural land. These must be implemented in a revised EIR before adoption of the Statement of Overriding Considerations.

Fourth, as discussed in more detail below, the County cannot make the necessary findings to support approval of the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.

These comments are supported by supplemental expert evidence. CARE CA's air quality consultant Paul E. Rosenfeld, Ph.D. of Soil Water Air Protection Enterprise ("SWAPE"),[11] transportation expert Norman Marshall,[12] and agriculture resources expert Henry House.[13] Our air quality consultant provides substantial evidence that the Project will result in significant project-specific and cumulative public health impacts from DPM emitted during construction and operation. Our agriculture resources expert provides substantial evidence demonstrating that there is feasible mitigation that would substantially reduce the Project's significant agricultural impacts that the County fails to adopt in violation of CEQA. Our

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[9] Resolution No. 2025-303, Attachment B: Mitigation Monitoring and Reporting Program, p. MMRP-1.
[10] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[11] See **Exhibit A,** Paul E. Rosenfeld, Ph.D., Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("SWAPE Comments").
[12] See **Exhibit B,** Norman Marshall, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("Marshall Comments").
[13] See **Exhibit C,** Henry House, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("House Comments").

transportation expert demonstrates that the County lacks substantial evidence to conclude that the Project will not result in significant impacts to the existing housing/jobs imbalance. These potentially significant impacts necessarily require the County to revise and recirculate the EIR prior to Project approval.

II. STATEMENT OF INTEREST

CARE CA is a non-profit organization which advocates for a sustainable construction industry and protecting the environment and health of its communities' workforces. CARE CA includes the Southern California Pipe Trades District Council 16 and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in and around Riverside County.

CARE CA advocates for protecting the environment and the health of their communities' workforces. CARE CA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits, and which minimize adverse environmental and other impacts on local communities. CARE CA members live, work, recreate, and raise their families in Riverside County and its communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

In addition, CARE CA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

III. THE BOARD OF SUPERVISORS CANNOT MAKE THE REQUISITE FINDINGS TO APPROVE THE PROJECT

The Project requires the County to certify the FEIR and approve several entitlements, including the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.[14] However, as

[14] FEIR, p. 4.

discussed herein, the Staff Report and the County's response to comments fails to adequately address several significant environmental and public health impacts. As a result, the County lacks substantial evidence to make the requisite findings to approve the Project or its entitlements.

General Plan Amendment

CARE CA's previous comments explained that in order to approve the Project's GPA, the Board must make all of the findings required in both Section 2.4 (Entitlement/Policy General Plan Amendment) and 2.7 (Agriculture Foundation Component General Plan Amendments) of Riverside County Ordinance 348:

1. Section 2.4: Entitlement/Policy General Plan Amendment

In order to approve an entitlement/policy amendment the Board must make the first two findings listed below and any one or more of the subsequent findings listed below:

- The proposed change does not involve a change in or conflict with:
  - the Riverside County Vision;
  - any general planning principle set forth in general plan Appendix B; or
  - any foundation component designation in the general plan.
- The proposed amendment would either contribute to the purposes of the general plan or, at a minimum, would not be detrimental to them;
- Special circumstances or conditions have emerged that were unanticipated in preparing the general plan;
- A change in policy is required to conform to changes in state or federal law or applicable findings of a court of law;
- An amendment is required to comply with an update of the housing element or change in state housing element law;
- An amendment is required to expand basic employment job opportunities (jobs that contribute directly to the county's economic base) and that would improve the ratio of jobs-to-workers in the county;
- An amendment is required to address changes in ownership of land or land not under the land use authority of the board of supervisors.[15]

[15] Ordinance No. 348 § 2.4

2. Section 2.7: Agricultural Foundation Component General Plan Amendment

The Board must make both of the following requirements to approve the GPA:

- A maximum of 7% of the Agricultural Foundation acreage shall be generally authorized for conversion from the Agricultural Foundation Component to any other Foundation Component within a 2 ½ year period. [16]
- The proposed amendment must either contribute to the achievement of the purposes of the General Plan or, at a minimum, not be detrimental to them. [17]

The Project is inconsistent with the General Plan and results in significant, unmitigated agricultural impacts which prevent the County from making the requisite findings above.

First, the GPA conflicts with the County's General Plan Vision Statement. By proposing the permanent conversion of over 619 acres of important farmland without any mitigation, the GPA directly contradicts the County's stated goals of preserving agricultural areas, which have historical importance in Riverside County, in the face of mounting growth pressures in agricultural areas.[18]

Second, the GPA conflicts with principles set forth in General Plan Appendix B. Similar to the General Plan, the Planning Principles encourage the preservation of agricultural land. Specifically, the Planning Principles state that "[a]griculture should be treated as an economic land use" and that incentives and policies should be put in place to stimulate agricultural production and protect agricultural areas from urban encroachment.[19] For the same reasons discussed above, the Amendment's conversion of agricultural land conflicts with these principles.

Third, the GPA involves a clear change to a foundational component designation in the General Plan. Specifically, the GPA proposes to change the current General Plan Foundation designation of Agriculture to Community Development.[20] Therefore, the Board cannot make the first required finding to approve the GPA under Section 2.4 of Ordinance No. 348.

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[16] Ordinance No. 348 § 2.7.B.3.
[17] General Plan Administration Element, p. A-16.
[18] Vision Statement, pp. V-20, V-21; see also Land Use Element, p. LU-44;
[19] General Plan Appendix B: Planning Principles, pp. 12-13.
[20] FEIR, p. 2.16-18.

The Board also cannot make the second required finding to approve the GPA under Section 2.7 of Ordinance No. 348. As discussed below, the Project is detrimental to the purposes of the General Plan because it still fails to mitigate the Project's conversion of agricultural land into non-agricultural use. This is detrimental to the purposes of Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land.

The County attempts to ignore this inconsistency by claiming that the Project is consistent with the General Plan because it is consistent with the General Plan's policy which allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. However, compliance with this single policy does not excuse the County's continued inconsistency with the other policies in the General Plan related to preserving agricultural land through conservation easements.

Therefore, the Board cannot make the requisite findings to approve the Project's GPA.

Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[21] The County continues to conclude that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[22] However, for the same reasons discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land. Therefore, the Board cannot make the requisite findings to approve the Specific Plan.

Plot Plan

The Project's three plot plan applications cannot be approved unless it complies with the requirements of Section 18.30 in Riverside County Ordinance No. 348, including:

[21] Riverside County Ordinance No. 348, §§ 2.8, 2.9, 2.1.
[22] Responses to Comments, Response C-12, p. 53.

1. The proposed use must conform to all the requirements of the general plan and with all applicable requirements of state law and the ordinances of Riverside County;
2. The overall development of the land shall be designed for the protection of the public health, safety and general welfare; to conform to the logical development of the land and to be compatible with the present and future logical development of the surrounding property. The plan shall consider the location and need for dedication and improvement of necessary streets and sidewalks, including the avoidance of traffic congestion; and shall take into account topographical and drainage conditions, including the need for dedication and improvements of necessary structures as a part thereof;
3. All Plot Plans which permit the construction of more than one structure on a single legally divided parcel shall, in addition to all other requirements, be subject to a condition which prohibits the sale of any existing or subsequently constructed structures on the parcel until the parcel is divided and a final map recorded in accordance with Ordinance No. 460 in such a manner that each building is located on a separate legally divided parcel.[23]

The Board cannot make the first two of these required findings. First, for the same reasons discussed above, the Project does not conform with all of the requirements of the General Plan by converting 619 acres of important farmland without proposing any mitigation. Second, the development of the land would not be designed for the protection of the public health, safety, and general welfare. As discussed below and in SWAPE's attached comments, the Project will result in significant project-specific and cumulative public health impacts from exposure to the DPM emitted during Project construction and operation.

Zone Change

The Project's Zone Change cannot be approved unless it complies with the requirements of Section 20.3 in Riverside County Ordinance No. 348. This Section requires the Board to find the Zone Change consistent with the General Plan. As discussed above, the Zone Change is not consistent with the General Plan because it would allow the permanent conversion of 619 acres of agricultural land to non-agricultural use without any mitigation. Therefore, the Board cannot approve the Zone Change.

[23] Ordinance No. 348 § 18.30(C).

Tentative Tract Map

The Project's Tentative Tract Map cannot be approved unless it complies with the requirements of Section 20.3 of Riverside County Ordinance No. 348., as well as the Subdivision Map Act. Accordingly, the Board must make the following findings:

- That the proposed map is consistent with the general plan or applicable specific plan, or other applicable provisions of the Municipal Code;
- That the site is physically suitable for the type of development;
- That the site is physically suitable for the proposed density of development;
- That the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- That the design of the subdivision or the type of improvements are not likely to cause serious public health problems;
- That the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.[24]

The Board cannot make these requisite findings for several reasons. First, as discussed above, the proposed map is not consistent with the General Plan's policies and goals related to the preservation of agricultural land. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments below demonstrate, the Project will have significant project-specific and cumulative public health impacts that were not adequately disclosed or analyzed. Specifically, the FEIR failed to analyze the Project's potential impacts from construction and operation-related TAC emissions. As a result, the County also has not provided substantial evidence to demonstrate that the proposed mitigation will adequately reduce these health risks to less than significant levels. Therefore, the Board cannot make the requisite findings to recommend approval of the Tentative Tract Map.

[24] Subdivision Map Act §§ 66474, 66473.5; Ordinance No. 348 § 20.3.

IV. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE THE PROJECT'S INDIVIDUAL AND CUMULATIVE HEALTH RISK IMPACTS REMAIN UNRESOLVED

a. The Record Contains Substantial Evidence of Significant, Unmitigated Health Risk Impacts

CARE CA's prior comments demonstrated that the County failed to analyze the potentially significant cancer risks from the Project's construction and operation-related DPM emissions. The County limited its health risk analysis to criteria air pollutants by relying on Localized Significance Thresholds ("LSTs"), which measure criteria pollutants but do not measure TACs, including DPM. Health risk from exposure to DPM is measured under a separate threshold for cancer risk. Since the County failed to measure the severity of DPM exposure against a relevant threshold, the FEIR lacks substantial evidence to support a conclusion that health risk would be less than significant. Moreover, CARE CA's expert conducted a screening level health risk analysis of the Project's DPM emissions, which demonstrated that the Project would cause significant health risk impacts that the FEIR failed to disclose or mitigate.

The County now incorrectly attempts to discredit SWAPE's screening-level health risk analysis by misrepresenting the results of its own LST analysis and improperly concluding that the County does not have a legal duty to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not expressly required by CEQA. This reasoning is legally flawed, misleading, and directly contrary to CEQA's requirement to analyze potentially significant environmental impacts.

First, the County claims that they do not need to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not required by CEQA. This is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR,[25] including the health risk caused by human exposure to the project's air emissions.[26] The absence of a requirement in the Guidelines to prepare a specific type of HRA does not relieve the County of its duty to fully analyze and mitigate the Project's potentially significant health impacts.

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[25] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[26] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.

Second, the County continues to erroneously assert that compliance with LSTs are sufficient to rule out health risk from the Project. The County further misrepresents the purpose of LSTs by claiming that, because LSTs evaluate particulate matter, they also account for cancer risks associated with the TAC fraction of DPM. This is incorrect. CARE CA previously explained that LSTs do not analyze TAC emissions and therefore cannot be used to determine whether a project would result in increased cancer risk, even where modeled criteria pollutant emissions fall below LSTs. LSTs are designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO2, CO, PM10, or PM2.5 to exceed the ambient air quality standards at nearby receptors.[27] TACS, by contrast, have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.[28] Accordingly, reliance on LST compliance to dismiss potential cancer risks from diesel-related TAC emissions is misleading and contrary to CEQA.

Third, the County criticizes SWAPE's use of *total* particulate matter in its screening-level HRA. At the same time, the County acknowledges that it did not disclose the *exhaust* PM2.5 and PM10 from its CalEEMod output files at the time public comments were being requested.[29] SWAPE also explains that, while the County criticizes the use of annual PM10 emissions as a surrogate for DPM, this is a standard practice in CEQA analysis and is consistent with SCAQMD guidance as it provides a conservative upper-bound estimate that captures the DPM fraction.[30] The County also asserts that SWAPE's health risk analysis is predicated on the incorrect assumption that the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. This is incorrect, as SWAPE explains in its updated screening-level HRA, the calculations rely on the County's own PM2.5 and PM10 emission estimates disclosed in the FEIR.[31] These updated calculations demonstrate that the Project will result in a residential lifetime cancer risk of 12.4 in one million, which exceeds SCAQMD's 10-in-one-million threshold.[32] This constitutes substantial evidence that the Project will result in a significant impact that the County failed to address in the FEIR.

The County next asserts that compliance with existing local and state regulations, together with Mitigation Measures AQ-1 and AQ-2—which requires a dust control plan and limits idling—will ensure impacts remain below significant

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[27] *Id.* at p. 5.
[28] *Id.*
[29] SWAPE Comments, p. 7.
[30] *Id.*
[31] *Id.*
[32] *Id.* at p. 8.

levels.[33] SWAPE considered these in its HRA and still found that impacts would be reduced to less than significant levels. The Board of Supervisors Staff Report also added a new measure to AQ-2 that requires the use of Tier 4 construction equipment. This was not available at the time SWAPE conducted its screening level analysis. Despite adding this condition, the County still refuses to quantify post-mitigation emissions or otherwise demonstrate, with substantial evidence, that this additional measure would reduce impacts below the applicable significance threshold. Because CEQA requires an agency's conclusions regarding significance of impacts and mitigation effectiveness to be supported by substantial evidence, the County's unsupported assertion is inadequate, and the impacts remain potentially significant.

For the reasons discussed above, the County must revise the EIR to include an analysis of the Project's potentially significant cancer risks.

b. The Record Contains Substantial Evidence of Significant, Unmitigated Cumulative Health Risks

CARE CA's prior comments demonstrated that the FEIR omitted an analysis of the Project's cumulative TAC emissions. We further explained that when conducting this analysis, the County should use the new draft guidance from South Coast Air Quality Management District ("SCAQMD") instead of SCAQMD's outdated White Paper on Potential Control Strategies to Address Cumulative Impacts from 2003.

In response, the County claims that it properly limited its cumulative impacts analysis to criteria air pollutants (CO, NOx, ROG). It reiterates its argument that impacts from TAC emissions did not need to be analyzed because an HRA is not required for the Project. As discussed above, this is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR.[34]

Nor can the County sidestep its obligation to analyze cumulative health risk by relying on an outdated SCAQMD threshold. Under CEQA, "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant."[35] CARE CA's air quality expert provides substantial evidence that the

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[33] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 30.
[34] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[35] 14 Cal. Code Regs. ("CEQA Guidelines") § 15064(b)(2).

Project may result in significant cumulative TAC emissions that the County failed to address in the FEIR. SWAPE applied SCAQMD's November 6, 2024, Working Group draft cumulative impacts guidance, which contrary to the County's assertion, was not developed solely for warehouse projects. These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review and meaningfully evaluate cumulative toxic air contaminant impacts.[36] This is particularly relevant to the Project because it will be located in an AB617 disadvantaged community.[37]

The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met.[38] These factors include:

1. Whether the background cancer risk, as indicated MATES, in the Project area is within the 50th-30th percentile;
2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.[39]

SWAPE's analysis found that the Project satisfies all three criteria, effectively reducing the significance threshold to 3 in one million.[40]

First, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin.[41] Specifically, the Project site has a cancer risk of 206 in one million, or within the 43rd percentile.[42] This lowers the significance threshold to 7 in one million.[43]

Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB617 community.[44] This lowers the significance threshold to 5 in one million.[45]

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[36] SWAPE Comments, p. 1.
[37] SWAPE Comments, p. 3.
[38] *Id.* at p. 1.
[39] *Id.* at pp. 1-2.
[40] *Id.* at pp. 4-5.
[41] *Id.* at p. 2.
[42] *Id.*
[43] *Id.*
[44] *Id.* at p. 3.
[45] *Id.* at pp. 3-4.

Third, the Project is likely to generate 951 heavy-duty truck trips.[46] As SWAPE explains, the Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips.[47] The FEIR states that "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips."[48] Based on these estimates, SWAPE concludes that the Project would likely generate 951 heavy-duty truck trips, which constitutes 4% to 7% of the total anticipated daily vehicle traffic.[49] Therefore, the cumulative health risk threshold would be reduced to 3 in one million.[50]

SWAPE's screening-level HRA of the Project's construction and operation-related DPM emissions calculated that the Project would result in a lifetime cancer risk of 12.4 in one million, an infant-specific cancer risk of 4.89 in one million, and a child-specific cancer risk of 6.48 in one million.[51] These all exceed the 3 in one million cumulative significance threshold.[52]

Therefore, there is substantial evidence that the Project may result in significant cumulative health risk impacts that the FEIR did not address. The County must revise and recirculate a new EIR to include this analysis.

V. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE AGRICULTURE IMPACTS REMAIN SIGNIFICANT AND UNMITIGATED

a. The County Fails to Adopt All Feasible Mitigation as Required by CEQA

CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project impacts from the conversion of agricultural land is significant and unavoidable because it failed to adopt any mitigation, let alone "all feasible mitigation" as required by CEQA to support its adoption of a statement of overriding considerations. CARE CA's agriculture expert

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[46] *Id.* at p. 4.
[47] *Id.*
[48] *Id.*
[49] *Id.*
[50] *Id.*
[51] *Id.* at p. 5.
[52] *Id.*

also provided substantial evidence that, contrary to the County's claim, an Agriculture Conservation Easement ("ACE") is feasible, effective mitigation for the conversion of Prime Farmland.

Despite this evidence, the County continues to erroneously reject an ACE based on generalized drought conditions in Riverside County, refuses to adopt any mitigation, and flagrantly misstates CEQA's requirement to adopt all feasible mitigation.

First, the County misstates the law, claiming that they are not required to adopt all feasible mitigation to reduce impacts to the greatest extent feasible before an impact can be declared significant and unavoidable. Instead, the County claims that "CEQA only requires the adoption of mitigation measures that will avoid or substantially lessen the significant environmental effect," citing to CEQA Guidelines Section 15091 as support.[53] This misinterprets Section 15091, which merely lays out findings an Agency must make before approving an EIR that identifies significant environmental impacts. Specifically, this section requires that agency's make one or more findings before approving an EIR that identifies significant environmental impacts. This includes demonstrating that the significant impact will either be avoided or substantially lessened[54] or that mitigation is infeasible.[55]

The County also directly contradicts CEQA Section 21002, which states that "public agencies should not approve projects as proposed if there are feasible alternative or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects."[56] When making these findings CEQA also requires the agency to adopt a Statement of Overriding Considerations.[57] Several courts have interpreted the requirements for adopting a statement of overriding considerations, which includes incorporating "all feasible mitigation."[58] For instance, the Supreme Court in *Sierra Club v. County of Fresno,* found that "[e]ven when a project's benefits outweigh its unmitigated effects, agencies are still required to implement all mitigation measures unless those

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[53] *Id.*
[54] 14 CCR § 15091 (a), (b)
[55] 14 CCR § 15091(c).
[56] See also PRC § 21002.1(b) ("[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so."
[57] PRC § 21081; 14 CCR § 15093
[58] *Covington v Great Basin Unif. Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879-883; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525; *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967.

measures are truly infeasible."[59] Accordingly, the County must adopt all feasible mitigation.

Second, the FEIR continues to argue that an ACE is infeasible because there is ongoing drought placing a strain on water supplies, citing to the fact that "CVWD has notified the property owner that no imported water will be provided to the subject property for at least the coming two years."[60] The County also points to CVWD's long-term water management plans as evidence regarding the scarcity of Colorado River water and the substantial demand for water caused by agricultural uses in the Coachella Valley.[61] The County claims that this "constitutes substantial evidence and supports the reasonable inference that an ACE would exacerbate existing water supply challenges resulting from drought conditions."[62] The County also argues that requiring an ACE is infeasible because it is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities. However, both of these reasons are speculative and inadequate to demonstrate that an ACE or other mitigation is infeasible. There is no evidence that conserving existing agricultural land would exacerbate drought conditions.[63] The County also has not provided any evidence demonstrating that an ACE is infeasible for financial reasons.[64] Furthermore, as demonstrated in Mr. House's previous comments and discussed further below, several General Plan policies also favor conserving agriculture land.[65] Therefore, the County has not provided the substantial evidence necessary to demonstrate that an ACE is infeasible.

In addition to an ACE, Mr. House identifies that an in-lieu fee is another feasible, unconsidered mitigation measure.[66] Mr. House also provides substantial evidence that the County failed to consider mitigation measures used in other California counties that would avoid conserving water-deprived lands.[67] For example, agriculture and land stewardship framework and strategies and public benefit agreements—a mitigation measure that has been successfully employed in nearby Imperial County since 2012.[68] The FEIR provides no explanation for why

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[59] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525 (citing *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967).
[60] Response to Comments, Response C-7.
[61] *Id.*
[62] *Id.*
[63] House Comments, p. 2.
[64] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 13; House Comments, p. 2.
[65] *Id.*
[66] House Comments, p. 3.
[67] *Id.*
[68] *Id.*

these alternatives would be infeasible. Because the County has failed to analyze or adopt these feasible mitigation measures, it lacks substantial evidence to adopt the Statement of Overriding Considerations.[69]

Third, the County relies on *Yerba Buena Neighborhood Consortium LLC v. Regents of University of California* to conclude that its argument that an ACE is infeasible because of ongoing drought in California is a policy judgment that is owed deference. This mischaracterizes the Court's findings in *Yerba Buena*. The Court did not state that the Agency's determination regarding the feasibility of a mitigation measure will be deferred to in all cases. In fact, the Court cites to the Sixth District's decision in *California Native Plant Society v. City of Santa Cruz,* which states that when an Agency's findings of fact are based on erroneous legal assumptions like "voluntary mitigation [being] impermissible" this is "an error of law invalidating their finding that voluntary mitigation payments to FORA do not represent a feasible method of mitigating CSU's off-campus environmental effects."[70] Similarly here, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE and all other alternative mitigation measures are infeasible. This is legal error and is not owed deference. Additionally, as demonstrated above, our expert provides substantial evidence demonstrating that these mitigation measures are commonly used and thus are feasible to substantially reduce the impacts from the Project's conversion of agricultural land to non-agricultural uses.

Fourth, the County mischaracterizes the findings of Riverside County General Plan EIR No. 441 and EIR No. 521 to improperly claim that no project-specific mitigation measures are available to address the Project's conversion of agricultural land to non-agricultural use. The County's reliance on these documents is misplaced. Those EIRs evaluated countywide growth on a program level. They do not—and cannot—relieve the County of its obligation under CEQA to consider and adopt feasible project-level mitigation measures.[71]

b. The Project Conflicts with the Agricultural Policies in the County's General Plan

CARE CA's previous comments demonstrated that the Project is inconsistent with several of Riverside County's General Plan policies, which emphasize the

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[69] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[70] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997 (citing *City of Marina v. Board of Trustee of California State University* (2006) 39 Cal.4th 341, 365).
[71] House Comments, p. 2.

importance of agricultural land of the region, promote the preservation of prime farmland, and encourage the use of conservation easements.

As discussed above, the County fails to correct these inconsistencies by failing to mitigate the Project's conversion of agricultural land to non-agricultural use. Instead, the County claims that it is consistent with the General Plan because it allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. This response is inadequate because it dismisses the eight General Plan policies CARE CA's previous comments demonstrated the Project was inconsistent with. This is particularly relevant to Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land, which the County does not implement as mitigation.

The County claims that despite the failure to include a conservation easement, it is still consistent with these General Plan policies because it determined that a conservation easement is infeasible and its determination of infeasibility is owed deference, citing *Yerba Buena Neighborhood Consortium, LLC v. Regents of University of California*. As discussed above, the County's determination that an ACE is infeasible mitigation is not owed deference because it is based on legal error.[72] Specifically, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE is infeasible due to pre-existing drought conditions. Additionally, our agriculture expert provides substantial evidence that an ACE is feasible mitigation.

Therefore, the Project, as proposed, still fails to comply with several of the County's General Plan policies and requires the County to revise the EIR.

VI. ADDITIONAL DEFECTS IN THE FEIR THAT VIOLATE CEQA

a. The FEIR Fails to Describe or Analyze the Project's Proposed Substation

The FEIR does not comply with CEQA because it omits critical details about the Project's proposed Imperial Irrigation District ("IID") electrical substation, thereby preventing meaningful analysis of the Project's environmental impacts and frustrating informed public review.

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[72] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997.

CEQA requires an EIR to set forth a project description that is sufficient to allow an adequate evaluation and review of the environmental impact.[73] California courts have repeatedly held that an "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[74] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the Project's impacts and undermining meaningful public review.[75]

Here, the FEIR's project description states only that "[a]n on-site electric power substation is also planned in consultation with Imperial Irrigation District (IID) in the southeast portion of PA-1."[76] The FEIR does not disclose the size or generation capacity of the proposed substation. Without this information, the FEIR cannot meaningfully evaluate or disclose the impacts associated with the substation's construction or operation.

As a result of this deficient project description, the FEIR fails to quantify or analyze air quality and greenhouse gas ("GHG") emissions from construction of the IID substation. Table 2.5-6 (CalEEMod Land Use Assumptions) in the FEIR includes only equestrian center barns, commercial uses, and office space within Planning Area 1.[77] This entirely omits the substation. Because the FEIR does not account for emissions associated with construction of this major infrastructure component, the County potentially underestimates the Project's construction-related impacts.

This omission is further underscored by a newly added condition of approval stating that the substation could be as large as 50 MegaVolt-Ampere (MVA). [78] The FEIR never disclosed or analyzed the potential impacts of a substation this size. This failure is particularly problematic given documented summer blackouts and ongoing electrical supply constraints in the region, which indicate that existing

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[73] CEQA Guidelines § 15124.
[74] *Santiago County Water Dist. v. County of Orange* (1981) 118 CA3d 81; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *Stopthemilleniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 85-89; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.
[75] CEQA Guidelines § 15124; see *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 192-193; see also *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591, 1597 ("An accurate and complete project description is necessary to fully evaluate the project's potential environmental effects.").
[76] FEIR, p. 1-7.
[77] FEIR, p. 2.5-11; CalEEMod Outputs, p. 12 of 139; AQ and GHG Appendix, p. 67.
[78] Specific Plan Conditions of Approval, Condition 8, p. 8.

distribution infrastructure may already be operating near capacity. Although the FEIR makes general references to existing distribution lines[79], it provides no analysis demonstrating that these facilities can accommodate the Project's new demand, nor does it evaluate whether off-site system upgrades or transmission improvements may be required.[80] In fact, the new condition of approval acknowledges this uncertainty by allowing the substation size to increase or decrease based on final design and feasibility determinations made by the Planning Director in consultation with IID.[81] Construction of the substation and any associated upgrades could result in potentially significant air quality, GHG, noise, and transportation impacts—none of which are evaluated in the FEIR.

The IID substation may also result in significant operational noise impacts that were not analyzed in the FEIR. Although the FEIR references operational noise measurements for an IID substation, it does not disclose the size or capacity of the substation used as the basis for those measurements. Instead, it vaguely asserts that the measurements were collected from "similar types of activities" and "assume the worst-case noise environment."[82] Without identifying whether the analyzed facility reflects a 50-MVA substation—or a smaller installation—the FEIR precludes meaningful evaluation of the Project's potentially significant operational noise impacts. For example, if the reference substation is smaller than the proposed facility, operational noise impacts could be significantly greater than analyzed in the FEIR.

Furthermore, as SWAPE comments, substations and associated high-voltage transmission facilities can introduce potential hazards, including increased wildfire ignition risk, electromagnetic field exposure concerns, and electrical arc-flash hazards, and risks related to equipment failure or transformer fire events.[83] Without disclosing the size of the substation or the extent of any required transmission or distribution upgrades, the FEIR cannot meaningfully assess these hazards risks or determine whether additional mitigation would be necessary.

By omitting this information from the Project description and failing to analyze the potentially significant impacts that could result from the construction

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[79] FEIR, p. 2.21-14.
[80] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 118.
[81] Specific Plan Conditions of Approval, Condition 8, p. 8 ("if less or greater substation sizing may be appropriate based on project final design. Any reduction substantially below double the project demand will be considered by the Planning Director in consultation with IID and based on reasonable information on technical or financial infeasibility").
[82] FEIR Appendix H, p. 61.
[83] SWAPE Comments, p. 9.

and operation of the substation, the FEIR deprives the public of a meaningful opportunity to comment on these impacts prior to project approval and denies decision-makers essential information required for informed decision-making. CEQA requires that where standard and accepted methodologies exist to evaluate potential impacts, an EIR must apply them or explain why it cannot do so.[84] The FEIR does neither.

As a result, the FEIR presents a misleading and incomplete description of the Project and its environmental impacts. The County must revise and recirculate the EIR to disclose the full scope of the proposed electrical infrastructure and to analyze the associated environmental impacts in compliance with CEQA.

b. The FEIR Lacks Substantial Evidence to Conclude That the Project Will Not Have Significant Population and Housing Impacts

CEQA requires an EIR to discuss the growth-inducing impacts of a proposed project, including the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment..."[85] The FEIR lacks substantial evidence to conclude that the Project will not have a significant adverse impact on housing or employment growth.[86] As Mr. Marshall's comments demonstrate, the FEIR overstates the Project's contribution to the existing jobs/housing ratio imbalance in the Eastern Unincorporated Coachella Valley.

According to the FEIR, the Eastern Unincorporated Coachella Valley has a high unemployment rate, with 13% of working age adults being unemployed and 33.5% of individuals being considered low income (51% to 80% of median income).[87] The FEIR also acknowledges that there are 19,836 housing units currently in the eastern unincorporated areas of Riverside County, but 36.9% were used seasonally, mostly as vacation homes, but also for migrant workers.[88] So, although there is a healthy stock of owner-occupied housing available, there is a substantial deficit in available rental housing.[89] According to the Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research) ("LUCI"), a jobs-

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[84] *Berkeley Jet* (2001) 91 CA4th 1344, 1370.
[85] CEQA Guidelines §§ 15126, 15126.2.
[86] FEIR, p. 2.16-22; Resolution No. 2025-303, Attachment A: CEQA Findings, p. 103.
[87] FEIR, p. 2.16-11.
[88] FEIR, p. 2.16-8.
[89] FEIR, p. 2.16-8.

to-housing ratio of 1.5:1 is considered balanced.[90] According to the Riverside County Housing Element Background Report, eastern unincorporated areas of the County had a jobs-to-housing ratio of 1.02:1 in 2018, which is below the county-wide ratio (1.55:1) and the target ratio, according to LUCI.[91]

The FEIR claims that it will contribute both jobs and housing to address this jobs to housing imbalance. With respect to jobs, the FEIR states that "[t]he provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance."[92] As Mr. Marshall explains, this overstates the proposed Project's job benefits because many, and possibly, most of the jobs would be seasonal.[93] The employment numbers for these seasonal jobs would likely be lower during the off-season, since they are tied to the activities of the equestrian center, which is active only during the October to April event season.[94] Mr. Marshall also states that it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property.[95] Thus, in cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.[96]

With respect to housing, the FEIR exaggerates the Project's contribution by stating "[t]he Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages."[97] While this may be true during peak seasons, Mr. Marshall explains that the housing created by the Project is mostly for seasonal employees (Workforce Housing) or for short-term guests (resort condos, hotel).[98] The remaining housing types (Estate Residential and Medium Density Residential) would not be rental housing or would not be affordable for renters, which is the type of housing most needed in the Eastern Unincorporated Coachella Valley.[99]

The County also acknowledges that the Project has the potential to create a demand for additional housing, particularly housing affordable to households

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[90] FEIR, p. 2.16-10.
[91] *Id.*
[92] FEIR, p. 2.16-21.
[93] Marshall Comments, p. 2.
[94] FEIR, p. 2.16-16.
[95] Marshall Comments, p. 3.
[96] *Id.*
[97] FEIR, p. 2.16-17.
[98] Marshall Comments, p. 5.
[99] *Id.*

earning 80% or less of the County's median income."[100] However, the County attempts to claim that the "market will respond to any demand for additional housing resulting from the Project." This does not constitute substantial evidence.

As a result, the Project may increase housing demand while worsening the jobs/housing imbalance. Because the FEIR analyzes employment and housing as if the seasonal equestrian uses would be year round, this masks the potentially significant impacts the Project may have on the area's current jobs-housing imbalance. The FEIR should be revised to provide a more accurate analysis of the Project's potential impacts. Until this impact is accurately disclosed and analyzed, the Board lacks substantial evidence to find that the Project would not have adverse impacts in these areas.

VII. CONCLUSION

For the reasons discussed above, and in CARE CA's previous comments, the FEIR for the Project remains wholly inadequate under CEQA. The Board of Supervisors cannot make the necessary findings to approve the Project or its entitlements because the County has not adequately disclosed, analyzed, or mitigated the Project's potentially significant unmitigated environmental and land use impacts. The FEIR must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions require that the EIR be recirculated for additional public review.

CARE CA respectfully requests that the Board remand the Project back to County staff to prepare and recirculate a legally adequate EIR prior to further consideration. Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Alaura McGuire

Alaura McGuire

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[100] FEIR, p. 2.16-1.

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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December 15, 2025

Alaura McGuire
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601 Gateway Blvd #1000
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Subject: Comments on the Thermal Ranch Specific Plan (SCH No. 2023050624)

Dear Ms. McGuire,

We have reviewed the July 2025 Final Environmental Impact Report ("FEIR") and November 2024 Draft Environmental Impact Report ("DEIR") for the Thermal Ranch Specific Plan ("Specific Plan/Project") located in the County of Riverside ("County"). After our review of the FEIR, we find that the FEIR is insufficient in addressing some of our concerns regarding the Project's health risk impacts. As we asserted in our January 6, 2025 comment letter, a revised EIR should be prepared to adequately evaluate the Project's potential impacts.

Air Quality

Inadequate Analysis of Cumulative Air Quality Impacts

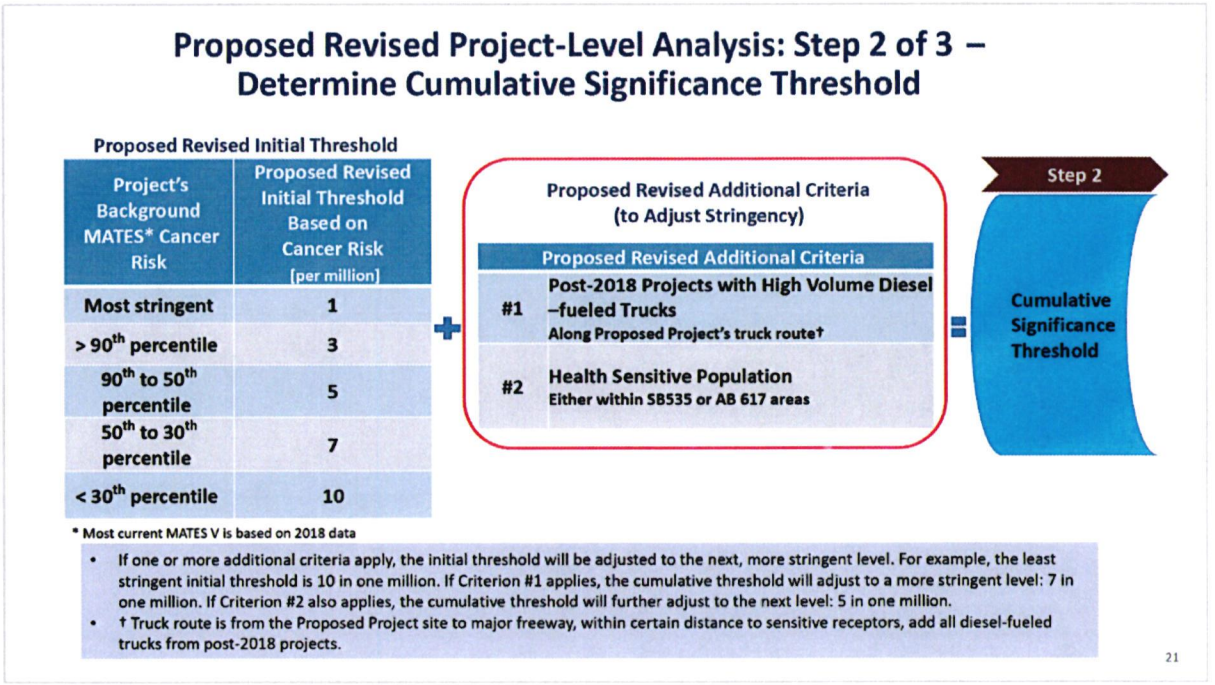
The FEIR provides an inadequate analysis of the Project's cumulative health risk impacts as it fails to analyze the potential cumulative cancer risks of the Project. The County should employ the draft cumulative cancer-risk significance thresholds published by the South Coast Air Quality Management District ("SCAQMD"). These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review meaningfully evaluate cumulative toxic air contaminant ("TAC") impacts.

SCAQMD's Working Group Meeting #6 presentation from November 2024 outlines a tiered methodology that reduces the standard 10-in-one-million cancer-risk threshold when one or more screening criteria are met, including:

1. Whether the background cancer risk, as indicated by MATES, in the Project area is within the 50th–30th percentile;

2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.

The tiered methodology, as proposed by SCAQMD, states that "if one or more additional criteria apply, the initial threshold will be adjusted to the next, more stringent level" (see screenshot below).[1]

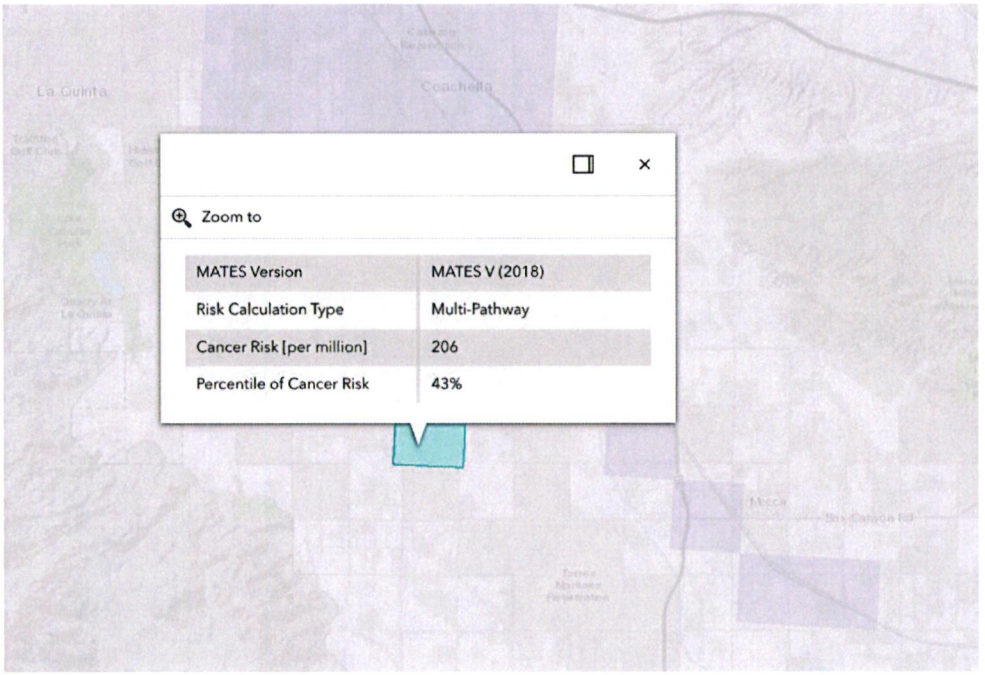


The Project satisfies multiple criteria that require a cumulative health risk analysis and the application of a more stringent cancer risk threshold under SCAQMD's framework.

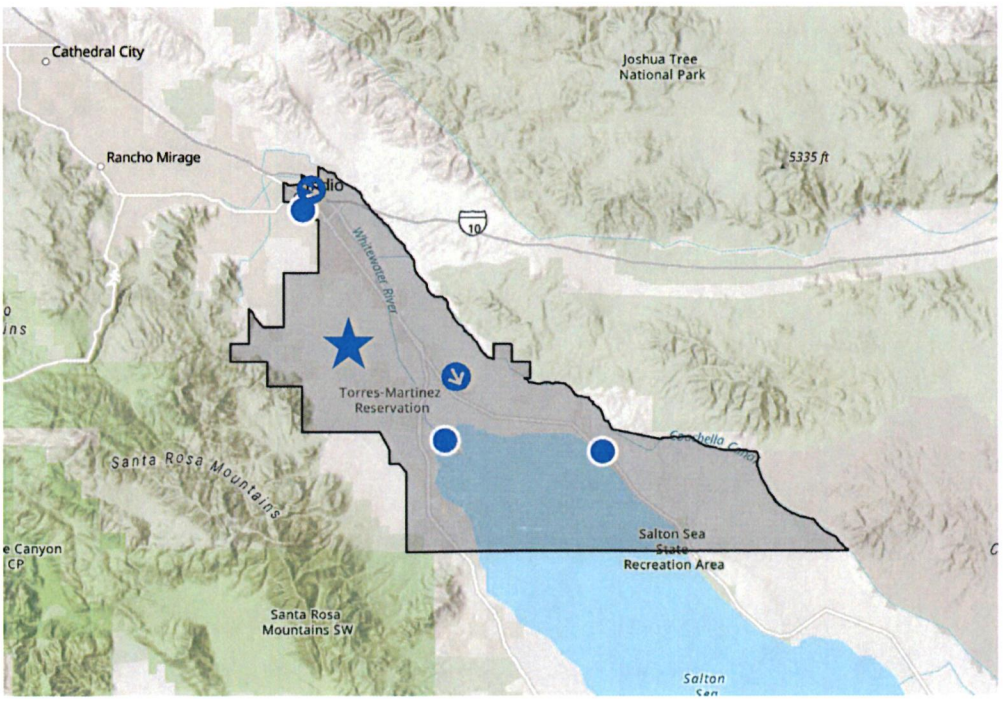
First, The Data Visualization Tool for Mates V, a monitoring and evaluation study conducted by SCAQMD, demonstrates that the County already exhibits a heightened residential carcinogenic risk from exposure to air toxics.[2] Specifically, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin—and thus meets the criteria for a 7-in-one-million threshold—with a cancer risk of 206 in one million, or 43% (see screenshot below).

[1] "Working Group Meeting #6 Cumulative Impacts from Air Toxics for CEQA Projects," SCAQMD, November 2024, available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13, p. 21.

[2] "Residential Air Toxics Cancer Risk Calculated from Model Data in Grid Cells." MATES V, 2018, *available at:* https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk; see also: "MATES V Multiple Air Toxics Exposure Study." SCAQMD, *available at:* http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

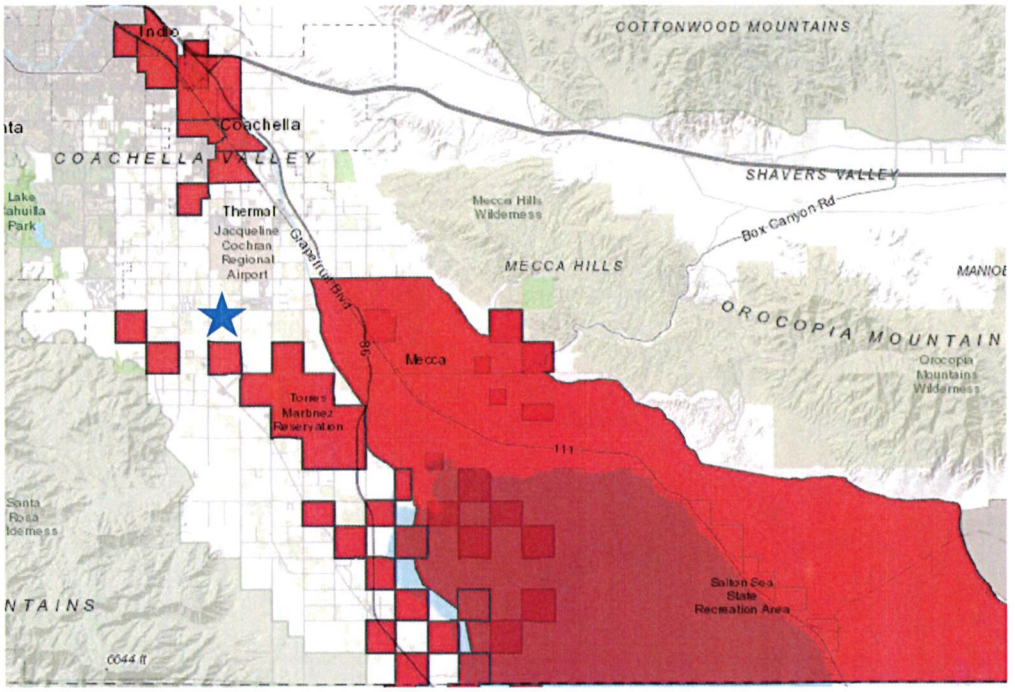


Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB 617 community, which signals that the region already experiences elevated cumulative air pollution burdens (see screenshot below).[3]



[3] "AB 617 Community Air Monitoring." SCAQMD, available at: http://xappprod.aqmd.gov/AB617CommunityAirMonitoring/Home/Index.

The Project area is also located adjacent to an SB 535 disadvantaged community, which further demonstrates that residents already face disproportionate environmental hazards and the Specific Plan may therefore worsen health risks for community members within the immediate area (see screenshot below).[4]



As such, the Project would move up to the next stringent tier of SCAQMD's draft framework of 5-in-one-million.

Third, the Project includes land uses that are reasonably expected to generate heavy-duty truck activity over its lifespan. The Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips. Although the FEIR does not disclose whether the Project would exceed 951 heavy-duty truck trips per day, the FEIR does disclose that, "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips" (p. 2.5-11). Thus, it is reasonable to assume that the Project would generate 951 heavy-duty truck trips, which would constitute roughly 4% to 7% of the total anticipated daily vehicle traffic. Assuming the Specific Plan meets SCAQMD's additional high-volume diesel truck criteria, the FEIR must then be evaluated against a 3-in-one-million cumulative threshold.

[4] "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, *available at:* https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/

Because the Project is located within a MATES 30th to 50th percentile background cancer risk and AB 617 community, as well as likely meets the 951-truck trip threshold, the FEIR should prepare a cumulative air toxics analysis using the 3-in-one-million threshold.

According to the screening-level HRA analysis below, the Project's construction and operation-related DPM emissions would result in a lifetime cancer risk of 12.4 in one million. The Project would also result in an infant and child-specific cancer risk of 4.89 and 6.48 in one million, respectively. These exceed the 3 in one million significance threshold and constitute potentially significant cumulative impacts that were not analyzed or mitigated in the FEIR.

CEQA requires a good-faith, evidence-based analysis of cumulative impacts. SCAQMD has indicated in both its Working Group presentations and in comment letters, such as those submitted on the DJT4 Parcel Delivery Facility Project,[5] that lead agencies should use this cumulative-risk framework when evaluating TAC and diesel particulate matter ("DPM") impacts in overburdened communities. A revised EIR should be prepared to identify which SCAQMD cumulative-risk criteria apply to the Project, disclose the appropriate cumulative cancer-risk threshold, model construction and operational emissions accordingly, and provide mitigation where exceedances occur.

Diesel Particulate Matter Emissions Inadequately Evaluated

As discussed in our January 6th comment letter, the DEIR failed to adequately evaluate potential Project-level health risk impacts. Review of the FEIR demonstrates that the analysis of the Project's health risk impacts is again lacking. For the reasons discussed below, we maintain our January 6th comment that the FEIR is inadequate and recommend that a revised EIR be prepared to adequately evaluate the Project's potential health risk impacts on nearby sensitive receptors.

First, the FEIR states that "[b]ecause the Project did not exceed LSTs, additional air dispersion modeling and/or construction-related health risk assessments are therefore not required or warranted" (p. 64). We reiterate that the SCAQMD Localized Significance Threshold ("LST") methodology is designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ to exceed the ambient air quality standards at nearby receptors. Unlike criteria pollutants, TACs are regulated under separate state frameworks administered by OEHHA and CARB, which require a health risk assessment ("HRA") when generated. TACs have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.

In regard to existing guidelines, the FEIR states:

> "Because the Project does not propose industrial warehouse uses, the Project is not subject to the CA DOJ recommendation to prepare a quantitative HRA in accordance with the Office of

[5] "Draft Environmental Impact Report (DEIR) for the December 20, 2024 Proposed DJT4 Parcel Delivery Facility Project (Proposed Project) (SCH No. 2023070241)." SCAQMD, December 2024, https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/orc241106-09-deir-djt4-parcel-delivery-facility-project.pdf.

> Environmental Health Hazard Assessment ('OEHHA'). Additionally, CEQA does not mandate or even recommend in-depth health risk assessments for all projects. The SCAQMD requires the preparation of an operational Health Risk Assessment (HRA) for facilities associated with emission of high levels of toxic air contaminants; the Project proposes none of these land uses or surrounding conditions" (p. 66).

Furthermore, regarding the Project's projected operational toxic air contaminant ("TAC") emissions, the FEIR continues by stating:

> "The eight categories of existing sources of TACs include high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations. The TRSP neither proposes the development of any such facilities, nor is it situated in proximity to any such facility. With regard to high-traffic freeways and roads, CARB defines freeways and high traffic roads as including rural roads with 50,000 vehicles per day. As discussed on page 2.5-22 of the DEIR, nearby roadways have average daily traffic (ADT) volumes of up to 39,300 vehicles per day in horizon year (2045) with Project weekday conditions" (p. 100).

While we acknowledge that current guidance may not explicitly require the certain land uses to prepare an HRA, this reasoning misconstrues current agency recommendations and ignores that diesel truck activity—not land-use labels—is the primary driver of cancer risk from DPM emissions. SCAQMD comment letters have recommended that, for projects that generate or attract substantial vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile-source HRA.[6] Similarly, SCAQMD has long recommended HRAs for projects with more than 100 daily heavy-duty diesel truck trips.[7]

As previously mentioned, the Specific Plan includes several land uses that inherently require ongoing delivery, service, and hauling operations that will involve trucks, including the large equestrian center and commercial and retail development. The DEIR itself identifies up to 21,523 daily vehicle trips at buildout, indicating a scale of development where even a modest percentage of truck activity could easily exceed 100 trucks per day. Given the Project's size and trip generation, the FEIR's assumption that the Project's truck activity would be negligible is not supported by substantial evidence. The FEIR also misuses CARB's definition of rural freeways and high-traffic roads as those with 50,000 vehicles per day to argue that the Project does not warrant an HRA. This is incorrect, as CARB uses this definition to recommend that projects "avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day."[8] Thus, this threshold pertains to the

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[6] "A-2 Notice of Preparation Comments." Los Angeles World Airports (LAWA), May 2017, *available at:* https://www.lawa.org/sites/lawa/files/documents/12_Appendix_A-2_Notice_of_Preparation_Comment_Letters.pdf.

[7] "Air Quality Analysis Handbook." SCAQMD, 1993, *available at:* https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

[8] "AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE." CARB, 2005, *available at:* https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

placement of new sensitive receptors near existing emission sources, not whether an evaluation of future DPM emissions generated by a project is necessary.

Given the Project's proposed land use sizes and types, anticipated vehicular activity, and the community's existing vulnerability, preparing a quantitative HRA is both best practice and necessary to satisfy CEQA's good-faith disclosure requirements. Without quantifying Project-level and cumulative TAC/DPM emissions and comparing them to the appropriate SCAQMD thresholds, the FEIR does not provide substantial evidence demonstrating that significant health-risk impacts would not occur.

Screening-Level Analysis Demonstrates Potentially Significant Health Risk Impact

As discussed in our January 6th comment letter, the proposed Project results in a potentially significant health risk impact. The FEIR raises concerns regarding the emission rate and parameters used in our screening-level HRA, which we have addressed and subsequently prepared an updated screening-level HRA. For the reasons discussed below, we maintain our January 6th comment that the FEIR may result in a significant health risk impact and a refined HRA is warranted to further evaluate the impact of the Project's DPM emissions on nearby, sensitive receptors.

The FEIR criticizes our use of *total* particulate matter ("PM") but acknowledges that *exhaust* $PM_{2.5}$ and PM_{10} were not originally displayed in the DEIR's CalEEMod output files. The FEIR indicates that, for both construction and operational emissions, "Appendix B of this Final EIR provides the TRSP CalEEMod Detailed Report that displays the PM2.5E emissions" (p. 71). We have prepared an updated screening-level HRA using the annual exhaust $PM_{2.5}$ emissions provided in the FEIR's updated CalEEMod air modeling.

In regard to our use of operational PM_{10} emissions estimates, the FEIR states:

> "Review of the health risk calculations in Attachment A of the SWAPE letter confirms that the HRA data inputs SWAPE applied are incorrect. As shown in the screenshot from the SWAPE letter below, the operational inputs show 22.6 tons per year was used, which correlates to the Project's total PM10T emissions, not the Project's PM2.5 emissions, and more importantly its PM2.5E emissions" (p. 73).

As demonstrated above, the FEIR criticizes the use of annual PM_{10} emissions as a surrogate for DPM. However, it is standard practice in CEQA analyses to use PM_{10} emissions as a proxy for DPM, pursuant to SCAQMD guidance, as it provides a conservative upper-bound estimate that captures the DPM fraction. For example, the construction HRA for the 2111–2139 South Pacific Avenue Project located in Los Angeles states that "the off-road PM_{10} exhaust estimates reported by CalEEMod were used as a surrogate for DPM emissions" (p. 2).[9] Regardless, as mentioned above, we prepared an updated screening-level HRA using the FEIR's annual $PM_{2.5}$ exhaust emission estimates in order to address the FEIR's concerns.

[9] See attachment D for 2111 South Pacific Avenue Construction Health Risk Assessment.

Additionally, the FEIR clarifies that the nearest sensitive receptor is 25 meters from the eastern boundary of the Project site (p. 76). Regardless, according to the AERSCREEN output files and as previously specified in our January 6th comment letter, the maximally exposed individual receptor ("MEIR") is located approximately 1,225 meters downwind of the site. Thus, DPM concentrations at 1,225 meters were used in our updated screening-level HRA.

All other methodologies were consistent with those described in our January 6th comment letter. The results of our calculations are shown in the table below.

The Maximally Exposed Individual at an Existing Residential Receptor

Age Group	Emissions Source	Duration (years)	Concentration (ug/m3)	Cancer Risk
3rd Trimester	Construction	0.25	0.0149	2.03E-07
Infant (0 - 2)	Construction	2	0.0149	4.89E-06
	Construction	*4.67*	*0.0149*	*1.80E-06*
	Operation	*9.33*	*0.0194*	*4.68E-06*
Child (2 - 16)	Total	14		6.48E-06
Adult (16 - 30)	Operation	14	0.0194	7.80E-07
Lifetime		**30**		**1.24E-05**

The excess cancer risks for the 3rd trimester of pregnancy, infants, children, and adults at the MEIR located approximately 1,225 meters away, over the course of construction and operation of future projects, are approximately 0.203, 4.89, 6.48, and 0.780 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) is approximately 12.4 in one million, which exceeds the SCAQMD threshold of 10-in-one-million (as well as the cumulative thresholds discussed above). The Specific Plan thus results in a potentially significant Project-level health risk impact not previously addressed or identified by the FEIR.

A revised EIR should be prepared to conduct a refined HRA evaluating the Project's construction and operational DPM emissions in AERMOD, which can account for more detailed parameters, and mitigate significant cancer risk impacts, if applicable.

Energy

Inadequate Analysis of Energy Demand

The FEIR fails to disclose the anticipated size or capacity of the proposed on-site substation and thus fails to provide the information necessary to evaluate whether adequate electrical infrastructure exists

to support the Project. Although the FEIR states that the substation will serve the Project and supply excess capacity to the surrounding area, the FEIR acknowledges that the Project Applicant is still coordinating with the Imperial Irrigation District to determine available transmission capacity. Without disclosure of the substation's planned load capacity, the FEIR does not provide substantial evidence that the expected electrical demand associated with Project buildout can be reliably met.

This omission is particularly consequential given the region's documented summer blackouts and ongoing electrical supply constraints, which indicate that existing distribution lines may already be operating near capacity. While the DEIR generally references existing distribution infrastructure, it conducts no analysis demonstrating that these lines can accommodate substantial new demand, nor does it evaluate whether off-site upgrades may be required. CEQA requires a good-faith effort to disclose and evaluate the full scope of a project's infrastructure needs, including reasonably foreseeable off-site energy improvements. By failing to disclose the substation size, the FEIR precludes meaningful evaluation of whether additional infrastructure will be required, whether such improvements may result in significant impacts, or whether the Project could exacerbate the strain on existing energy infrastructure.

Moreover, substations and associated high-voltage transmission facilities can introduce potential hazards—such as increased wildfire ignition risk, electromagnetic field exposure concerns, electrical arc-flash hazards, and risks related to equipment failure or transformer fire events—each of which must be evaluated when new or expanded electrical infrastructure is required. Without identifying the substation's size or the extent of necessary transmission upgrades, the FEIR cannot meaningfully assess these potential hazard impacts or disclose whether additional mitigation would be required.

In the absence of detailed information about the proposed substation, the FEIR's conclusion that the Project would not result in significant energy or utility impacts is unsupported by substantial evidence. A revised EIR is necessary to disclose the substation's capacity and evaluate the associated environmental impacts.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: Health Risk Calculations
Attachment B: AERSCREEN Output Files, Construction
Attachment C: AERSCREEN Output FIles, Operations

Construction

2026	
Annual Emissions (tons/year)	0.22
Daily Emissions (lbs/day)	1.205479452
Construction Duration (days)	365
Total DPM (lbs)	440
Total DPM (g)	199584
Start Date	1/1/2026
End Date	1/1/2027
Construction Days	365

2027	
Annual Emissions (tons/year)	0.13
Daily Emissions (lbs/day)	0.712328767
Construction Duration (days)	365
Total DPM (lbs)	260
Total DPM (g)	117936
Start Date	1/1/2027
End Date	1/1/2028
Construction Days	365

2028	
Annual Emissions (tons/year)	0.09
Daily Emissions (lbs/day)	0.493150685
Construction Duration (days)	366
Total DPM (lbs)	180.4931507
Total DPM (g)	81871.69315
Start Date	1/1/2028
End Date	1/1/2029
Construction Days	366

2029	
Annual Emissions (tons/year)	0.08
Daily Emissions (lbs/day)	0.438356164
Construction Duration (days)	365
Total DPM (lbs)	160
Total DPM (g)	72576
Start Date	1/1/2029
End Date	1/1/2030
Construction Days	365

2030	
Annual Emissions (tons/year)	0.08
Daily Emissions (lbs/day)	0.438356164
Construction Duration (days)	365
Total DPM (lbs)	160
Total DPM (g)	72576
Start Date	1/1/2030
End Date	1/1/2031
Construction Days	365

2031	
Annual Emissions (tons/year)	0.08
Daily Emissions (lbs/day)	0.438356164
Construction Duration (days)	365
Total DPM (lbs)	160
Total DPM (g)	72576
Start Date	1/1/2031
End Date	1/1/2032
Construction Days	365

2032	
Annual Emissions (tons/year)	0.07
Daily Emissions (lbs/day)	0.383561644
Construction Duration (days)	335
Total DPM (lbs)	128.4931507
Total DPM (g)	58284.49315
Start Date	1/1/2032
End Date	12/1/2032
Construction Days	335

Total	
Total DPM (lbs)	1488.986301
Total DPM (g)	675404.1863
Emission Rate (g/s)	0.003094686
Release Height (meters)	3
Total Acreage	619
Max Horizontal (meters)	2,238.31
Min Horizontal (meters)	1,119.15
Initial Vertical Dimension (meters)	1.5
Setting	Urban
Population	1,420
Start Date	1/1/2026
End Date	12/1/2032
Total Construction Days	2526
Total Years of Construction	6.92
Total Years of Operation	23.08

Operation

Emission Rate	
Annual Emissions (tons/year)	0.14
Daily Emissions (lbs/day)	0.767123288
Total DPM (lbs)	280
Emission Rate (g/s)	0.004027397
Release Height (meters)	3
Total Acreage	619
Max Horizontal (meters)	2,238.31
Min Horizontal (meters)	1,119.15
Initial Vertical Dimension (meters)	1.5
Setting	Urban
Population	1,420

The Maximally Exposed Individual at an Existing Residential Receptor				
Age Group	**Emissions Source**	**Duration** (years)	**Concentration** (ug/m3)	**Cancer Risk**
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	Construction	*4.67*	*0.0149*	*1.80E-06*
	Operation	*9.33*	*0.0194*	*4.68E-06*
Child (2 - 16)	Total	14		6.48E-06
Adult (16 - 30)	Operation	14	0.0194	7.80E-07
Lifetime		**30**		**1.24E-05**

AERSCREEN 21112 / AERMOD 21112 11/19/25
11:26:20

TITLE: Thermal Ranch, Construction

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.309E-02	g/s	0.246E-01	lb/hr
AREA EMISSION RATE:	0.124E-08	g/(s-m2)	0.980E-08	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	2238.31	meters	7343.54	feet
AREA SOURCE SHORT SIDE:	1119.15	meters	3671.75	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1420			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.1490	10	1125.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	12	12	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	208.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.1167	2525.00	0.5635E-01

25.00	0.1176	2550.00	0.5629E-01
50.00	0.1186	2575.00	0.5621E-01
75.00	0.1196	2600.00	0.5615E-01
100.00	0.1205	2625.00	0.5608E-01
125.00	0.1215	2650.00	0.5601E-01
150.00	0.1224	2675.00	0.5594E-01
175.00	0.1233	2700.00	0.5586E-01
200.00	0.1242	2725.00	0.5579E-01
225.00	0.1250	2750.00	0.5572E-01
250.00	0.1259	2775.00	0.5565E-01
275.00	0.1267	2800.00	0.5558E-01
300.00	0.1276	2825.00	0.5551E-01
325.00	0.1284	2850.00	0.5543E-01
350.00	0.1292	2875.00	0.5535E-01
375.00	0.1300	2900.00	0.5527E-01
400.00	0.1307	2925.00	0.5519E-01
425.00	0.1315	2950.00	0.5511E-01
450.00	0.1323	2975.00	0.5503E-01
475.00	0.1330	3000.00	0.5495E-01
500.00	0.1337	3025.00	0.5487E-01
525.00	0.1345	3050.00	0.5480E-01
550.00	0.1352	3075.00	0.5471E-01
575.00	0.1359	3100.00	0.5463E-01
600.00	0.1366	3125.00	0.5455E-01
625.00	0.1373	3150.00	0.5447E-01
650.00	0.1379	3175.00	0.5438E-01
675.00	0.1386	3200.00	0.5429E-01
700.00	0.1392	3225.00	0.5421E-01
725.00	0.1399	3250.00	0.5412E-01
750.00	0.1405	3275.00	0.5403E-01
775.00	0.1411	3300.00	0.5394E-01
800.00	0.1418	3325.00	0.5385E-01
825.00	0.1424	3350.00	0.5377E-01
850.00	0.1430	3375.00	0.5369E-01
875.00	0.1436	3400.00	0.5360E-01
900.00	0.1442	3425.00	0.5351E-01
925.00	0.1447	3450.00	0.5342E-01
950.01	0.1453	3475.00	0.5333E-01
975.00	0.1459	3500.00	0.5325E-01
1000.00	0.1464	3525.00	0.5315E-01
1025.00	0.1470	3550.00	0.5306E-01
1050.00	0.1476	3575.00	0.5297E-01
1075.00	0.1481	3600.00	0.5288E-01
1100.00	0.1487	3625.00	0.5278E-01
1125.00	0.1490	3650.00	0.5269E-01
1149.99	0.1489	3675.00	0.5259E-01
1175.00	0.1486	3700.00	0.5250E-01
1200.00	0.1473	3725.00	0.5241E-01
1225.00	0.1474	3750.00	0.5231E-01
1249.99	0.1386	3775.00	0.5222E-01

1275.00	0.1265	3800.00	0.5213E-01
1300.00	0.1178	3825.00	0.5205E-01
1325.00	0.1124	3850.00	0.5196E-01
1350.00	0.1077	3875.00	0.5186E-01
1375.00	0.1037	3900.00	0.5177E-01
1400.00	0.9900E-01	3925.00	0.5167E-01
1425.00	0.9619E-01	3950.00	0.5158E-01
1450.00	0.9361E-01	3975.00	0.5148E-01
1475.00	0.9124E-01	4000.00	0.5138E-01
1500.00	0.9023E-01	4025.00	0.5129E-01
1525.00	0.8824E-01	4050.00	0.5119E-01
1550.00	0.8638E-01	4075.00	0.5110E-01
1574.99	0.8463E-01	4100.00	0.5101E-01
1600.00	0.8297E-01	4125.00	0.5092E-01
1625.00	0.8142E-01	4150.00	0.5082E-01
1650.00	0.7994E-01	4175.00	0.5072E-01
1675.01	0.7853E-01	4200.00	0.5063E-01
1700.00	0.7719E-01	4225.00	0.5053E-01
1725.00	0.7591E-01	4250.00	0.5044E-01
1750.00	0.7469E-01	4275.00	0.5035E-01
1775.00	0.7352E-01	4300.00	0.5025E-01
1800.00	0.7239E-01	4325.00	0.5016E-01
1825.00	0.7131E-01	4350.00	0.5007E-01
1850.00	0.7027E-01	4375.00	0.4998E-01
1875.00	0.6927E-01	4400.00	0.4990E-01
1899.99	0.6830E-01	4425.00	0.4981E-01
1925.00	0.6738E-01	4450.00	0.4971E-01
1950.00	0.6647E-01	4475.00	0.4961E-01
1975.00	0.6560E-01	4500.00	0.4952E-01
2000.00	0.6478E-01	4525.00	0.4942E-01
2025.00	0.6402E-01	4550.00	0.4932E-01
2050.00	0.6328E-01	4575.00	0.4923E-01
2075.00	0.6257E-01	4600.00	0.4913E-01
2100.00	0.6187E-01	4625.00	0.4904E-01
2125.00	0.6118E-01	4650.00	0.4895E-01
2150.00	0.6052E-01	4675.00	0.4885E-01
2175.00	0.5987E-01	4700.00	0.4876E-01
2200.00	0.5924E-01	4725.00	0.4867E-01
2225.00	0.5862E-01	4750.00	0.4858E-01
2250.00	0.5801E-01	4775.00	0.4850E-01
2275.00	0.5742E-01	4800.00	0.4841E-01
2300.00	0.5688E-01	4825.00	0.4831E-01
2325.00	0.5683E-01	4850.00	0.4822E-01
2350.00	0.5677E-01	4875.00	0.4813E-01
2375.00	0.5671E-01	4900.00	0.4803E-01
2400.00	0.5665E-01	4925.00	0.4794E-01
2425.00	0.5659E-01	4950.00	0.4785E-01
2450.00	0.5653E-01	4975.00	0.4776E-01
2475.00	0.5647E-01	5000.00	0.4767E-01
2500.00	0.5641E-01		

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1492	0.1492	0.1492	0.1492	N/A
DISTANCE FROM SOURCE	1135.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1167	0.1167	0.1167	0.1167	N/A
DISTANCE FROM SOURCE	1.00 meters				

AERSCREEN 21112 / AERMOD 21112 11/19/25
11:36:31

TITLE: Thermal Ranch, Operations

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.403E-02	g/s	0.320E-01	lb/hr
AREA EMISSION RATE:	0.161E-08	g/(s-m2)	0.128E-07	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	2238.31	meters	7343.54	feet
AREA SOURCE SHORT SIDE:	1119.15	meters	3671.75	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1420			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.1940	10	1125.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	12	12	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	208.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.1519	2525.00	0.7336E-01

25.00	0.1532	2550.00	0.7328E-01
50.00	0.1545	2575.00	0.7319E-01
75.00	0.1557	2600.00	0.7310E-01
100.00	0.1569	2625.00	0.7301E-01
125.00	0.1581	2650.00	0.7292E-01
150.00	0.1593	2675.00	0.7283E-01
175.00	0.1605	2700.00	0.7274E-01
200.00	0.1617	2725.00	0.7264E-01
225.00	0.1628	2750.00	0.7255E-01
250.00	0.1639	2775.00	0.7246E-01
275.00	0.1650	2800.00	0.7237E-01
300.00	0.1661	2825.00	0.7227E-01
325.00	0.1671	2850.00	0.7217E-01
350.00	0.1682	2875.00	0.7207E-01
375.00	0.1692	2900.00	0.7197E-01
400.00	0.1702	2925.00	0.7186E-01
425.00	0.1712	2950.00	0.7176E-01
450.00	0.1722	2975.00	0.7165E-01
475.00	0.1732	3000.00	0.7155E-01
500.00	0.1741	3025.00	0.7145E-01
525.00	0.1751	3050.00	0.7135E-01
550.00	0.1760	3075.00	0.7124E-01
575.00	0.1769	3100.00	0.7113E-01
600.00	0.1778	3125.00	0.7103E-01
625.00	0.1787	3150.00	0.7092E-01
650.00	0.1796	3175.00	0.7080E-01
675.00	0.1804	3200.00	0.7069E-01
700.00	0.1813	3225.00	0.7058E-01
725.00	0.1821	3250.00	0.7046E-01
750.00	0.1830	3275.00	0.7035E-01
775.00	0.1838	3300.00	0.7023E-01
800.00	0.1846	3325.00	0.7012E-01
825.00	0.1854	3350.00	0.7001E-01
850.00	0.1862	3375.00	0.6990E-01
875.00	0.1869	3400.00	0.6979E-01
900.00	0.1877	3425.00	0.6967E-01
925.00	0.1884	3450.00	0.6956E-01
950.01	0.1892	3475.00	0.6944E-01
975.00	0.1899	3500.00	0.6933E-01
1000.00	0.1907	3525.00	0.6920E-01
1025.00	0.1914	3550.00	0.6908E-01
1050.00	0.1921	3575.00	0.6897E-01
1075.00	0.1929	3600.00	0.6885E-01
1100.00	0.1936	3625.00	0.6872E-01
1125.00	0.1940	3650.00	0.6860E-01
1149.99	0.1939	3675.00	0.6848E-01
1175.00	0.1935	3700.00	0.6835E-01
1200.00	0.1918	3725.00	0.6823E-01
1225.00	0.1919	3750.00	0.6811E-01
1249.99	0.1805	3775.00	0.6800E-01

1275.00	0.1647	3800.00	0.6788E-01
1300.00	0.1534	3825.00	0.6776E-01
1325.00	0.1464	3850.00	0.6765E-01
1350.00	0.1403	3875.00	0.6752E-01
1375.00	0.1350	3900.00	0.6740E-01
1400.00	0.1289	3925.00	0.6728E-01
1425.00	0.1252	3950.00	0.6715E-01
1450.00	0.1219	3975.00	0.6703E-01
1475.00	0.1188	4000.00	0.6690E-01
1500.00	0.1175	4025.00	0.6678E-01
1525.00	0.1149	4050.00	0.6666E-01
1550.00	0.1125	4075.00	0.6654E-01
1574.99	0.1102	4100.00	0.6642E-01
1600.00	0.1080	4125.00	0.6629E-01
1625.00	0.1060	4150.00	0.6617E-01
1650.00	0.1041	4175.00	0.6604E-01
1675.01	0.1022	4200.00	0.6592E-01
1700.00	0.1005	4225.00	0.6579E-01
1725.00	0.9883E-01	4250.00	0.6567E-01
1750.00	0.9724E-01	4275.00	0.6555E-01
1775.00	0.9572E-01	4300.00	0.6543E-01
1800.00	0.9425E-01	4325.00	0.6531E-01
1825.00	0.9284E-01	4350.00	0.6520E-01
1850.00	0.9149E-01	4375.00	0.6508E-01
1875.00	0.9019E-01	4400.00	0.6497E-01
1899.99	0.8893E-01	4425.00	0.6485E-01
1925.00	0.8773E-01	4450.00	0.6473E-01
1950.00	0.8655E-01	4475.00	0.6460E-01
1975.00	0.8542E-01	4500.00	0.6447E-01
2000.00	0.8434E-01	4525.00	0.6434E-01
2025.00	0.8336E-01	4550.00	0.6422E-01
2050.00	0.8240E-01	4575.00	0.6410E-01
2075.00	0.8147E-01	4600.00	0.6397E-01
2100.00	0.8055E-01	4625.00	0.6385E-01
2125.00	0.7966E-01	4650.00	0.6373E-01
2150.00	0.7880E-01	4675.00	0.6361E-01
2175.00	0.7795E-01	4700.00	0.6349E-01
2200.00	0.7713E-01	4725.00	0.6337E-01
2225.00	0.7632E-01	4750.00	0.6326E-01
2250.00	0.7554E-01	4775.00	0.6314E-01
2275.00	0.7476E-01	4800.00	0.6303E-01
2300.00	0.7407E-01	4825.00	0.6290E-01
2325.00	0.7399E-01	4850.00	0.6278E-01
2350.00	0.7392E-01	4875.00	0.6266E-01
2375.00	0.7384E-01	4900.00	0.6254E-01
2400.00	0.7376E-01	4925.00	0.6242E-01
2425.00	0.7368E-01	4950.00	0.6231E-01
2450.00	0.7360E-01	4975.00	0.6219E-01
2475.00	0.7352E-01	5000.00	0.6207E-01
2500.00	0.7344E-01		

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1942	0.1942	0.1942	0.1942	N/A
DISTANCE FROM SOURCE	1135.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1519	0.1519	0.1519	0.1519	N/A
DISTANCE FROM SOURCE	1.00 meters				

EXHIBIT B

1295 Hartford Avenue #8
White River Junction VT 05075

Norman Marshall, President
(802) 356-2969

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December 15, 2025

Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Subject: **Thermal Ranch Specific Plan**

Dear Ms. McGuire,

I have reviewed the vehicle miles traveled ("VMT) impacts of the Thermal Ranch Specific Plan as described in the Draft Environmental Impact Report ("DEIR") dated November 2024 and Final Environmental Impact Report ("FEIR") dated July 16, 2025. I make the following findings:

1) The proposed Thermal Ranch project uses would be highly seasonal. The FEIR analyzes the employment, housing and VMT impacts of the project as if the uses would be year-round. This is misleading and fails to fully account for the project's impacts.
2) The FEIR states that 80% of the equestrian center employment would be seasonal. Many of the other jobs also would be seasonal. This would do little to alleviate the area's jobs/housing imbalance.
3) Although the area generally has an excess of jobs, it also has a deficit of affordable housing. The project would not significantly address this issue.
4) The only project component that is a regular year-round use is the housing that is not allocated to seasonal workers and not labeled "tourist" or "resort." This housing is likely to result in a significant VMT impact given the area's jobs/housing imbalance. The mean commute distance in Census data for workers residing in project area is 27 miles one-way. Building large amounts of new housing in VMT-inefficient areas exacerbates the jobs/housing imbalance and should be avoided.

Seasonal Factors Not Adequately Analyzed

The proposed Thermal Ranch project uses would be highly seasonal. The FEIR analyzes the employment, housing and VMT impacts of the project as if the uses would be year-round. As discussed below, this is misleading and fails to fully account for the project's impacts.

Employment

The FEIR states:

> The commercial, hotel, and equestrian components of the proposed development are estimated to generate approximately 1,325 jobs. The provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance. (FEIR 2.16-21)

This statement overstates the proposed project's job benefits because many, and possibly, most of the jobs would be seasonal. The breakdown of the 1,325 jobs is in the FEIR table reproduced below. (FEIR, p. 2.16-16

Table 2.16-10
Estimated Project Employment

Land Use	Quantity	Estimated Employees
Commercial Retail	200,000 square feet	800
Hotel	150 rooms	225
Equestrian Center	223.1 acres	300
	Total	**1,325**

Source: Thermal Ranch Specific Plan Vehicles Miles Traveled Analysis, prepared by Urban Crossroads, January 30, 2023.

The FEIR states that 80% of the equestrian center jobs would be seasonal:

> Of the 300± jobs to be generated by the equestrian center, approximately 80% would be seasonal in nature, active only during the October to April event season. (FEIR p. 2.16-16)

The FEIR also states that the hotel use also is directly tied to the seasonal equestrian use:

> In this case, the proposed the hotel would not be provided if the adjacent Horse Park were not located at the site, so it is reasonable to assume that visitors which select this location are considering the proximity to the Horse Park use. (App. L, PDF p. 5 of 26)

Therefore, the hotel would likely have a very high vacancy rate during the May to September period, and also have lower employment during this off-season.

Regarding the commercial retail uses, the FEIR states:

> Proposed commercial areas would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space. (FEIR, p. ES-2)

These numbers do not add up:

> 75,000 + 10,000 + 150,000 equals 235,000, not 275,000.

The FEIR states:

> The Project would include 275,000± gross leasable square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space; 50,000 square feet of resort retail space, 150,000 square feet of commercial retail space, and a 150-room hotel. (FEIR, p. 5)

These numbers are different and don't add up either:

> 75,000 + 10,000 + 50,000 + 150,000 equals 285,000, not 275,000.

Like the hotel use, this commercial/retail space would not be provided if the adjacent Horse Park were not located at the site. Therefore, much of the employment would be seasonal. Three of the categories listed in the excerpts above are directly tied to the equestrian center including: "equestrian event retail", "resort retail space," and "office space at the equestrian center." The other category of 150,000 square feet of "commercial retail space" is not further defined. However, it is probable that these usages would also be highly seasonal if they are built at all, because it does not appear that the year-round population in the area is sufficient to support this amount of year-round retail.

The FEIR acknowledges the seasonality of the employment, stating:

> As previously stated, at full buildout, the non-equestrian portions of the Project are projected to employ approximately 800 full-time and part-time staff for the proposed commercial uses, and approximately 225 staff for the proposed hotel. Some of these jobs may be seasonal in nature, given that demand for staff may fluctuate with the additional business generated by visitors and area residents attending competitions at the equestrian center. (FEIR, p. 2.16-17)

Given the seasonal nature of much, or possibly most, of the jobs, the benefits of the project in addressing the jobs/housing imbalance in the area is overstated.

It is also questionable that these seasonal jobs will be filled by local residents. In particular, it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property. The FEIR states:

> The proposed PA-4 workforce housing would provide up to 500 units of workforce housing to accommodate the approximate 300 jobs generated by the equestrian center. (FEIR, p. 2.16-16)

In cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.

Housing

Although the area has a deficit of jobs relative to housing overall, it also has a significant workforce housing affordability problem. The FEIR documents "a substantial deficit in available rental housing." (FEIR, p. 2.16-8)

The FEIR acknowledges that the project will add to needed workforce housing when it states:

> The estimated 1,025 hotel and commercial staff could create a demand for additional housing, including housing affordable to households earning 80% of less of the County's median income. According to the U.S. Bureau of Labor Statistics, the mean hourly wage for food preparation and serving related occupations in the Riverside-San Bernardino-Ontario Metropolitan Statistical Area is $16.81 as of May 2022. Based on the same source, the mean hourly wage for sales and related occupations is $22.98.14 converted to annual salaries and compared to the County's median income, these wages would fall into the very-low income (up to 50% of median income or $0 - $37,650 per year) and low income (51% to 80% of median income or $37,651 - $60,250) categories.
>
> For the reasons stated above, the jobs generated by the Project could create demand for housing, including affordable housing. (FEIR p. 2.16-17)

The FEIR then exaggerates the project's contribution towards addressing the workforce housing problems. It states:

> The Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages. While the proposed workforce housing is primarily intended for employees of the equestrian center, some of the units may be available for other employees of the Project. Moreover, as discussed below, it is likely that the majority of commercial retail, restaurant and hotel jobs generated by the Project would be filled by existing residents of the Coachella Valley that are already housed. As previously stated, eastern unincorporated areas of Riverside County have a below average jobs-to-housing ratio. (FEIR p. 2.16-17)

All of the housing totals in the FEIR are labeled "up to." FEIR Table 1-1 (p. 1-17) lists the "Workforce Cottages" as totaling 300-500. Given that these units are primarily to house the "approximate 300 jobs generated by the equestrian center," the lower 300 number appears more probably than the upper 500 number, particularly given that some units likely will house more than one worker in the same family.

The FEIR table (FEIR p. 2.16-15) reproduced below shows the breakdown of the "up to 1,362" units.

Table 2.16-9 Project Land Use Summary				
Planning Area	**Land Use**	**Acres (Net)**	**Residential Dwelling Units**	**RV Spaces**
PA 1	Commercial Tourist	223.1		
PA 2	Estate Residential	194.3	132	
PA 3	Medium Density Residential	69.5	390	
PA 4	High Density Residential	41.1	500	320
PA 5	Commercial Tourist	54.4	340	
PA 6	Commercial Retail	21.4		
	Totals	**603.8±**	**1,362**	**320**

In the table, the 500 "high density residential" units in the table are more likely fewer than 500 and are primarily for seasonal equestrian center workers who likely are drawn from outside the area. Therefore, they would not serve as workforce housing, either for the other employees in the project, or for the general area.

The FEIR says that these units might be available for rent to others including farmworkers during the "May to September offseason." (FEIR, p. 2-16-17) However, the FEIR provides no evidence that these short-term rentals would provide any practical benefit, as it is likely a period when other tourist-related seasonal employment and the associated workforce housing demand are at their low points. It also is not the peak period for agricultural work.

> The main harvest and peak season for farm work in the Coachella Valley is from **October through June**, due to the area's three distinct growing seasons. [1] While there are tasks throughout the year, the most intensive periods for planting and harvesting occur during these months, with specific crops like dates and grapes having peak harvests at different times within that window.[2]

The other categories in the FEIR table reproduced above are unlikely to provide any workforce housing. The "Estate Residential" with an average of 0.6 units per acre will be very expensive. The Commercial Tourist category proposed for Planning Area 5 includes expensive amenities, including resort condominiums and a hotel, which are not intended for year-round occupancy. The least expensive category will be the 390 Medium Density Residential Units with an average density of 5.6 units per acre., but few of these will be rental properties and the rents will likely be high.

Therefore, the County overestimates its contribution to the jobs/housing in the region. The FEIR should be revised to include more accurate assumptions reflecting the highly seasonal nature of the Project.

---

[1] Coachella Valley Irrigated Lands Coalition, *Water Quality Monitoring Plan* (May 20, 2014), p. 5, available at: https://www.waterboards.ca.gov/rwqcb7/board_decisions/adopted_orders/orders/2014/0046attach_e.pdf; The Weather Channel, *Crowing The Holiday MVP: Why The #1 Vegetable At Thanksgiving Is The One You Least Expect,* available at: https://weather.com/features/news/2025-11-24-coachella-valley-celery-harvest-thanksgiving-weather-climate-change?utm_source=chatgpt.com.

[2] *Id.*

Considering the jobs/housing ration is already imbalanced and the County admits that the Project will lead to more housing demand, this may reveal potentially significant impacts that require mitigation.

The Year-Round Housing Component Would Likely Result in a Significant VMT Impact

The only project component that is a regular year-round use is the part of the housing that is not allocated to seasonal works and not labeled "tourist" or "resort." This housing is likely to result in a significant VMT impact given the jobs/housing imbalance in the area discussed in the FEIR. The jobs/housing imbalance is forecast to worsen in the Eastern Coachella Valley as shown in this table reproduced from the FEIR (p. 2.16-6).

Table 2.16-3
Eastern Coachella Valley Population and Employment Forecasts

Eastern Coachella Valley Area Plan	Population			Housing Units			Employment		
	2010	2020	2035	2010	2020	2035	2010	2020	2035
Incorporated	42,500	76,500	135,00	9,300	19,010	36,542	6,351	12,700	30,400
Unincorporated	32,454	89,606	206,313	7,363	22,971	55,286	6,878	15,849	35,577
Total	**74,954**	**166,106**	**341,313**	**16,663**	**41,981**	**91,828**	**13,229**	**28,549**	**65,977**

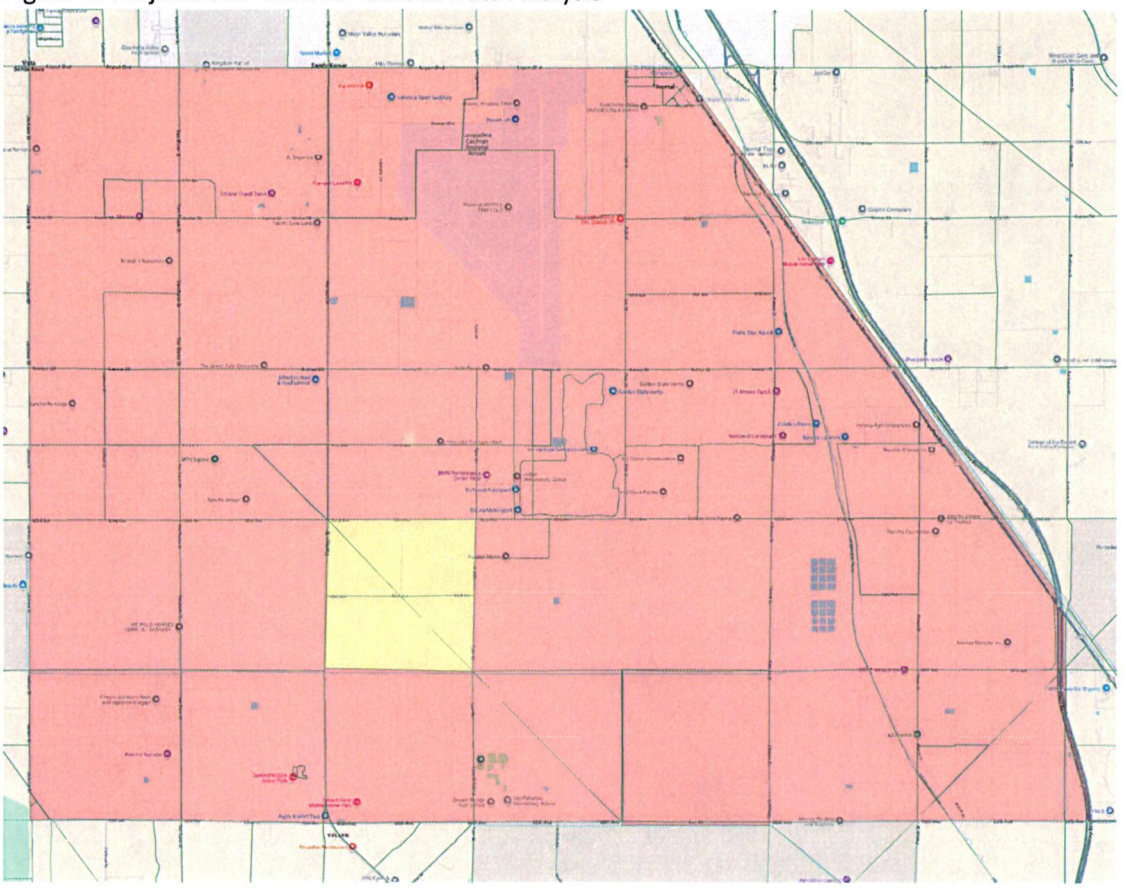
Source: Riverside County General Plan Appendix F-1 Population and Employment Forecasts

The table shows 49,847 additional housing units between 2020 and 2035, but only 37,428 more jobs over the same period. The FEIR includes an estimated 89,434 in the labor force in 2021 (FEIR, p. 2.16-94). This implies that there are over two workers per housing in the area, on average. Applying a ratio of 2 to the 2035 forecasts shown in the table above, this results in an increase of about 100,000 workers vs. 37,428 jobs over the period 2020-2035, requiring a huge increase in net out-commuting.

There are many long-distance commutes from those living in the vicinity of the project today. The U.S. Census Bureau publishes Longitudinal Employer-Household Dynamics ("LEHD") Origin-Destination Employment Statistics ("LODES") data that provide detailed geographic data about workers' commutes to jobs.[3] In order to focus on existing commutes from the immediate project area, I have extracted LODES data for the shaded area in the Figure 1 below, where the project area is shown in yellow.

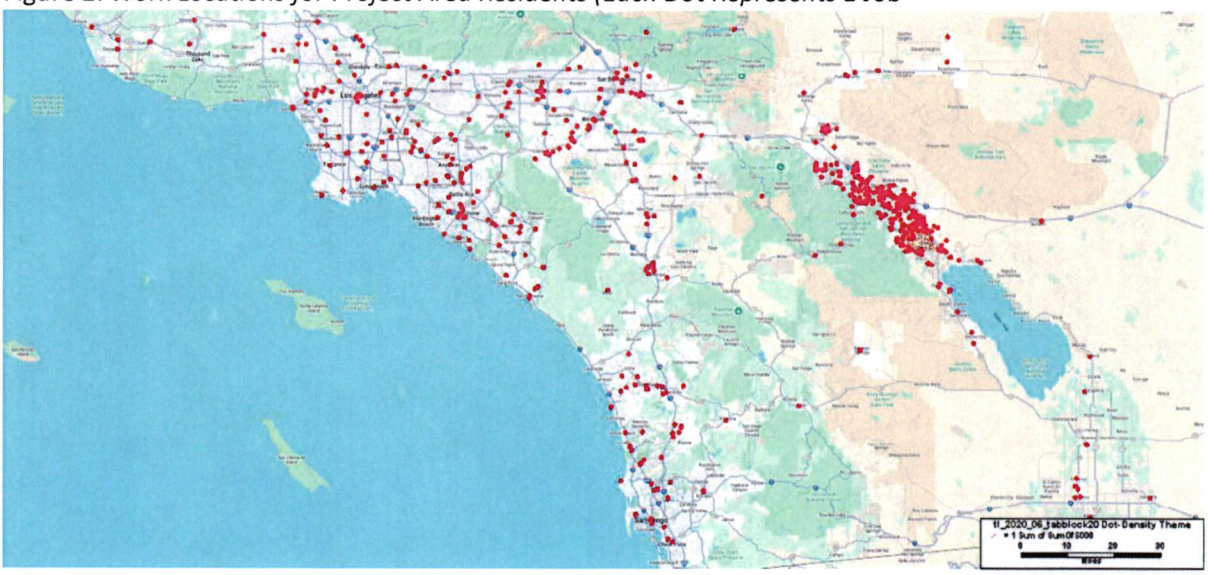
[3] The LODES data represent "covered" employment which excludes non-profits and some other categories.

Figure 1: Project Area Used for Census Data Analysis



The map below maps work locations for residents in the area shaded in Figure 1.

Figure 2: *Work Locations for Project Area Residents (Each Dot Represents 1 Job*



As shown in the Figure 2, about 60 percent of project area residents work in the Coachella Valley. However, there are also are many project area residents who commute long distances to destinations throughout the greater Los Angeles region. The mean commute distance in the LODES data for workers residing in project area (including the short commutes) is 27 miles one-way.[4]

Given the local/jobs housing imbalance and the existing long commute patterns, the assertion that "The Project is located in a low VMT area for residential uses" based on the RIVTAM model (FEIR, Appendix L, PDF p. 5 of 26) is not credible. I have 35 years experience in regional travel demand modeling. The models were not developed for this purpose and are not capable of matching the long real-world commutes.

Building large amounts of new housing in VMT-inefficient areas that exacerbates the jobs/housing imbalance should be avoided.

Sincerely,



Norman L. Marshall

[4] This calculation excludes records where the apparent commute distance is greater than 100 miles one-way.

Resume

NORMAN L. MARSHALL, PRESIDENT

nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (37 Years, 23 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in $250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced

model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additional analyzed using the City's Synchro model

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka'ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Caroline including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

MEMBERSHIPS/AFFILIATIONS

Associate Member, Transportation Research Board (TRB)

Member and Co-Leader Project for Transportation Modeling Reform, Congress for the New Urbanism (CNU)

EXHIBIT C

HOUSE AGRICULTURAL CONSULTANTS

Providing expertise in agricultural science, management, & appraisal since 1977.

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telephone +1 530 753-3361

December 15, 2025 (via electronic mail)

To: Ms. Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
amcguire@adamsbroadwell.com

From: Greg and Henry House
House Agricultural Consultants
gahouse@houseag.com, hajhouse@houseag.com

Re: Expert review of County Response to Public Comments of Thermal Ranch Project, Riverside County, with respect to agricultural matters

Dear Ms. McGuire:

At your request, we have reviewed Riverside County's responses to public comments on the EIR (FEIR) for the *Thermal Ranch Specific Plan Project* (Thermal Ranch Specific Plan SP No. 00401)—hereinafter, the *Thermal Ranch project*, or, the *project*—to comment on agricultural resources in our capacity as agriculture experts. These are our second set of comments on this project.

We, House Agricultural Consultants (hereinafter, HAC), are an agricultural-consulting firm that has analyzed agricultural impacts of numerous similar projects as well as agricultural-reclamation plans over a period of many years. A description of our qualifications as consultants follows as an appendix to this memorandum.

We reply to three county responses, those to comments C-7, C-8, and C-17.

1 Comment on Response to C-7

In its response to comment C-7 the County makes this assertion (on page 34 in the PDF):

> Pursuant to County General Plan EIR No. 441 and EIR 521, no additional project-specific mitigation measures are feasible. Thus, impacts due to conflict with existing agricultural zoning or uses, including those leading to the conversion of designated Farmlands, as well as encroachment impacts, would be significant and unavoidable.

1.1 A dereliction of duty? On the same page the County quotes General Plan EIR No. 521, saying

> General Plan EIR No. 521 further concluded, reiterating the findings of the General Plan EIR No. 441) that General Plan policies: "do not set specific requirements that would limit the conversion of agricultural lands to non-agricultural uses. Further, EIR No. 441 (for 2003 General Plan Update) finds the policies do not identify the amount, extent or location of agricultural land to be conserved and that it is impossible to assess if policies would effectively reduce potentially significant impacts associated with the conversion of agricultural land to non-agricultural uses." (GPA 960 EIR No. 521, p. 4.5-35).

This passage from the General Plan is very revealing in that:

1) it does not set specific requirements that would limit conversion of agricultural lands, and
2) it states that it is "impossible to assess" if its policies would be effective in reducing significant impacts from the conversion of agricultural land to non-agricultural uses.

Impossible? Is it not the duty and mission of the County to follow CEQA and serve its constituent public? What this reveals is a complete lack of interest in conserving agricultural land, in complete contrast to the goals and objectives listed in the General Plan's Vision Statement, Open Space Element, and Land Use Element, which we have previously cited and enumerated in our original comment.

Nevertheless, if it were impossible to figure out, then the County certainly could not assert that "no additional project-specific mitigation measures are feasible". This finding in the County's General Plan EIR does not excuse the County from its duty under CEQA to analyze and adopt all feasible mitigation to reduce impacts to less-than-significant levels.

1.2 There is a way to assess the cost of an ACE. The County states that an agricultural conservation easement (ACE) would threaten its promotion of housing and economic-development opportunities:

> Rather, the County has determined that the requirement of an ACE will not serve to effectively mitigate Project impacts and is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities, which would be unnecessarily encumbered and threatened by a requirement for agricultural conservation easements as a condition of project development.

How does an ACE threaten this project's development? Since the County policy is in favor of conserving agriculture, we are not amiss to conclude that this means an ACE would cost money that the developer does not want to pay. However, no assessment of the cost has been done, yet the cost is certainly not "impossible" to determine; the valuation of agricultural conservation easements is a well established discipline that can be performed by many licensed real estate appraisers throughout California.

2 Comment on County response to C-8

In this comment response the County quotes California Code of Regulations to argue that an ACE is infeasible:

> To determine whether a mitigation measure or alternative is infeasible, an agency must necessarily weigh and balance its pros and cons taking account of a broad range of factors. (See 14 CCR §§15091(a)(3)). After weighing these factors, an agency may conclude that a mitigation measure or alternative is impractical or undesirable from a policy standpoint and reject it as infeasible on that ground.

2.1 Specific reasoning is required. However, 14 CCR §§15091(a)(3), 15364 states:

> Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The County has misstepped again by not providing *specific* reasons why the mitigation measure of an ACE is infeasible. Instead the County has used a circular argument: that in essence it has a policy to find this kind of mitigation infeasible as it finds such mitigation conflicts with its policy of promoting housing and economic-development opportunities. It also again depends on generalized references to ongoing drought in the community without providing any specific evidence to demonstrate that the Project's use of an ACE would exacerbate the issue. As mentioned in our previous comments, an ACE only conserves existing agricultural land—it does not create new agricultural land.

14 CCR §§15091(a)(3) requires that the County must provide specific, tangible reasons, not generalities, and the pros and cons of these specific reasons are to be weighed and balanced before the County can reject a potential mitigation measure even if it does not fully mitigate the significant impact.

2.2 A reasonable alternative mitigation measure. The County appears to have failed to consider other alternative measures being used in other California counties to mitigate the significant impact of loss of agricultural land to urban conversion; and importantly, these alternative measures meet the County's concerns about water shortages by not requiring a conservation easement on nearby water-deprived lands.

There are several agricultural mitigation measure alternatives to ACE's that are being utilized in other California counties, including Agriculture and Land Stewardship (ALS) Framework and Strategies (ALS Strategies), and public benefit agreements, a mitigation measure that has been successfully employed in nearby Imperial County since 2012.

2.2.1 IN-LIEU FEES. Agricultural land-loss mitigation is accomplished by the establishment of an "in-lieu" fee-collection program by the county. The fee is collected at time of issuance of the grading permit for the project in question, and it is called "in-lieu" because instead of requiring the developer to provide a ACE, the fee legally satisfies the developer's mitigation requirement.

The fee amount can be specified in various ways; a popular method is based on a set percentage of the project land's appraised value.

The collected in-lieu fee is deposited in a trust fund that is used exclusively for county approved, designated purposes, including both the purchase of ACEs, and for community benefits related to agriculture; this last being also known as a public-benefit program.[1]

2.3 Public-benefit Agreements. The public-benefit agreement is therefore utilized as an alternative to the purchase of ACEs in numerous counties of California. Imperial County, for instance has reportedly collected over $14 million as an alternative mitigation measure to benefit agricultural businesses, researchers, and local students; for instance, Imperial County has given out more than $1.6 million in grants to the University of California Cooperative Extension, $130,955 to the Imperial County Sheriff's Office, nearly $7.5 million in loans to several agricultural businesses, and more than $400,000 in scholarships to students in agriculture-related fields of study.

2.4 ALS Strategies. Riverside County should also consider how ALS Strategies can be utilize in-lieu mitigation fees to support and enhance the County's agricultural economy, which it has admitted will be negatively impacted by the project.

According to the California Department of Water Resources (DWR), ALS Strategies can help maintain agricultural lands that provide benefits to farmers and the environment.[2] DWR's web site lists a specific set of strategies for supportng the local agricultural economy:

– Develop area-wide economic and land use studies, such as plans for the protection and restoration of habitat areas that takes into consideration the vitality of the agricultural economy
– Promote economic development
– Improve transportation infrastructure
– Help farmers and landowners earn new revenue from recreation and tourism
– Assist farmers and landowners in working with governmental agencies

2.5 In-lieu fee mitigation measures fit County needs. These two in-lieu fee mitigation measures, the Public Benefit Agreement programs, and the ALS Strategies, both seem to be feasible and a perfect fit for Riverside County which, under its General Plan policies, seeks to

[1] See Imperial County's public-benefit program: ⟨*https://imperial.granicus.com/MetaViewer.php?view_id=2&clip_id=1760&meta_id=290112*⟩.

[2] See ⟨*https://water.ca.gov/Programs/California-Water-Plan/Water-Resource-Management-Strategies/Agriculture-and-Land-Stewardship-Framework*⟩.

both support its local agricultural economy and to promote housing and economic development opportunities, while complying with CEQA in providing mitigation for the loss of agricultural land to urban development through this project.

3 Comment on County response to C-17

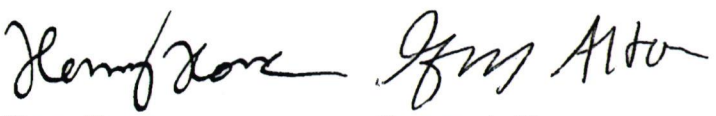
In this comment response the County mostly recycles talking points already made in C-7 and C-8. We refer the reader to our comments on these items, above, and our original comments prepared in our initial memo dated October 21, 2025. We add only the comment below.

3.1 Cumulative impacts. The County has argued that its general plan allows for up to 7 percent of agricultural land conversion apparently without any attempt at mitigation for the land loss. There has been no presentation of how the combination of this project and other past, present, and probable future projects may contribute to the overall significant negative environmental effect. The EIR needs to address this issue.

4 Closing

This concludes our current review of this project. A description of our professional qualifications is found in the appendix that follows.

Sincerely,



Henry House Gregory A. House

5 Appendix: Qualifications of House Agricultural Consultants

5.1 Qualifications of Henry House. Agricultural Economist · Agricultural Consultant · Licensed Appraiser · Farmer.

Summary of professional expertise:—

– California appraiser's license number AG-3010876 (Certified General Appraiser). This is the highest level of licensing for a real-estate appraiser and additionally qualifies Mr. House to value business interests, intellectual property, and other specialized assets and to opine on appraisals by others (the service of appraisal review).

– Agricultural economics and business lost profits; econometric controversies.

– Value of lost crops, emblements, and foodstuff inventory.

– Farm management: good farming practices in row crops and orchards, such as almonds and walnuts.

– Livestock management: carrying capacity of land, range management, standard of care for grazing animals, fencing.

– Right-to-farm issues, e.g., vehicle–agriculture, vehicle–livestock conflicts in agricultural districts, feasibility of agriculture on urban-proximate lands, spraying drift.

– Appraisal: valuation in disputes concerning real property, valuation of agricultural and rural land, valuation of valuation of agricultural personal property (e.g., chattel), valuation of agricultural-commercial facilities (e.g., aquaculture), valuation of development rights, assessed-value analysis for assessment appeal.

– Condemnation: valuation services for this appraisal specialty, including severance damages, in support of eminent-domain litigation.

– Conservation projects: Mr. House has assisted numerous land trusts in establishing conservation easements, including The Nature Conservancy, Yolo Land Trust, Solano Land Trust, Agricultural-Natural Resources Trust, River Partners, and Sutter Buttes Regional Land Trust.

– Management evaluation of commercial equestrian facilities.

– Management of rural property.

– Statistical analysis, geographic-information-system (GIS) analysis, and software engineering (analytics).

– Expert services to litigation on the foregoing with deposition and trial-testimony experience; partial list of matters below. Qualified expert in the counties of Butte, Colusa, Kern, and Riverside.

Representative recently concluded matters in which Mr. Henry House was retained by counsel as a forensic expert:—

County of Tulare, October 2025.—Topic: econometrics · agricultural irrigation · evapotranspiration · water rights · California Sustainable Groundater Management Act (SGMA). *Friant Water Authority v. Eastern Tule Groundwater Sustainability Agency* (case no. VCU306343). A matter of claimed economic damages due to the defendant's method of charging and accounting for groundwater drawn from a regulated basis by its memners, primarily farms growing diverse crops. Scope included econometrics and expertise in farm management.

County of Sacramento, September 2025.—Topic: farming standard of care · agricultural dust · walnuts. *Gerald Larson, et al. v. Robert Larson, et al.* (Sacramento County case no. 34-2021-00294930, consolidated with 34-2021-00311331 and 34-2022-00327390). An auto-accident case wherein dust allegedly originating from the defendants' walnut orchard obscured visibility on a public road, contributing to an accident with multiple vehicles involved. Mr. House was retained and designated to review the location of the incident, the crops and nature of agriculture in the area, and the standard of care used by the farming defendants, reasonableness of their actions, and their process for conducting agricultural operations, opining on the same and in rebuttal of other experts.

County of Butte, June 2025.—Topic: agricultural lost profits · olives. *Zih Jun Wang v. Pacific Gas & Electric Company, et al.*. A case regarding an olive grove in Butte County, where portion of the trees were destroyed by a utility company, in substantial excess of the utility's real-property rights under its easement to undertake fire-prevention activities. Mr. House opined on the economic impact of the trees' destruction, including cost of restoration, timeline to return to productive capacity, and lost profits, thereby assisting the client to obtain a settlement.

County of Wake, State of North Carolina, November 2024.—Topic: farm management, standard of care for labor contracting. *Carlos Moreno, et al. v. Florida Orange Gold, LLC, José Javier Gutierrez, Gilberto Gutierrez, and Howell Farming Co., Inc.* Mr. House was retained and designated for expertise on the client's standard of care in hiring contract labor in Wayne County, North Carolina. Plaintiff Moreno suffered a workplace injury, alleged to have been caused by heat sickness, while weeding watermelons as a contract laborer (as an employee of Florida Orange Gold) on the farmland of client Howell Farming Co. (defendant); the plaintiffs' cause of action against Howell was negligence. Mr. House opined on several controverted factual elements of the allegation of negligence, including the division of responsibility for workers' safety between farm-labor contractor (employer) and farmer hiring contract labor (nonemployer owner of the crop and possessor of the farmland), customary and accepted practices to manage risk of heat illness from hot weather, and whether summertime weeding in eastern North Carolina meets the characteristics of an "inherently dangerous activity" as defined by North Carolina law.

Federal venue, August 2024.—Topic: farm management, real-property rights. A federal-court matter, involving appraisal and farm-management expertise, which is confidential per our agreement with the client. This matter was venued in a federal district of California.

County of Sacramento, July 2024.—Topic: real-estate costs to cure · appraisal · conspiracy.—*Robert Williams and Christina Williams v. Dynamic Asset Solutions, LLC, Prato Real Estate, Inc., Bricker Construction, Inc., and Finley Home Services, Inc., et al.*. Mr. House was retained by Williams and opined in deposition on the fair market value of the subject property, a luxury home, in as-sold condition, its fair market value as if it had not suffered from damage discovered by buyer, and the market cost of repairs. Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Los Angeles, March 2024.—Topic: real-estate appraisal. *JP's Nevada Trust v. 2Bulls Conservation Ventures et al.* Mr. House was retained by JP's Nevada Trust and opined on valuation methodology and opined the fair market value of three ranch properties at the times of three controverted transactions in service of the plaintiff in a dispute in which the buyer (plaintiff) alleged conspiracy to defraud and a pattern of racketeering activity in violation of 19 U.S.C. § 1962(c), the Racketeer Influenced and Corrupt Organizations Act (RICO). Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Nevada, November 2023.—Topic: lost profits. *Andrew Hainsworth, et al. v. Pacific Gas & Electric Company.* A fire loss on a property in Rough and Ready. Mr. House was retained by Hainsworth and subsequently opined written findings regarding the plaintiff's lost profits from licensed *Cannabis* production in rural Nevada County, including an opinion on the market value of Nevada County-grown *Cannabis* relative to the market in aggregate.

County of Franklin, State of Washington, September 2023–June 2024.—Topic: real-estate appraisal. *Ice Harbor Properties, LLC and Certain Underwriters Subscribing to Certificate No. XLS0342717 v. Agri Control Technologies, Inc. d.b.a. BTU Ventilation and Parrish Stakkeland* (case no. 20-2-50118-11, Superior Court of the State of Washington, County of Franklin). A dispute over the compensation due by the defendants for the fire loss of the plaintiff's real property, a warehouse specialized for climate-controlled bulk storage of potatoes and onions. The plaintiffs retained and designated Mr. House as a rebuttal witness to opine on the fair market value of the lost building, the market for similar buildings, and other experts' opinions.

County of Tulare, July 2023.—Topic: livestock economics · real-estate appraisal. *Jones, et al. v. Pleasant Valley Canal Company, et al.* (Tulare County Superior Court case no. VCU274417). A dispute over a cattle-ranching and hay-growing operation which the plaintiffs alleged had been damaged by the operation of a canal crossing the plaintiffs' property. The scope for which Mr. House was retained and designated by the defendants included analyzing the plaintiffs' alleged diminution of value of real estate, analyzing the plaintiffs' alleged economic loss from death of cattle, and opining on the water company's standard of care in maintenance of its canal. Additionally, I assisted retaining counsel to engage an expert in veterinary pathology.

County of Minidoka, State of Idaho, March–August 2023.—Topic: standard of care for livestock fencing. *Michael O. Ottley v. Hanssen et al.* (case no. CV34-21-00168, District Court of the Fifth Judicial District of the State of Idaho). An auto-accident case wherein the defendants' cattle had escaped onto a public road and been struck by the plaintiff in rural Minidoka County, Idaho. The defendants retained and designated Mr. House to analyze the defendants' standard of care in managing the cattle, to opine on the quality of the defendants' fencing in comparison to locally accepted standards of adequacy, and for rebuttal of the plaintiff's fencing expert.

County of Imperial, November 2022–February 2024.—Topic: agricultural economics · hay. *Freddi Abatti et al. v. James Davis, et al.* (Imperial County Superior Court case no. ECU002597). The defendants retained and designated Mr. House to evaluate the lost profits in hay crops in Imperial County resulting from a fire.

County of Merced, September 2022–January 2024.—Topic: agricultural economics · lost profits · almonds. *Athwal Investments et al. v. San Luis Pump Co. et al.* (case no. 20CV03787). A matter of almond trees in Merced County allegedly damaged consequent to lack of irrigation water. Scope included analysis of the economic lost profits from orchard trees lost and replanted as well as from lost yield in service of two defendants.

See also.—Mr. House's separately provided listing of testimonies lists additional matters.

Partial list of management-consulting assignments:—

– Numerous consulting assignments for Leland Stanford Junior University on the management of its agricultural lands, which feature cattle, horses, and vegetable crops. Topics addressed have included livestock standard of care, carrying capacity of lands, safety of animals, safety of structures, and management of drainage and water quality.

– Consulting farm management for John and Marie Cronin Trust B, a landowner near Rio Vista, California. Lands were utilized for cattle grazing.

– Numerous appraisal assignments of farmland and rangeland properties utilized for crops and livestock (cattle, sheep, and aquaculture).

– A list of additional management-consulting clients served available on request.

Experience:—

Agricultural consultant, appraiser, consulting agricultural economist.— House Agricultural Consultants, providing agricultural science, economics, management, and appraisal services. 2000–present.

Farmer.— Coco Ranch, a family farm growing organic apples, peaches, cherries, and field crops and raising sheep, poultry, and goats. 2000–present.

Education:—

– B.S., "Natural History", University of California, Davis, 1999, with Honors. Coursework in agronomy, botany, ecology, entomology, geology, hydrology, nematology, plant pathology, soil biology, sustainable agriculture, statistics, and wildlife biology.

– Numerous courses of the American Society of Farm Managers & Rural Appraisers (ASFMRA) regarding farm management, agricultural consulting, and appraisal. Recently completed: *Livestock Ranch Seminar* (February 15, 2024) and *Appraisal of Water Rights Seminar* (March 8, 2024), both in ASFMRA's appraisal-education series.

– Numerous courses of the Appraisal Institute regarding real-estate appraisal.

– Courses from Savory Institute regarding livestock management.

Appointments & activities:—

– Member, Solano County Farm Bureau.

– Member, American Society of Farm Managers & Rural Appraisers.

– Board of Directors, Davis Media Access, Davis, California, 2014–2017.

– Board of Directors, Davis Farmers Market Association, 2001–2003.

– Assistant instructor, "Principles of Farm Management", course M-10, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

– Course proctor, "M-25: Enhanced Client Services", an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

Publications & speaking engagements:—

– Lecturer/instructor, "Farm Management", course ARE 140, and "Appraisal of Farms & Rural Resources", course ARE 145, University of California–Davis, 2015–present.

– *Principles of Farm Management*, Course M-10, a 40-hour professional credit Internet educational offering of the American Society of Farm Managers & Rural Appraisers

– Educational speaker at the annual meeting of the California Chapter of the American Society of Farm Managers & Rural Appraisers, November 19, 2021, Coalinga, California. Topic: valuation of conservation easements.

5.2 Qualifications of Gregory A. House. Agricultural Consultant · Agronomist · Professional Farm Manager · Rural Appraiser · Farmer.

Experience:—

– Agricultural consultant, 1983–present—House Agricultural Consultants, providing agricultural-science, economics, management, and appraisal services.

– Farmer, 1987–present.—Growing organic apples, peaches, cherries, apricots, field and seed crops.

– Corporation secretary and consulting agronomist, 1977–1983—Hannesson, Riddle & Associates, Inc.

Professional affiliations:—

– American Society of Farm Managers & Rural Appraisers
– American Society of Agronomy
– Crop Science Society of America
– Soil Science Society of America
– California Certified Organic Farmers
– California Farm Bureau.

Accreditations:—

– Accredited Farm Manager (AFM), American Society of Farm Managers & Rural Appraisers, certificate no. 501

– Certified Professional Agronomist (CPAg), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd., certificate no. 2319

– Certified Crop Advisor (CCA), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd.

N.B.—These credentials have continuing-education requirements with which I am in compliance.

Education:—

– B.S., Crop Ecology, University of California, Davis, 1975, with Honors

– Numerous courses from the University of California Extension in agricultural economics, crop management, real estate, & hazardous waste management

– Cornell University Certificate Program, Implementing Good Agricultural Practices: A Key to Produce Safety

– Courses of the American Society of Farm Managers & Rural Appraisers: Principles of Rural Appraisal · Advanced Rural Appraisal · Eminent Domain · Report Writing School · Economics of Farm Management · Principles of Farm Management · Standards and Ethics · Permanent Plantings Seminar · Standards and Ethics for Farm Managers · ASFMRA Code of Ethics

National Uniform Standards of Professional Appraisal Practice Courses of the Appraisal Institute: Basic Valuation Procedures · Real Estate Statistics and Valuation Modeling · Advanced Income Capitalization · Valuation of Conservation Easements Certificate Program · Condemnation Appraising: Principles and Applications · Appraising the Appraisal · How Tenants Create or Destroy Value: Leasehold Valuation and Its Impact on Value.

– Former Accredited Rural Appraiser (ARA), American Society of Farm Managers & Rural Appraisers, certificate no. 749 (retired).

Expert-witness court testimony:—

– Superior Court Qualified Expert Witness in the following California counties: Alameda, Colusa, Kern, Fresno, Madera, Merced, Monterey, Orange, Riverside, San Joaquin, San Luis Obispo, Santa Barbara, Santa Cruz, Solano, Sonoma, Sutter, Ventura, Yolo

– United States Tax Court qualified expert witness

– United States Bankruptcy Court qualified expert witness.

A comprehensive listing of Mr. House's depositions and trial appearances is available upon request. The list currently numbers seventy-two matters in which Mr. House gave sworn testimony (either deposition, trial or hearing appearance, or both), including thirty-two trial appearances.

Awards:—

– CCOF Presidential Award, California Certified Organic Farmers, February, 2001.

– Meritorious Service in Communications, American Society of Farm Managers & Rural Appraisers, November 2004.

– H.E. Buck Stalcup Excellence in Education Award, American Society of Farm Managers & Rural Appraisers, October, 2011.

Appointments & activities:—

– Adjunct Lecturer, University of California, Davis, Department of Agricultural & Resource Economics, current; Courses ARE 140 Farm Management; ARE 145 Appraisal of Farms & Rural Resources, 2015–2021.

– Instructor, *Principles of Farm Management*, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1996–2007.

– President, California Chapter American Society of Farm Managers & Rural Appraisers 1994–1995; Secretary–Treasurer, 1984–1990.

– Board of Directors, Yolo Land Trust, 1993–2001.

– Board of Directors, American Red Cross, Yolo County Chapter 1987–1989.

– Member, Yolo County Right to Farm Grievance Committee 1992–1995.

– Vice Chairman, Management Education Committee, American Society of Farm Managers & Rural Appraisers, 1998–2000 (committee member since 1986).

– Yolo County LAFCo Agricultural Forum LESA subcommittee, 1999.

– California Certified Organic Farmers: Treasurer of the Board of Directors, 1998–2003; Executive Director, 1999–2000; Member of the Finance Committee, 1998–current.

– CCOF Foundation Going Organic Program, Management Team member, 2006–2012.

– USDA Organic Grant Panel member, Washington, DC, 2002.

– City of Davis Open Space and Habitat Commission, 2006–2016, Chairman, 2007–2009.

– Member, Fruit Orchard Technical Advisory Group, Filoli Gardens, Woodside, California.

– Member, Organic and Sustainable Agriculture Program Steering Committee, University of California Cooperative Extension, Yolo and Solano Counties, California, 2008–2013.

– Member, Solano County Right to Farm Grievance Committee 2022–present.

Speaking engagements:—

– Guest lecturer, University of Florida at Gainesville–Vegetable Crops Department. Seminar on transition to organic agriculture, November 1994.

– Featured program speaker, 1995 annual *Eco-Farm Conference.* Lecture on economics of organic-apple production, Asilomar, California, 1995.

– Guest speaker, multiple events of Community Alliance with Family Farmers. Presentations on farm management and agricultural economics, 1996 and 1997.

– Instructor, American Society of Farm Managers & Rural Appraisers. Course "M-12", *Standards and Ethics for Professional Farm Managers*, March 1997.

– Guest speaker, American Horticultural Society. Lecture entitled *Challenges of Organic Stone Fruit Production*, Sacramento, California, July 2001.

– Organizer and presenter, *Going Organic Kickoff Meetings.* A program of California Certified Organic Farmers, November 2005 and December 2006.

– Master of ceremonies, annual meeting of California Certified Organic Farmers. Sacramento, California, February 2006.

– Featured program speaker, 2012 annual *Eco-Farm Conference.* Lecture entitled *Imitating Natural Systems: Towards an Indigenous Agro-forestry*, Asilomar, California, 2012.

– Seminar presentation, American Society of Farm Managers & Rural Appraisers. *Rapid Fire Seminar: What Makes for Comparable Sales in Condemnation Appraisal*—Reno, Nevada, October 2013.

– Featured program speaker, 2014 annual *Eco-Farm Conference.* Lecture entitled *Food Safety Regulatory Compliance in Fruit Orchards*, Asilomar, California, 2014.

Publications:—

– *Principles of Farm Management*, course "M-10", a forty-hour professional-credit online educational offering of the American Society of Farm Managers & Rural Appraisers.

– *Conservation Issues in Agriculture*, a unit of course "M-25", a fifteen-hour professional-credit online educational offering of the American Society of Farm Managers & Rural Appraisers.

– *A Primer on Organic Agriculture*, an article in *2006 Trends in Agricultural Land and Lease Values*, a publication of the California Chapter of the American Society of Farm Managers & Rural Appraisers.

– *Case Study: Using Indigenous Agroforestry Management Techniques to Support Sustainability in Production Agriculture*, a paper-poster presented at *Harlan II, An International Symposium on Biodiversity in Agriculture: Domestication, Evolution and Sustainability*, September 14–18, 2008, University of California–Davis.

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Memorandum

DATE: **December 16, 2025**

TO: **Board of Supervisors**

FROM: **Russell Brady, Project Planner**

RE: **Item 23.1 – LCJA Public Comments and Responses**

Attached are additional public comments received from Leadership Counsel for Justice & Accountability (LCJA) since completion of the package for the Board of Supervisors. There are additional reference materials that were provided with the letter that are not included with the memo, but will still be part of the record on the project.

Also attached is an email from the applicant with their responses to this letter.

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LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

December 13, 2025

Sent Via Email

Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon St.
Riverside, CA 92501

Re: Comments on Thermal Ranch Project FEIR Responses and Approval Resolution

Dear Mr. Brady:

Leadership Counsel for Justice & Accountability and Semillas de la Resistencia (Semillas) submit these comments on the Thermal Ranch Final Environmental Impact Report (FEIR). Consistent with our comments on the Draft Environmental Impact Report and Final Environmental Impact Report, we remain concerned that the FEIR fails to accurately analyze all potentially significant impacts, and that it does not assess all feasible mitigation measures. As a result of these failings, the FEIR is inadequate under the requirements of the California Environmental Quality Act (CEQA). The FEIR must be corrected and recirculated before it can be certified by the County.

Residents we work with in the Eastern Coachella Valley are not opposed to continued development in the area, but communities in the vicinity of the project are already burdened with critically degraded air quality, water quality, and face other social and economic consequences of the pattern of growth in the region. The Project's reasonably foreseeable impacts will further burden these communities absent incorporation of additional feasible mitigation measures. (DEIR, p.4-2, 4-3). Further, the admittedly significant and unavoidable impacts of the Project as proposed cannot outweigh the Project's benefits to local residents without additional commitments from the proponent. To that end, approval of the Project must be delayed until the FEIR is revised to comply with CEQA, including by adding additional mitigation measures.

Further, the Board of Supervisors should require a clear, enforceable, mutually agreeable plan to ensure that the mitigation priorities of local communities that will be most affected by the Project are advanced by this development *before* certifying the FEIR. As identified by members of Semillas, these community priorities include:

(1) **Safe Housing.** Investment in safe housing, particularly for existing residents living nearby the project. These investments should include, but not be limited to, repairs and upgrades to windows, doors, roofing, etc., to improve insulation from noise, odors, heat, and light. Where existing nearby housing cannot be upgraded to a sustainably safe and habitable condition, replacement housing and/or relocation should be provided.

(2) **Safe Drinking Water And Wastewater.** As previously noted, the mobile home park nearest the project lacks access to safe drinking water and sewer service. The project should ensure that, at a minimum, this mobile home park benefits from the infrastructure improvements that the project would generate by consolidating it into Coachella Valley Water District for water and sewer.

(3) **Opportunities For Students.** To mitigate the impacts of the project and ensure that existing residents benefit, the project should provide direct investments in local ECV youth. Such investments should include, but are not limited to, scholarship opportunities for students attending nearby schools, coverage of essential educational expenses such as school supplies and testing fees, and support for programs that prepare youth for veterinarian careers and other specialized professional pathways.

(4) **Safe Transportation.** To mitigate air quality impacts and provide community benefits, the project should incorporate transportation safety improvements necessary to address the potential increased traffic and mobility impacts identified by local residents. This includes, the installation of shade structurings at nearby SunBus stops, provision of vans or shuttle services for residents lacking reliable transportation, and implementation of roadway and lighting improvements to ensure safe travel for pedestrians, cyclists, and drivers.

(5) **Accessible Green Spaces.** To mitigate air quality impacts and address the need for safe outdoor areas, the project should provide publicly accessible green spaces, including parks, community gathering areas, and shaded outdoor spaces. These spaces are important to ECV residents because they promote community health and well-being, help reduce heat and improve air quality in the area. If a new park is proposed, residents should be consulted on its location and design.

Turning to additional comments regarding the FEIR, the following comments supplement letters dated January 10, 2025 and October 15, 2025.[1]

A. The Project Cannot Defer Development of an Operation Dust Control Plan.

The DEIR/FEIR improperly defers development of mitigation measures for operational dust impacts. The DEIR identifies mitigation measure AQ-4 Operational Dust Control Plan. (DEIR, p.ES-8.) This mitigation measure calls for the development of an operational fugitive dust control plan, identifying the developer and development HOA as responsible parties, and implementation as ongoing.

However, the residential component of the project has not been constructed, so an HOA does not currently exist, and as such cannot be assumed to participate in the task of developing an operational fugitive dust control plan. Further, it does not commit the responsible agency to any specific performance standards. By failing to identify specific standards and to assign them to accountable parties, MM AQ-4 violates the CEQA principle prohibiting delayed implementation of mitigation measures (See *King and Gardinier Farms, LLC v. County of Kern et al.* (2020) 45 Cal.App.5th 814.)

[1] These letters are attached for convenience, as Attachments A and B.

The County must revise MM AQ-4 to provide for the development of an operational dust control plan based on specific performance standards, with clearly defined accountable parties. Otherwise, this measure is speculative and unenforceable, and cannot support the conclusion that operational fugitive dust impacts will be less than significant.

B. The Project EIR Must Include An Enforceable Mitigation Measure Implementing A Defined And Adequate Manure Management Plan.

The County's Responses to Planning Commission Comments (Responses) fails to address the comments provided by LCJA in our October 15, 2025 letter titled "RE: Thermal Ranch Specific Plan Final Environmental Impact Report." This comment serves to augment our manure related concerns addressed in that letter.

The unclear, unsubstantiated, and insufficient commitments to manure management in the FEIR are especially significant in light of the fact that the area slated for manure collection and storage, and other "back of house" operations, is also planned to serve as a stormwater retention area for the project site. (See DEIR Exhibit 1-7, 2.12-2.) Given the seasonal nature of rainfall in the Eastern Coachella Valley, the likelihood that significant rainfall will occur is highest during the competition season.[2] With the lack of enforceable commitments to ensure daily manure hauling, and appropriate overflow storage capacity onsite, the combined stormwater retention/manure storage use of the "back of house" area risks contamination to water resources and/or spillage of manure under the upset conditions of a storm event. And, even if manure is hauled daily, there is an unanalyzed risk of surface and groundwater impacts regardless of whether manure is hauled daily. This is because it does not appear, for example, that there are any plans to cover the manure during temporary daily storage, to place the manure on a concrete pad or other lined storage area, or to ensure that there is adequate stormwater retention to prevent overflow during high precipitation events.Without a manure management plan addressing these risks and ensure that best management practices are adopted, the planned joint uses of the "back of house" area for manure storage and stormwater retention are incompatible.[3]

Also, we question the purpose of the inclusion in the Responses to Planning Commission Comments of the "Memorandum from Southern California Mobile Griding [sic], Inc." as Appendix B. The stated purpose of this "memo" or "correspondence" as referenced in Response B-2 is to support the County's argument that manure has re-use potential throughout the region, in order to rebut concerns regarding potential manure impacts. (Responses, p.6) This reference to the memo also contends that the contractor hauls manure from the currently operational Desert International Horse Park on a daily basis. (*Id.*) The memo is also referenced in the Operations Plan, also included in Appendix B. However, because the Operations Plan continually shifts

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[2] See https://www.coachellavalleyrcd.org/coachella-valley#:~:text=Rainfall%20is%20limited%20with%20average,some%20regions%20of%20the%20Valley.

[3] The need to retain all wastewater generated, including all of the precipitation on and drainage through waste areas, is required by the Colorado River Regional Water Quality Control Board for all CAFO facilities, including the Project. (See *CRRWQCB Order R7-2021-0029/NPDES No. CAG017001* (Nov. 2022), attached as Attachment C.

tense between present and future, it is not clear whether the discussion of manure removal by the contractor is restating the current alleged practices at DIHP, or prospective operation of Thermal Ranch.

The use of this memo by the County fails to resolve the Project's manure management issues for several reasons. First, to restate a comment made in our Oct. 15, 2025 letter, while it is true that when appropriately processed manure may serve as a valuable compost feedstock, absent appropriate handling manure is a major pollutant, and poses serious threats to human health and the environment. Simply attempting to characterize manure as a benign material does not make it so.[4]

Second, reliance on the alleged current operations of the DIHP to support the claim that manure will be hauled from the Project daily is inadequate. The Project would generate a substantially larger volume of manure than the DIHP, making the operations of DIHP irrelevant to this Project. Further, as stated in our Oct. 15, 2025 comments, there is ambiguity as to the actual hauling schedule of the DIHP, which the Responses fails to clarify. Without an enforceable agreement between Thermal Ranch and a hauler that includes a commitment to daily hauling of *all* manure daily, the FEIR's analysis and mitigation of manure-related impacts is speculative and inadequate.

Also, although the environmental documents repeatedly reference "daily" removal, it is unclear that the volume of manure generated would be removable on a daily basis with the number of truck trips projected in the FEIR. For instance, the FEIR states that manure hauling would generate between 1.68 and 3.36 truck trips per day, with 3.36 representing a conservative estimate based on a maximum hauled weight of 40,000 lbs. per truck. (FEIR, p.96.) While hauled weight may be the relevant parameter for determining the legally permissible limit of a load, volume must also be taken into consideration for determining manure-removal capacity. Although tractor-trailers may be able to haul 40,000 lbs. per load, a trailer of this size may accommodate no more than 30 cubic yards of material.[5] With a projected daily volume of 135,000 lbs. of manure corresponding to approximately 450 cubic yards of manure, approximately 15 truck trips would be required daily. This is considerably higher than the number estimated in the FEIR, and raises questions about the feasibility of "daily" removal such as staging of multiple pick-ups and the frequency of trips. It appears instead that either *all* manure will not be removed on a daily basis, or the FEIR underestimates daily truck trips. Either way, the FEIR analysis is thus flawed and inadequate.

Fourth, the memo itself fails to actually support any of the contentions that it is referenced in support of in the Responses and the Operations Plan. The only information in the memo related to manure removal operations are assertions that "[w]e pick up manure in covered trailers daily from October to April. We then deliver to farms throughout the Coachella Valley. The farms use the manure for fertilizer and dust control. We have the capacity to serve the proposed equestrian

[4] The pollution potential of horse manure is widely accepted and best practices exist that can limit the risks to water quality. (See *Equestrian-Related Water Quality Best Management Practices* (June 2004), South Orange County Horses and Water Quality Task Force, included as Attachment D.)

[5] See https://www.fandshauling.com/blog/how-many-cubic-yards-in-a-dump-truck.

facility at Thermal Ranch, including any expansion of existing operations at the new location." Nowhere in the memo is a commitment to daily operation.

Fifth, the FEIR does not contain an analysis of which farms will use the manure and does not analyze the potential for offsite surface and groundwater quality impacts from overapplication of fertilizer. There is no analysis of the enforceable measures that will be taken to ensure that exported manure is applied to feed crops at rates that are protective of groundwater quality.

Finally, this purported "communication" with Southern California Mobile Grinding, Inc., is unattributed, and undated, and unsupported by any documentation. In addition, it does not represent a binding agreement or enforceable plan. This is insufficient to support a determination that the Project does not risk a significant impact due to manure generation. (CEQA Guidelines § 15384(a) ["Argument, speculation, unsubstantiated opinion or narrative...does not constitute substantial evidence."].)

C. The Project FEIR Must Include A Revised Analysis Of Light Impacts And Require Adequate Lighting Mitigation.



Nighttime lighting at the Desert International Horse Park.[6]

[6] From https://deserthorsepark.com/desert-international-horse-park-announces-dates-for-2022-2023-show-season/.

Although the DEIR states that "[w]ithin the planning area, the majority of lands are undeveloped, and daytime and nighttime skies are only modestly affected by light and glare" it concludes that the Project would have less than significant light and glare impacts. (DEIR, 2.3-11.)

This is based in part on stated commitments to "low lighting levels at all levels of outdoor application, including equestrian arenas in the center of the site where fixtures will provide shielded, focus lighting on the performance spaces". (DEIR, 2.3-11) Also, the DEIR commits to Mitigation Measure AES-3, which outlines requirements under Riverside County Ordinances 655 and 915, and also recommends measures including "[o]utdoor lighting shall be limited to the minimum height, number and intensity of fixtures needed to provide security and identification, taking every reasonable effort to preserve the community's night skies" and "[e]levated lighting, including but not limited to parking lot lighting, shall be fullcutoff fixtures. Drop or sag lens fixtures shall not be permitted." (DEIR, ES-7.) However, the DEIR also states that arena lights will be up to 65 feet in height. Pictured above, the lights currently in operation at the Desert International Horse Park show how elevated stadium lighting can be clearly visible from a distance. The DEIR should be revised to include discussion of how stadium lighting will be specifically constructed to prevent light and glare impacts on surrounding residential land uses.

D. The County cannot certify the Project EIR because the statement of overriding considerations is not supported by legally sufficient analysis or substantial evidence in the record.

As noted above, the DEIR concludes the Project would result in significant and unavoidable impacts to air quality, agricultural resources, and traffic. As a result, the Project cannot be approved without an adequate Statement of Overriding Considerations. (CEQA Guidelines § 15093(b).) However, by failing to justify the rejection of mitigation measures in both of these areas, the Project's analysis of the unavoidability of these impacts is legally flawed. Further, by failing to fully account for the potential noise, light, manure, and population growth impacts posed by the Project, the DEIR fails to adequately assess the Project's potential environmental harm. For both of these reasons, the statement of overriding considerations cannot appropriately weigh the potential impacts of the Project with purported benefits, and thus is insufficient under CEQA requirements. (*Center for Biological Diversity v. County of Los Angeles* (2025) 12 Cal.App.5th 317, at 354, citing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 at p. 508; *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.)

In addition to the mitigation measures set forth in prior public comments on the DEIR and FEIR, additional possible mitigation measures excluded from analysis include whether there is the possibility of committing funds to a mitigation bank or offset program to mitigate air quality impacts.[7] Also, the feasibility of incentivizing more rapid and comprehensive adoption of electric vehicles through inclusion of residential and commercial solar photovoltaic systems coupled with battery storage should be addressed.

Also, the Statement of Overriding Considerations cannot balance the impacts of the project against the benefits referenced by the County. (*Center for Biological Diversity v. County of Los*

[7] See e.g. *Settlement Agreement Regarding Otay Ranch Village 13 Project*, included as Attachment E, for the feasibility of mitigation measures not considered in the Project EIR.

Angeles (2025) 12 Cal.App.5th 317, at 354, citing *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 983.) The purported benefits to area infrastructure that the Project would allegedly result in are not described in detail, nor are they presented as part of the project in a way that would make them mandatory and enforceable. They are therefore uncertain and speculative.[8] As a result of the speculative nature of the Project's benefits at this stage, the statement of overriding considerations cannot be supported by substantial evidence, and is insufficient to meet CEQA requirements. (*Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1223.)

* * * * *

Thank you for the opportunity to comment, and we look forward to working with Riverside County to ensure that the Thermal Ranch project benefits nearby residents and is supported by legally-adequate environmental review.

Sincerely,

Ivanna Uriarte
Housing and Land Use Policy Advocate
Leadership Counsel for Justice and Accountability

Jovana Morales Tilgren
Housing and Land Use Policy Manager
Leadership Counsel for Justice and Accountability

Seth Alston
Staff Attorney
Leadership Counsel for Justice and Accountability

[8] The DEIR lacks any details regarding the capacity of the IID substation, reserved capacity available after project demands are met, or how the infrastructure will be funded. Without these details, it is inadequate as an informational document and cannot support a finding that the Project's benefits will outweigh its impacts. Only the Responses, provided just 6 days before the Project's Board of Supervisors Hearing and not circulated publicly, state that the substation is in the engineering and design phase, that it will be fully funded by the developer, and offer approximate capacity figures. (Responses, B-7). However, this response still fails to establish enforceable commitments, or to provide clear information to the public sufficient to meet the informational purpose of an EIR under CEQA.

Brady, Russell

From: Vaughn, James <James.Vaughn@procopio.com>
Sent: Monday, December 15, 2025 4:57 PM
To: Brady, Russell
Cc: JEREMY SMITH; John Criste; DePalatis, Paul; Brizuela, Christopher; Abbot, Matthew L.
Subject: RE: LCJA Comments on Thermal Ranch SP Project

Hi Russell,

We have completed our review of the latest Leadership Counsel submission. Terra Nova does not plan to submit formal written responses due to the short amount of time available, but we can address any questions the Board may have tomorrow.

In the meantime, here is a synopsis of the issues raised and our response:

1. The letter lists area resident concerns, but all of these concerns relate to existing conditions in the Thermal area, not any environmental effects that would be caused by the project. These include (i) safe housing, (ii) safe drinking water and wastewater, (iii) opportunities for students, (iv) safe transportation, and (v) accessible green space. While the Thermal Ranch project will not solve these existing conditions, it will make those conditions meaningfully better by providing safe housing, funding and constructing water and wastewater infrastructure and paying substantial fees to CVWD, creating internships and other opportunities for local students, and providing an equestrian area that members of the public can visit and experience free of charge,

2. Mitigation of Operational Dust: The letter asserts that Mitigation Measure AQ-4 is unenforceable an improperly defers mitigation. This is incorrect. Mitigation Measure AQ-4 requires the Thermal Ranch developer/operator to prepare and implement an operational Fugitive Dust Control Plan for the equestrian center consistent with the established performance standards set forth in SCAQMD Rule 403, and it identifies the application of dust suppressants to disturbed or unpaved surfaces as one feasible means of meeting the required SCAQMD performance standards. It is also worth noting that the EIR concludes that even without such mitigation, operational dust impacts from the project will be less than significant.

3. Manure Management: The letter raises the same manure management issues previously raised in earlier comments and responded to in writing. The letter incorrectly asserts that the manure generated by the horse show will threaten surface or ground water because the short-term manure storage area will be located in a stormwater retention basin. To the contrary, Mitigation Measure HYD-7 and HYD-8 require that the manure storage areas be located a prescribed distance away from all sources of surface and ground water, and be constructed in a manner to prevent any risk of contamination to surface or ground water. They will not be located in any stormwater retention areas. This is further explained in the Supplemental Response to Comments and the Horse Show Operations Plan. Moreover, these measures are consistent with the recommendations provided in the Equestrian-Related Water Quality Best Management Practices submitted with the Leadership Counsel letter.

4. Light & Glare: The letter raises the same light & glare concerns raised in comment letters on the Draft EIR, which were fully responded to the Final EIR. While the horse show will have some lighted competition areas, this lighting is required to comply with the established requirements of Riverside County Lighting Ordinance 655 and 915, which are specified in Mitigation Measure AES-3. As concluded in the Final EIR, this mitigation measure will ensure that all project light & glare impacts are less than significant.

5. Statement of Overriding Considerations: The letter asserts that the Statement of Overriding Considerations cannot properly be adopted due to the impacts described above and because the County did not adopt further mitigation measures requiring Agricultural conservation easements, GHG mitigation bank funding, and additional EV chargers. All of these arguments are addressed in the Final EIR and the Supplemental Responses. Moreover, the comment letter supplies no evidence of the existence of a feasible and enforceable GHG mitigation bank that would effectively reduce the remaining unmitigated GHG emissions that would result from the Project. CEQA does not require the adoption of proposed mitigation measures that will not avoid or substantially lessen significant impacts, and the Statement of Overriding Considerations is not inadequate for not considering such mitigation measures.

   Finally, regarding the legal adequacy of the Statement of Overriding Considerations, CEQA requires that the lead agency must set forth the reasons for adopting a Statement of Overriding Considerations based on the final EIR or other information in the record. (Pub Res C §21081(b); 14 Cal Code Regs §15093(a)). A statement of overriding considerations expresses the "larger, more general reasons for approving the project." (*Concerned Citizens of S. Cent. L.A. v. Los Angeles Unified Sch. Dist.* (1994) 24 Cal.App.4th 826, 847). Reviewing courts defer to the policy judgments reflected in a statement of overriding considerations, recognizing that determining a project's benefits and the weight to be given them, when balanced against the project's environmental impacts, is highly discretionary. A statement of overriding considerations represents an agency's policy judgment and is legally inadequate only if it does not accurately reflect the significant impacts disclosed by the EIR or if it mischaracterizes the relative benefits of the project. (*Woodward Park Homeowners Ass'n v. City of Fresno* (2007) 150 CA4th 683, 717). Here, the Statement of Overriding Considerations both accurately reflects the significant impacts disclosed by the EIR and accurately characterizes the relative benefits of the Project.

I would be glad to speak to these issues at the hearing if necessary and if time permits, but I request that this information be included somewhere in the Administrative Record for the Project so it can be relied upon by the Board of Supervisors.

Please let me know if you have any questions.

Thanks,

--Jim

JAMES VAUGHN
PARTNER
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RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Memorandum

DATE: **December 16, 2025**

TO: **Board of Supervisors**

FROM: **Russell Brady, Project Planner**

RE: **Item 23.1 – SAFER Public Comments and Responses**

Attached are additional public comments received from Supporters Alliance for Environmental Responsibility (SAFER). There are additional reference materials that were provided with the letter that are not included with the memo, but will still be part of the record on the project.

Also attached are formal responses to the SAFER comments. Similarly, the responses include additional reference materials, but not included in the memo but still part of the record on the project.

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December 10, 2025

Via Email

V. Manuel Perez, Chair
Karen Spiegel, Vice-Chair
Jose Medina
Chuck Washington
Yxstian Gutierrez
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Russell Brady, Senior Planner
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Re: SAFER Comment
Thermal Ranch Specific Plan
Environmental Impact Report - SCH No. 2023050624
Board of Supervisors Hearing Date: Dec. 16, 2025

To Chair Perez, Vice-Chair Spiegel, and Honorable Supervisors:

This comment is submitted on behalf of Supporters Alliance For Environmental Responsibility ("SAFER") and its members living or working in and around the County of Riverside ("County") regarding the Thermal Ranch Specific Plan Project ("Project") to be heard at the Board of Supervisors' December 16, 2025 meeting.

SAFER is concerned that Project's Environmental Impact Report ("EIR") is inadequate under the California Environmental Quality Act ("CEQA") due to: (1) failing to require all feasible mitigation measures for the Project's significant and unavoidable impacts to operational air quality; (2) failing to demonstrate that additional mitigation for the Project's significant and unavoidable impacts to agricultural resources is infeasible; (3) failing to adequately analyze, disclose, and mitigate the Project's air quality impacts; and (4) failing to adequately analyze, disclose, and mitigate the Project's impacts to biological resources. SAFER also joins in the comments submitted on behalf of CARE California and the Leadership Council for Justice & Accountability.

Due to the EIR's shortcomings, SAFER respectfully requests that the Board refrain from approving the Project and EIR at this time and, instead, direct planning staff

to revise the EIR prior to taking any further action on this Project.

PROJECT DESCRIPTION

The Project proposes: a 231-acre equestrian center and related show facilities, including barns, stabling, and related equestrian services; 1,362 dwelling units ranging in densities from 0.67 to 27.3 units per acre and up to 320 RV spaces; 275,000 square feet of retail and other commercial space, including 75,000 square feet of equestrian event-related retail space; 10,000 square feet of office space in Planning Area 1 150,000 square feet of retail space in Planning Area 6; and a 54.4-acre mixed use resort with a 150 key resort hotel, beach club, pool and other recreational amenities. The Project also requires an off-site 5-million-gallon domestic water reservoir to meet Project demand and fire flows. The new reservoir will be at the existing, improved CVWD Middleton reservoir site located approximately 2.4 miles southwest of the Project site.

The 622-acre Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County. The entire Project site is currently in agricultural use inclusive of several ag-related haybarns, packing sheds, and other structures, which are planned for removal.

LEGAL STANDARD

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an EIR (except in certain limited circumstances). (See, e.g., Pub. Resources Code, § 21100.) The EIR is the very heart of CEQA. (*Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.) "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Communities for a Better Environment v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 109 (*CBE v. CRA*).)

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. (14 CCR § 15002(a)(1).) "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.) The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1354 (*Berkeley Jets*); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.)

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures. (14 CCR § 15002(a)(2) and (3); see also *Berkeley Jets*, 91 Cal.App.4th at 1354; *Citizens of Goleta Valley,* 52 Cal.3d at 564.) The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." (14 CCR § 15002(a)(2).) If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." (Pub. Res. Code, § 21081; 14 CCR § 15092(b)(2)(A) and (B).)

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" (*Berkeley Jets*, 91 Cal.App.4th at 1355 [quoting, *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 391, 409, n. 12.) "A prejudicial abuse of discretion occurs 'if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.'" (*Berkeley Jets*, *supra*, 91 Cal.App.4th at 1355.)

An EIR must "include[] sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises." (*Sierra Club v. Cty. of Fresno* (2018) 6 Cal.5th 502, 510.) "Whether or not the alleged inadequacy is the complete omission of a required discussion or a patently inadequate one-paragraph discussion devoid of analysis, the reviewing court must decide whether the EIR serves its purpose as an informational document." (*Id.* at 516.) "The determination whether a discussion is sufficient is not solely a matter of discerning whether there is substantial evidence to support the agency's factual conclusions." (*Id.*) As the Court emphasized:

> [W]hether a description of an environmental impact is insufficient because it lacks analysis or omits the magnitude of the impact is not a substantial evidence question. A conclusory discussion of an environmental impact that an EIR deems significant can be determined by a court to be inadequate as an informational document without reference to substantial evidence.

(*Id.* at 514.)

In general, mitigation measures must be designed to minimize, reduce or avoid an identified environmental impact or to rectify or compensate for that impact. (14 CCR

§ 15370.) Where several mitigation measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. (14 CCR § 15126.4(a)(1)(B).) A lead agency may not make the required CEQA findings unless the administrative record clearly shows that all uncertainties regarding the mitigation of significant environmental impacts have been resolved.

DISCUSSION

I. The EIR Fails to Adopt All Feasible Mitigation Measures for the Project's Significant and Unavoidable Impacts to Operational Air Quality.

CEQA prohibits a lead agency from approving a project with significant environmental effects if there are feasible mitigation measures or alternatives that can substantially lessen or avoid those effects. (Pub. Res. Code § 21002; *Mountain Lion Found. v. Fish & Game Comm'n* (1997) 16 Cal.4th 105, 134; *Laurel Heights*, 47 Cal.3d at 403 ["The chief goal of CEQA is mitigation or avoidance of environmental harm"].) CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (PRC §21061.1; 14 CCR § 15364.) "The core of an EIR is the mitigation and alternatives sections." (*Citizens of Goleta Valley*, 52 Cal.3d at 564.) When an EIR concludes that a project will have significant impacts, the lead agency has two duties: to meaningfully consider feasible mitigation measures and alternatives, and to identify mitigation measures and alternatives rejected as infeasible. (See *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1353.)

The lead agency may not approve a project with significant impacts unless it makes one or more of three findings:

(1) that changes or alternations have been required in, or incorporated into, the project that mitigate or avoid the significant effects on the environment;

(2) that the agency making the findings lacks jurisdiction to make the change, but that another agency does have such authority, and either has made or can and should make, the change; and/or

(3) that specific economic, legal, social, technological, or other considerations ... make infeasible the mitigation measures or project alternatives identified in the EIR.

(Pub. Res. Code §21081(a); 14 CCR §15091(a.).)

When a comment suggests "better ways to avoid or mitigate the significant environmental impacts" (14 CCR §§15088(c), 15204(a)), the lead agency must respond

to the comment by either explaining why further consideration of the alternative or mitigation was rejected or by providing an evaluation of the alternative. (*Marin Mun. Water Dist. v. KG Land Cal. Corp*. (1991) 235 Cal.App.3d 1652, 1666; *Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 992 (*CNPS*).) "'[A]n adequate EIR must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible.' [citation omitted] 'While the response need not be exhaustive, it should evince good faith and a reasoned analysis.'" (*CNPS*, 177 Cal.App.4th at 992 [citing *L.A. Unified School Dist. v. City of L.A.* (1997) 58 Cal.App.4th 1019, 1029; see also, *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 442, fn. 8.)

The EIR concludes that the Project will result in significant and unavoidable operational air quality impacts due to emissions of carbon monoxide (CO), nitrogen oxides (NOx), and reactive organic gases (ROG). (DEIR, p. 4-2.) The EIR explains that "[a]pproximately 80% of CO emissions, 83% of NOx emissions, and 45% of ROG emissions associated with Project operations are from mobile sources, resulting in part from the large quantity of daily vehicle trips that the Project is projected to produce during the peak October to April equestrian competition. (DEIR, p. 4-3.) The EIR then claims that these mobile emissions have been mitigated to the extent feasible through measures aimed at reducing vehicle miles traveled (VMT). (*Id.*)

However, the EIR fails to demonstrate that additional electric vehicle (EV) parking, beyond the bare minimum required by code, is infeasible for this Project. The EIR points to the Riverside County Climate Action Plan Update, which requires the installation of EV charging stations in all garages of new units of residential development, and the state's Title 24, which requires a certain percentage of overall parking spaces to be EV spaces, as evidence that the County has imposed all feasible EV mitigation measures. (DEIR, p. 2.5-17.) The EIR also references Mitigation Measure AQ-3 as reducing mobile source emissions. (*Id.*) However, Measure AQ-3 only requires the applicant to comply with state "energy use guidelines," which have nothing to do with EV spaces. The EIR mischaracterizes the issue. The question is not whether *any* measures have been applied to reduce VMTs. Rather, the question is whether there are additional, feasible mitigation measures to reduce VMTs could be applied to the Project prior to concluding that the operational air quality impacts are significant and unavoidable.

Because the Project's operational air quality impacts remain significant and unavoidable even with incorporation of regulations and MM AQ-3, the County must require all feasible mitigation measures to reduce the impacts to the extent feasible prior to proceeding with the Project. (Pub. Res. Code §21081(a); 14 CCR §15091(a.).) There is ample opportunity for the County to expand requirements for EV spaces beyond the bare minimum required by Title 24. Regulations such as Title 24 represent the *floor* of what the Project must do, not the ceiling. For example, beyond the bare minimum of EV

spaces currently required for the Project, Title 24 includes Tier 1 and Tier 2 voluntary measures that demonstrate the potential feasibility of requiring more EV spaces. (CalGreen §§ A5.106.5.3.1, A5.106.5.3.2.) Under these voluntary standards, the Project would provide 30-45% of the total spaces as EV capable spaces, of which 33% would also have chargers. The fact that Title 24 includes these voluntary standards—which go beyond the bare minimum—demonstrates that the standards are potentially feasible for this Project. The County cannot certify this EIR until the maximum feasible amount of EV spaces are required.

II. The EIR Lacks Substantial Evidence to Conclude that Agricultural Conservation Easements as Mitigation for Significant and Unavoidable Impacts to Agricultural Resources Are Infeasible.

The EIR concludes that that Project's conversion of 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance to non-agricultural uses will result in a significant and unavoidable impact to agricultural resources. (DEIR, p. 4-1 to -2.) The California Department of Conservation submitted a comment, dated June 23, 2023, recommending that the County consider agricultural conservation easements as mitigation to substantially lessen the Project's impacts. (DEIR, p. 2.4-22.) As noted in the EIR, the Court of Appeal has held that agricultural conservation easements can be effective at *partially* reducing significant and unavoidable impacts, even if the impacts are not reduced to less-than-significant levels. (*Id.* [citing *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412, 437.)

Rather than requiring agricultural conservation easements as recommended by the Department of Conservation, the EIR claims that "requiring purchase of a conservation easement on other lands would also add a significant cost to the Project, which could potentially render it financially infeasible." (DEIR, p. 4-2.) The EIR's claim of infeasibility, without more, is deficient. Although mitigation measures may be found infeasible on economic grounds.(Pub. Res. Code § 21081(a)(3); 14 CCR § 15091(a)(3)), findings of economic infeasibility must be supported by relevant economic evidence. (See, e.g., *County of San Diego v. Grossmont Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 108 [community college's proportional share of cost of off-campus traffic mitigation measures could not be found economically infeasible in absence of cost estimates]; *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322, 326-27 [infeasibility finding based on economic factors cannot be made without estimate of income or expenditures to support conclusion that proposed mitigation would make project unprofitable].)

The EIR conclusory statement that conservation easements could potentially render the Project infeasible does not meet CEQA's standard for infeasibility. If the County wants to claim that conservation easements are infeasible, the County must provide comparative evidence demonstrating that the easements would make the

Project unprofitable. Notably, the fact that the easements might make the Project *less* profitable is not a reason to reject the mitigation measure—the County must show that the Project would be rendered unprofitable. (See *Burger*, *supra*, (1975) 45 Cal.App.3d at 327.)

III. The EIR's fails to provide substantial evidence that the Project's air quality impacts will be less than significant.

Air quality expert Patrick Sutton of Baseline Environmental Consulting ("Baseline") reviewed the EIR's air quality analysis. Baseline's comment letter and Mr. Sutton's CV are attached as Exhibit A.

In order to evaluate the Project's air quality impacts, the EIR relies on emission estimates for construction and operation of the Project calculated using the California Emissions Estimator Model Version 2022.1 ("CalEEMod"). This model relies on recommended default values based on site specific information related to a number of factors. "The default construction parameters can be modified based on site-specific information, but the user is required to justify all changes from the default model settings based on substantial evidence." (Ex. A, p. 1.)

Baseline reviewed the Project's CalEEMod files and found that the EIR made improper adjustments to the Project's construction length, which resulted in the EIR incorrectly concluding that air quality impacts would be less than significant. (Ex. A, pp. 1-3.) According to the EIR, the Project would be constructed in two phases with Planning Areas 1 and 4 completed in 2026 and Planning Areas 2, 3, 5, and 6 complete in 2032. For its air quality analysis, the EIR assumed that all Planning Areas would be constructed simultaneously over a 7-year period. (*Id.*, p. 2.)

If each Planning Area were constructed sequentially with no overlap, "the total default construction schedule would be 12,190 works days (~47 years)." (Ex. A, p. 2.) The EIR's CalEEMod reduced that default construction schedule by 84% to fit the proposed 7-year construction schedule. However, the EIR's CalEEMod did not account for the fact that in order to complete construction on the 7-year timeline, the CalEEMod's default intensity of daily construction equipment activity (i.e. the CalEEMod does not account for the construction intensity needed to complete construction in 1/6th of the time). (*Id.*) As explained by Baseline:

> To complete all construction within 7-years, the project would need to increase the amount of construction equipment used by at least a factor of six. This would then generate average daily criteria air pollutant emissions that are at least six times higher than the emissions reported in the DEIR, ***which would exceed the applicable thresholds of significance***.

(Ex. A, p. 3.) As a result of this error, the EIR fails to adequately analyze, disclose, and mitigate the Project's significant air quality impacts. The EIR must be revised to disclose this impact and mitigate it to the extent feasible.

Baseline also found that the EIR improperly assumed that there would be no overlap between construction and operation of the Project (i.e. the EIR assumed that construction of all Planning Areas would be complete in 2032 and that operational emissions would only occur in 2032 and later). (Ex. A, p. 3.) However, it is more reasonable to assume that each Planning Area will become operational upon completion of its construction. As a result, "there would be overlapping years of construction and operation that would result in a combination of criteria air pollutant emissions that could be significantly higher than the emissions estimated in the DEIR." (Ex. A, pp. 3-4.) The EIR should be revised to accurately disclose the impacts of overlapping construction and operation and to mitigate that impact to the extent feasible.

IV. The EIR inadequately evaluates the health risk impacts from emissions of diesel particulate matter.

Care California submitted a comment on the Draft EIR in which their air quality experts faulted the EIR for failing to conduct a quantified health risk assessment ("HRA") to evaluate the health risk impacts from Project-generated emissions of diesel particulate matter ("DPM"), a known human carcinogen, during construction of the Project. In response, the FEIR claimed that an HRA is not necessary because the Project's emissions of PM2.5 do not exceed SCAQMD's Localized Significance Thresholds ("LSTs"). (FEIR, p. 41.) However, the FEIR's response is inadequate because "SCAQMD's LSTs only apply to criteria air pollutants and were not designed to evaluate localized health risks from exposure to DPM, because the toxicities of DPM and ambient PM2.5 are not equal." (Ex. A, p. 6.)

As Baseline explains,

> . . . [T]he LSTs "represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard." In California, only about 8% of the average ambient PM2.5 concentration in outdoor air is comprised of DPM. While the federal and state ambient air quality standards established for PM2.5 were designed to be protective of human health for ambient conditions, these standards are not representative of particulate matter emissions from construction that contain significantly higher concentrations of DPM than typical ambient concentrations due to the exhaust from diesel-powered construction equipment.

(Ex. A, p. 6.)

Because SCAQMD's LSTs are not representative of the impacts that will occur from construction-generated DPM, "there is no substantial evidence provided in the FEIR to support the use of the SCAQMD's LST for PM2.5 to evaluate potential health risks to sensitive receptors exposed to DPM from the exhaust of diesel-powered construction equipment." (Ex. A, p. 6.) In order to accurately evaluate the Project's impacts, the EIR must be revised to include a quantified HRA "to estimate the incremental increase in cancer risk for nearby sensitive receptors exposed to DPM emissions during project construction in accordance with the OEHHA guidance." (*Id.*, p. 7.) "The health risk assessment should also evaluate health risks to on-site residences that are located in completed Planning Areas while construction of adjacent Planning Areas is ongoing." (*Id.*)

Matt Hagemann, P.G., C.Hg., and Paul E. Rosenfeld, Ph.D., of the Soil/Water/Air Protection Enterprise ("SWAPE") reviewed the air quality analysis in the EIR. SWAPE's comment letter and CVs are attached as Exhibit B. SWAPE found that the EIR failed to adequately evaluate the human health impacts resulting from the Project's emissions of diesel particulate matter.

The EIR fails to provide any quantified analysis of the impacts to human health from Project-related emissions of diesel particulate matter ("DPM"). As noted by SWAPE, CEQA requires that that the EIR "correlate the increase in emissions that future projects would generate to the adverse impacts on human health caused by those emissions." (Ex. B, pp. 4-5.) Such an analysis is not possible without a quantified HRA.

SWAPE prepared a screening-level HRA to evaluate potential impacts to human health from DPM during construction of the Project using AERSCREEN, the leading screening-level air quality dispersion model. (Ex. B, pp. 5-9.) According to the EIR, construction of the Project will generate approximately 361 pounds of DPM over the 919-day construction period. (Id. at p. 5.) SWAPE conducted their HRA to calculate the increased cancer risk resulting from those DPM emissions to the Maximally Exposed Individual Receptor located approximately 150 meters downwind of the Project site. (Id. at p. 6.) The HRA utilized age sensitivity factors in order to "account for the increased sensitivity to carcinogens during early-in-life exposure and to assess the risk for susceptible subpopulations such as children." (Id.)

SWAPE's HRA found that increased cancer risk to 3rd trimester pregnancies, infants and children during construction and operation of the Project would be 26.8 in one million, 648 in one millions, and 13.7 in one million, respectively. (Ex. B, p. 8.) Each of the above increased cancer risks exceed the CEQA significance threshold of 10 in one million established by the South Diego Air Pollution Control District ("SDAPCD"). By

failing to conduct an HRA, the EIR fails to provide substantial evidence that the Project's health impacts from DPM emissions would be less than significant. The EIR must be amended and recirculated in order to disclose this impact and mitigate it to the extent feasible. SWAPE has provided feasible mitigation measures for this impact that should be incorporated into a revised EIR. (Id. at pp. 9-10.)

V. The EIR Fails to Adequately Disclose and Mitigate the Project's Significant Impacts to Biological Resources.

Expert wildlife ecologist Dr. Shawn Smallwood, Ph.D., reviewed the EIR's analysis of impacts to biological resources. Dr. Smallwood's comment and CV are attached as **Exhibit B**.

Dr. Smallwood found several deficiencies in the EIR's analysis of the Project's impacts on wildlife, including: (1) the EIR underestimates the diversity of species at the Project site; (2) the EIR fails to adequately analyze and mitigate the Project's impacts to habitat loss and fragmentation, wildlife movement, traffic collisions with wildlife, domestic cat predation, and cumulative impacts; and (3) the EIR's mitigation measures are inadequate to reduce the Project's impacts to biological resources to less-than-significant levels.

A. The SEIR lacks substantial evidence of the Project's impacts to biological resources due to an underestimation of the diversity of species at the Project site.

Dr. Smallwood and his associate conducted two daytime wildlife surveys on October 16 and 17, 2025 and one nocturnal wildlife survey on October 16, 2025. For the daytime surveys, they walked the perimeter of the Project site using binoculars to scan for wildlife. For the nighttime survey, they walked the southern perimeter of the Project site with a bat detector. (Ex. B, p. 2.) These surveys detected "63 species of vertebrate wildlife at or adjacent to the project site, including 13 confirmed and an additional 6 possible species with special status." (*Id.*, p. 5.) The special-status species observed include short-eared owl, American white pelican, American kestrel, and canyon bat. (*Id.*, pp. 16-17.)

Dr. Smallwood calculated that more thorough site visits would reveal an even greater diversity of wildlife. (Ex. B, pp. 17-20.) Given more time to survey the site, Dr. Smallwood's predicts that 159 species of vertebrate wildlife, including 28 special-status species, would be detected on site. (*Id.*, p. 20.) Based on his review of the EIR and the site visits, Dr. Smallwood concluded, "[T]he large number of species I predict at the project site is indicative of a relatively species-rich wildlife community that warrants a serious survey effort." (*Id.*)

The wildlife surveys conducted for the EIR fell well short of accurately documenting the richness of wildlife utilizing the Project site. According to the EIR's surveys, only *five* vertebrate species were observed on-site. Conversely, Dr. Smallwood observed nearly 13x as many species, which lead Dr. Smallwood "to question whether [the EIR] surveyed the same wildlife community that we did."(Ex. B, p. 22.) Due to the number of species observed in the EIR's surveys, Dr. Smallwood concludes that the EIR's "survey findings need to be dismissed as entirely unreliable as a characterization of the existing wildlife community."(*Id.*)

Furthermore, the EIR's review of available wildlife databases to identify which species are known to have occurred at or near the Project site was inadequate. (Ex. B, pp. 22-31.) The EIR relied on the California Natural Diversity Data Base ("CNDDB") to determine which species have potential to occur in the Project area. (*Id.*, p. 23.) However, as Dr. Smallwood explains:

> By querying the CNDDB to establish the pool of special-status species for analysis of occurrence likelihoods, [the EIR] screened out many special-status species from further consideration in the characterization of the wildlife community as part of the existing environmental setting. The CNDDB is not designed to support absence determinations or to screen out species from characterization of a site's wildlife community.
> . . .
> Furthermore, the CNDDB is interested only in the findings of special-status species, which means that species more recently assigned special status will have been reported many fewer times to the CNDDB than were species assigned special status since the inception of the CNDDB. Therefore, occurrence records in the CNDDB are most abundant for species assigned special status decades ago, but fewest for species only recently assigned special status. And because negative findings are not reported to the CNDDB, the CNDDB is also inappropriate as a basis for weighting occurrence likelihoods such as absent, not expected, unlikely, low, moderate or high. Whereas the CNDDB can be confirmatory of species presence, it cannot support absence determinations or assignments of low likelihood of occurrence.

(*Id.*)

Based on available databases (including CNDDB, iNaturalist, and eBird) and site visits, Dr. Smallwood found that "144 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential." (Ex. B, p. 23.) The EIR Biological Report only analyzed the occurrence potential for 32 special-status species, which amounts to only 22% of the special-status species identified by Dr. Smallwood. (*Id.*, p. 24.) Therefore, the EIR screened out 112 of the special-status

species known to occur at or near the Project site from further review. (*Id.*) For the 32 special-status species that were analyzed, the EIR claims that all of them were either absent from the site or have a low likelihood of occurring. Those conclusions are not accurate because, of those 32 species, "five have been documented as certainly or probably on the project site, and four have been documented within 1.5 miles of the site, and another two have been documented between 1.5 and 4 miles of the site." (Ex. B, p. 24.) special-status species, "34 have been documented on the project site, 25 have been within 1.5 miles, and 44 have been documented between 1.5 and 4 miles of the site." (*Id.*) Further analysis is needed in the EIR to address possible impacts to those species before determining that the Project will not result in significant impacts.

Every EIR must start from a "baseline" assumption. The CEQA "baseline" is the set of environmental conditions against which to compare a project's anticipated impacts. *Communities for a Better Envt. v. So. Coast Air Qual. Mgmt. Dist.* (2010) 48 Cal. 4th 310, 321; see 14 CCR § 15125(a). Due to the inadequate analysis on the Biological Report, the EIR underestimates the biological baseline at the Project site and, as a result, cannot provide substantial evidence about the severity of the Project's impacts on biological resources. As a result, the EIR must be revised to properly disclose the biological baseline and the impacts of this Project.

B. The EIR fails to analyze, disclose, and mitigate the Project's impacts on wildlife due to habitat loss and fragmentation, wildlife movement, bird-window collisions, house cat predation, traffic-wildlife collisions, and cumulative impacts.

Dr. Smallwood found that the EIR failed to adequately discuss numerous significant impacts that the Project will have on biological resources due to habitat loss and fragmentation, wildlife movement, bird-window collisions, house cat predation, traffic-wildlife collisions, and cumulative impacts. (Ex. B, pp. 33-44.) By failing to disclose and mitigate these impacts, the EIR is inadequate and must be revised.

1. <u>Habitat loss and fragmentation</u>

The EIR failed to account for the reduction in productive capacity for wildlife that will result from habitat loss. As Dr. Smallwood explains, "The site is habitat to at least 63 species of vertebrate wildlife which we observed on or adjacent to the site." (Ex. B, p. 33.) Dr. Smallwood calculates that the Project site contains approximately 188 nest sites for birds. (*Id.*, p. 34.)

As a result of habitat loss and fragmentation from the Project, Dr. Smallwood predicts that the loss of 188 nest sites would corresponds to an overall loss of 757 fledglings per year and an overall loss of 851 birds per year, most of which are protected by the federal Migratory Bird Treaty Act and California's Migratory Bird

Protection Act . (Ex. A, p. 34.) Dr. Smallwood concludes that "[t]he loss of 851 birds would easily qualify as an unmitigated significant impact." (*Id.*) The EIR must be revised to analyze, disclose, and mitigate this impact to the extent possible.

2. Wildlife Movement

Dr. Smallwood found that the EIR failed to adequately assess the Project's impacts on wildlife movement. (Ex. B, pp. 34-35.) The EIR's conclusion that wildlife movement impacts would be less than significant stands in sharp contrast to what Dr. Smallwood observed on site. As Dr. Smallwood explains,

> The project site is obviously important to wildlife movement in the region, because Noriko and I observed many large mixed flocks of red-winged blackbirds and yellow-headed blackbirds fly across the southern aspect of the project site, mostly heading east or west (Photo 21). We also observed large flocks of brown-headed cowbirds, American pipits and California horned larks flying across the project site, as well as smaller flocks of American white pelicans, great-tailed grackles, common ravens, snowy egrets (headed north), house finches, western meadowlarks, and turkey vultures. We also observed birds flying across singly, including Caspian tern, great blue heron, and short-eared owl, and there were birds foraging on the site, including American kestrel and Say's phoebe. All the bat species we detected had passed over part of the project site, because we would not have detected them unless they were calling within 30 feet of our detectors.
>
> The evidence is overwhelming that the project site is situated on the daily flight paths of thousands of birds. It is also adjacent to two large areas of natural vegetation cover, it includes a long reach of freshwater marsh that is loaded with common yellowthroats, marsh wrens, American coots, pied-billed grebes and gadwall.

(*Id.*)

Rather than engaging with the actual conditions at the Project site, the EIR relies on speculative statements such as "[the Project site] is not expected to be in use as an established corridor" and "it is unlikely that the proposed development would interfere substantially with the movement of any migratory or native species." (Ex. A, p. 35.) Instead of speculation, the EIR's conclusions "should have been based on a program of observations to establish whether and how wildlife use the project site for movement in the region." (*Id.*) Without such an analysis, the EIR fails to provide substantial evidence that impacts to wildlife movement will be less than significant.

3. Bird-Window Collisions.

The EIR fails to account for the impact to bird species from collisions with the Project's glass windows and facades. The impacts from window collisions are important because such collisions "are often characterized as either the second or third largest source or human-caused bird mortality." (Ex. B, p. 36.) Dr. Smallwood calculated that the Project would result in ***4,677 bird deaths per year*** due to collisions with the Project's windows and glass facades. (*Id.*, p. 38.) The EIR must be revised to disclose, discuss, or mitigate this impact to the extent feasible.

4. House Cat Predation

The EIR fails to account for the impact to wildlife from the introduction of domestic cats to the area. As Dr. Smallwood explains:

> In 2012 there were 0.44 house cats per human in the USA, and 122 vertebrate animals were killed per cat, free-ranging members of which killed disproportionately larger numbers of vertebrate wildlife. The SEIR reports there would be 1,574 residential units in the project, and it predicts there would be 4,958 new residents. ***The above rates of cat ownership applied to this number of new residents would predict 1,618 new cats, which based on the findings of Loss et al. (2013) would kill 197,396 vertebrate wildlife per year***.

(Ex. B, p. 39.)

Furthermore, cats introduce *Toxoplasma gondii*, which is "a parasite that can infect virtually all warm-blooded animals." (Ex. B, p. 39.) *Toxoplasma gondii* can cause toxoplasmosis, which in severe cases can damage the brain, eyes, or other organs. (Center For Disease Control, About Toxoplasmosis, https://www.cdc.gov/toxoplasmosis/about/index.html.) Additionally, "[i]nfants infected [by *Toxoplasma gondii*] while still in the womb often have no symptoms at birth but can develop symptoms later in life." (*Id.*)

Dr. Smallwood concludes that "[i]mpacts to wildlife from the introduction of house cats into the environment would be highly significant, and yet these impacts are not considered in the DEIR. (Ex. B, p. 40.) The EIR must be revised to disclose and analyze this impact. The revised EIR should also consider whether mitigating this impact is feasible through requirements on future residents constraining house cat ownership by, for example, requiring cats to remain indoors. (*Id.*)

5. Traffic-Wildlife Collisions

The EIR fails to address the impacts to wildlife from collisions with traffic generated by the Project. This omission is important because, as Dr. Smallwood explains,

> Vehicle collisions have accounted for the deaths of many thousands of amphibian, reptile, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level (Forman et al. 2003). Across North America traffic impacts have taken devastating tolls on wildlife (Forman et al. 2003). In Canada, 3,562 birds were estimated killed per 100 km of road per year (Bishop and Brogan 2013), and the US estimate of avian mortality on roads is 2,200 to 8,405 deaths per 100 km per year, or 89 million to 340 million total per year (Loss et al. 2014). Local impacts can be more intense than nationally.

(Ex. B, p. 40.) According to the EIR, the Project would result in 63,260,124 annual vehicle miles traveled ("VMT"). (*Id.*, p. 42.) Based on the Project's annual VMT, Dr. Smallwood estimates that traffic from the Project will kill at least 26, 908 vertebrates annually. (*Id.*) Especially due to the special-status species occurring and likely to occur at or near the Project, these collisions represent a significant impact to wildlife that must addressed, discussed, and mitigated in a revised EIR.

6. Cumulative Impacts

The EIR's analysis of cumulative impacts to biological resources is fundamentally flawed for not meeting the requirements of CEQA. As required by the CEQA Guidelines,

> The following elements are necessary to an adequate discussion of significant cumulative impacts: (1) Either:
> (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
> (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

(14 CCR § 15130(b).

The EIR is fundamentally deficient in its cumulative impact analysis (not only for biological resources but for *all* impacts analyzed in the EIR) because the EIR contains neither a list of past, present, and probable future projects nor a summary of projections contained in an adopted local, regional or statewide plan, or related planning document. In other words, this EIR plainly violates CEQA Guideline 15130(b) and, as a result, the cumulative impact analysis for every impact in the EIR must be revised to comply. The failure to utilize one of the two methods required by Guideline 15130(b) is fatal to this EIR.

For cumulative biological impacts specifically, the EIR relies primarily on its faulty wildlife surveys (see, *supra*, Section V.A) to conclude that the Project site has "low conservation value." (Ex. B, p. 42.) However, because the surveys that informed that conclusion are faulty, the conclusion cannot be relied upon. The EIR then claims that mitigation payments to the CVMSHCP would mitigate any cumulative impacts of the Project. However, as Dr. Smallwood notes, the CVMSHCP does *not* cover all of the special-status species observed on the Project site or likely to occur at the Project site. (*Id.*, p. 43.) As a result, mitigation payments to the CVMSHCP will have no benefit for these special-status species and cannot be relied upon to conclude that cumulative impacts will be less than significant. For those reasons, the EIR must be revised to comply with CEQA Guideline 15130(b) and to accurately analyze, disclose, ad mitigate the Project's cumulative impacts.

C. The EIR's mitigation measures for biological resources are inadequate.

Dr. Smallwood critiqued the EIR's proposed mitigation measures as being inadequate to reduce the Project's impacts to biological resources to less than significant levels. (Ex. B, pp. 44-45.) For example, the pre-construction surveys required by mitigation measure BIO-1 lack any objective standards and, as a result, "allows a single individual to make a subjective decision, outside the public's view, to determine the buffer area or when to relax the buffers for any given species." (*Id.*)

Dr. Smallwood provides a list of feasible mitigation measures that should be incorporated into the Project to reduce impacts to biological resources. (Ex. B, pp. 45-47.) These measures include: (1) compensatory mitigation for species not covered by the CVMSHCP; (2) adhering to Bird-Safe Design Guidelines to reduce bird-window collisions; (3) compensatory mitigation for wildlife killed/injured by vehicles and window collisions; and (4) a requirement for native landscaping. (*Id.*) The EIR should be revised to adopt these feasible mitigation measures prior to approval of the Project.

CONCLUSION

For the reasons discussed above as well as the reasons raised by other commenters, including CARE California and the Leadership Council for Justice & Accountability, SAFER respectfully requests that the Board of Supervisors refrain from approving the Project and EIR at this time and, instead, direct planning staff to revise (and recirculate as appropriate) the EIR prior to taking any further action on this Project.

Sincerely,

Brian B. Flynn
Lozeau Drury LLP

EXHIBIT A

2ND SUPPLEMENTAL
RESPONSES TO COMMENTS TO BOARD OF SUPERVISORS

THERMAL RANCH SPECIFIC PLAN ET AL

SP No. 00401; General Plan Amendment No. GPA 2300001; Change of Zone No. 2300003; Tentative Tract Map No. 38578; Plot Plan No.s 230005, 230006 and 240016

RIVERSIDE COUNTY, CALIFORNIA
STATE CLEARINGHOUSE NO. 2023050624

Introduction

This second set of supplemental comments on the Thermal Ranch Specific Plan project were received by the County Planning Department on December 10, 2025. Exhibit A provides responses to general or repeated comments, and to specific comments on the Final EIR (FEIR) for the Thermal Ranch Specific Plan Project. Responses have been prepared in accordance with Section 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA) Guidelines. The following Section I provides verbatim comments received in writing and subsequent responses. (Also see attached Appendix A, which provides the bracketed comment letter).

A. Lozeau Drury for SAFER: Letter Dated December 10, 2025: new letter, their second

SECTION I

RESPONSE TO PLANNING COMMISSION HEARING COMMENTS

Overarching concerns expressed by this commenter on the Thermal Ranch project include application of mitigation measures, impacts to air quality, agricultural resources, and biological resources. Many of these expressions of concern repeat comments made and responded to in the Final EIR and in the first Supplemental Responses to Comments of November 13, 2025, as well as in the comments and supplemental responses provided herein. In addition to again responding to comments, this supplemental response includes Appendix B: Thermal Ranch Specific Plan Air Quality Memorandum dated December 15, 2025, and Appendix C: Biological Resources Technical Memorandum dated December 15, 2025.

SECTION I

RESPONSE TO SPECIFIC PLANNING COMMENTS

The following verbatim comments were received on the Final EIR and 1st Supplemental Responses to Comments to Planning Commission. These comments concern aspects of the Final EIR (Response to Comments on the Draft EIR), including clarification of information, adequacy of analysis, and similar issues. The following responses have been prepared to address issues raised in the Lozeau Drury (SAFER) comment letter of December 10, 2025. The bracketed and complete comment letter and its attachments are included in Appendix A of this 2nd Supplemental Response to Comments.

A. **Lozeau | Drury for SAFER, December 10, 2025**

Comment A-1: **The EIR Fails to Adopt All Feasible Mitigation Measures for the Project's Significant and Unavoidable Impacts to Operational Air Quality.**

CEQA prohibits a lead agency from approving a project with significant environmental effects if there are feasible mitigation measures or alternatives that can substantially lessen or avoid those effects. (Pub. Res. Code § 21002; *Mountain Lion Found. v. Fish & Game Comm'n* (1997) 16 Cal.4th 105, 134; *Laurel Heights*, 47 Cal.3d at 403 ["The chief goal of CEQA is mitigation or avoidance of environmental harm"].)CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (PRC §21061.1; 14 CCR § 15364.) "The core of an EIR is the mitigation and alternatives sections." (*Citizens of Goleta Valley*, 52 Cal.3d at 564.) When an EIR concludes that a project will have significant impacts, the lead agency has two duties: to meaningfully consider feasible mitigation measures and alternatives, and to identify mitigation measures and alternatives rejected as infeasible. (See *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1353.)

The lead agency may not approve a project with significant impacts unless it makes one or more of three findings:

(1) that changes or alternations have been required in, or incorporated into, the project that mitigate or avoid the significant effects on the environment;

(2) that the agency making the findings lacks jurisdiction to make the change, but that another agency does have such authority, and either has made or can and should make, the change; and/or

(3) that specific economic, legal, social, technological, or other considerations … make infeasible the mitigation measures or project alternatives identified in the EIR.

(Pub. Res. Code §21081(a); 14 CCR §15091(a.).)

When a comment suggests "better ways to avoid or mitigate the significant environmental impacts" (14 CCR §§15088(c), 15204(a)), the lead agency must respond to the comment by either explaining why further consideration of the alternative or mitigation was rejected or by providing an evaluation of

the alternative. (*Marin Mun. Water Dist. v. KG Land Cal. Corp.* (1991) 235 Cal.App.3d 1652, 1666; *Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 992 (*CNPS*).) "'[A]n adequate EIR must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible.' [citation omitted] 'While the response need not be exhaustive, it should evince good faith and a reasoned analysis.'" (*CNPS*, 177 Cal.App.4th at 992 [citing *L.A. Unified School Dist. v. City of L.A.* (1997) 58 Cal.App.4th 1019, 1029; see also, *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 442, fn. 8.)

The EIR concludes that the Project will result in significant and unavoidable operational air quality impacts due to emissions of carbon monoxide (CO), nitrogen oxides (NOx), and reactive organic gases (ROG). (DEIR, p. 4-2.) The EIR explains that "[a]pproximately 80% of CO emissions, 83% of NOx emissions, and 45% of ROG emissions associated with Project operations are from mobile sources, resulting in part from the large quantity of daily vehicle trips that the Project is projected to produce during the peak October to April equestrian competition. (DEIR, p. 4-3.) The EIR then claims that these mobile emissions have been mitigated to the extent feasible through measures aimed at reducing vehicle miles traveled (VMT). (*Id.*)

However, the EIR fails to demonstrate that additional electric vehicle (EV) parking, beyond the bare minimum required by code, is infeasible for this Project. The EIR points to the Riverside County Climate Action Plan Update, which requires the installation of EV charging stations in all garages of new units of residential development, and the state's Title 24, which requires a certain percentage of overall parking spaces to be EV spaces, as evidence that the County has imposed all feasible EV mitigation measures. (DEIR, p. 2.5-17.) The EIR also references Mitigation Measure AQ-3 as reducing mobile source emissions. (*Id.*) However, Measure AQ-3 only requires the applicant to comply with state "energy use guidelines," which have nothing to do with EV spaces. The EIR mischaracterizes the issue. The question is not whether *any* measures have been applied to reduce VMTs. Rather, the question is whether there are additional, feasible mitigation measures to reduce VMTs could be applied to the Project prior to concluding that the operational air quality impacts are significant and unavoidable.

Because the Project's operational air quality impacts remain significant and unavoidable even with incorporation of regulations and MM AQ-3, the County must require all feasible mitigation measures to reduce the impacts to the extent feasible prior to proceeding with the Project. (Pub. Res. Code

§21081(a); 14 CCR §15091(a.).) There is ample opportunity for the County to expand requirements for EV spaces beyond the bare minimum required by Title 24. Regulations such as Title 24 represent the *floor* of what the Project must do, not the ceiling. For example, beyond the bare minimum of EV spaces currently required for the Project, Title 24 includes Tier 1 and Tier 2 voluntary measures that demonstrate the potential feasibility of requiring more EV spaces. (CalGreen §§ A5.106.5.3.1, A5.106.5.3.2.) Under these voluntary standards, the Project would provide 30-45% of the total spaces as EV capable spaces, of which 33% would also have chargers. The fact that Title 24 includes these voluntary standards—which go beyond the bare minimum—demonstrates that the standards are potentially feasible for this Project. The County cannot certify this EIR until the maximum feasible amount of EV spaces are required.

Response A-1: This comment is copied verbatim from Lozeau Drury's comment letter dated October 21, 2025, and has already been responded to in the Supplemental Responses to Planning Commission Hearing Comments (see Response D-1). No additional response is warranted.

Comment A-2: **The EIR Lacks Substantial Evidence to Conclude that Agricultural Conservation Easements as Mitigation for Significant and Unavoidable Impacts to Agricultural Resources Are Infeasible.**

The EIR concludes that that Project's conversion of 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance to non-agricultural uses will result in a significant and unavoidable impact to agricultural resources. (DEIR, p. 4-1 to -2.) The California Department of Conservation submitted a comment, dated June 23, 2023, recommending that the County consider agricultural conservation easements as mitigation to substantially lessen the Project's impacts. (DEIR, p. 2.4-22.) As noted in the EIR, the Court of Appeal has held that agricultural conservation easements can be effective at *partially* reducing significant and unavoidable impacts, even if the impacts are not reduced to less-than-significant levels. (*Id.* [citing *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412, 437.)

Rather than requiring agricultural conservation easements as recommended by the Department of Conservation, the EIR claims that "requiring purchase of a conservation easement on other lands would also add a significant cost to the Project, which could potentially render it financially infeasible." (DEIR, p. 4-2.) The EIR's claim of infeasibility, without more, is deficient. Although mitigation measures may be found infeasible on

economic grounds.(Pub. Res. Code § 21081(a)(3); 14 CCR § 15091(a)(3)), findings of economic infeasibility must be supported by relevant economic evidence. (See, e.g., *County of San Diego v. Grossmont Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 108 [community college's proportional share of cost of off-campus traffic mitigation measures could not be found economically infeasible in absence of cost estimates]; *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322, 326-27 [infeasibility finding based on economic factors cannot be made without estimate of income or expenditures to support conclusion that proposed mitigation would make project unprofitable].)

The EIR conclusory statement that conservation easements could potentially render the Project infeasible does not meet CEQA's standard for infeasibility. If the County wants to claim that conservation easements are infeasible, the County must provide comparative evidence demonstrating that the easements would make the Project unprofitable. Notably, the fact that the easements might make the Project *less* profitable is not a reason to reject the mitigation measure—the County must show that the Project would be rendered unprofitable. (See *Burger*, *supra*, (1975) 45 Cal.App.3d at 327.)

Response A-2: Similar comments were made with regard to the Draft EIR and in supplemental comments to the Planning Commission. The reader is again referred to FEIR Responses B-8, C-10, and C-11, and to Supplemental Responses to Planning Commission Hearing Comments C-7, C-8, C-11, C-14, C-15, C-17, and D-2 on November 13, 2025. No additional response is required.

Comment A-3: **The EIR's fails to provide substantial evidence that the Project's air quality impacts will be less than significant.**

Air quality expert Patrick Sutton of Baseline Environmental Consulting ("Baseline") reviewed the EIR's air quality analysis. Baseline's comment letter and Mr. Sutton's CV are attached as Exhibit A.

In order to evaluate the Project's air quality impacts, the EIR relies on emission estimates for construction and operation of the Project calculated using the California Emissions Estimator Model Version 2022.1 ("CalEEMod"). This model relies on recommended default values based on site specific information related to a number of factors. "The default construction parameters can be modified based on site-specific information,

but the user is required to justify all changes from the default model settings based on substantial evidence." (Ex. A, p. 1.)

Baseline reviewed the Project's CalEEMod files and found that the EIR made improper adjustments to the Project's construction length, which resulted in the EIR incorrectly concluding that air quality impacts would be less than significant. (Ex. A, pp. 1-3.) According to the EIR, the Project would be constructed in two phases with Planning Areas 1 and 4 completed in 2026 and Planning Areas 2, 3, 5, and 6 complete in 2032. For its air quality analysis, the EIR assumed that all Planning Areas would be constructed simultaneously over a 7-year period. (*Id.*, p. 2.)

If each Planning Area were constructed sequentially with no overlap, "the total default construction schedule would be 12,190 works days (~47 years)." (Ex. A, p. 2.) The EIR's CalEEMod reduced that default construction schedule by 84% to fit the proposed 7-year construction schedule. However, the EIR's CalEEMod did not account for the fact that in order to complete construction on the 7-year timeline, the CalEEMod's default intensity of daily construction equipment activity (i.e. the CalEEMod does not account for the construction intensity needed to complete construction in 1/6th of the time). (*Id.*) As explained by Baseline:

> To complete all construction within 7-years, the project would need to increase the amount of construction equipment used by at least a factor of six. This would then generate average daily criteria air pollutant emissions that are at least six times higher than the emissions reported in the DEIR, *which would exceed the applicable thresholds of significance*. (Ex. A, p. 3.) As a result of this error, the EIR fails to adequately analyze, disclose, and mitigate the Project's significant air quality impacts. The EIR must be revised to disclose this impact and mitigate it to the extent feasible.

Baseline also found that the EIR improperly assumed that there would be no overlap between construction and operation of the Project (i.e. the EIR assumed that construction of all Planning Areas would be complete in 2032 and that operational emissions would only occur in 2032 and later). (Ex. A, p. 3.) However, it is more reasonable to assume that each Planning Area will become operational upon completion of its construction. As a result, "there would be overlapping years of construction and operation that would result in a combination of criteria air pollutant emissions that could be significantly higher than the emissions estimated in the DEIR." (Ex. A, pp. 3-4.) The EIR should be revised to accurately disclose the impacts of

overlapping construction and operation and to mitigate that impact to the extent feasible.

Response A-3: Construction Period Modeling

The commenter asserts that the EIR fails to adequately analyze, disclose and mitigate the Project's significant air quality impacts because the EIR's air quality analysis assumed that all Planning Areas would be constructed simultaneously over a 7-year period, and the CalEEMod default intensity did not account for the construction intensity needed to complete the construction during that time period. The commenter applies the false assumption that if each Planning Area were constructed sequentially with no overlap, the total default construction schedule would be 47 years according to the commenter's attached review by Baseline Environmental Consulting. (See Comment Letter Exhibit A, p. 2).

Similar comments were raised in the CARE California comment letter dated January 10, 2025, and were responded to in the FEIR (See Responses C-3, C-16 and C-17). The commenter's assertion that the EIR's construction emissions analysis does not account for all Project construction activity is mistaken. The commenter assumes that the entire Project's acreage will require the same intensity of construction activity. The commenter's note in Exhibit A, Table 1 of the comment letter acknowledges this: *"The default workdays are for grading, site preparation, and building construction based on modeled acreage."* The commenter's analysis does not account for the Project's actual building area, landscape area, and special landscape area, which is substantially less than the Project's total acreage. The CalEEMod software provides default durations for construction phases and users are explicitly allowed, and encouraged when appropriate, to adjust or override these default phase lengths in the Construction Phases screen when justified with project-specific data. The reduced disturbed footprint, combined with project-specific buildout information, provides adequate justification for modifying the CalEEMod default construction schedule.

The Draft EIR addresses Project construction emissions in section 3.4 of Appendix B, Air Quality and Greenhouse Gas Report for the Thermal Ranch Specific Plan. Section 3.4 addresses the number of days required to complete each construction phase based on the specific requirements of each phase. For example, the demolition phase includes the demolition of approximately 55,000 square feet of existing agricultural sheds and structures (essentially shade structures), and the grading phase for the new reservoir involves 11,900 cubic yards (CY) of earthwork, including 7,500 CY

of cut, 4,400 CY of import, and 10,800 CY of fill. (DEIR Appendix B, p. 33). Unlike the commenter's analysis, the Project's CalEEMod analysis accounts for the actual building area impacts within the Project's total acreage. For example, Section 1.2 (Land Use Types) in Appendix A of the Draft EIR's Air Quality Report specifies that Unrefrigerated Warehouse uses (i.e., Equestrian Center uses) totaling 182 acres will include a total building area, landscape area, and special landscape area of 3,192,433 square feet, which equates to 73.29 acres. The commenter's CalEEMod analysis specifies Equestrian Center acreage as 223.1 acres. In other words, the Project's CalEEMod inputs are more precise than the commenter's CalEEMod analysis. As described in Response C-17 in the FEIR, the Project's air quality analysis does not benefit, and results do not improve as a consequence of the Project's construction period modeling. As the EIR states, the construction schedule is conservative and likely overstates the concentration of criteria pollutants. (DEIR, p. 2.5-15).

Furthermore, the commenter incorrectly claims that compressing a construction phase would require scaling up the equipment list by a similar factor (at least six times) to maintain the same total work output. However, this isn't how CalEEMod functions or what it mandates. The model's defaults for equipment inventory and usage are based on project size metrics like acreage, not phase length, meaning shortening the duration alone just lowers the total emissions by reducing cumulative operating days, without affecting the daily equipment list.

Exhibit A of the comment letter claims that increasing the construction equipment list by a factor of six would result in average daily criteria air pollutant emissions at least six times higher than those reported in the DEIR, thereby exceeding applicable significance thresholds and necessitating revision of the DEIR to disclose and mitigate these impacts. This assertion relies on unsubstantiated assumptions and lacks supporting evidence. Terra Nova Planning and Research evaluated this claim and prepared a technical response memorandum provided as Appendix B to this Response to Comments. To directly test the assertion, the Terra Nova memorandum includes results from a CalEEMod model run that multiplies the original construction equipment list by a factor of six while incorporating the mitigation measures identified in Response C-10 of the Supplemental Responses to Planning Commission Hearing Comments dated November 13, 2025. As demonstrated in Table 4 of Appendix B, even under this very unrealistic "substantially intensified equipment scenario," mitigated construction emissions would remain below applicable significance thresholds and no further analysis is required.

Construction and Operation Overlap

The commenter asserts that overlapping Phase 1 operations (Planning Areas 1 and 4) with Phase 2 construction (Planning Areas 2, 3, 5, and 6) could result in criteria pollutant emissions significantly higher than those analyzed in the DEIR. The commenter's assertion is based on assumptions that lack supporting evidence or analysis. To test this assertion, attached Appendix B combines emissions from separate modeling runs for Phase 1 operations and Phase 2 construction. As shown in Tables 4 and 5 of attached Appendix B:

1. Neither Phase 1 nor Phase 2 construction emissions exceed applicable construction significance thresholds.
2. The combined Phase 1 operational and Phase 2 construction emissions are lower than the full project buildout operational emissions analyzed in the DEIR. As shown in Table 5 of Appendix B, the overlapping emissions of Phase 1 operation and Phase 2 construction represent only 50–98% of the full buildout operational emissions analyzed in the DEIR

The DEIR therefore conservatively analyzed and disclosed impacts of the buildout scenario with the highest emission potential, and no further analysis is required.

Comment A-4: **The EIR inadequately evaluates the health risk impacts from emissions of diesel particulate matter.**

Care California submitted a comment on the Draft EIR in which their air quality experts faulted the EIR for failing to conduct a quantified health risk assessment ("HRA") to evaluate the health risk impacts from Project-generated emissions of diesel particulate matter ("DPM"), a known human carcinogen, during construction of the Project. In response, the FEIR claimed that an HRA is not necessary because the Project's emissions of PM2.5 do not exceed SCAQMD's Localized Significance Thresholds ("LSTs"). (FEIR, p. 41.) However, the FEIR's response is inadequate because "SCAQMD's LSTs only apply to criteria air pollutants and were not designed to evaluate localized health risks from exposure to DPM, because the toxicities of DPM and ambient PM2.5 are not equal." (Ex. A, p. 6.)

As Baseline explains,

> ... [T]he LSTs "represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard." In California, only about 8% of the average ambient PM2.5 concentration in outdoor air is comprised of DPM. While the federal and state ambient air quality standards established for PM2.5 were designed to be protective of human health for ambient conditions, these standards are not representative of particulate matter emissions from construction that contain significantly higher concentrations of DPM than typical ambient concentrations due to the exhaust from diesel-powered construction equipment.
>
> (Ex. A, p. 6.)

Because SCAQMD's LSTs are not representative of the impacts that will occur from construction-generated DPM, "there is no substantial evidence provided in the FEIR to support the use of the SCAQMD's LST for PM2.5 to evaluate potential health risks to sensitive receptors exposed to DPM from the exhaust of diesel-powered construction equipment." (Ex. A, p. 6.) In order to accurately evaluate the Project's impacts, the EIR must be revised to include a quantified HRA "to estimate the incremental increase in cancer risk for nearby sensitive receptors exposed to DPM emissions during project construction in accordance with the OEHHA guidance." (*Id.*, p. 7.) "The health risk assessment should also evaluate health risks to on-site residences that are located in completed Planning Areas while construction of adjacent Planning Areas is ongoing." (*Id.*)

Matt Hagemann, P.G., C.Hg., and Paul E. Rosenfeld, Ph.D., of the Soil/Water/Air Protection Enterprise ("SWAPE") reviewed the air quality analysis in the EIR. SWAPE's comment letter and CVs are attached as Exhibit B. SWAPE found that the EIR failed to adequately evaluate the human health impacts resulting from the Project's emissions of diesel particulate matter.

The EIR fails to provide any quantified analysis of the impacts to human health from Project-related emissions of diesel particulate matter ("DPM"). As noted by SWAPE, CEQA requires that that the EIR "correlate the increase in emissions that future projects would generate to the adverse impacts on human health caused by those emissions." (Ex. B, pp. 4-5.) Such an analysis is not possible without a quantified HRA.

SWAPE prepared a screening-level HRA to evaluate potential impacts to human health from DPM during construction of the Project using

AERSCREEN, the leading screening-level air quality dispersion model. (Ex. B, pp. 5-9.) According to the EIR, construction of the Project will generate approximately 361 pounds of DPM over the 919-day construction period. (Id. at p. 5.) SWAPE conducted their HRA to calculate the increased cancer risk resulting from those DPM emissions to the Maximally Exposed Individual Receptor located approximately 150 meters downwind of the Project site. (Id. at p. 6.) The HRA utilized age sensitivity factors in order to "account for the increased sensitivity to carcinogens during early-in-life exposure and to assess the risk for susceptible subpopulations such as children." (Id.)

SWAPE's HRA found that increased cancer risk to 3rd trimester pregnancies, infants and children during construction and operation of the Project would be 26.8 in one million, 648 in one millions, and 13.7 in one million, respectively. (Ex. B, p. 8.) Each of the above increased cancer risks exceed the CEQA significance threshold of 10 in one million established by the South Diego Air Pollution Control District ("SDAPCD"). By failing to conduct an HRA, the EIR fails to provide substantial evidence that the Project's health impacts from DPM emissions would be less than significant. The EIR must be amended and recirculated in order to disclose this impact and mitigate it to the extent feasible. SWAPE has provided feasible mitigation measures for this impact that should be incorporated into a revised EIR. (Id. at pp. 9-10.)

Response A-4: This comment reiterates the arguments raised in Comment C-4, C-19, C-20, and C-21 of the FEIR from CARE California's comment letter dated January 10, 2025, and appears to offer no new argument. These comments have already been responded to in the FEIR (see Responses C-4, C-19, C-20, and C-21). No additional response is warranted.

Comment A-5: **The SEIR lacks substantial evidence of the Project's impacts to biological resources due to an underestimation of the diversity of species at the Project site.**

Dr. Smallwood and his associate conducted two daytime wildlife surveys on October 16 and 17, 2025 and one nocturnal wildlife survey on October 16, 2025. For the daytime surveys, they walked the perimeter of the Project site using binoculars to scan for wildlife. For the nighttime survey, they walked the southern perimeter of the Project site with a bat detector. (Ex. B, p. 2.) These surveys detected "63 species of vertebrate wildlife at or adjacent to the project site, including 13 confirmed and an additional 6 possible species

with special status." (*Id.*, p. 5.) The special-status species observed include short-eared owl, American white pelican, American kestrel, and canyon bat. (*Id.*, pp. 16-17.)

Dr. Smallwood calculated that more thorough site visits would reveal an even greater diversity of wildlife. (Ex. B, pp. 17-20.) Given more time to survey the site, Dr. Smallwood's predicts that 159 species of vertebrate wildlife, including 28 special-status species, would be detected on site. (*Id.*, p. 20.) Based on his review of the EIR and the site visits, Dr. Smallwood concluded, "[T]he large number of species I predict at the project site is indicative of a relatively species-rich wildlife community that warrants a serious survey effort." (*Id.*)

The wildlife surveys conducted for the EIR fell well short of accurately documenting the richness of wildlife utilizing the Project site. According to the EIR's surveys, only *five* vertebrate species were observed on-site. Conversely, Dr. Smallwood observed nearly 13x as many species, which lead Dr. Smallwood "to question whether [the EIR] surveyed the same wildlife community that we did." (Ex. B, p. 22.) Due to the number of species observed in the EIR's surveys, Dr. Smallwood concludes that the EIR's "survey findings need to be dismissed as entirely unreliable as a characterization of the existing wildlife community."(*Id.*)

Furthermore, the EIR's review of available wildlife databases to identify which species are known to have occurred at or near the Project site was inadequate. (Ex. B, pp. 22-31.) The EIR relied on the California Natural Diversity Data Base ("CNDDB") to determine which species have potential to occur in the Project area. (*Id.*, p. 23.) However, as Dr. Smallwood explains:

> By querying the CNDDB to establish the pool of special-status species for analysis of occurrence likelihoods, [the EIR] screened out many special-status species from further consideration in the characterization of the wildlife community as part of the existing environmental setting. The CNDDB is not designed to support absence determinations or to screen out species from characterization of a site's wildlife community.
>
> Furthermore, the CNDDB is interested only in the findings of special-status species, which means that species more recently assigned special status will have been reported many fewer times to the CNDDB than were species assigned special status since the inception of the CNDDB. Therefore, occurrence records in the

> CNDDB are most abundant for species assigned special status decades ago, but fewest for species only recently assigned special status. And because negative findings are not reported to the CNDDB, the CNDDB is also inappropriate as a basis for weighting occurrence likelihoods such as absent, not expected, unlikely, low, moderate or high. Whereas the CNDDB can be confirmatory of species presence, it cannot support absence determinations or assignments of low likelihood of occurrence.
>
> (*Id.*)

Based on available databases (including CNDDB, iNaturalist, and eBird) and site visits, Dr. Smallwood found that "144 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential." (Ex. B, p. 23.) The EIR Biological Report only analyzed the occurrence potential for 32 special-status species, which amounts to only 22% of the special-status species identified by Dr. Smallwood. (*Id.*, p. 24.) Therefore, the EIR screened out 112 of the special-status species known to occur at or near the Project site from further review. (*Id.*) For the 32 special-status species that were analyzed, the EIR claims that all of them were either absent from the site or have a low likelihood of occurring. Those conclusions are not accurate because, of those 32 species, "five have been documented as certainly or probably on the project site, and four have been documented within 1.5 miles of the site, and another two have been documented between 1.5 and 4 miles of the site." (Ex. B, p. 24.) special-status species, "34 have been documented on the project site, 25 have been within 1.5 miles, and 44 have been documented between 1.5 and 4 miles of the site." (*Id.*) Further analysis is needed in the EIR to address possible impacts to those species before determining that the Project will not result in significant impacts.

Every EIR must start from a "baseline" assumption. The CEQA "baseline" is the set of environmental conditions against which to compare a project's anticipated impacts. *Communities for a Better Envt. v. So. Coast Air Qual. Mgmt. Dist.* (2010) 48 Cal. 4th 310, 321; see 14 CCR § 15125(a). Due to the inadequate analysis on the Biological Report, the EIR underestimates the biological baseline at the Project site and, as a result, cannot provide substantial evidence about the severity of the Project's impacts on biological resources. As a result, the EIR must be revised to properly disclose the biological baseline and the impacts of this Project.

Response A-5: The basis for response to comments from Lozeau Drury et al regarding biological resources is, in part, a technical memorandum prepared by the

Project biologist[1] and appended to this Response to Comments as Appendix B. Both the commenter and their biologist[2] completely ignore the actual characteristics of the Project site, the entirety of which is in active agriculture and has been for more than 70 years. Excepting three small trees in the center of the Project site, which is occupied by sheds and a maintenance shop, there is no vegetation (native or otherwise) on the Project site (see DEIR Exhibit I-3). Surrounding lands, including those to the south and west, have been in cultivation in the past. Revegetation of these sites is dominated by non-native plant species, including tamarisk and a variety of non-native grasses and perennials.

The commenter's biologist also misleadingly references an on-site or nearby "marsh" along Ave 64 where many of the species "observations" they have made are located. The subject "marsh" is an agricultural tailwater catchment from which the on-site farmer draws irrigation water draining off the site and reuses it for crop irrigation, and this offsite feature will not be impacted by the Project. The comment falsely suggests that the Project will impact an intact, permanent wetland, which the subject feature is not. It is also important to note that the Coachella Valley Water District (CVWD) owns this feature, which is part of the CVWD Ave 64 stormwater evacuation channel, part of the CVWD master drainage plan for the eastern Coachella Valley.

The observed species accounts described by the commenter and their biologist (see Appendix B of Comment Letter A, which is Appendix A of this Response to Comments) are troubling, internally inconsistent and misleading. Many if not most of the species identified, most of which are birds, are "observed" by virtue of their flying over but not roosting, nesting or even foraging on the Project site. However, both the biologist report and the commenter's summary mislead the reader. For instance, the commenter's biologist (Smallwood et al) states that they "detected" 63 species but fail to clarify that all but six (6) of the "detected" species occurred off-site or as flyovers.

The commenter's consulting biologist's memorandum moves quickly from actual observations to the application of statistical methods, some of their own invention, to "predict" the number of species that should be expected to occur on the Project site or the vicinity. Furthermore, the Lozeau Drury

1 Response to Thermal Ranch Specific Plan Environmental Impact Report comment letter from SAFER dated December 10, 2025, prepared by Scott Crawford and Nathan Moorhatch, WSP, Inc.

2 Thermal Ranch Specific Plan memorandum prepared by Shawn Smallwood, Ph.D., October 30, 2025; is Exhibit B to Lozeau Drury SAFER Letter of December 10, 2025.

letter states that *"...only five vertebrate species were observed on-site. Conversely, Dr. Smallwood observed nearly 13x as many species."*

In short, the Lozeau Drury biologist relies heavily on extrapolation of possible species occurrences, much as a research biologist than as a professional field biologist. Although highly critical of the EIR biologists and their analysis, Smallwood spent very limited time actually observing wildlife on the site.[3] Smallwood et al also indicated that they surveyed the Project site along the perimeter only; the subject property is a square mile, so the biologists never got closer than one-half mile from the center of the project site.

The commenter is correct that the Project biologist relied on the California Natural Diversity Data Base ("CNDDB") for valuable distribution and occurrence information. However, the commenter and Smallwood et al fail to mention that the Project biologist used many decades and many thousands of hours of field biologist work in the Coachella Vallery that also informed the Project biologists' professional opinions. In addition to the CNDDB, WSP biologists also used The US Fish & Wildlife Service (USFWS) IPaC data, the USFWS Official Species List provided by the USFWS office in Carlsbad, California, California Native Plant Society, the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP, 2016) and related database, and others. A partial list of resources used to prepared the Project's biological resources assessment include:

- California Natural Diversity Data Base (CNDDB) RareFind 5 (CDFW 2022a)
- Special Animals List (CDFW 2022)
- California Native Plant Society's (CNPS) Inventory of Rare, Threatened, and Endangered Plants of California (CNPS 2022a)
- CVMSHCP (CVAG 2008)
- United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). 2019. Web Soil Survey
- USGS 7.5' Indio, Martinez Mtn., Rabbit Peak, Valerie, and Mecca, Calif. Quadrangle (USGS 1972 - 2015)
- USFWS ECOS-IPaC website: "List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project".

Ironically, the academically trained and oriented Smallwood et al points to such data sources as iNaturalist and eBird that they used as their primary data sources, which are popular phone apps for anyone (not just

[3] Ibid. Smallwood et al spent 1.67 hours of diurnal survey and 2.5 hours of nocturnal survey on 16 October 2025, and during 3.17 hours of diurnal survey on 17 October 2025

professional biologists) allowing posting of species identifications, including incorrect ones.

Table 2 of the Smallwood memo[4] lists the probability of occurrence of special status birds at the Project site, appearing to rely almost exclusively on iNaturalist and eBird data. The table identifies reported species occurrences as being "Very close" if reported with 1.5 miles of the Project site. Of the 60± species the Smallwood Table 2 lists, the vast major are defined as "In region", meaning that the iNaturalist or eBird posting was between 4 and 30 miles from the Project site. The diversity of habitats within 30 miles of the site makes such an exercise inapplicable at best and a determined misrepresentation at worst. While several species were reported within 1.5 miles of the project site, the only species identified as occurring "on-site" were observed flyovers, not birds roosting, nesting or foraging.

In summary, the Smallwood claim repeated by the commenter that *"144 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential"* is patently false and misleading. After substantial consideration and review by County biologists, the County believes that the Project biological resources assessment provides an accurate and adequate analysis of the project's potential impacts to biological resources.

Comment A-6: <u>Habitat loss and fragmentation</u>

The EIR failed to account for the reduction in productive capacity for wildlife that will result from habitat loss. As Dr. Smallwood explains, "The site is habitat to at least 63 species of vertebrate wildlife which we observed on or adjacent to the site." (Ex. B, p. 33.) Dr. Smallwood calculates that the Project site contains approximately 188 nest sites for birds. (*Id.*, p. 34.)

As a result of habitat loss and fragmentation from the Project, Dr. Smallwood predicts that the loss of 188 nest sites would corresponds to an overall loss of 757 fledglings per year and an overall loss of 851 birds per year, most of which are protected by the federal Migratory Bird Treaty Act and California's Migratory Bird Protection Act . (Ex. A, p. 34.) Dr. Smallwood concludes that "[t]he loss of 851 birds would easily qualify as an unmitigated

[4] Ibid.

significant impact." (*Id.*) The EIR must be revised to analyze, disclose, and mitigate this impact to the extent possible.

Response A-6: First, again it must be noted that the habitat value of Project lands is currently near zero. Periodically throughout the year, the Project site is disced and cultivated, planted with non-native vegetable crops, harvested and reside plowed under, then these lands lie fallow for months before farming operations resume. The argument that the Project EIR failed to account for the reduction in productive capacity of these lands for wildlife that will result from habitat loss is unfounded and has no basis in fact.

The development of the Project will have no effect on local or regional habitat fragmentation. As noted, the entire 620±-acre site is in active cultivation and the entire site is planned for mixed-use development that has the potential to actually increase habitat, nesting and foraging opportunities for a wide range of species that have no resources to take advantage of on this site. The tortured statistical argument Smallwood et al put forth is an abstraction and unreasonable extrapolation, and does not accurately represent or analyse probable species occurrences or circumstance at the site or in the vicinity. Neither productive capacity nor nesting birds will be significantly affected by the proposed project. In this regard, it should be noted that the project is required to conduct pre-construction nesting bird survey to further ensure that Project development does not have a significant adverse impact on nesting birds.

Comment A7: <u>Wildlife Movement</u>

Dr. Smallwood found that the EIR failed to adequately assess the Project's impacts on wildlife movement. (Ex. B, pp. 34-35.) The EIR's conclusion that wildlife movement impacts would be less than significant stands in sharp contrast to what Dr. Smallwood observed on site. As Dr. Smallwood explains,

The project site is obviously important to wildlife movement in the region, because Noriko and I observed many large mixed flocks of red-winged blackbirds and yellow-headed blackbirds fly across the southern aspect of the project site, mostly heading east or west (Photo 21). We also observed large flocks of brown-headed cowbirds, American pipits and California horned larks flying across the project site, as well as smaller flocks of American white pelicans, great-tailed grackles, common ravens, snowy egrets (headed north), house finches, western meadowlarks, and turkey vultures. We also observed birds flying across singly, including Caspian

tern, great blue heron, and short-eared owl, and there were birds foraging on the site, including American kestrel and Say's phoebe. All the bat species we detected had passed over part of the project site, because we would not have detected them unless they were calling within 30 feet of our detectors.

The evidence is overwhelming that the project site is situated on the daily flight paths of thousands of birds. It is also adjacent to two large areas of natural vegetation cover, it includes a long reach of freshwater marsh that is loaded with common yellowthroats, marsh wrens, American coots, pied-billed grebes and gadwall.

(*Id.*)

Rather than engaging with the actual conditions at the Project site, the EIR relies on speculative statements such as "[the Project site] is not expected to be in use as an established corridor" and "it is unlikely that the proposed development would interfere substantially with the movement of any migratory or native species." (Ex. A, p. 35.) Instead of speculation, the EIR's conclusions "should have been based on a program of observations to establish whether and how wildlife use the project site for movement in the region." (*Id.*) Without such an analysis, the EIR fails to provide substantial evidence that impacts to wildlife movement will be less than significant.

Response A-7: Again, it must be made clear that the subject property is, for all intent and purposes, essentially devoid of vegetation that could provide shelter or cover for wildlife moving across the site. Smallwood et al focuses on movement of birds, which can fly across the site regardless of its condition. As WSP explains below[5]:

Wildlife linkages (corridors) link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. Linkages or wildlife movement corridors effectively act as links between different populations of a species.

The (Project) survey area was assessed to determine if a wildlife linkage occurs on or within a portion of the project site. In the 2001 *Missing Linkages: Restoring Connectivity to the California Landscape*, ...three potential wildlife movement corridors were identified: (1) Whitewater River from the Salton Sea north to the San Gorgonio Mountains, (2) east-west just north of the Salton Sea and connects the Santa Rosa Mountains to the foothills of the Chocolate Mountains, and (3) north of Indio and connects the Santa Rosa Mountains with Joshua Tree national Monument. Due to the

5 Response to Thermal Op. cit., WSP, Inc. 2022.

disturbed nature of the agricultural activities surrounding the project site, there are no wildlife movement corridors or linkages within the project site. Therefore, wildlife movement corridors will not be impacted by the proposed project.

Currently, there is no suitable habitat for any sensitive wildlife species to occur on-site. However, it is well known that the southern portion of the Coachella Valley is historically known as a stopping place for large numbers of migratory birds. We also know that buildings with windows are known to have an increase in avian mortality. As the project site does not provide suitable habitat for any sensitive avian species, development of the property will not increase the number of sensitive species based on the change in property conditions. As noted in Dr. Smallwood's observations, a number of bird species were observed flying over the project site. The development of the project will not impede the flight path of avian species, and the development will continue to allow migratory birds access to the surrounding available resources.

Comment A-8: Bird-Window Collisions.

The EIR fails to account for the impact to bird species from collisions with the Project's glass windows and facades. The impacts from window collisions are important because such collisions "are often characterized as either the second or third largest source or human-caused bird mortality." (Ex. B, p. 36.) Dr. Smallwood calculated that the Project would result in *4,677 bird deaths per year* due to collisions with the Project's windows and glass facades. (*Id.*, p. 38.) The EIR must be revised to disclose, discuss, or mitigate this impact to the extent feasible.

Response A-8: The most common source of bird-window strikes is glass reflecting the sky, trees, or habitat, tricking birds into seeing what appears to them to be an open flight path, especially with large, clear, or parallel windows creating "pass-through" effects, combined with indoor lights attracting migrants at night and territorial males attacking their reflections. Due to the challenges of cooling buildings in the desert, large expanses of glass are generally avoided and limited to special use areas (lobbies, art studios and similar spaces), thereby limiting apparent "pass-through" effects that can confuse birds in flight. World-wide, the greatest incidents of bird-window collisions are with migratory birds, and to a lesser extent resident birds.

It should also be noted that there is no regulation, such as building codes, that address the issue of bird-window collisions. If instances of bird-window

collisions occur, window visibility can be improved by a variety of well-known and proven window treatments. No additional mitigation is required or warranted.

Comment A-9: House Cat Predation

The EIR fails to account for the impact to wildlife from the introduction of domestic cats to the area. As Dr. Smallwood explains:

> In 2012 there were 0.44 house cats per human in the USA, and 122 vertebrate animals were killed per cat, free-ranging members of which killed disproportionately larger numbers of vertebrate wildlife. The SEIR reports there would be 1,574 residential units in the project, and it predicts there would be 4,958 new residents. ***The above rates of cat ownership applied to this number of new residents would predict 1,618 new cats, which based on the findings of Loss et al. (2013) would kill 197,396 vertebrate wildlife per year.***
>
> (Ex. B, p. 39.)

Furthermore, cats introduce *Toxoplasma gondii*, which is "a parasite that can infect virtually all warm-blooded animals." (Ex. B, p. 39.) *Toxoplasma gondii* can cause toxoplasmosis, which in severe cases can damage the brain, eyes, or other organs. (Center For Disease Control, About Toxoplasmosis, https://www.cdc.gov/toxoplasmosis/about/index.html.) Additionally, "[i]nfants infected [by *Toxoplasma gondii*] while still in the womb often have no symptoms at birth but can develop symptoms later in life." (*Id.*)

Dr. Smallwood concludes that "[i]mpacts to wildlife from the introduction of house cats into the environment would be highly significant, and yet these impacts are not considered in the DEIR. (Ex. B, p. 40.) The EIR must be revised to disclose and analyze this impact. The revised EIR should also consider whether mitigating this impact is feasible through requirements on future residents constraining house cat ownership by, for example, requiring cats to remain indoors. (*Id.*)

Response A-9: There is little question that house and feral cats (and some other pets) kill large numbers of birds, small mammals and reptiles each year. Under California law domestic cats are viewed as property. Nonetheless, state agencies are empowered to manage free-roaming/feral cats as wildlife threats. However, feelings run strong with cat owners and California has recently adopted regulations banning cat declawing (AB 867) effective Jan

1, 2026. For domestic (versus feral) cats, owners are encouraged to confine cats indoors, make animal abandonment illegal, and fine cat owners for unneutered, impounded cats, and local ordinances adding curfews or colony bans where empowered to do so. California and other states lack strict indoor-only mandates for domestic cats. It is expected that the Project developer and residents will rely on education and local action to curb cat predation on native wildlife. Again, it should be noted that there is currently no viable habitat on the Project site, and that the number of species using the site is very low. While site development and associated landscaping will attract birds, most of these will be common opportunities species.

With the regard for the potential of domestic cats to introduce the parasite *Toxoplasma gondii* to human or wildlife populations, it is estimated that 15 to 40 percent of domestic cats in the US have been infected with this parasite at some time in their lives. Spread is by ingestion of shed oocysts (parasite eggs), although the percentage of cats actively shedding oocysts (the infectious stage) at any given time is much lower.[6] A variety of strategies are available to help control the spread of this parasite, including avoiding uncooked or undercooked meats, keeping cat litter boxes clean and practicing good personal hygiene, keeping cats indoors and feeding cats only commercial pet foods. There are no strict mandatory controls currently being applied to *Toxoplasma gondii.* Agencies such as the federal Center for Disease Control (CDC) and the Food and Drug Administration (FDA) provide guidance on control of the parasite, while local health agencies encourage responsible pet waste management and pet care as effective means of preventing environmental contamination and possible impacts to wildlife. No further mitigation is available or required. Also see attached Appendix C: Response to Thermal Ranch Specific Plan Environmental Impact Report comment letter from SAFER dated December 10, 2025, prepared by WSP.

Comment A-10: Traffic-Wildlife Collisions

The EIR fails to address the impacts to wildlife from collisions with traffic generated by the Project. This omission is important because, as Dr. Smallwood explains,

6 "Toxoplasma gondii infection in domestic and wild felids as public health concerns: a systematic review and meta-analysis", Kareem Hatam-Nahavandi et al,, National Library of Medicine, May 4, 2021.

> Vehicle collisions have accounted for the deaths of many thousands of amphibians, reptile, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level (Forman et al. 2003). Across North America traffic impacts have taken devastating tolls on wildlife (Forman et al. 2003). In Canada, 3,562 birds were estimated killed per 100 km of road per year (Bishop and Brogan 2013), and the US estimate of avian mortality on roads is 2,200 to 8,405 deaths per 100 km per year, or 89 million to 340 million total per year (Loss et al. 2014). Local impacts can be more intense than nationally.

(Ex. B, p. 40.) According to the EIR, the Project would result in 63,260,124 annual vehicle miles traveled ("VMT"). (*Id.*, p. 42.) Based on the Project's annual VMT, Dr. Smallwood estimates that traffic from the Project will kill at least 26, 908 vertebrates annually. (*Id.*) Especially due to the special-status species occurring and likely to occur at or near the Project, these collisions represent a significant impact to wildlife that must addressed, discussed, and mitigated in a revised EIR.

Response A-10: As the Project biologists point out in attached Appendix C, compensatory mitigation for impacts to common wildlife species impacted by an increase in vehicle traffic is not required under CEQA guidelines. Since the removal of unsuitable habitat would not result in an increase in vehicle collisions with sensitive wildlife species, no compensatory mitigation is required. It should also be noted that the Project will utilize native and drought-tolerant non-native landscaping, that is expected to be beneficial to the overall ecosystem following project construction. No further measures are available or warranted.

Comment A-11: <u>Cumulative Impacts</u>

The EIR's analysis of cumulative impacts to biological resources is fundamentally flawed for not meeting the requirements of CEQA. As required by the CEQA Guidelines,

The following elements are necessary to an adequate discussion of significant cumulative impacts: (1) Either:

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that

describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency. (

14 CCR § 15130(b).

The EIR is fundamentally deficient in its cumulative impact analysis (not only for biological resources but for *all* impacts analyzed in the EIR) because the EIR contains neither a list of past, present, and probable future projects nor a summary of projections contained in an adopted local, regional or statewide plan, or related planning document. In other words, this EIR plainly violates CEQA Guideline 15130(b) and, as a result, the cumulative impact analysis for every impact in the EIR must be revised to comply. The failure to utilize one of the two methods required by Guideline 15130(b) is fatal to this EIR.

For cumulative biological impacts specifically, the EIR relies primarily on its faulty wildlife surveys (see, *supra*, Section V.A) to conclude that the Project site has "low conservation value." (Ex. B, p. 42.) However, because the surveys that informed that conclusion are faulty, the conclusion cannot be relied upon. The EIR then claims that mitigation payments to the CVMSHCP would mitigate any cumulative impacts of the Project. However, as Dr. Smallwood notes, the CVMSHCP does *not* cover all of the special-status species observed on the Project site or likely to occur at the Project site. (*Id.*, p. 43.) As a result, mitigation payments to the CVMSHCP will have no benefit for these special-status species and cannot be relied upon to conclude that cumulative impacts will be less than significant. For those reasons, the EIR must be revised to comply with CEQA Guideline 15130(b) and to accurately analyze, disclose, ad mitigate the Project's cumulative impacts.

Response A-11: The commenter wishes to ignore the substantial investment and commitment that has been made by the County and local jurisdictions in the development and implementation of the Coachella Valley Multiple Species Habitat Conservation Plan. The CVMSHCP addresses habitat conservation across more than 1.1 million acres of the Coachella Valley, including the Project planning area. It provides direct coverage for 27 sensitive species and important habitat and ecological processes. It incorporates and takes

into account the various land use plans development by the County and the local jurisdictions and makes provision for landscape-scale Conservation Areas.

As the Project biologists point out, the CV MSHCP was prepared so every project in the Coachella Valley, regardless of size, would contribute to the Plan through the payment of development impact fees. This includes projects that have no potentially significant impacts to covered species under the Plan. This cumulative payment of fees is used to offset regional impacts to projects outside of the designated conservation areas, so the high-quality conservation areas that provide suitable habitat for sensitive species can be conserved. In addition, the proposed Project is not within or adjacent to a conservation area and the habitat within the project site is not suitable for supporting a population of any sensitive plant or wildlife species, cumulative impacts associated with the development of this project are not considered significant under CEQA.

Comment A-12: **The EIR's mitigation measures for biological resources are inadequate.**

Dr. Smallwood critiqued the EIR's proposed mitigation measures as being inadequate to reduce the Project's impacts to biological resources to less than significant levels. (Ex. B, pp. 44-45.) For example, the pre-construction surveys required by mitigation measure BIO-1 lack any objective standards and, as a result, "allows a single individual to make a subjective decision, outside the public's view, to determine the buffer area or when to relax the buffers for any given species." (*Id.*)

Dr. Smallwood provides a list of feasible mitigation measures that should be incorporated into the Project to reduce impacts to biological resources. (Ex. B, pp. 45-47.) These measures include: (1) compensatory mitigation for species not covered by the CVMSHCP; (2) adhering to Bird-Safe Design Guidelines to reduce bird-window collisions; (3) compensatory mitigation for wildlife killed/injured by vehicles and window collisions; and (4) a requirement for native landscaping. (*Id.*) The EIR should be revised to adopt these feasible mitigation measures prior to approval of the Project.

Response A-12: The Draft EIR was reviewed by state and local conservation groups and agencies. The California Department of Fish & Game provided input that has been incorporated into modified mitigation measures addressing impacts to biological resources. As clearly indicated above, the proposed project is a Covered Activity under the CV MSHCP, and the payment of

development impact fees will provide a substantial boost to landscape-scale conservation efforts in the eastern Coachella Valley. Beyond those mitigation measures set forth in the Draft and Final EIR, no additional mitigation is required.

Comment A-13: **Valley Fever (Comment from Baseline Environmental Consulting Addendum to Lozeau Drury December 10, 2025 Comment Letter)**

Valley fever, also known as coccidioidomycosis, is a disease caused by inhaling spores of the fungus Coccidioides from airborne dust and soil. Coccidioides grow best in soil after heavy rainfall and then disperse into the air most effectively during hot, dry conditions. Exposure to Coccidioides can infect the lungs and cause respiratory symptoms including cough, fever, chest pain, and tiredness.

In California, the number of reported Valley fever cases has greatly increased in recent years. Since 2000, Valley fever cases increased from less than 1,000 cases to nearly 12,500 cases in 2024, the highest number on record for California.[6] Riverside County, where the project is located, confirmed 465 cases in 2024. As of August 2025, 322 cases have been reported, which is a 58% rise from the same period last year.[7]

The DEIR and FEIR did evaluate the potential risk of Valley fever to receptors exposed to dust emissions during project construction. The failure of the DEIR and FEIR to evaluate, disclose, and mitigate (if necessary) the risk of Valley fever to receptors during project construction presents a significant date gap.

Response A-13: The commenter's assertions are noted. However, since Riverside County comprises a population of 2.5 million people, and according to the map below produced by the CDC, Riverside County experiences 0-5.9 cases of Valley Fever per 100,000 population annually, there is no evidence that Valley Fever is a significant health risk in Coachella Valley. Furthermore, the commenter fails to point out that Valley Fever cases in Riverside County have gone down, from 206 in 2023, to 181 in 2024[7].

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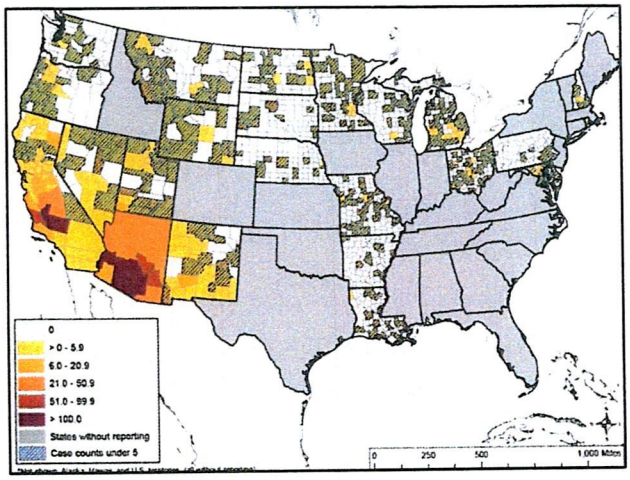
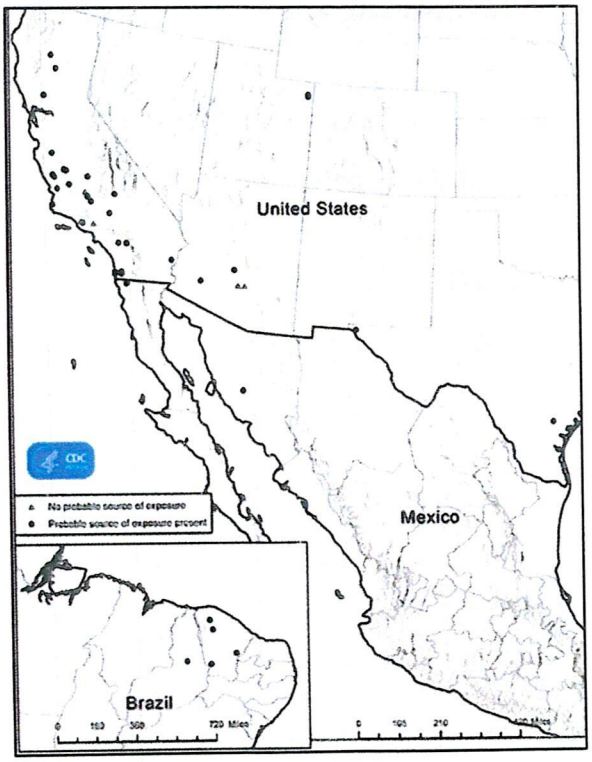
7 CDPH, Cumulative Reported Suspect, Probable, and Confirmed Annual Cases of Coccidioidomycosis by Local Health Jurisdiction and Year of Estimated Onset, California, 2022-2024





According to the federal CDC, there has been no outbreak of Valley fever in the Coachella Valley between 1940 and 2015, as shown in this published map.[8] Therefore, although the commenter makes claims that Valley Fever is a significant health issue in Palm Springs, the evidence they provide is not supported by fact. Valley Fever is not a significant health issue in the Coachella Valley.

8 https://www.cdc.gov/fungal/diseases/coccidioidomycosis/maps.html

TECHNICAL MEMORANDUM

TO: **John D. Criste, AICP**
Principal

FROM: **Kelly Clark**
Senior Planner

DATE: **December 15, 2025**

RE: **Memorandum in Support of Thermal Ranch Specific Plan 2nd Supplemental Responses to Comments to Board of Supervisors Regarding Air Quality**

Terra Nova has completed the following memorandum in support of the 2nd Supplemental Response to Comments for the Thermal Ranch Specific Plan (Project or TRSP) Draft Environmental Impact Report (DEIR) (SCH 2023050624). This memorandum has been prepared to support response to the comments submitted by Lozeau Drury for SAFER ("SAFER") dated December 10, 2025 and the Baseline comment letter referenced and appended ("Exhibit A") to the SAFER comment letter dated November 3, 2025.

Specifically, the purpose of this memorandum is to provide technical reporting refuting two claims made in the Lozeau Drury comment letter:

Claim 1: Increasing the construction equipment list by a factor of six would result in average daily criteria air pollutant emissions at least six times higher than those reported in the DEIR, thereby exceeding applicable significance thresholds.

Claim 2: Overlapping Planning Area operations and construction could result in criteria pollutant emissions significantly higher than those analyzed in the DEIR.

PROJECT OVERVIEW

In September 2024 Terra Nova prepared a detailed Air Quality and Greenhouse Gas Report (AQ/GHG Report) for the Project DEIR. The purpose of the Report was to assess the potential air quality and greenhouse gas (GHG) impacts associated with the construction and operation of the Project in accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The Project proposes a high-quality, master-planned equestrian lifestyle community with six (6) distinct Planning Areas (PAs) centered around a world-class equestrian center on 619.1 acres of farmland. The proposed Project includes up to 1,362 dwelling units (including up to 500 units of workforce housing), 285,000 square feet of commercial uses, a 150-key hotel and a 320-space RV park. The Project also proposes construction of a 5-million-gallon (mg) off-site

water tank at the existing Middleton Reservoir site. For analysis purposes, the AQ/GHG Report assumed buildout of all Project PAs would occur over 7 years with an operational year (2032) consistent with the operational year assumed for the Project-specific Traffic Study.

CLAIM 1

The comment letter incorrectly argues that if each PA were constructed sequentially with no overlap, "the total default construction schedule would be 12,190 works days (~47 years) (Ex. A, p. 2.). Because the proposed 7-year construction schedule represents 84% reduction, or approximately 1/6th of the default construction schedule, the commenter argues that the intensity of daily construction equipment should have also be increased by a factor of six, and by doing so would result in average daily criteria air pollutant emissions at least six times higher than those reported in the DEIR, thereby exceeding applicable significance thresholds.

Per the comment letter:

> To complete all construction within 7-years, the project would need to increase the amount of construction equipment used by at least a factor of six. This would then generate average daily criteria air pollutant emissions that are at least six times higher than the emissions reported in the DEIR, *which would exceed the applicable thresholds of significance*. (Ex. A, p. 3.) As a result of this error, the EIR fails to adequately analyze, disclose, and mitigate the Project's significant air quality impacts. The EIR must be revised to disclose this impact and mitigate it to the extent feasible.

To test this claim, a substantially intensified construction equipment scenario was modeled using CalEEMod, with results provided in Attachment 1 of this memo. The modeling retained all assumptions from the original DEIR except for increasing the number of all construction equipment by a factor of six. Additional construction mitigation measures consistent with the revisions provided in Response C-10 of the Supplemental Responses to Planning Commission Hearing Comments dated November 13, 2025 were also applied.

Per Response C-10 of the Supplemental Responses to Planning Commission Hearing Comments, the following ***bold*** text was added to Mitigation Measure AQ-2 (Construction Equipment Emission Reductions; DEIR p. 2.5-26), and was applied to the CalEEMod run in Attachment 1:

> **AQ-2 Construction Equipment Emission Reductions**
> The following measures will reduce ***PM***, NOx and ROG emissions from construction equipment:
> - Limit heavy-duty diesel vehicle idling to less than 5 minutes at a single location (vehicles more than 10,000 lbs.)
> - Use oxidation catalysts on all construction equipment. The oxidation catalyst must achieve a minimum 15% reduction in NOx emissions.

- ***All off-road diesel-powered equipment with an engine greater than 50 horsepower used during Project construction shall be powered by USEPA Tier 4 Final engines or cleaner.***
  - ***The construction contractor must submit a list of all equipment to be used, including model numbers and serial numbers, along with a copy of each unit's USEPA Tier 4 Final certification, to the lead agency before construction begins. This information shall be available on-site during construction for verification by the project monitor.***
  - ***If a specific piece of equipment cannot be equipped with a Tier 4 engine due to lack of commercial availability, the contractor must identify the specific equipment, document the unavailability, and ensure it operates on no less than a Tier 3 engine with a CARB-approved Level 3 Diesel Particulate Filter (DPF).***
  - ***To the extent feasible, contractors shall use electric, hybrid, or alternative-fueled construction equipment. Electric construction tools shall be used where grid electricity is available.***

Emissions from this scenario were compared to the SCAQMD construction thresholds and those reported in the DEIR, as presented in Table 4 on page 8 of this memo. As shown in Table 4, construction emissions would not exceed SCAQMD thresholds if the equipment list were to be increased by a factor of six under mitigated conditions. Therefore, the commenters claim that increasing the construction equipment list by a factor of six would result in average daily criteria air pollutant emissions that exceed applicable significance thresholds is incorrect.

CLAIM 2

The commenter claims that the EIR improperly assumed that there would be no overlap between construction and operation of the Project, and that overlapping emissions could result in criteria pollutant emissions significantly higher than those analyzed in the DEIR.

To test this claim, two CalEEMod reports were prepared for Phase 1 and Phase 2 of Project buildout consistent with Project phasing description in Section 1 of the EIR. Table 2 provides the CalEEMod land use assumptions used for Phase 1 (PAs 1 and 4) and Table 3 provides the CalEEMod land use assumptions used for Phase 2 (PAs 2, 3, 5, and 6). Emission results are provided in Attachment 2 (Phase 1 results) and Attachment 3 (Phase 2 results). The modeling assumed that Phase 1 construction would begin in early 2026 and be completed in mid-2027 (duration: 1.5 years), followed immediately by Phase 2 construction starting in mid-2027 and completing in late 2032 (duration: 5.5 years).[1]

[1] To reflect current conditions, Phase 1 completion was modeled in 2027 rather than 2026. The phasing plan referenced in Section 1 assumed Project approval in early 2025, but delays in approval hearings have rendered this timeline unrealistic.

December 16, 2025

Terra Nova Planning and Research
42635 Melanie Place, Suite 101
Palm Desert, CA 92211
Tel: (760) 341-4800
Attn: John Criste

Submitted via email to: jcriste@terranovaplanning.com

Subject: **Response to Thermal Ranch Specific Plan Environmental Impact Report comment letter from SAFER dated December 10, 2025**

Dear Mr. Criste:

The purpose of this letter is to respond to the Supporters Alliance For Environmental Responsibility ("SAFER") comment letter dated December 10, 2025, on the Thermal Ranch Specific Plan Environmental Impact Report Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. The Project is located within a 622-acre project site surrounded by 62nd Avenue to the north, 64th Avenue to the south, Harrison Street to the west, and Tyler Street to the east in Thermal, California. In this letter, SAFER states that the EIR Fails to Adequately Disclose and Mitigate the Project's Significant Impacts to Biological Resources and is separated into three main topics:

1. The SEIR lacks substantial evidence of the Project's impacts to biological resources due to an underestimation of the diversity of species at the Project site.
2. The EIR fails to analyze, disclose, and mitigate the Project's impacts on wildlife due to habitat loss and fragmentation, wildlife movement, bird-window collisions, house cat predation, traffic-wildlife collisions, and cumulative impacts.
3. The EIR's mitigation measures for biological resources are inadequate.

WSP has reviewed the SAFER comment letter and Exhibit B, which includes the comment letter prepared by Dr. Kenneth Shawn Smallwood and his Curriculum Vitae. The following letter is WSP's response to the comment letter and additional information. We have separated our responses by individual issues that should be addressed concerning the information in the comment letter as it addresses the inadequacy of our CEQA analysis.

1. Expertise of the Commenting Biologist

The comments associated with Biological Resources were generated from a letter prepared by Dr. Kenneth Shawn Smallwood. The following information occurs on his CV, which was provided as part of the comment letter. In addition to completing his PhD in 1990, he completed an unknown number of years of post-graduate research, with the majority of his experience in research and monitoring studies. His most recent experience was consulting for the U.S. Navy between 1999 and 2013 by conducting endangered species surveys, hazardous waste site monitoring, and habitat restoration for project located in northern California. He has authored many papers on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species.

Response: The following comments are based on a review of Dr. Smallwood's CV. Typically, CV's are tailored to document relevant experience, especially in reference to a comment letter. He has no relevant experience documented between 2013 and 2025. He also has no documented experience conducting biological surveys in southern California and has no experience preparing CEQA compliant Biological Resources Assessments. There is no evidence of any Coachella Valley Multiple Species Habitat Conservation Plan experience as well. This lack of

local experience does not provide any confidence in his ability to assess the potentially significant impacts to sensitive species and habitats within the project site and the eastern Coachella Valley.

The Biological Resources Assessment Report prepared for the project was completed by WSP wildlife biologist Natham Moorhatch. With over 34 years of biological consulting experience, he has conducted the following types of assessments: rare plant species surveys; plant species inventory and vegetation mapping; revegetation plan preparation and implementation; general wildlife species surveys; focused sensitive wildlife species surveys and habitat quality assessments; sensitive wildlife species monitoring and relocations; small mammal trapping studies; Corps Section 404 waters/wetlands delineation and jurisdictional determination; CDFG 1602 stream and riparian habitat assessments and jurisdictional determinations; and preparation of biological assessment reports and sections of EIS and EIR documents for federal, state, and/or county agency CEQA and NEPA environmental review. Professional experience includes serving as a lead biologist, supervising, and managing biological compliance monitoring and sensitive species survey efforts for a variety of large-scale projects.

Mr. Moorhatch has been authorized by the U.S. Fish and Wildlife Service to independently perform focused surveys for the federally endangered Delhi Sands Flower-loving Fly, Quino Checkerspot Butterfly, Casey's June Beetle, and the federally threatened California Gnatcatcher and Western yellow-billed cuckoo. Mr. Moorhatch has also been authorized to assist other permitted biologists with focused surveys for the Stephens' Kangaroo Rat, San Bernardino Kangaroo Rat, Los Angeles Pocket Mouse, Palm Springs Pocket Mouse, Mojave Ground Squirrel, California Red-legged Frog, Least Bell's Vireo (nest searches), and Southwestern Willow Flycatcher (assistant for nest searches and surveys). He has also received both federal and state agency authorization for specific projects to capture, handle, process, and relocate the Desert Tortoise; and to capture, handle, and release the California Red-legged Frog. Additionally, he conducts general inventories of flora and fauna; and authors biological assessments and mitigation plans.

Mr. Moorhatch has extensive experience as a local wildlife biologist. He has completed CEQA related documents in the Coachella Valley for over 30 years and has completed hundreds of MSHCP consistency analysis in the Coachella Valley since 2008.

2. The Commentors Description of the CEQA Analysis

In his letter, he describes that most CEQA reviews focus on special-status species because CEQA's Checklist Evaluation of Environmental Impacts specifies that such evaluation includes potential impacts to special-status species. He describes that the CEQA policies undervalue the importance of protecting common species from becoming threatened or endangered. He also Cites Pub. Res. Code § 21001(c), an important policy of CEQA that states: "to prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history."

Response: His comments regarding this policy are not restricted to standard CEQA policies regarding special-status species, but that CEQA guidelines should also apply to common wildlife populations and plant and animal communities. This is not the purpose or the way CEQA guidelines were intended. The CEQA checklist for Biological Resources includes much more than just sensitive plant and wildlife species and includes all sensitive biological resources, including sensitive species, sensitive habitats, wetlands, local ordinances, and HCPs. The standard CEQA analysis for biological resources is habitat based and should reflect the potential effects of the proposed project on current existing conditions. The Biological Resources Assessment Report prepared for this project identifies those sensitive species that could potentially occur on the project site based on the habitat that currently exists on-site. The impact to 622 acres of disturbed habitat will not result in the loss of any significant populations of common plant, wildlife, and/or plant community and should not be the focus of CEQA guidelines.

3. The SEIR lacks substantial evidence of the Project's impacts to biological resources due to an underestimation of the diversity of species at the Project site.

In the comment letter, Dr. Smallwood identifies 63 species of vertebrate wildlife at or adjacent to the project site, including 13 confirmed and an additional 6 possible species with special status during his two-day survey effort. His opinion is that due to the lower number of identified individuals recorded in the original biological resources assessment in 2022, that the biological resources assessment and CEQA analysis are inadequate.

Response:

The purpose of the field surveys is not to obtain an exhaustive list of all plant and wildlife species occurring on the project site, but to assess the habitat on-site and to determine the potential for sensitive biological resources to occur within the project site. Dr. Smallwood does not indicate which species were identified on the project site and which were observed near the project site (Table 1 of his comment letter). More importantly, he doesn't describe the project site and the associated on-site habitat in any meaningful way. A one-day or even a two-day analysis to document current site conditions does not and will never adequately document the total number of species that may utilize a project site. It should also be noted that the surveys conducted in 2022 were following a significant series of drought years. The 2025 Smallwood surveys were completed following two of the highest recorded rain events in recorded history in the Coachella Valley. The surveys were also completed I mid-October when many of the winter migrants are moving through the area. Our biologist could have stayed on the project for a month and the results of the survey would still be the same. The loss of diversity of the project site regarding common species is not considered a significant impact under CEQA. What Smallwood et al. should have assessed were the functions and values of the habitat that occurs on the project site and how that loss would affect federally and state listed threatened, endangered, and otherwise rare species.

The project consists of actively disked agricultural land. At the time of the survey in 2022, the entire 622-acre property was under active agriculture and nearly void of all vegetation. The property is actively irrigated during the growing season. There are a few tamarisk on-site and one unidentified palm tree, but no other trees. No other trees were identified within the project site. There was also no wetland habitat on-site. To adequately assess the project site, the first step is to understand the habitat, it's function and value. The quality of the habitat is considered highly disturbed and is considered low habitat quality for any plant and wildlife species. Due to the low habitat quality, there is no suitable habitat for any sensitive plant or wildlife species. Therefore, regardless of how many common species are identified during the survey, it doesn't change the analysis conducted in conformance with CEQA.

4. The EIR fails to analyze, disclose, and mitigate the Project's impacts on wildlife due to habitat loss and fragmentation, wildlife movement, bird-window collisions, house cat predation, traffic-wildlife collisions, and cumulative impacts.

Dr. Smallwood states that the EIR fails to adequately analysis the project's potential impacts regarding habitat loss and how that affects habitat fragmentation, wildlife movement, bird-window collisions, house cat predation, traffic-wildlife collision, and overall cumulative impacts. This portion of the Coachella Valley is part of an expansive agricultural production and the project site has been in active agriculture since the late 1950's and the existing structures were built in the late 1970's. Isolated patches of native habitat are scattered throughout the Coachella Valley, but there are no contiguous patches of native habitat. Therefore, the loss of 622-acres of disturbed agricultural fields is not considered a significant impact under current CEQA guidelines as the project site does not support suitable habitat for any sensitive plant and/or wildlife species. If habitat fragmentation in this area was considered significant, then it would have been part of the MSHCP conservation area design.

Response:

Dr. Smallwood's comments are based on the estimated or model-projection of the number of wildlife species that may occur in the surrounding project area, but does not account for the actively disturbed nature of the project site itself. The loss of 622 acres of frequently disturbed active agricultural lands is not considered a significant impact. The portions of the project site that contain potentially suitable habitat are those areas along the perimeter of the agricultural fields that are less likely to be disturbed regularly. These were the areas that were targeted during the

biological resources assessment as they have the highest potential to support species like burrowing owl. Mr. Moorhatch has over 30 years conducting burrowing owl habitat assessments, protocol surveys, and passive relocations. This experience allows him to quickly identify areas in this region that may or may not provide suitable habitat.

Wildlife linkages (corridors) link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization or farming creates isolated "islands" of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they prohibit the infusion of new individuals and genetic information. Linkages or wildlife movement corridors effectively act as links between different populations of a species.

Linkages help to mitigate the effects of habitat fragmentation by: (1) allowing animals to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity; (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs.

The survey area was assessed to determine if a wildlife linkage occurs on or within a portion of the project site. In the 2001 Missing Linkages: Restoring Connectivity to the California Landscape, three potential wildlife movement corridors were identified in this portion of the eastern Coachella Valley. The first one runs along the Whitewater River/CV Stormwater Channel from the Salton Sea north to the San Gorgonio Mountains. The second one runs east-west just north of the Salton Sea and connects the Santa Rosa Mountains to the foothills of the Chocolate Mountains. The third one occurs north of Indio and connects the Santa Rosa Mountains with Joshua Tree national Monument. Due to the disturbed nature of the agricultural activities surrounding the project site, there are no wildlife movement corridors or linkages within the project site or area. Therefore no wildlife movement corridors will be impacted by the proposed project. The closest recognized linkage is approximately 2.4 miles to the east along the Whitewater River/CV Stormwater Channel. Due to the undeveloped nature of the project, it is reasonable to assume that portions of the project site are occasionally utilized by wildlife for daily travel paths, but the site would not be considered a regional wildlife movement corridor.

Currently, there is no suitable habitat for any sensitive wildlife species to occur on-site. However, it is well known that the southern portion of the Coachella Valley is historically known as a stopping place for large numbers of migratory birds. It is also well established that buildings with reflective windows are associated with an increase in avian mortality. As the project site does not provide suitable habitat for any sensitive avian species, development of the property will not increase the number of sensitive species based on the change in property conditions. As noted in Dr. Smallwood's observations, a number of bird species were observed flying over the project site. The development of the project will not impede the flight path of avian species, and the development will continue to allow migratory birds access to the surrounding available resources.

It is well understood that the presence of house cats increases the mortality of common avian species as well as small mammals, reptiles, and amphibians. So we agree that cats can impact local wildlife populations due to predation. However, there is currently no suitable habitat for sensitive wildlife species on the project site. The surrounding agricultural lands also do not provide suitable habitat for sensitive species. There are a few adjacent parcels that have native habitat, but they are considered isolated. There is no way to control who moves into residential development. Cat owners should be held accountable for maintaining control of their cats 100% of the time (just like all other animals) either through keeping cats indoors or contained to the owner's property either using secure outdoor enclosures for cats or using rollers attached to the tops of perimeter fences or walls to keep cats confined to the owner's property.

There is currently full public access with paved roads along the northern, eastern, and western boundaries (62nd Street, Tyler Street, and Harrison Street respectively). Impacts to local wildlife species will likely increase due to the

increase in vehicle traffic. However, due to the disturbed nature of the project site and the surrounding agricultural lands, the species that will most likely be affected are opportunistic species that would utilize the disturbed habitats as local travel paths searching for food, such as coyote, racoon, opossum, skunks, and brush rabbits. Impacts to these species, although unfortunate, are not considered sensitive under CEQA.

Dr. Smallwood states that the 2022 wildlife study completed for the preparation of the EIR was faulty due to a low number of observed plant and wildlife species. Since this report was also used to prepare Cumulative Biological Impacts, he questions the validity of the document used to determine that the project site has low conservation value.

Response: The CVMSHCP was prepared so every project in the Coachella Valley, regardless of size, would contribute to the implementation of the Plan through the payment of the standard MSHCP development impact fee. This includes projects that have no potentially significant impacts to covered species under the Plan. This cumulative payment of fees is used to acquire and conserve habitat and offset regional impacts to projects outside of the designated conservation areas, so the high-quality conservation areas that provide suitable habitat for sensitive species can be conserved. Since the proposed project is not within a conservation area and the habitat within the project site is not suitable for supporting a population of any sensitive plant or wildlife species, cumulative impacts associated with the development of this project are not considered significant under CEQA.

5. The EIR's mitigation measures for biological resources are inadequate.

Dr. Smallwood states that the Project's proposed mitigation measures are inadequate to reduce the Project's impacts to biological resources to less than significant levels. He assumes that qualified biological monitors do not have the capacity to make subjective decisions, outside of public's view, to determine the adequate size or the increase or decrease in size of suitable no-construction buffers. His recommended mitigation measures include: These measures include: (1) compensatory mitigation for species not covered by the CVMSHCP; (2) adhering to Bird-Safe Design Guidelines to reduce bird-window collisions; (3) compensatory mitigation for wildlife illed/injured by vehicles and window collisions; and (4) a requirement for native landscaping.

Response:

Based on Dr. Smallwood's CV, it is assumed that inexperienced biologists would be completing construction monitoring efforts associated with nesting birds, and do not have the capacity to make subjective decisions. WSP's biological monitors have spent years monitoring construction related activities for several common and sensitive avian species. Although WSP's staff may not be the specific qualified biologists conducting the monitoring work, it is reasonable to assume that the construction of the proposed project would be completed with a competent biological monitor that has experience in this area. This is a standard mitigation measure, and qualifications of biological monitors are generally assumed and no additional approvals or qualifications are required as it relates to CEQA compliance. These qualifications and approvals are specifically required for federal and state regulatory permits associated with proposed projects that have impacts to sensitive biological resources.

Regarding the compensatory mitigation for species not covered under the CVMSHCP, the project does not contain suitable habitat nor would it support a population of sensitive species. Therefore, the loss of unsuitable habitat does not require compensatory impacts. Adhering to Bird-Safe Design Guidelines to reduce bird-window collisions is a project design feature, which may be utilized and is highly recommended, but is not a mitigation measure. Compensatory mitigation for impacts to common wildlife species impacted by an increase in vehicle traffic is not required under CEQA guidelines. Since the removal of unsuitable habitat would not result in an increase in vehicle collisions with sensitive wildlife species, no compensatory mitigation is required.

Lastly, native landscaping is a project design feature, which may be beneficial to the overall ecosystem following project construction, but it is not required under CEQA. The existing habitat that will been removed is highly disturbed and of little to no ecological value. Any kind of landscaping would be an improvement. But requiring native landscape under CEQA guidelines for project related impacts to disturbed non-native habitat is not appropriate.

If you have any questions or concerns regarding this letter, please contact me at (714) 742-5316.

Sincerely,

Scott Crawford
Senior Vice President
Director of Natural and Cultural Resources

Nathan Moorhatch
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December 15, 2025

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Re: Agenda Item 23.1: Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624)

Dear Chair Perez, Vice-Chair Spiegal, Board Members, and Clerk of the Board:

On behalf of Californians Allied for a Responsible Economy ("CARE CA"), we submit these comments on Agenda Item 23.1 related to the Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624) ("Project") proposed by Thermal Ranch, LLC ("Applicant").

The Project's proposed entitlements include a General Plan Amendment (GPA No. 2300001), a Tentative Tract Map (TTM No. 38578), three Plot Plan applications (Plot Plan No.s 230005, -6, -16), and a Change of Zone (CZ No. 2300003) to construct a mix of residential and commercial uses centered around a 231-acre equestrian center and related show facilities, including barns, stabling and related equestrian services on a 619± acres.[1] The residential components of the Project would include a mix of residential neighborhoods ranging from seasonal and year-round workforce housing and RV park facilities to large single-family estate

[1] FEIR, p. ES-2.

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lots, single-family attached and detached homes and resort condominiums.[2] At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.67 to 27.3 units per acre and up to 320 RV spaces.[3] The commercial components of the Project would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space.[4] A 54.4±-acre mixed use resort with a 150± key resort hotel, beach club, pool and other recreational amenities, and ancillary retail is also proposed.[5] The proposed Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County.[6]

CARE CA respectfully requests that the Board of Supervisor's continue the December 16, 2025, hearing and remand the Project to Staff to revise and recirculate the EIR in compliance with the California Environmental Quality Act ("CEQA"). The County cannot certify the FEIR, adopt the Project's Mitigation Monitoring & Reporting Program ("MMRP"), adopt the Statement of Overriding Considerations, or approve the Projects entitlements based on the County's legally deficient environmental analysis and inadequate mitigation, and absent substantial evidence to support the necessary findings for Project approval.

I. EXECUTIVE SUMMARY AND BACKGROUND

On January 10, 2025, CARE CA submitted comments, supported by expert evidence, explaining that the Draft Environmental Impact Report ("DEIR") had substantial informational and evidentiary defects, and relied on unsupported conclusions to assert that the Project's impacts would be fully mitigated by the measures proposed in the Project's MMRP and conditions of approval. CARE CA's expert reports included substantial evidence demonstrating that the Project would result in potentially significant impacts on public health, noise, and agricultural resources that were not adequately disclosed, analyzed or fully mitigated in the DEIR. As a result of the DEIR's fundamental inadequacies and conclusory nature, the DEIR failed to disclose or fully mitigate many of the Project's significant impacts, resulting in an inadequate public review process.

For example, CARE CA's air quality expert demonstrated that the County improperly relied on Localized Significance Thresholds ("LSTs") to assess health

[2] FEIR, p. ES-2.
[3] FEIR, p. ES-2.
[4] FEIR, p. ES-2.
[5] FEIR, p. ES-2.
[6] FEIR, p. 1-3.

risk, which failed to identify potentially significant health impacts from exposure of nearby residents and workers to toxic air contaminant ("TAC") emissions. CARE CA's noise expert provided substantial evidence that the DEIR underestimated operational noise impacts by failing to analyze impacts at the closest residence to the Project site and by underestimating HVAC run time. Finally, CARE CA's comments demonstrated that the DEIR lacked any mitigation for the Project's significant agricultural impacts and therefore did not provide substantial evidence to support its proposed statement of overriding considerations.

The County released the Final Environmental Impact Report ("FEIR") in September 2025, which included responses to CARE CA's comments. The Planning Commission held a hearing on October 22, 2025 to consider the FEIR and Project entitlements. On October 21, 2025, CARE CA submitted comments to the Planning Commission detailing that the FEIR still failed to comply with CEQA. CARE CA's agriculture expert provided substantial evidence demonstrating that the Project's agricultural impacts can feasibly be mitigated by an Agricultural Conservation Easement ("ACE"), which should have been implemented by the County. The Planning Commission nevertheless voted to recommend approval by the Board.

Prior to the Board hearing, Staff prepared responses to CARE CA's FEIR comments ("Responses to Comments").[7] However, neither the Responses nor the Board Staff Report resolve the FEIR's fundamental deficiencies and still fail to meaningfully respond to all of the Project's substantial evidence from CARE CA's experts. The County must revise and recirculate the EIR to comply with CEQA before the Board may consider approving the Project.

First, the County cannot certify the FEIR because it lacks substantial evidence to make the necessary CEQA Findings.[8] CEQA Findings must be supported by substantial evidence in the administrative record. The record before the Board does not contain substantial evidence demonstrating that the Project's significant environmental effects will be eliminated or substantially avoided, as required by law. In fact, substantial evidence in CARE CA's comments on the DEIR, FEIR, and expert consultant reports continue to demonstrate that the Project results in significant, unmitigated environmental impacts requiring revision and recirculation of the EIR.

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[7] Responses to Comments, pp. 1-202.
[8] Riverside County Board of Supervisors Resolution No. 2025-303, Attachment A: CEQA Findings, pp. 1-152.

Second, the County cannot adopt the MMRP because it lacks substantial evidence to conclude that the MMRP will reduce or avoid the Project's significant impacts.[9] Rather, CARE CA's expert consultant provides substantial evidence that the Project will result in significant air quality and public health impacts, notwithstanding the mitigation proposed in the MMRP, which were not addressed in the FEIR. These impacts must be analyzed and further mitigation required for any significant impacts found.

Third, the County cannot adopt the Statement of Overriding Considerations because it lacks substantial evidence to make the necessary findings.[10] The record before the Board demonstrates that there are changes or alterations that can be incorporated into the Project which would substantially lessen the significant environmental effect as identified in the FEIR. Specifically, CARE CA's expert provides substantial evidence that there are feasible mitigation measures that would substantially reduce the Project's significant impacts from the conversion of important agricultural land. These must be implemented in a revised EIR before adoption of the Statement of Overriding Considerations.

Fourth, as discussed in more detail below, the County cannot make the necessary findings to support approval of the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.

These comments are supported by supplemental expert evidence. CARE CA's air quality consultant Paul E. Rosenfeld, Ph.D. of Soil Water Air Protection Enterprise ("SWAPE"),[11] transportation expert Norman Marshall,[12] and agriculture resources expert Henry House.[13] Our air quality consultant provides substantial evidence that the Project will result in significant project-specific and cumulative public health impacts from DPM emitted during construction and operation. Our agriculture resources expert provides substantial evidence demonstrating that there is feasible mitigation that would substantially reduce the Project's significant agricultural impacts that the County fails to adopt in violation of CEQA. Our

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[9] Resolution No. 2025-303, Attachment B: Mitigation Monitoring and Reporting Program, p. MMRP-1.
[10] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[11] See **Exhibit A,** Paul E. Rosenfeld, Ph.D., Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("SWAPE Comments").
[12] See **Exhibit B,** Norman Marshall, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("Marshall Comments").
[13] See **Exhibit C,** Henry House, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("House Comments").

transportation expert demonstrates that the County lacks substantial evidence to conclude that the Project will not result in significant impacts to the existing housing/jobs imbalance. These potentially significant impacts necessarily require the County to revise and recirculate the EIR prior to Project approval.

II. STATEMENT OF INTEREST

CARE CA is a non-profit organization which advocates for a sustainable construction industry and protecting the environment and health of its communities' workforces. CARE CA includes the Southern California Pipe Trades District Council 16 and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in and around Riverside County.

CARE CA advocates for protecting the environment and the health of their communities' workforces. CARE CA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits, and which minimize adverse environmental and other impacts on local communities. CARE CA members live, work, recreate, and raise their families in Riverside County and its communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

In addition, CARE CA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

III. THE BOARD OF SUPERVISORS CANNOT MAKE THE REQUISITE FINDINGS TO APPROVE THE PROJECT

The Project requires the County to certify the FEIR and approve several entitlements, including the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.[14] However, as

[14] FEIR, p. 4.

discussed herein, the Staff Report and the County's response to comments fails to adequately address several significant environmental and public health impacts. As a result, the County lacks substantial evidence to make the requisite findings to approve the Project or its entitlements.

General Plan Amendment

CARE CA's previous comments explained that in order to approve the Project's GPA, the Board must make all of the findings required in both Section 2.4 (Entitlement/Policy General Plan Amendment) and 2.7 (Agriculture Foundation Component General Plan Amendments) of Riverside County Ordinance 348:

1. Section 2.4: Entitlement/Policy General Plan Amendment

In order to approve an entitlement/policy amendment the Board must make the first two findings listed below and any one or more of the subsequent findings listed below:

- The proposed change does not involve a change in or conflict with:
  - the Riverside County Vision;
  - any general planning principle set forth in general plan Appendix B; or
  - any foundation component designation in the general plan.
- The proposed amendment would either contribute to the purposes of the general plan or, at a minimum, would not be detrimental to them;
- Special circumstances or conditions have emerged that were unanticipated in preparing the general plan;
- A change in policy is required to conform to changes in state or federal law or applicable findings of a court of law;
- An amendment is required to comply with an update of the housing element or change in state housing element law;
- An amendment is required to expand basic employment job opportunities (jobs that contribute directly to the county's economic base) and that would improve the ratio of jobs-to-workers in the county;
- An amendment is required to address changes in ownership of land or land not under the land use authority of the board of supervisors.[15]

[15] Ordinance No. 348 § 2.4

2. Section 2.7: Agricultural Foundation Component General Plan Amendment

The Board must make both of the following requirements to approve the GPA:

- A maximum of 7% of the Agricultural Foundation acreage shall be generally authorized for conversion from the Agricultural Foundation Component to any other Foundation Component within a 2 ½ year period. [16]
- The proposed amendment must either contribute to the achievement of the purposes of the General Plan or, at a minimum, not be detrimental to them. [17]

The Project is inconsistent with the General Plan and results in significant, unmitigated agricultural impacts which prevent the County from making the requisite findings above.

First, the GPA conflicts with the County's General Plan Vision Statement. By proposing the permanent conversion of over 619 acres of important farmland without any mitigation, the GPA directly contradicts the County's stated goals of preserving agricultural areas, which have historical importance in Riverside County, in the face of mounting growth pressures in agricultural areas.[18]

Second, the GPA conflicts with principles set forth in General Plan Appendix B. Similar to the General Plan, the Planning Principles encourage the preservation of agricultural land. Specifically, the Planning Principles state that "[a]griculture should be treated as an economic land use" and that incentives and policies should be put in place to stimulate agricultural production and protect agricultural areas from urban encroachment.[19] For the same reasons discussed above, the Amendment's conversion of agricultural land conflicts with these principles.

Third, the GPA involves a clear change to a foundational component designation in the General Plan. Specifically, the GPA proposes to change the current General Plan Foundation designation of Agriculture to Community Development.[20] Therefore, the Board cannot make the first required finding to approve the GPA under Section 2.4 of Ordinance No. 348.

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[16] Ordinance No. 348 § 2.7.B.3.
[17] General Plan Administration Element, p. A-16.
[18] Vision Statement, pp. V-20, V-21; see also Land Use Element, p. LU-44;
[19] General Plan Appendix B: Planning Principles, pp. 12-13.
[20] FEIR, p. 2.16-18.

The Board also cannot make the second required finding to approve the GPA under Section 2.7 of Ordinance No. 348. As discussed below, the Project is detrimental to the purposes of the General Plan because it still fails to mitigate the Project's conversion of agricultural land into non-agricultural use. This is detrimental to the purposes of Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land.

The County attempts to ignore this inconsistency by claiming that the Project is consistent with the General Plan because it is consistent with the General Plan's policy which allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. However, compliance with this single policy does not excuse the County's continued inconsistency with the other policies in the General Plan related to preserving agricultural land through conservation easements.

Therefore, the Board cannot make the requisite findings to approve the Project's GPA.

Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[21] The County continues to conclude that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[22] However, for the same reasons discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land. Therefore, the Board cannot make the requisite findings to approve the Specific Plan.

Plot Plan

The Project's three plot plan applications cannot be approved unless it complies with the requirements of Section 18.30 in Riverside County Ordinance No. 348, including:

[21] Riverside County Ordinance No. 348, §§ 2.8, 2.9, 2.1.
[22] Responses to Comments, Response C-12, p. 53.

1. The proposed use must conform to all the requirements of the general plan and with all applicable requirements of state law and the ordinances of Riverside County;
2. The overall development of the land shall be designed for the protection of the public health, safety and general welfare; to conform to the logical development of the land and to be compatible with the present and future logical development of the surrounding property. The plan shall consider the location and need for dedication and improvement of necessary streets and sidewalks, including the avoidance of traffic congestion; and shall take into account topographical and drainage conditions, including the need for dedication and improvements of necessary structures as a part thereof;
3. All Plot Plans which permit the construction of more than one structure on a single legally divided parcel shall, in addition to all other requirements, be subject to a condition which prohibits the sale of any existing or subsequently constructed structures on the parcel until the parcel is divided and a final map recorded in accordance with Ordinance No. 460 in such a manner that each building is located on a separate legally divided parcel.[23]

The Board cannot make the first two of these required findings. First, for the same reasons discussed above, the Project does not conform with all of the requirements of the General Plan by converting 619 acres of important farmland without proposing any mitigation. Second, the development of the land would not be designed for the protection of the public health, safety, and general welfare. As discussed below and in SWAPE's attached comments, the Project will result in significant project-specific and cumulative public health impacts from exposure to the DPM emitted during Project construction and operation.

Zone Change

The Project's Zone Change cannot be approved unless it complies with the requirements of Section 20.3 in Riverside County Ordinance No. 348. This Section requires the Board to find the Zone Change consistent with the General Plan. As discussed above, the Zone Change is not consistent with the General Plan because it would allow the permanent conversion of 619 acres of agricultural land to non-agricultural use without any mitigation. Therefore, the Board cannot approve the Zone Change.

[23] Ordinance No. 348 § 18.30(C).

Tentative Tract Map

The Project's Tentative Tract Map cannot be approved unless it complies with the requirements of Section 20.3 of Riverside County Ordinance No. 348., as well as the Subdivision Map Act. Accordingly, the Board must make the following findings:

- That the proposed map is consistent with the general plan or applicable specific plan, or other applicable provisions of the Municipal Code;
- That the site is physically suitable for the type of development;
- That the site is physically suitable for the proposed density of development;
- That the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- That the design of the subdivision or the type of improvements are not likely to cause serious public health problems;
- That the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.[24]

The Board cannot make these requisite findings for several reasons. First, as discussed above, the proposed map is not consistent with the General Plan's policies and goals related to the preservation of agricultural land. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments below demonstrate, the Project will have significant project-specific and cumulative public health impacts that were not adequately disclosed or analyzed. Specifically, the FEIR failed to analyze the Project's potential impacts from construction and operation-related TAC emissions. As a result, the County also has not provided substantial evidence to demonstrate that the proposed mitigation will adequately reduce these health risks to less than significant levels. Therefore, the Board cannot make the requisite findings to recommend approval of the Tentative Tract Map.

[24] Subdivision Map Act §§ 66474, 66473.5; Ordinance No. 348 § 20.3.

IV. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE THE PROJECT'S INDIVIDUAL AND CUMULATIVE HEALTH RISK IMPACTS REMAIN UNRESOLVED

a. The Record Contains Substantial Evidence of Significant, Unmitigated Health Risk Impacts

CARE CA's prior comments demonstrated that the County failed to analyze the potentially significant cancer risks from the Project's construction and operation-related DPM emissions. The County limited its health risk analysis to criteria air pollutants by relying on Localized Significance Thresholds ("LSTs"), which measure criteria pollutants but do not measure TACs, including DPM. Health risk from exposure to DPM is measured under a separate threshold for cancer risk. Since the County failed to measure the severity of DPM exposure against a relevant threshold, the FEIR lacks substantial evidence to support a conclusion that health risk would be less than significant. Moreover, CARE CA's expert conducted a screening level health risk analysis of the Project's DPM emissions, which demonstrated that the Project would cause significant health risk impacts that the FEIR failed to disclose or mitigate.

The County now incorrectly attempts to discredit SWAPE's screening-level health risk analysis by misrepresenting the results of its own LST analysis and improperly concluding that the County does not have a legal duty to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not expressly required by CEQA. This reasoning is legally flawed, misleading, and directly contrary to CEQA's requirement to analyze potentially significant environmental impacts.

First, the County claims that they do not need to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not required by CEQA. This is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR,[25] including the health risk caused by human exposure to the project's air emissions.[26] The absence of a requirement in the Guidelines to prepare a specific type of HRA does not relieve the County of its duty to fully analyze and mitigate the Project's potentially significant health impacts.

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[25] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[26] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.

Second, the County continues to erroneously assert that compliance with LSTs are sufficient to rule out health risk from the Project. The County further misrepresents the purpose of LSTs by claiming that, because LSTs evaluate particulate matter, they also account for cancer risks associated with the TAC fraction of DPM. This is incorrect. CARE CA previously explained that LSTs do not analyze TAC emissions and therefore cannot be used to determine whether a project would result in increased cancer risk, even where modeled criteria pollutant emissions fall below LSTs. LSTs are designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO2, CO, PM10, or PM2.5 to exceed the ambient air quality standards at nearby receptors.[27] TACS, by contrast, have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.[28] Accordingly, reliance on LST compliance to dismiss potential cancer risks from diesel-related TAC emissions is misleading and contrary to CEQA.

Third, the County criticizes SWAPE's use of *total* particulate matter in its screening-level HRA. At the same time, the County acknowledges that it did not disclose the *exhaust* PM2.5 and PM10 from its CalEEMod output files at the time public comments were being requested.[29] SWAPE also explains that, while the County criticizes the use of annual PM10 emissions as a surrogate for DPM, this is a standard practice in CEQA analysis and is consistent with SCAQMD guidance as it provides a conservative upper-bound estimate that captures the DPM fraction.[30] The County also asserts that SWAPE's health risk analysis is predicated on the incorrect assumption that the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. This is incorrect, as SWAPE explains in its updated screening-level HRA, the calculations rely on the County's own PM2.5 and PM10 emission estimates disclosed in the FEIR.[31] These updated calculations demonstrate that the Project will result in a residential lifetime cancer risk of 12.4 in one million, which exceeds SCAQMD's 10-in-one-million threshold.[32] This constitutes substantial evidence that the Project will result in a significant impact that the County failed to address in the FEIR.

The County next asserts that compliance with existing local and state regulations, together with Mitigation Measures AQ-1 and AQ-2—which requires a dust control plan and limits idling—will ensure impacts remain below significant

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[27] *Id.* at p. 5.
[28] *Id.*
[29] SWAPE Comments, p. 7.
[30] *Id.*
[31] *Id.*
[32] *Id.* at p. 8.

levels.[33] SWAPE considered these in its HRA and still found that impacts would be reduced to less than significant levels. The Board of Supervisors Staff Report also added a new measure to AQ-2 that requires the use of Tier 4 construction equipment. This was not available at the time SWAPE conducted its screening level analysis. Despite adding this condition, the County still refuses to quantify post-mitigation emissions or otherwise demonstrate, with substantial evidence, that this additional measure would reduce impacts below the applicable significance threshold. Because CEQA requires an agency's conclusions regarding significance of impacts and mitigation effectiveness to be supported by substantial evidence, the County's unsupported assertion is inadequate, and the impacts remain potentially significant.

For the reasons discussed above, the County must revise the EIR to include an analysis of the Project's potentially significant cancer risks.

b. The Record Contains Substantial Evidence of Significant, Unmitigated Cumulative Health Risks

CARE CA's prior comments demonstrated that the FEIR omitted an analysis of the Project's cumulative TAC emissions. We further explained that when conducting this analysis, the County should use the new draft guidance from South Coast Air Quality Management District ("SCAQMD") instead of SCAQMD's outdated White Paper on Potential Control Strategies to Address Cumulative Impacts from 2003.

In response, the County claims that it properly limited its cumulative impacts analysis to criteria air pollutants (CO, NOx, ROG). It reiterates its argument that impacts from TAC emissions did not need to be analyzed because an HRA is not required for the Project. As discussed above, this is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR.[34]

Nor can the County sidestep its obligation to analyze cumulative health risk by relying on an outdated SCAQMD threshold. Under CEQA, "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant."[35] CARE CA's air quality expert provides substantial evidence that the

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[33] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 30.
[34] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[35] 14 Cal. Code Regs. ("CEQA Guidelines") § 15064(b)(2).

Project may result in significant cumulative TAC emissions that the County failed to address in the FEIR. SWAPE applied SCAQMD's November 6, 2024, Working Group draft cumulative impacts guidance, which contrary to the County's assertion, was not developed solely for warehouse projects. These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review and meaningfully evaluate cumulative toxic air contaminant impacts.[36] This is particularly relevant to the Project because it will be located in an AB617 disadvantaged community.[37]

The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met.[38] These factors include:

1. Whether the background cancer risk, as indicated MATES, in the Project area is within the 50th-30th percentile;
2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.[39]

SWAPE's analysis found that the Project satisfies all three criteria, effectively reducing the significance threshold to 3 in one million.[40]

First, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin.[41] Specifically, the Project site has a cancer risk of 206 in one million, or within the 43rd percentile.[42] This lowers the significance threshold to 7 in one million.[43]

Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB617 community.[44] This lowers the significance threshold to 5 in one million.[45]

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[36] SWAPE Comments, p. 1.
[37] SWAPE Comments, p. 3.
[38] *Id.* at p. 1.
[39] *Id.* at pp. 1-2.
[40] *Id.* at pp. 4-5.
[41] *Id.* at p. 2.
[42] *Id.*
[43] *Id.*
[44] *Id.* at p. 3.
[45] *Id.* at pp. 3-4.

Third, the Project is likely to generate 951 heavy-duty truck trips.[46] As SWAPE explains, the Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips.[47] The FEIR states that "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips."[48] Based on these estimates, SWAPE concludes that the Project would likely generate 951 heavy-duty truck trips, which constitutes 4% to 7% of the total anticipated daily vehicle traffic.[49] Therefore, the cumulative health risk threshold would be reduced to 3 in one million.[50]

SWAPE's screening-level HRA of the Project's construction and operation-related DPM emissions calculated that the Project would result in a lifetime cancer risk of 12.4 in one million, an infant-specific cancer risk of 4.89 in one million, and a child-specific cancer risk of 6.48 in one million.[51] These all exceed the 3 in one million cumulative significance threshold.[52]

Therefore, there is substantial evidence that the Project may result in significant cumulative health risk impacts that the FEIR did not address. The County must revise and recirculate a new EIR to include this analysis.

V. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE AGRICULTURE IMPACTS REMAIN SIGNIFICANT AND UNMITIGATED

a. The County Fails to Adopt All Feasible Mitigation as Required by CEQA

CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project impacts from the conversion of agricultural land is significant and unavoidable because it failed to adopt any mitigation, let alone "all feasible mitigation" as required by CEQA to support its adoption of a statement of overriding considerations. CARE CA's agriculture expert

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[46] *Id.* at p. 4.
[47] *Id.*
[48] *Id.*
[49] *Id.*
[50] *Id.*
[51] *Id.* at p. 5.
[52] *Id.*

also provided substantial evidence that, contrary to the County's claim, an Agriculture Conservation Easement ("ACE") is feasible, effective mitigation for the conversion of Prime Farmland.

Despite this evidence, the County continues to erroneously reject an ACE based on generalized drought conditions in Riverside County, refuses to adopt any mitigation, and flagrantly misstates CEQA's requirement to adopt all feasible mitigation.

First, the County misstates the law, claiming that they are not required to adopt all feasible mitigation to reduce impacts to the greatest extent feasible before an impact can be declared significant and unavoidable. Instead, the County claims that "CEQA only requires the adoption of mitigation measures that will avoid or substantially lessen the significant environmental effect," citing to CEQA Guidelines Section 15091 as support.[53] This misinterprets Section 15091, which merely lays out findings an Agency must make before approving an EIR that identifies significant environmental impacts. Specifically, this section requires that agency's make one or more findings before approving an EIR that identifies significant environmental impacts. This includes demonstrating that the significant impact will either be avoided or substantially lessened[54] or that mitigation is infeasible.[55]

The County also directly contradicts CEQA Section 21002, which states that "public agencies should not approve projects as proposed if there are feasible alternative or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects."[56] When making these findings CEQA also requires the agency to adopt a Statement of Overriding Considerations.[57] Several courts have interpreted the requirements for adopting a statement of overriding considerations, which includes incorporating "all feasible mitigation."[58] For instance, the Supreme Court in *Sierra Club v. County of Fresno,* found that "[e]ven when a project's benefits outweigh its unmitigated effects, agencies are still required to implement all mitigation measures unless those

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[53] *Id.*
[54] 14 CCR § 15091 (a), (b)
[55] 14 CCR § 15091(c).
[56] See also PRC § 21002.1(b) ("[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so."
[57] PRC § 21081; 14 CCR § 15093
[58] *Covington v Great Basin Unif. Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879-883; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525; *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967.

measures are truly infeasible."[59] Accordingly, the County must adopt all feasible mitigation.

Second, the FEIR continues to argue that an ACE is infeasible because there is ongoing drought placing a strain on water supplies, citing to the fact that "CVWD has notified the property owner that no imported water will be provided to the subject property for at least the coming two years."[60] The County also points to CVWD's long-term water management plans as evidence regarding the scarcity of Colorado River water and the substantial demand for water caused by agricultural uses in the Coachella Valley.[61] The County claims that this "constitutes substantial evidence and supports the reasonable inference that an ACE would exacerbate existing water supply challenges resulting from drought conditions."[62] The County also argues that requiring an ACE is infeasible because it is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities. However, both of these reasons are speculative and inadequate to demonstrate that an ACE or other mitigation is infeasible. There is no evidence that conserving existing agricultural land would exacerbate drought conditions.[63] The County also has not provided any evidence demonstrating that an ACE is infeasible for financial reasons.[64] Furthermore, as demonstrated in Mr. House's previous comments and discussed further below, several General Plan policies also favor conserving agriculture land.[65] Therefore, the County has not provided the substantial evidence necessary to demonstrate that an ACE is infeasible.

In addition to an ACE, Mr. House identifies that an in-lieu fee is another feasible, unconsidered mitigation measure.[66] Mr. House also provides substantial evidence that the County failed to consider mitigation measures used in other California counties that would avoid conserving water-deprived lands.[67] For example, agriculture and land stewardship framework and strategies and public benefit agreements—a mitigation measure that has been successfully employed in nearby Imperial County since 2012.[68] The FEIR provides no explanation for why

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[59] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525 (citing *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967).
[60] Response to Comments, Response C-7.
[61] *Id.*
[62] *Id.*
[63] House Comments, p. 2.
[64] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 13; House Comments, p. 2.
[65] *Id.*
[66] House Comments, p. 3.
[67] *Id.*
[68] *Id.*

these alternatives would be infeasible. Because the County has failed to analyze or adopt these feasible mitigation measures, it lacks substantial evidence to adopt the Statement of Overriding Considerations.[69]

Third, the County relies on *Yerba Buena Neighborhood Consortium LLC v. Regents of University of California* to conclude that its argument that an ACE is infeasible because of ongoing drought in California is a policy judgment that is owed deference. This mischaracterizes the Court's findings in *Yerba Buena*. The Court did not state that the Agency's determination regarding the feasibility of a mitigation measure will be deferred to in all cases. In fact, the Court cites to the Sixth District's decision in *California Native Plant Society v. City of Santa Cruz,* which states that when an Agency's findings of fact are based on erroneous legal assumptions like "voluntary mitigation [being] impermissible" this is "an error of law invalidating their finding that voluntary mitigation payments to FORA do not represent a feasible method of mitigating CSU's off-campus environmental effects."[70] Similarly here, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE and all other alternative mitigation measures are infeasible. This is legal error and is not owed deference. Additionally, as demonstrated above, our expert provides substantial evidence demonstrating that these mitigation measures are commonly used and thus are feasible to substantially reduce the impacts from the Project's conversion of agricultural land to non-agricultural uses.

Fourth, the County mischaracterizes the findings of Riverside County General Plan EIR No. 441 and EIR No. 521 to improperly claim that no project-specific mitigation measures are available to address the Project's conversion of agricultural land to non-agricultural use. The County's reliance on these documents is misplaced. Those EIRs evaluated countywide growth on a program level. They do not—and cannot—relieve the County of its obligation under CEQA to consider and adopt feasible project-level mitigation measures.[71]

b. The Project Conflicts with the Agricultural Policies in the County's General Plan

CARE CA's previous comments demonstrated that the Project is inconsistent with several of Riverside County's General Plan policies, which emphasize the

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[69] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[70] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997 (citing *City of Marina v. Board of Trustee of California State University* (2006) 39 Cal.4th 341, 365).
[71] House Comments, p. 2.

importance of agricultural land of the region, promote the preservation of prime farmland, and encourage the use of conservation easements.

As discussed above, the County fails to correct these inconsistencies by failing to mitigate the Project's conversion of agricultural land to non-agricultural use. Instead, the County claims that it is consistent with the General Plan because it allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. This response is inadequate because it dismisses the eight General Plan policies CARE CA's previous comments demonstrated the Project was inconsistent with. This is particularly relevant to Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land, which the County does not implement as mitigation.

The County claims that despite the failure to include a conservation easement, it is still consistent with these General Plan policies because it determined that a conservation easement is infeasible and its determination of infeasibility is owed deference, citing *Yerba Buena Neighborhood Consortium, LLC v. Regents of University of California.* As discussed above, the County's determination that an ACE is infeasible mitigation is not owed deference because it is based on legal error.[72] Specifically, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE is infeasible due to pre-existing drought conditions. Additionally, our agriculture expert provides substantial evidence that an ACE is feasible mitigation.

Therefore, the Project, as proposed, still fails to comply with several of the County's General Plan policies and requires the County to revise the EIR.

VI. ADDITIONAL DEFECTS IN THE FEIR THAT VIOLATE CEQA

a. The FEIR Fails to Describe or Analyze the Project's Proposed Substation

The FEIR does not comply with CEQA because it omits critical details about the Project's proposed Imperial Irrigation District ("IID") electrical substation, thereby preventing meaningful analysis of the Project's environmental impacts and frustrating informed public review.

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[72] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997.

CEQA requires an EIR to set forth a project description that is sufficient to allow an adequate evaluation and review of the environmental impact.[73] California courts have repeatedly held that an "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[74] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the Project's impacts and undermining meaningful public review.[75]

Here, the FEIR's project description states only that "[a]n on-site electric power substation is also planned in consultation with Imperial Irrigation District (IID) in the southeast portion of PA-1."[76] The FEIR does not disclose the size or generation capacity of the proposed substation. Without this information, the FEIR cannot meaningfully evaluate or disclose the impacts associated with the substation's construction or operation.

As a result of this deficient project description, the FEIR fails to quantify or analyze air quality and greenhouse gas ("GHG") emissions from construction of the IID substation. Table 2.5-6 (CalEEMod Land Use Assumptions) in the FEIR includes only equestrian center barns, commercial uses, and office space within Planning Area 1.[77] This entirely omits the substation. Because the FEIR does not account for emissions associated with construction of this major infrastructure component, the County potentially underestimates the Project's construction-related impacts.

This omission is further underscored by a newly added condition of approval stating that the substation could be as large as 50 MegaVolt-Ampere (MVA). [78] The FEIR never disclosed or analyzed the potential impacts of a substation this size. This failure is particularly problematic given documented summer blackouts and ongoing electrical supply constraints in the region, which indicate that existing

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[73] CEQA Guidelines § 15124.
[74] *Santiago County Water Dist. v. County of Orange* (1981) 118 CA3d 81; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *Stopthemilleniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 85-89; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.
[75] CEQA Guidelines § 15124; see *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 192-193; see also *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591, 1597 ("An accurate and complete project description is necessary to fully evaluate the project's potential environmental effects.").
[76] FEIR, p. 1-7.
[77] FEIR, p. 2.5-11; CalEEMod Outputs, p. 12 of 139; AQ and GHG Appendix, p. 67.
[78] Specific Plan Conditions of Approval, Condition 8, p. 8.

distribution infrastructure may already be operating near capacity. Although the FEIR makes general references to existing distribution lines[79], it provides no analysis demonstrating that these facilities can accommodate the Project's new demand, nor does it evaluate whether off-site system upgrades or transmission improvements may be required.[80] In fact, the new condition of approval acknowledges this uncertainty by allowing the substation size to increase or decrease based on final design and feasibility determinations made by the Planning Director in consultation with IID.[81] Construction of the substation and any associated upgrades could result in potentially significant air quality, GHG, noise, and transportation impacts—none of which are evaluated in the FEIR.

The IID substation may also result in significant operational noise impacts that were not analyzed in the FEIR. Although the FEIR references operational noise measurements for an IID substation, it does not disclose the size or capacity of the substation used as the basis for those measurements. Instead, it vaguely asserts that the measurements were collected from "similar types of activities" and "assume the worst-case noise environment."[82] Without identifying whether the analyzed facility reflects a 50-MVA substation—or a smaller installation—the FEIR precludes meaningful evaluation of the Project's potentially significant operational noise impacts. For example, if the reference substation is smaller than the proposed facility, operational noise impacts could be significantly greater than analyzed in the FEIR.

Furthermore, as SWAPE comments, substations and associated high-voltage transmission facilities can introduce potential hazards, including increased wildfire ignition risk, electromagnetic field exposure concerns, and electrical arc-flash hazards, and risks related to equipment failure or transformer fire events.[83] Without disclosing the size of the substation or the extent of any required transmission or distribution upgrades, the FEIR cannot meaningfully assess these hazards risks or determine whether additional mitigation would be necessary.

By omitting this information from the Project description and failing to analyze the potentially significant impacts that could result from the construction

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[79] FEIR, p. 2.21-14.
[80] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 118.
[81] Specific Plan Conditions of Approval, Condition 8, p. 8 ("if less or greater substation sizing may be appropriate based on project final design. Any reduction substantially below double the project demand will be considered by the Planning Director in consultation with IID and based on reasonable information on technical or financial infeasibility").
[82] FEIR Appendix H, p. 61.
[83] SWAPE Comments, p. 9.

and operation of the substation, the FEIR deprives the public of a meaningful opportunity to comment on these impacts prior to project approval and denies decision-makers essential information required for informed decision-making. CEQA requires that where standard and accepted methodologies exist to evaluate potential impacts, an EIR must apply them or explain why it cannot do so.[84] The FEIR does neither.

As a result, the FEIR presents a misleading and incomplete description of the Project and its environmental impacts. The County must revise and recirculate the EIR to disclose the full scope of the proposed electrical infrastructure and to analyze the associated environmental impacts in compliance with CEQA.

b. The FEIR Lacks Substantial Evidence to Conclude That the Project Will Not Have Significant Population and Housing Impacts

CEQA requires an EIR to discuss the growth-inducing impacts of a proposed project, including the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment..."[85] The FEIR lacks substantial evidence to conclude that the Project will not have a significant adverse impact on housing or employment growth.[86] As Mr. Marshall's comments demonstrate, the FEIR overstates the Project's contribution to the existing jobs/housing ratio imbalance in the Eastern Unincorporated Coachella Valley.

According to the FEIR, the Eastern Unincorporated Coachella Valley has a high unemployment rate, with 13% of working age adults being unemployed and 33.5% of individuals being considered low income (51% to 80% of median income).[87] The FEIR also acknowledges that there are 19,836 housing units currently in the eastern unincorporated areas of Riverside County, but 36.9% were used seasonally, mostly as vacation homes, but also for migrant workers.[88] So, although there is a healthy stock of owner-occupied housing available, there is a substantial deficit in available rental housing.[89] According to the Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research) ("LUCI"), a jobs-

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[84] *Berkeley Jet* (2001) 91 CA4th 1344, 1370.
[85] CEQA Guidelines §§ 15126, 15126.2.
[86] FEIR, p. 2.16-22; Resolution No. 2025-303, Attachment A: CEQA Findings, p. 103.
[87] FEIR, p. 2.16-11.
[88] FEIR, p. 2.16-8.
[89] FEIR, p. 2.16-8.

to-housing ratio of 1.5:1 is considered balanced.[90] According to the Riverside County Housing Element Background Report, eastern unincorporated areas of the County had a jobs-to-housing ratio of 1.02:1 in 2018, which is below the county-wide ratio (1.55:1) and the target ratio, according to LUCI.[91]

The FEIR claims that it will contribute both jobs and housing to address this jobs to housing imbalance. With respect to jobs, the FEIR states that "[t]he provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance."[92] As Mr. Marshall explains, this overstates the proposed Project's job benefits because many, and possibly, most of the jobs would be seasonal.[93] The employment numbers for these seasonal jobs would likely be lower during the off-season, since they are tied to the activities of the equestrian center, which is active only during the October to April event season.[94] Mr. Marshall also states that it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property.[95] Thus, in cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.[96]

With respect to housing, the FEIR exaggerates the Project's contribution by stating "[t]he Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages."[97] While this may be true during peak seasons, Mr. Marshall explains that the housing created by the Project is mostly for seasonal employees (Workforce Housing) or for short-term guests (resort condos, hotel).[98] The remaining housing types (Estate Residential and Medium Density Residential) would not be rental housing or would not be affordable for renters, which is the type of housing most needed in the Eastern Unincorporated Coachella Valley.[99]

The County also acknowledges that the Project has the potential to create a demand for additional housing, particularly housing affordable to households

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[90] FEIR, p. 2.16-10.
[91] *Id.*
[92] FEIR, p. 2.16-21.
[93] Marshall Comments, p. 2.
[94] FEIR, p. 2.16-16.
[95] Marshall Comments, p. 3.
[96] *Id.*
[97] FEIR, p. 2.16-17.
[98] Marshall Comments, p. 5.
[99] *Id.*

earning 80% or less of the County's median income."[100] However, the County attempts to claim that the "market will respond to any demand for additional housing resulting from the Project." This does not constitute substantial evidence.

As a result, the Project may increase housing demand while worsening the jobs/housing imbalance. Because the FEIR analyzes employment and housing as if the seasonal equestrian uses would be year round, this masks the potentially significant impacts the Project may have on the area's current jobs-housing imbalance. The FEIR should be revised to provide a more accurate analysis of the Project's potential impacts. Until this impact is accurately disclosed and analyzed, the Board lacks substantial evidence to find that the Project would not have adverse impacts in these areas.

VII. CONCLUSION

For the reasons discussed above, and in CARE CA's previous comments, the FEIR for the Project remains wholly inadequate under CEQA. The Board of Supervisors cannot make the necessary findings to approve the Project or its entitlements because the County has not adequately disclosed, analyzed, or mitigated the Project's potentially significant unmitigated environmental and land use impacts. The FEIR must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions require that the EIR be recirculated for additional public review.

CARE CA respectfully requests that the Board remand the Project back to County staff to prepare and recirculate a legally adequate EIR prior to further consideration. Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Alaura McGuire

Alaura McGuire

:arm

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[100] FEIR, p. 2.16-1.

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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December 15, 2025

Alaura McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd #1000
South San Francisco, CA 94080

Subject: Comments on the Thermal Ranch Specific Plan (SCH No. 2023050624)

Dear Ms. McGuire,

We have reviewed the July 2025 Final Environmental Impact Report ("FEIR") and November 2024 Draft Environmental Impact Report ("DEIR") for the Thermal Ranch Specific Plan ("Specific Plan/Project") located in the County of Riverside ("County"). After our review of the FEIR, we find that the FEIR is insufficient in addressing some of our concerns regarding the Project's health risk impacts. As we asserted in our January 6, 2025 comment letter, a revised EIR should be prepared to adequately evaluate the Project's potential impacts.

Air Quality

Inadequate Analysis of Cumulative Air Quality Impacts

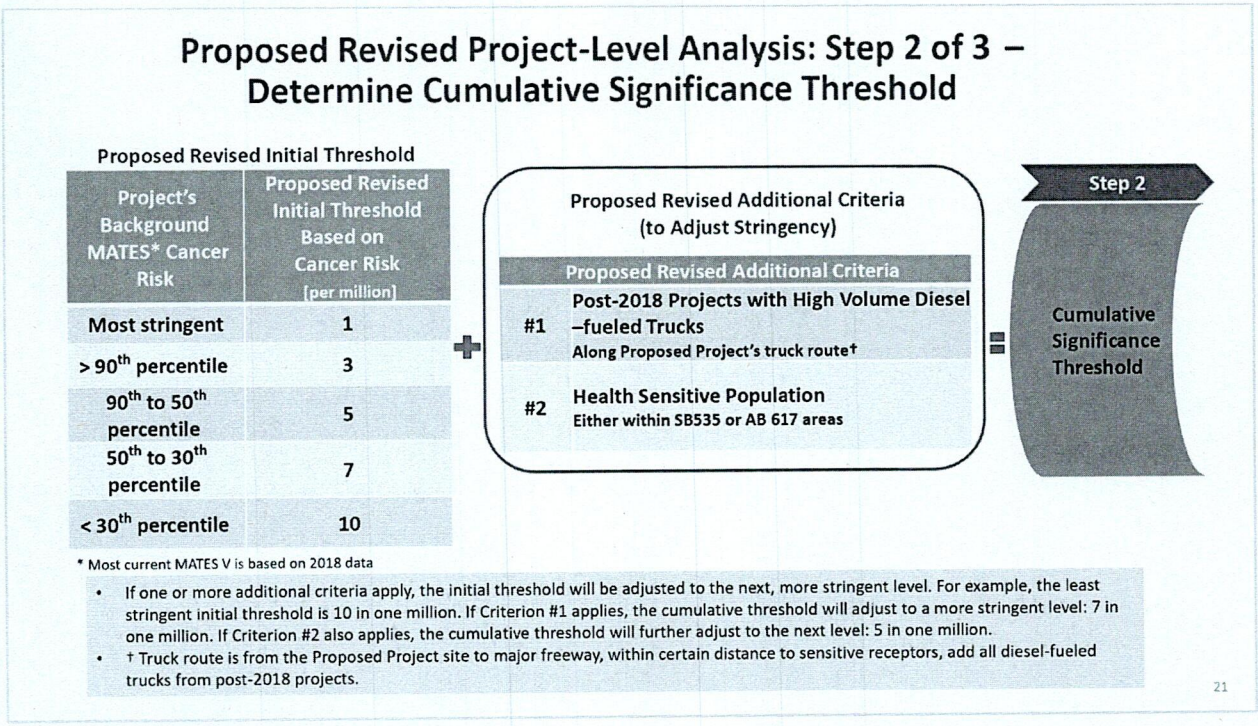
The FEIR provides an inadequate analysis of the Project's cumulative health risk impacts as it fails to analyze the potential cumulative cancer risks of the Project. The County should employ the draft cumulative cancer-risk significance thresholds published by the South Coast Air Quality Management District ("SCAQMD"). These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review meaningfully evaluate cumulative toxic air contaminant ("TAC") impacts.

SCAQMD's Working Group Meeting #6 presentation from November 2024 outlines a tiered methodology that reduces the standard 10-in-one-million cancer-risk threshold when one or more screening criteria are met, including:

1. Whether the background cancer risk, as indicated by MATES, in the Project area is within the 50th–30th percentile;

2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.

The tiered methodology, as proposed by SCAQMD, states that "if one or more additional criteria apply, the initial threshold will be adjusted to the next, more stringent level" (see screenshot below).[1]

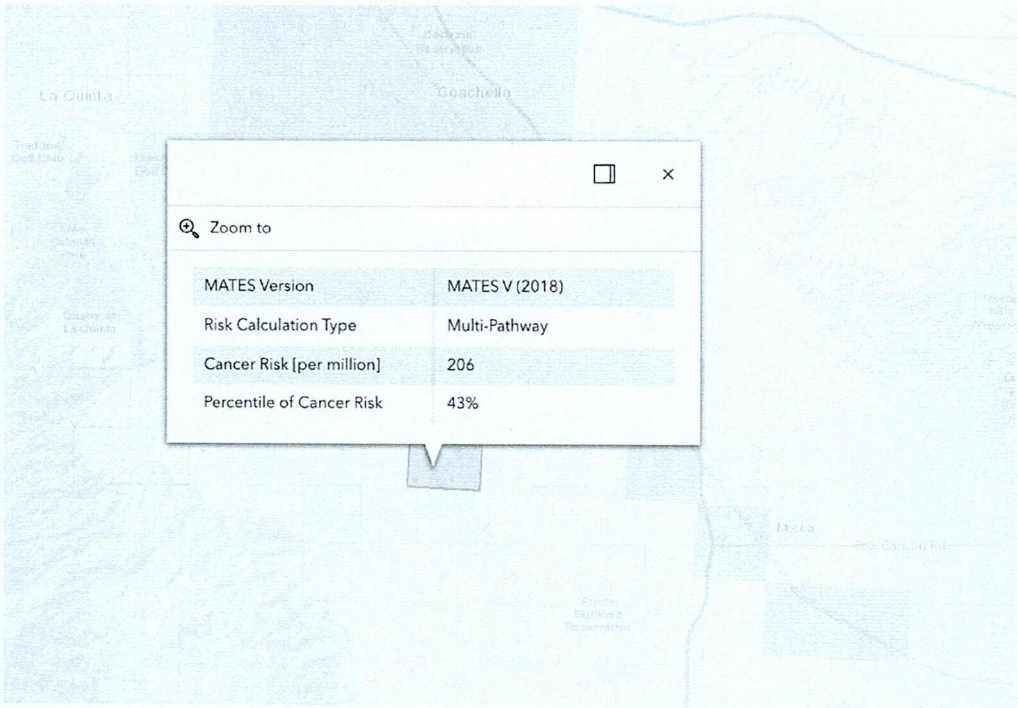


The Project satisfies multiple criteria that require a cumulative health risk analysis and the application of a more stringent cancer risk threshold under SCAQMD's framework.

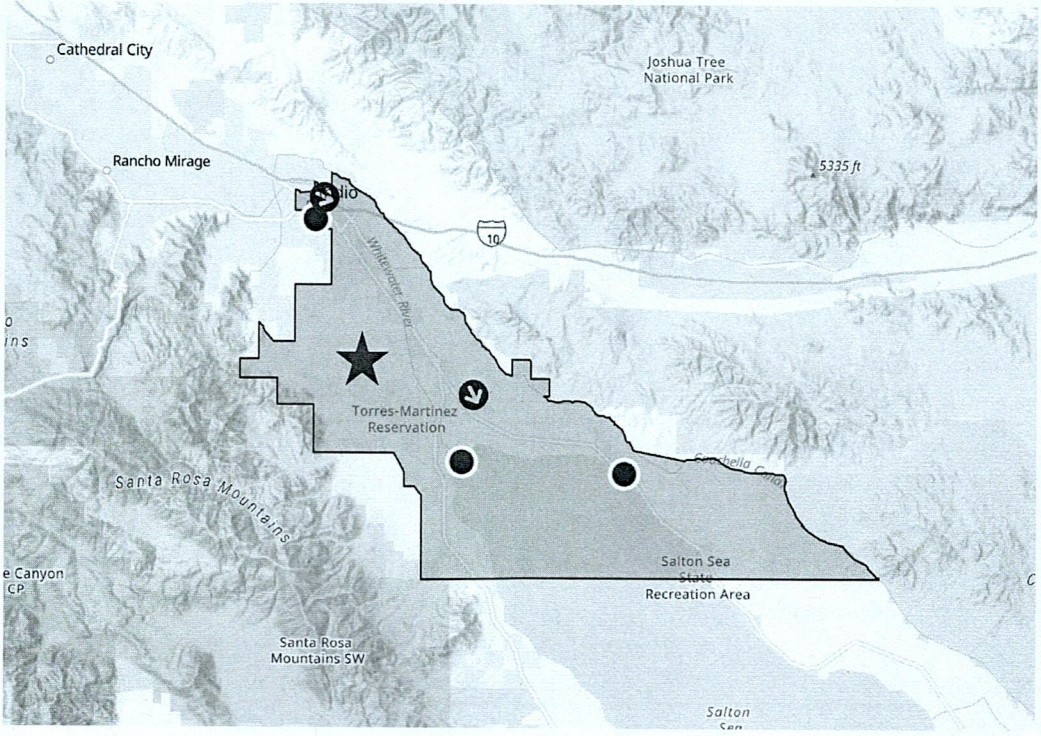
First, The Data Visualization Tool for Mates V, a monitoring and evaluation study conducted by SCAQMD, demonstrates that the County already exhibits a heightened residential carcinogenic risk from exposure to air toxics.[2] Specifically, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin—and thus meets the criteria for a 7-in-one-million threshold—with a cancer risk of 206 in one million, or 43% (see screenshot below).

[1] "Working Group Meeting #6 Cumulative Impacts from Air Toxics for CEQA Projects," SCAQMD, November 2024, available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13, p. 21.

[2] "Residential Air Toxics Cancer Risk Calculated from Model Data in Grid Cells." MATES V, 2018, *available at:* https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk; see also: "MATES V Multiple Air Toxics Exposure Study." SCAQMD, *available at:* http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

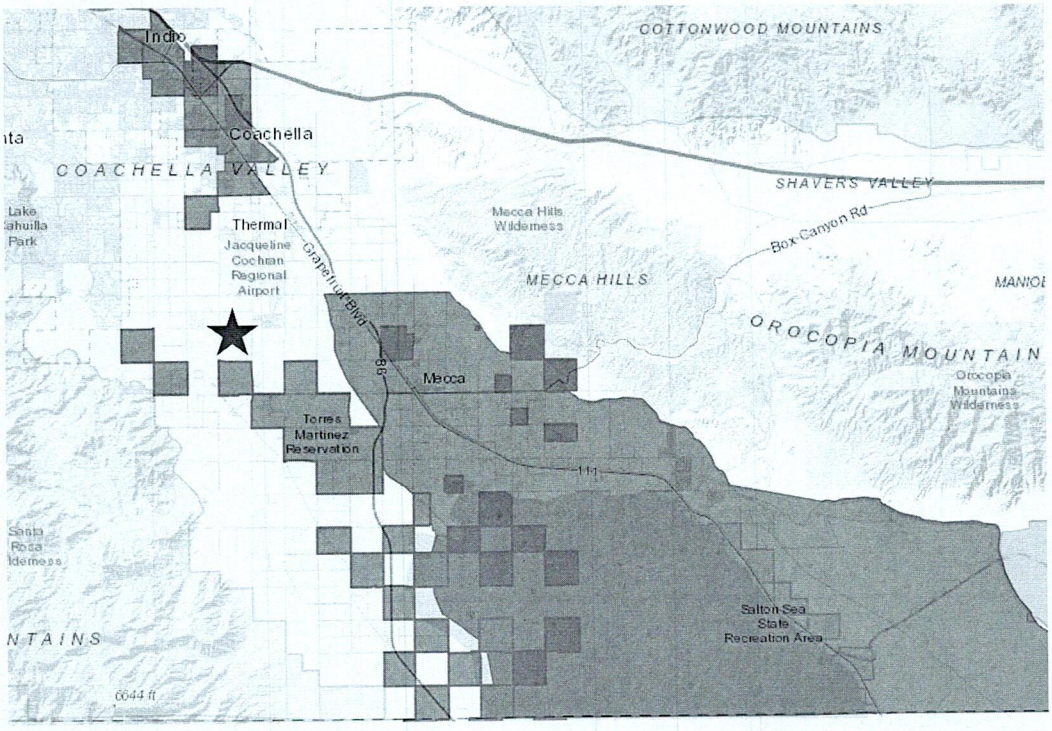


Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB 617 community, which signals that the region already experiences elevated cumulative air pollution burdens (see screenshot below).[3]



[3] "AB 617 Community Air Monitoring." SCAQMD, available at: http://xappprod.aqmd.gov/AB617CommunityAirMonitoring/Home/Index.

The Project area is also located adjacent to an SB 535 disadvantaged community, which further demonstrates that residents already face disproportionate environmental hazards and the Specific Plan may therefore worsen health risks for community members within the immediate area (see screenshot below).[4]



As such, the Project would move up to the next stringent tier of SCAQMD's draft framework of 5-in-one-million.

Third, the Project includes land uses that are reasonably expected to generate heavy-duty truck activity over its lifespan. The Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips. Although the FEIR does not disclose whether the Project would exceed 951 heavy-duty truck trips per day, the FEIR does disclose that, "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips" (p. 2.5-11). Thus, it is reasonable to assume that the Project would generate 951 heavy-duty truck trips, which would constitute roughly 4% to 7% of the total anticipated daily vehicle traffic. Assuming the Specific Plan meets SCAQMD's additional high-volume diesel truck criteria, the FEIR must then be evaluated against a 3-in-one-million cumulative threshold.

[4] "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, *available at:* https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/

Because the Project is located within a MATES 30th to 50th percentile background cancer risk and AB 617 community, as well as likely meets the 951-truck trip threshold, the FEIR should prepare a cumulative air toxics analysis using the 3-in-one-million threshold.

According to the screening-level HRA analysis below, the Project's construction and operation-related DPM emissions would result in a lifetime cancer risk of 12.4 in one million. The Project would also result in an infant and child-specific cancer risk of 4.89 and 6.48 in one million, respectively. These exceed the 3 in one million significance threshold and constitute potentially significant cumulative impacts that were not analyzed or mitigated in the FEIR.

CEQA requires a good-faith, evidence-based analysis of cumulative impacts. SCAQMD has indicated in both its Working Group presentations and in comment letters, such as those submitted on the DJT4 Parcel Delivery Facility Project,[5] that lead agencies should use this cumulative-risk framework when evaluating TAC and diesel particulate matter ("DPM") impacts in overburdened communities. A revised EIR should be prepared to identify which SCAQMD cumulative-risk criteria apply to the Project, disclose the appropriate cumulative cancer-risk threshold, model construction and operational emissions accordingly, and provide mitigation where exceedances occur.

Diesel Particulate Matter Emissions Inadequately Evaluated

As discussed in our January 6th comment letter, the DEIR failed to adequately evaluate potential Project-level health risk impacts. Review of the FEIR demonstrates that the analysis of the Project's health risk impacts is again lacking. For the reasons discussed below, we maintain our January 6th comment that the FEIR is inadequate and recommend that a revised EIR be prepared to adequately evaluate the Project's potential health risk impacts on nearby sensitive receptors.

First, the FEIR states that "[b]ecause the Project did not exceed LSTs, additional air dispersion modeling and/or construction-related health risk assessments are therefore not required or warranted" (p. 64). We reiterate that the SCAQMD Localized Significance Threshold ("LST") methodology is designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ to exceed the ambient air quality standards at nearby receptors. Unlike criteria pollutants, TACs are regulated under separate state frameworks administered by OEHHA and CARB, which require a health risk assessment ("HRA") when generated. TACs have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.

In regard to existing guidelines, the FEIR states:

> "Because the Project does not propose industrial warehouse uses, the Project is not subject to the CA DOJ recommendation to prepare a quantitative HRA in accordance with the Office of

[5] "Draft Environmental Impact Report (DEIR) for the December 20, 2024 Proposed DJT4 Parcel Delivery Facility Project (Proposed Project) (SCH No. 2023070241)." SCAQMD, December 2024, https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/orc241106-09-deir-djt4-parcel-delivery-facility-project.pdf.

> Environmental Health Hazard Assessment ('OEHHA'). Additionally, CEQA does not mandate or even recommend in-depth health risk assessments for all projects. The SCAQMD requires the preparation of an operational Health Risk Assessment (HRA) for facilities associated with emission of high levels of toxic air contaminants; the Project proposes none of these land uses or surrounding conditions" (p. 66).

Furthermore, regarding the Project's projected operational toxic air contaminant ("TAC") emissions, the FEIR continues by stating:

> "The eight categories of existing sources of TACs include high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations. The TRSP neither proposes the development of any such facilities, nor is it situated in proximity to any such facility. With regard to high-traffic freeways and roads, CARB defines freeways and high traffic roads as including rural roads with 50,000 vehicles per day. As discussed on page 2.5-22 of the DEIR, nearby roadways have average daily traffic (ADT) volumes of up to 39,300 vehicles per day in horizon year (2045) with Project weekday conditions" (p. 100).

While we acknowledge that current guidance may not explicitly require the certain land uses to prepare an HRA, this reasoning misconstrues current agency recommendations and ignores that diesel truck activity—not land-use labels—is the primary driver of cancer risk from DPM emissions. SCAQMD comment letters have recommended that, for projects that generate or attract substantial vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile-source HRA.[6] Similarly, SCAQMD has long recommended HRAs for projects with more than 100 daily heavy-duty diesel truck trips.[7]

As previously mentioned, the Specific Plan includes several land uses that inherently require ongoing delivery, service, and hauling operations that will involve trucks, including the large equestrian center and commercial and retail development. The DEIR itself identifies up to 21,523 daily vehicle trips at buildout, indicating a scale of development where even a modest percentage of truck activity could easily exceed 100 trucks per day. Given the Project's size and trip generation, the FEIR's assumption that the Project's truck activity would be negligible is not supported by substantial evidence. The FEIR also misuses CARB's definition of rural freeways and high-traffic roads as those with 50,000 vehicles per day to argue that the Project does not warrant an HRA. This is incorrect, as CARB uses this definition to recommend that projects "avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day."[8] Thus, this threshold pertains to the

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[6] "A-2 Notice of Preparation Comments." Los Angeles World Airports (LAWA), May 2017, *available at:* https://www.lawa.org/sites/lawa/files/documents/12_Appendix_A-2_Notice_of_Preparation_Comment_Letters.pdf.

[7] "Air Quality Analysis Handbook." SCAQMD, 1993, *available at:* https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

[8] "AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE." CARB, 2005, *available at:* https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

placement of new sensitive receptors near existing emission sources, not whether an evaluation of future DPM emissions generated by a project is necessary.

Given the Project's proposed land use sizes and types, anticipated vehicular activity, and the community's existing vulnerability, preparing a quantitative HRA is both best practice and necessary to satisfy CEQA's good-faith disclosure requirements. Without quantifying Project-level and cumulative TAC/DPM emissions and comparing them to the appropriate SCAQMD thresholds, the FEIR does not provide substantial evidence demonstrating that significant health-risk impacts would not occur.

Screening-Level Analysis Demonstrates Potentially Significant Health Risk Impact

As discussed in our January 6th comment letter, the proposed Project results in a potentially significant health risk impact. The FEIR raises concerns regarding the emission rate and parameters used in our screening-level HRA, which we have addressed and subsequently prepared an updated screening-level HRA. For the reasons discussed below, we maintain our January 6th comment that the FEIR may result in a significant health risk impact and a refined HRA is warranted to further evaluate the impact of the Project's DPM emissions on nearby, sensitive receptors.

The FEIR criticizes our use of *total* particulate matter ("PM") but acknowledges that *exhaust* $PM_{2.5}$ and PM_{10} were not originally displayed in the DEIR's CalEEMod output files. The FEIR indicates that, for both construction and operational emissions, "Appendix B of this Final EIR provides the TRSP CalEEMod Detailed Report that displays the PM2.5E emissions" (p. 71). We have prepared an updated screening-level HRA using the annual exhaust $PM_{2.5}$ emissions provided in the FEIR's updated CalEEMod air modeling.

In regard to our use of operational PM_{10} emissions estimates, the FEIR states:

> "Review of the health risk calculations in Attachment A of the SWAPE letter confirms that the HRA data inputs SWAPE applied are incorrect. As shown in the screenshot from the SWAPE letter below, the operational inputs show 22.6 tons per year was used, which correlates to the Project's total PM10T emissions, not the Project's PM2.5 emissions, and more importantly its PM2.5E emissions" (p. 73).

As demonstrated above, the FEIR criticizes the use of annual PM_{10} emissions as a surrogate for DPM. However, it is standard practice in CEQA analyses to use PM_{10} emissions as a proxy for DPM, pursuant to SCAQMD guidance, as it provides a conservative upper-bound estimate that captures the DPM fraction. For example, the construction HRA for the 2111–2139 South Pacific Avenue Project located in Los Angeles states that "the off-road PM_{10} exhaust estimates reported by CalEEMod were used as a surrogate for DPM emissions" (p. 2).[9] Regardless, as mentioned above, we prepared an updated screening-level HRA using the FEIR's annual $PM_{2.5}$ exhaust emission estimates in order to address the FEIR's concerns.

[9] See attachment D for 2111 South Pacific Avenue Construction Health Risk Assessment.

Additionally, the FEIR clarifies that the nearest sensitive receptor is 25 meters from the eastern boundary of the Project site (p. 76). Regardless, according to the AERSCREEN output files and as previously specified in our January 6th comment letter, the maximally exposed individual receptor ("MEIR") is located approximately 1,225 meters downwind of the site. Thus, DPM concentrations at 1,225 meters were used in our updated screening-level HRA.

All other methodologies were consistent with those described in our January 6th comment letter. The results of our calculations are shown in the table below.

The Maximally Exposed Individual at an Existing Residential Receptor

Age Group	Emissions Source	Duration (years)	Concentration (ug/m3)	Cancer Risk
3rd Trimester	Construction	0.25	0.0149	2.03E-07
Infant (0 - 2)	Construction	2	0.0149	4.89E-06
	Construction	*4.67*	*0.0149*	*1.80E-06*
	Operation	*9.33*	*0.0194*	*4.68E-06*
Child (2 - 16)	Total	14		6.48E-06
Adult (16 - 30)	Operation	14	0.0194	7.80E-07
Lifetime		**30**		**1.24E-05**

The excess cancer risks for the 3rd trimester of pregnancy, infants, children, and adults at the MEIR located approximately 1,225 meters away, over the course of construction and operation of future projects, are approximately 0.203, 4.89, 6.48, and 0.780 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) is approximately 12.4 in one million, which exceeds the SCAQMD threshold of 10-in-one-million (as well as the cumulative thresholds discussed above). The Specific Plan thus results in a potentially significant Project-level health risk impact not previously addressed or identified by the FEIR.

A revised EIR should be prepared to conduct a refined HRA evaluating the Project's construction and operational DPM emissions in AERMOD, which can account for more detailed parameters, and mitigate significant cancer risk impacts, if applicable.

Energy

Inadequate Analysis of Energy Demand

The FEIR fails to disclose the anticipated size or capacity of the proposed on-site substation and thus fails to provide the information necessary to evaluate whether adequate electrical infrastructure exists

to support the Project. Although the FEIR states that the substation will serve the Project and supply excess capacity to the surrounding area, the FEIR acknowledges that the Project Applicant is still coordinating with the Imperial Irrigation District to determine available transmission capacity. Without disclosure of the substation's planned load capacity, the FEIR does not provide substantial evidence that the expected electrical demand associated with Project buildout can be reliably met.

This omission is particularly consequential given the region's documented summer blackouts and ongoing electrical supply constraints, which indicate that existing distribution lines may already be operating near capacity. While the DEIR generally references existing distribution infrastructure, it conducts no analysis demonstrating that these lines can accommodate substantial new demand, nor does it evaluate whether off-site upgrades may be required. CEQA requires a good-faith effort to disclose and evaluate the full scope of a project's infrastructure needs, including reasonably foreseeable off-site energy improvements. By failing to disclose the substation size, the FEIR precludes meaningful evaluation of whether additional infrastructure will be required, whether such improvements may result in significant impacts, or whether the Project could exacerbate the strain on existing energy infrastructure.

Moreover, substations and associated high-voltage transmission facilities can introduce potential hazards—such as increased wildfire ignition risk, electromagnetic field exposure concerns, electrical arc-flash hazards, and risks related to equipment failure or transformer fire events—each of which must be evaluated when new or expanded electrical infrastructure is required. Without identifying the substation's size or the extent of necessary transmission upgrades, the FEIR cannot meaningfully assess these potential hazard impacts or disclose whether additional mitigation would be required.

In the absence of detailed information about the proposed substation, the FEIR's conclusion that the Project would not result in significant energy or utility impacts is unsupported by substantial evidence. A revised EIR is necessary to disclose the substation's capacity and evaluate the associated environmental impacts.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: Health Risk Calculations
Attachment B: AERSCREEN Output Files, Construction
Attachment C: AERSCREEN Output FIles, Operations

Construction		
2026		**To**
Annual Emissions (tons/year)	0.22	Total DPM (lbs)
Daily Emissions (lbs/day)	1.205479452	Total DPM (g)
Construction Duration (days)	365	Emission Rate (g/s)
Total DPM (lbs)	440	Release Height (meters)
Total DPM (g)	199584	Total Acreage
Start Date	1/1/2026	Max Horizontal (meters)
End Date	1/1/2027	Min Horizontal (meters)
Construction Days	365	Initial Vertical Dimension (meters)
2027		Setting
Annual Emissions (tons/year)	0.13	Population
Daily Emissions (lbs/day)	0.712328767	Start Date
Construction Duration (days)	365	End Date
Total DPM (lbs)	260	Total Construction Days
Total DPM (g)	117936	Total Years of Construction
Start Date	1/1/2027	Total Years of Operation
End Date	1/1/2028	
Construction Days	365	
2028		
Annual Emissions (tons/year)	0.09	
Daily Emissions (lbs/day)	0.493150685	
Construction Duration (days)	366	
Total DPM (lbs)	180.4931507	
Total DPM (g)	81871.69315	
Start Date	1/1/2028	
End Date	1/1/2029	
Construction Days	366	
2029		
Annual Emissions (tons/year)	0.08	
Daily Emissions (lbs/day)	0.438356164	
Construction Duration (days)	365	
Total DPM (lbs)	160	
Total DPM (g)	72576	
Start Date	1/1/2029	
End Date	1/1/2030	
Construction Days	365	
2030		
Annual Emissions (tons/year)	0.08	
Daily Emissions (lbs/day)	0.438356164	
Construction Duration (days)	365	
Total DPM (lbs)	160	
Total DPM (g)	72576	
Start Date	1/1/2030	
End Date	1/1/2031	
Construction Days	365	

The Maximally Exposed Individual at an Existing Residential Receptor				
Age Group	**Emissions Source**	**Duration** (years)	**Concentration** (ug/m3)	**Cancer Risk**
3rd Trimester	Construction	0.25	0.0149	2.03E-07
Infant (0 - 2)	Construction	2	0.0149	4.89E-06
	Construction	*4.67*	*0.0149*	*1.80E-06*
	Operation	*9.33*	*0.0194*	*4.68E-06*
Child (2 - 16)	Total	14		6.48E-06
Adult (16 - 30)	Operation	14	0.0194	7.80E-07
Lifetime		**30**		**1.24E-05**

AERSCREEN 21112 / AERMOD 21112 11/19/25
11:26:20

TITLE: Thermal Ranch, Construction

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.309E-02	g/s	0.246E-01	lb/hr
AREA EMISSION RATE:	0.124E-08	g/(s-m2)	0.980E-08	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	2238.31	meters	7343.54	feet
AREA SOURCE SHORT SIDE:	1119.15	meters	3671.75	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1420			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.1490	10	1125.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	12	12	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	208.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.1167	2525.00	0.5635E-01

25.00	0.1176
50.00	0.1186
75.00	0.1196
100.00	0.1205
125.00	0.1215
150.00	0.1224
175.00	0.1233
200.00	0.1242
225.00	0.1250
250.00	0.1259
275.00	0.1267
300.00	0.1276
325.00	0.1284
350.00	0.1292
375.00	0.1300
400.00	0.1307
425.00	0.1315
450.00	0.1323
475.00	0.1330
500.00	0.1337
525.00	0.1345
550.00	0.1352
575.00	0.1359
600.00	0.1366
625.00	0.1373
650.00	0.1379
675.00	0.1386
700.00	0.1392
725.00	0.1399
750.00	0.1405
775.00	0.1411
800.00	0.1418
825.00	0.1424
850.00	0.1430
875.00	0.1436
900.00	0.1442
925.00	0.1447
950.01	0.1453
975.00	0.1459
1000.00	0.1464
1025.00	0.1470
1050.00	0.1476
1075.00	0.1481
1100.00	0.1487
1125.00	0.1490
1149.99	0.1489
1175.00	0.1486
1200.00	0.1473
1225.00	0.1474
1249.99	0.1386
2550.00	0.5629E-01
2575.00	0.5621E-01
2600.00	0.5615E-01
2625.00	0.5608E-01
2650.00	0.5601E-01
2675.00	0.5594E-01
2700.00	0.5586E-01
2725.00	0.5579E-01
2750.00	0.5572E-01
2775.00	0.5565E-01
2800.00	0.5558E-01
2825.00	0.5551E-01
2850.00	0.5543E-01
2875.00	0.5535E-01
2900.00	0.5527E-01
2925.00	0.5519E-01
2950.00	0.5511E-01
2975.00	0.5503E-01
3000.00	0.5495E-01
3025.00	0.5487E-01
3050.00	0.5480E-01
3075.00	0.5471E-01
3100.00	0.5463E-01
3125.00	0.5455E-01
3150.00	0.5447E-01
3175.00	0.5438E-01
3200.00	0.5429E-01
3225.00	0.5421E-01
3250.00	0.5412E-01
3275.00	0.5403E-01
3300.00	0.5394E-01
3325.00	0.5385E-01
3350.00	0.5377E-01
3375.00	0.5369E-01
3400.00	0.5360E-01
3425.00	0.5351E-01
3450.00	0.5342E-01
3475.00	0.5333E-01
3500.00	0.5325E-01
3525.00	0.5315E-01
3550.00	0.5306E-01
3575.00	0.5297E-01
3600.00	0.5288E-01
3625.00	0.5278E-01
3650.00	0.5269E-01
3675.00	0.5259E-01
3700.00	0.5250E-01
3725.00	0.5241E-01
3750.00	0.5231E-01
3775.00	0.5222E-01

1275.00	0.1265
1300.00	0.1178
1325.00	0.1124
1350.00	0.1077
1375.00	0.1037
1400.00	0.9900E-01
1425.00	0.9619E-01
1450.00	0.9361E-01
1475.00	0.9124E-01
1500.00	0.9023E-01
1525.00	0.8824E-01
1550.00	0.8638E-01
1574.99	0.8463E-01
1600.00	0.8297E-01
1625.00	0.8142E-01
1650.00	0.7994E-01
1675.01	0.7853E-01
1700.00	0.7719E-01
1725.00	0.7591E-01
1750.00	0.7469E-01
1775.00	0.7352E-01
1800.00	0.7239E-01
1825.00	0.7131E-01
1850.00	0.7027E-01
1875.00	0.6927E-01
1899.99	0.6830E-01
1925.00	0.6738E-01
1950.00	0.6647E-01
1975.00	0.6560E-01
2000.00	0.6478E-01
2025.00	0.6402E-01
2050.00	0.6328E-01
2075.00	0.6257E-01
2100.00	0.6187E-01
2125.00	0.6118E-01
2150.00	0.6052E-01
2175.00	0.5987E-01
2200.00	0.5924E-01
2225.00	0.5862E-01
2250.00	0.5801E-01
2275.00	0.5742E-01
2300.00	0.5688E-01
2325.00	0.5683E-01
2350.00	0.5677E-01
2375.00	0.5671E-01
2400.00	0.5665E-01
2425.00	0.5659E-01
2450.00	0.5653E-01
2475.00	0.5647E-01
2500.00	0.5641E-01
3800.00	0.5213E-01
3825.00	0.5205E-01
3850.00	0.5196E-01
3875.00	0.5186E-01
3900.00	0.5177E-01
3925.00	0.5167E-01
3950.00	0.5158E-01
3975.00	0.5148E-01
4000.00	0.5138E-01
4025.00	0.5129E-01
4050.00	0.5119E-01
4075.00	0.5110E-01
4100.00	0.5101E-01
4125.00	0.5092E-01
4150.00	0.5082E-01
4175.00	0.5072E-01
4200.00	0.5063E-01
4225.00	0.5053E-01
4250.00	0.5044E-01
4275.00	0.5035E-01
4300.00	0.5025E-01
4325.00	0.5016E-01
4350.00	0.5007E-01
4375.00	0.4998E-01
4400.00	0.4990E-01
4425.00	0.4981E-01
4450.00	0.4971E-01
4475.00	0.4961E-01
4500.00	0.4952E-01
4525.00	0.4942E-01
4550.00	0.4932E-01
4575.00	0.4923E-01
4600.00	0.4913E-01
4625.00	0.4904E-01
4650.00	0.4895E-01
4675.00	0.4885E-01
4700.00	0.4876E-01
4725.00	0.4867E-01
4750.00	0.4858E-01
4775.00	0.4850E-01
4800.00	0.4841E-01
4825.00	0.4831E-01
4850.00	0.4822E-01
4875.00	0.4813E-01
4900.00	0.4803E-01
4925.00	0.4794E-01
4950.00	0.4785E-01
4975.00	0.4776E-01
5000.00	0.4767E-01

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1492	0.1492	0.1492	0.1492	N/A
DISTANCE FROM SOURCE	1135.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1167	0.1167	0.1167	0.1167	N/A
DISTANCE FROM SOURCE	1.00 meters				

AERSCREEN 21112 / AERMOD 21112 11/19/25
11:36:31

TITLE: Thermal Ranch, Operations

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.403E-02 g/s	0.320E-01 lb/hr
AREA EMISSION RATE:	0.161E-08 g/(s-m2)	0.128E-07 lb/(hr-m2)
AREA HEIGHT:	3.00 meters	9.84 feet
AREA SOURCE LONG SIDE:	2238.31 meters	7343.54 feet
AREA SOURCE SHORT SIDE:	1119.15 meters	3671.75 feet
INITIAL VERTICAL DIMENSION:	1.50 meters	4.92 feet
RURAL OR URBAN:	URBAN	
POPULATION:	1420	
INITIAL PROBE DISTANCE =	5000. meters	16404. feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.1940	10	1125.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	12	12	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	208.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.1519	2525.00	0.7336E-01

25.00	0.1532
50.00	0.1545
75.00	0.1557
100.00	0.1569
125.00	0.1581
150.00	0.1593
175.00	0.1605
200.00	0.1617
225.00	0.1628
250.00	0.1639
275.00	0.1650
300.00	0.1661
325.00	0.1671
350.00	0.1682
375.00	0.1692
400.00	0.1702
425.00	0.1712
450.00	0.1722
475.00	0.1732
500.00	0.1741
525.00	0.1751
550.00	0.1760
575.00	0.1769
600.00	0.1778
625.00	0.1787
650.00	0.1796
675.00	0.1804
700.00	0.1813
725.00	0.1821
750.00	0.1830
775.00	0.1838
800.00	0.1846
825.00	0.1854
850.00	0.1862
875.00	0.1869
900.00	0.1877
925.00	0.1884
950.01	0.1892
975.00	0.1899
1000.00	0.1907
1025.00	0.1914
1050.00	0.1921
1075.00	0.1929
1100.00	0.1936
1125.00	0.1940
1149.99	0.1939
1175.00	0.1935
1200.00	0.1918
1225.00	0.1919
1249.99	0.1805
2550.00	0.7328E-01
2575.00	0.7319E-01
2600.00	0.7310E-01
2625.00	0.7301E-01
2650.00	0.7292E-01
2675.00	0.7283E-01
2700.00	0.7274E-01
2725.00	0.7264E-01
2750.00	0.7255E-01
2775.00	0.7246E-01
2800.00	0.7237E-01
2825.00	0.7227E-01
2850.00	0.7217E-01
2875.00	0.7207E-01
2900.00	0.7197E-01
2925.00	0.7186E-01
2950.00	0.7176E-01
2975.00	0.7165E-01
3000.00	0.7155E-01
3025.00	0.7145E-01
3050.00	0.7135E-01
3075.00	0.7124E-01
3100.00	0.7113E-01
3125.00	0.7103E-01
3150.00	0.7092E-01
3175.00	0.7080E-01
3200.00	0.7069E-01
3225.00	0.7058E-01
3250.00	0.7046E-01
3275.00	0.7035E-01
3300.00	0.7023E-01
3325.00	0.7012E-01
3350.00	0.7001E-01
3375.00	0.6990E-01
3400.00	0.6979E-01
3425.00	0.6967E-01
3450.00	0.6956E-01
3475.00	0.6944E-01
3500.00	0.6933E-01
3525.00	0.6920E-01
3550.00	0.6908E-01
3575.00	0.6897E-01
3600.00	0.6885E-01
3625.00	0.6872E-01
3650.00	0.6860E-01
3675.00	0.6848E-01
3700.00	0.6835E-01
3725.00	0.6823E-01
3750.00	0.6811E-01
3775.00	0.6800E-01

1275.00	0.1647
1300.00	0.1534
1325.00	0.1464
1350.00	0.1403
1375.00	0.1350
1400.00	0.1289
1425.00	0.1252
1450.00	0.1219
1475.00	0.1188
1500.00	0.1175
1525.00	0.1149
1550.00	0.1125
1574.99	0.1102
1600.00	0.1080
1625.00	0.1060
1650.00	0.1041
1675.01	0.1022
1700.00	0.1005
1725.00	0.9883E-01
1750.00	0.9724E-01
1775.00	0.9572E-01
1800.00	0.9425E-01
1825.00	0.9284E-01
1850.00	0.9149E-01
1875.00	0.9019E-01
1899.99	0.8893E-01
1925.00	0.8773E-01
1950.00	0.8655E-01
1975.00	0.8542E-01
2000.00	0.8434E-01
2025.00	0.8336E-01
2050.00	0.8240E-01
2075.00	0.8147E-01
2100.00	0.8055E-01
2125.00	0.7966E-01
2150.00	0.7880E-01
2175.00	0.7795E-01
2200.00	0.7713E-01
2225.00	0.7632E-01
2250.00	0.7554E-01
2275.00	0.7476E-01
2300.00	0.7407E-01
2325.00	0.7399E-01
2350.00	0.7392E-01
2375.00	0.7384E-01
2400.00	0.7376E-01
2425.00	0.7368E-01
2450.00	0.7360E-01
2475.00	0.7352E-01
2500.00	0.7344E-01
3800.00	0.6788E-01
3825.00	0.6776E-01
3850.00	0.6765E-01
3875.00	0.6752E-01
3900.00	0.6740E-01
3925.00	0.6728E-01
3950.00	0.6715E-01
3975.00	0.6703E-01
4000.00	0.6690E-01
4025.00	0.6678E-01
4050.00	0.6666E-01
4075.00	0.6654E-01
4100.00	0.6642E-01
4125.00	0.6629E-01
4150.00	0.6617E-01
4175.00	0.6604E-01
4200.00	0.6592E-01
4225.00	0.6579E-01
4250.00	0.6567E-01
4275.00	0.6555E-01
4300.00	0.6543E-01
4325.00	0.6531E-01
4350.00	0.6520E-01
4375.00	0.6508E-01
4400.00	0.6497E-01
4425.00	0.6485E-01
4450.00	0.6473E-01
4475.00	0.6460E-01
4500.00	0.6447E-01
4525.00	0.6434E-01
4550.00	0.6422E-01
4575.00	0.6410E-01
4600.00	0.6397E-01
4625.00	0.6385E-01
4650.00	0.6373E-01
4675.00	0.6361E-01
4700.00	0.6349E-01
4725.00	0.6337E-01
4750.00	0.6326E-01
4775.00	0.6314E-01
4800.00	0.6303E-01
4825.00	0.6290E-01
4850.00	0.6278E-01
4875.00	0.6266E-01
4900.00	0.6254E-01
4925.00	0.6242E-01
4950.00	0.6231E-01
4975.00	0.6219E-01
5000.00	0.6207E-01

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1942	0.1942	0.1942	0.1942	N/A
DISTANCE FROM SOURCE	1135.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1519	0.1519	0.1519	0.1519	N/A
DISTANCE FROM SOURCE	1.00 meters				

EXHIBIT B

1295 Hartford Avenue #8
White River Junction VT 05075

Norman Marshall, President
(802) 356-2969

nmarshall@smartmobility.com

December 15, 2025

Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Subject: Thermal Ranch Specific Plan

Dear Ms. McGuire,

I have reviewed the vehicle miles traveled ("VMT) impacts of the Thermal Ranch Specific Plan as described in the Draft Environmental Impact Report ("DEIR") dated November 2024 and Final Environmental Impact Report ("FEIR") dated July 16, 2025. I make the following findings:

1) The proposed Thermal Ranch project uses would be highly seasonal. The FEIR analyzes the employment, housing and VMT impacts of the project as if the uses would be year-round. This is misleading and fails to fully account for the project's impacts.
2) The FEIR states that 80% of the equestrian center employment would be seasonal. Many of the other jobs also would be seasonal. This would do little to alleviate the area's jobs/housing imbalance.
3) Although the area generally has an excess of jobs, it also has a deficit of affordable housing. The project would not significantly address this issue.
4) The only project component that is a regular year-round use is the housing that is not allocated to seasonal workers and not labeled "tourist" or "resort." This housing is likely to result in a significant VMT impact given the area's jobs/housing imbalance. The mean commute distance in Census data for workers residing in project area is 27 miles one-way. Building large amounts of new housing in VMT-inefficient areas exacerbates the jobs/housing imbalance and should be avoided.

Seasonal Factors Not Adequately Analyzed

The proposed Thermal Ranch project uses would be highly seasonal. The FEIR analyzes the employment, housing and VMT impacts of the project as if the uses would be year-round. As discussed below, this is misleading and fails to fully account for the project's impacts.

Employment

The FEIR states:

> The commercial, hotel, and equestrian components of the proposed development are estimated to generate approximately 1,325 jobs. The provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance. (FEIR 2.16-21)

This statement overstates the proposed project's job benefits because many, and possibly, most of the jobs would be seasonal. The breakdown of the 1,325 jobs is in the FEIR table reproduced below. (FEIR, p. 2.16-16

Table 2.16-10
Estimated Project Employment

Land Use	Quantity	Estimated Employees
Commercial Retail	200,000 square feet	800
Hotel	150 rooms	225
Equestrian Center	223.1 acres	300
	Total	**1,325**

Source: Thermal Ranch Specific Plan Vehicles Miles Traveled Analysis, prepared by Urban Crossroads, January 30, 2023.

The FEIR states that 80% of the equestrian center jobs would be seasonal:

> Of the 300± jobs to be generated by the equestrian center, approximately 80% would be seasonal in nature, active only during the October to April event season. (FEIR p. 2.16-16)

The FEIR also states that the hotel use also is directly tied to the seasonal equestrian use:

> In this case, the proposed the hotel would not be provided if the adjacent Horse Park were not located at the site, so it is reasonable to assume that visitors which select this location are considering the proximity to the Horse Park use. (App. L, PDF p. 5 of 26)

Therefore, the hotel would likely have a very high vacancy rate during the May to September period, and also have lower employment during this off-season.

Regarding the commercial retail uses, the FEIR states:

> Proposed commercial areas would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space. (FEIR, p. ES-2)

These numbers do not add up:

> 75,000 + 10,000 + 150,000 equals 235,000, not 275,000.

The FEIR states:

> The Project would include 275,000± gross leasable square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space; 50,000 square feet of resort retail space, 150,000 square feet of commercial retail space, and a 150-room hotel. (FEIR, p. 5)

These numbers are different and don't add up either:

> 75,000 + 10,000 + 50,000 + 150,000 equals 285,000, not 275,000.

Like the hotel use, this commercial/retail space would not be provided if the adjacent Horse Park were not located at the site. Therefore, much of the employment would be seasonal. Three of the categories listed in the excerpts above are directly tied to the equestrian center including: "equestrian event retail", "resort retail space," and "office space at the equestrian center." The other category of 150,000 square feet of "commercial retail space" is not further defined. However, it is probable that these usages would also be highly seasonal if they are built at all, because it does not appear that the year-round population in the area is sufficient to support this amount of year-round retail.

The FEIR acknowledges the seasonality of the employment, stating:

> As previously stated, at full buildout, the non-equestrian portions of the Project are projected to employ approximately 800 full-time and part-time staff for the proposed commercial uses, and approximately 225 staff for the proposed hotel. Some of these jobs may be seasonal in nature, given that demand for staff may fluctuate with the additional business generated by visitors and area residents attending competitions at the equestrian center. (FEIR, p. 2.16-17)

Given the seasonal nature of much, or possibly most, of the jobs, the benefits of the project in addressing the jobs/housing imbalance in the area is overstated.

It is also questionable that these seasonal jobs will be filled by local residents. In particular, it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property. The FEIR states:

> The proposed PA-4 workforce housing would provide up to 500 units of workforce housing to accommodate the approximate 300 jobs generated by the equestrian center. (FEIR, p. 2.16-16)

In cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.

Housing

Although the area has a deficit of jobs relative to housing overall, it also has a significant workforce housing affordability problem. The FEIR documents "a substantial deficit in available rental housing." (FEIR, p. 2.16-8)

The FEIR acknowledges that the project will add to needed workforce housing when it states:

> The estimated 1,025 hotel and commercial staff could create a demand for additional housing, including housing affordable to households earning 80% of less of the County's median income. According to the U.S. Bureau of Labor Statistics, the mean hourly wage for food preparation and serving related occupations in the Riverside-San Bernardino-Ontario Metropolitan Statistical Area is $16.81 as of May 2022. Based on the same source, the mean hourly wage for sales and related occupations is $22.98.14 converted to annual salaries and compared to the County's median income, these wages would fall into the very-low income (up to 50% of median income or $0 - $37,650 per year) and low income (51% to 80% of median income or $37,651 - $60,250) categories.
>
> For the reasons stated above, the jobs generated by the Project could create demand for housing, including affordable housing. (FEIR p. 2.16-17)

The FEIR then exaggerates the project's contribution towards addressing the workforce housing problems. It states:

> The Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages. While the proposed workforce housing is primarily intended for employees of the equestrian center, some of the units may be available for other employees of the Project. Moreover, as discussed below, it is likely that the majority of commercial retail, restaurant and hotel jobs generated by the Project would be filled by existing residents of the Coachella Valley that are already housed. As previously stated, eastern unincorporated areas of Riverside County have a below average jobs-to-housing ratio. (FEIR p. 2.16-17)

All of the housing totals in the FEIR are labeled "up to." FEIR Table 1-1 (p. 1-17) lists the "Workforce Cottages" as totaling 300-500. Given that these units are primarily to house the "approximate 300 jobs generated by the equestrian center," the lower 300 number appears more probably than the upper 500 number, particularly given that some units likely will house more than one worker in the same family.

The FEIR table (FEIR p. 2.16-15) reproduced below shows the breakdown of the "up to 1,362" units.

Table 2.16-9 Project Land Use Summary				
Planning Area	**Land Use**	**Acres (Net)**	**Residential Dwelling Units**	**RV Spaces**
PA 1	Commercial Tourist	223.1		
PA 2	Estate Residential	194.3	132	
PA 3	Medium Density Residential	69.5	390	
PA 4	High Density Residential	41.1	500	320
PA 5	Commercial Tourist	54.4	340	
PA 6	Commercial Retail	21.4		
	Totals	**603.8±**	**1,362**	**320**

In the table, the 500 "high density residential" units in the table are more likely fewer than 500 and are primarily for seasonal equestrian center workers who likely are drawn from outside the area. Therefore, they would not serve as workforce housing, either for the other employees in the project, or for the general area.

The FEIR says that these units might be available for rent to others including farmworkers during the "May to September offseason." (FEIR, p. 2-16-17) However, the FEIR provides no evidence that these short-term rentals would provide any practical benefit, as it is likely a period when other tourist-related seasonal employment and the associated workforce housing demand are at their low points. It also is not the peak period for agricultural work.

> The main harvest and peak season for farm work in the Coachella Valley is from **October through June**, due to the area's three distinct growing seasons. [1] While there are tasks throughout the year, the most intensive periods for planting and harvesting occur during these months, with specific crops like dates and grapes having peak harvests at different times within that window.[2]

The other categories in the FEIR table reproduced above are unlikely to provide any workforce housing. The "Estate Residential" with an average of 0.6 units per acre will be very expensive. The Commercial Tourist category proposed for Planning Area 5 includes expensive amenities, including resort condominiums and a hotel, which are not intended for year-round occupancy. The least expensive category will be the 390 Medium Density Residential Units with an average density of 5.6 units per acre., but few of these will be rental properties and the rents will likely be high.

Therefore, the County overestimates its contribution to the jobs/housing in the region. The FEIR should be revised to include more accurate assumptions reflecting the highly seasonal nature of the Project.

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[1] Coachella Valley Irrigated Lands Coalition, *Water Quality Monitoring Plan* (May 20, 2014), p. 5, available at: https://www.waterboards.ca.gov/rwqcb7/board_decisions/adopted_orders/orders/2014/0046attach_e.pdf; The Weather Channel, *Crowing The Holiday MVP: Why The #1 Vegetable At Thanksgiving Is The One You Least Expect,* available at: https://weather.com/features/news/2025-11-24-coachella-valley-celery-harvest-thanksgiving-weather-climate-change?utm_source=chatgpt.com.

[2] *Id.*

Considering the jobs/housing ration is already imbalanced and the County admits that the Project will lead to more housing demand, this may reveal potentially significant impacts that require mitigation.

The Year-Round Housing Component Would Likely Result in a Significant VMT Impact

The only project component that is a regular year-round use is the part of the housing that is not allocated to seasonal works and not labeled "tourist" or "resort." This housing is likely to result in a significant VMT impact given the jobs/housing imbalance in the area discussed in the FEIR. The jobs/housing imbalance is forecast to worsen in the Eastern Coachella Valley as shown in this table reproduced from the FEIR (p. 2.16-6).

Table 2.16-3
Eastern Coachella Valley Population and Employment Forecasts

Eastern Coachella Valley Area Plan	Population			Housing Units			Employment		
	2010	2020	2035	2010	2020	2035	2010	2020	2035
Incorporated	42,500	76,500	135,00	9,300	19,010	36,542	6,351	12,700	30,400
Unincorporated	32,454	89,606	206,313	7,363	22,971	55,286	6,878	15,849	35,577
Total	**74,954**	**166,106**	**341,313**	**16,663**	**41,981**	**91,828**	**13,229**	**28,549**	**65,977**

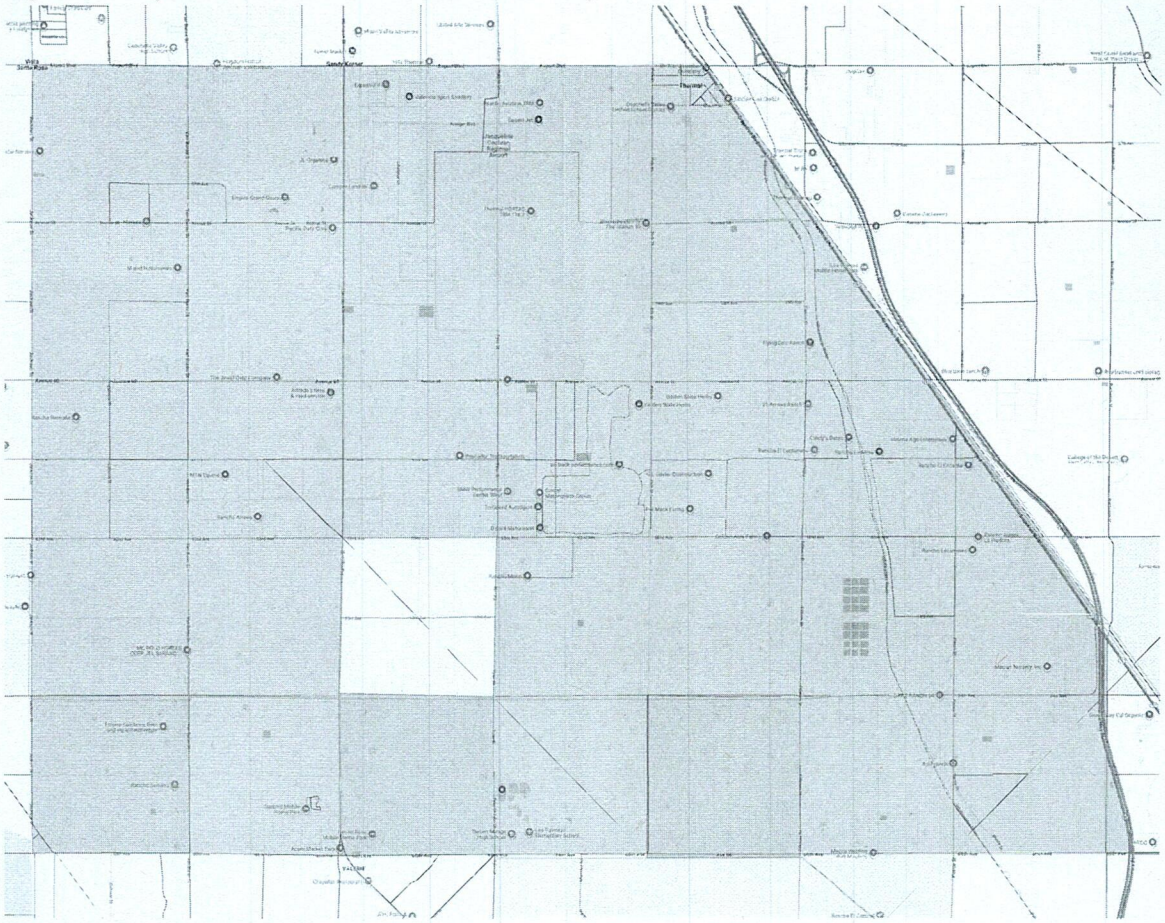
Source: Riverside County General Plan Appendix F-1 Population and Employment Forecasts

The table shows 49,847 additional housing units between 2020 and 2035, but only 37,428 more jobs over the same period. The FEIR includes an estimated 89,434 in the labor force in 2021 (FEIR, p. 2.16-94). This implies that there are over two workers per housing in the area, on average. Applying a ratio of 2 to the 2035 forecasts shown in the table above, this results in an increase of about 100,000 workers vs. 37,428 jobs over the period 2020-2035, requiring a huge increase in net out-commuting.

There are many long-distance commutes from those living in the vicinity of the project today. The U.S. Census Bureau publishes Longitudinal Employer-Household Dynamics ("LEHD") Origin-Destination Employment Statistics ("LODES") data that provide detailed geographic data about workers' commutes to jobs.[3] In order to focus on existing commutes from the immediate project area, I have extracted LODES data for the shaded area in the Figure 1 below, where the project area is shown in yellow.

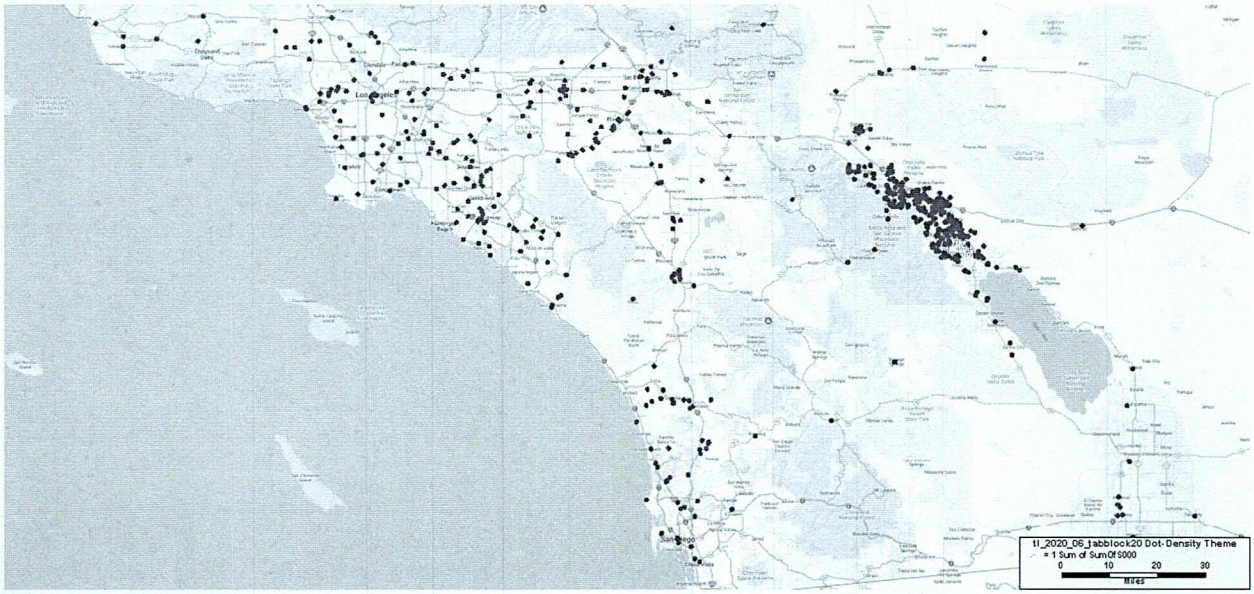
[3] The LODES data represent "covered" employment which excludes non-profits and some other categories.

Figure 1: Project Area Used for Census Data Analysis



The map below maps work locations for residents in the area shaded in Figure 1.

Figure 2: *Work Locations for Project Area Residents (Each Dot Represents 1 Job*



As shown in the Figure 2, about 60 percent of project area residents work in the Coachella Valley. However, there are also are many project area residents who commute long distances to destinations throughout the greater Los Angeles region. The mean commute distance in the LODES data for workers residing in project area (including the short commutes) is 27 miles one-way.[4]

Given the local/jobs housing imbalance and the existing long commute patterns, the assertion that "The Project is located in a low VMT area for residential uses" based on the RIVTAM model (FEIR, Appendix L, PDF p. 5 of 26) is not credible. I have 35 years experience in regional travel demand modeling. The models were not developed for this purpose and are not capable of matching the long real-world commutes.

Building large amounts of new housing in VMT-inefficient areas that exacerbates the jobs/housing imbalance should be avoided.

Sincerely,

Norman L. Marshall

Norman L. Marshall

[4] This calculation excludes records where the apparent commute distance is greater than 100 miles one-way.

Resume

NORMAN L. MARSHALL, PRESIDENT

nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (37 Years, 23 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in $250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced

model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additional analyzed using the City's Synchro model

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka'ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Caroline including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

MEMBERSHIPS/AFFILIATIONS

Associate Member, Transportation Research Board (TRB)

Member and Co-Leader Project for Transportation Modeling Reform, Congress for the New Urbanism (CNU)

EXHIBIT C

HOUSE AGRICULTURAL CONSULTANTS

Providing expertise in agricultural science, management, & appraisal since 1977.

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December 15, 2025 (via electronic mail)

To: Ms. Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
amcguire@adamsbroadwell.com

From: Greg and Henry House
House Agricultural Consultants
gahouse@houseag.com, hajhouse@houseag.com

Re: Expert review of County Response to Public Comments of Thermal Ranch Project, Riverside County, with respect to agricultural matters

Dear Ms. McGuire:

At your request, we have reviewed Riverside County's responses to public comments on the EIR (FEIR) for the *Thermal Ranch Specific Plan Project* (Thermal Ranch Specific Plan SP No. 00401)—hereinafter, the *Thermal Ranch project*, or, the *project*—to comment on agricultural resources in our capacity as agriculture experts. These are our second set of comments on this project.

We, House Agricultural Consultants (hereinafter, HAC), are an agricultural-consulting firm that has analyzed agricultural impacts of numerous similar projects as well as agricultural-reclamation plans over a period of many years. A description of our qualifications as consultants follows as an appendix to this memorandum.

We reply to three county responses, those to comments C-7, C-8, and C-17.

1 Comment on Response to C-7

In its response to comment C-7 the County makes this assertion (on page 34 in the PDF):

> Pursuant to County General Plan EIR No. 441 and EIR 521, no additional project-specific mitigation measures are feasible. Thus, impacts due to conflict with existing agricultural zoning or uses, including those leading to the conversion of designated Farmlands, as well as encroachment impacts, would be significant and unavoidable.

1.1 A dereliction of duty? On the same page the County quotes General Plan EIR No. 521, saying

> General Plan EIR No. 521 further concluded, reiterating the findings of the General Plan EIR No. 441) that General Plan policies: "do not set specific requirements that would limit the conversion of agricultural lands to non-agricultural uses. Further, EIR No. 441 (for 2003 General Plan Update) finds the policies do not identify the amount, extent or location of agricultural land to be conserved and that it is impossible to assess if policies would effectively reduce potentially significant impacts associated with the conversion of agricultural land to non-agricultural uses." (GPA 960 EIR No. 521, p. 4.5-35).

This passage from the General Plan is very revealing in that:

1) it does not set specific requirements that would limit conversion of agricultural lands, and
2) it states that it is "impossible to assess" if its policies would be effective in reducing significant impacts from the conversion of agricultural land to non-agricultural uses.

Impossible? Is it not the duty and mission of the County to follow CEQA and serve its constituent public? What this reveals is a complete lack of interest in conserving agricultural land, in complete contrast to the goals and objectives listed in the General Plan's Vision Statement, Open Space Element, and Land Use Element, which we have previously cited and enumerated in our original comment.

Nevertheless, if it were impossible to figure out, then the County certainly could not assert that "no additional project-specific mitigation measures are feasible". This finding in the County's General Plan EIR does not excuse the County from its duty under CEQA to analyze and adopt all feasible mitigation to reduce impacts to less-than-significant levels.

1.2 There is a way to assess the cost of an ACE. The County states that an agricultural conservation easement (ACE) would threaten its promotion of housing and economic-development opportunities:

> Rather, the County has determined that the requirement of an ACE will not serve to effectively mitigate Project impacts and is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities, which would be unnecessarily encumbered and threatened by a requirement for agricultural conservation easements as a condition of project development.

How does an ACE threaten this project's development? Since the County policy is in favor of conserving agriculture, we are not amiss to conclude that this means an ACE would cost money that the developer does not want to pay. However, no assessment of the cost has been done, yet the cost is certainly not "impossible" to determine; the valuation of agricultural conservation easements is a well established discipline that can be performed by many licensed real estate appraisers throughout California.

2 Comment on County response to C-8

In this comment response the County quotes California Code of Regulations to argue that an ACE is infeasible:

> To determine whether a mitigation measure or alternative is infeasible, an agency must necessarily weigh and balance its pros and cons taking account of a broad range of factors. (See 14 CCR §§15091(a)(3)). After weighing these factors, an agency may conclude that a mitigation measure or alternative is impractical or undesirable from a policy standpoint and reject it as infeasible on that ground.

2.1 Specific reasoning is required. However, 14 CCR §§15091(a)(3), 15364 states:

> Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The County has misstepped again by not providing *specific* reasons why the mitigation measure of an ACE is infeasible. Instead the County has used a circular argument: that in essence it has a policy to find this kind of mitigation infeasible as it finds such mitigation conflicts with its policy of promoting housing and economic-development opportunities. It also again depends on generalized references to ongoing drought in the community without providing any specific evidence to demonstrate that the Project's use of an ACE would exacerbate the issue. As mentioned in our previous comments, an ACE only conserves existing agricultural land—it does not create new agricultural land.

14 CCR §§15091(a)(3) requires that the County must provide specific, tangible reasons, not generalities, and the pros and cons of these specific reasons are to be weighed and balanced before the County can reject a potential mitigation measure even if it does not fully mitigate the significant impact.

2.2 A reasonable alternative mitigation measure. The County appears to have failed to consider other alternative measures being used in other California counties to mitigate the significant impact of loss of agricultural land to urban conversion; and importantly, these alternative measures meet the County's concerns about water shortages by not requiring a conservation easement on nearby water-deprived lands.

There are several agricultural mitigation measure alternatives to ACE's that are being utilized in other California counties, including Agriculture and Land Stewardship (ALS) Framework and Strategies (ALS Strategies), and public benefit agreements, a mitigation measure that has been successfully employed in nearby Imperial County since 2012.

2.2.1 IN-LIEU FEES. Agricultural land-loss mitigation is accomplished by the establishment of an "in-lieu" fee-collection program by the county. The fee is collected at time of issuance of the grading permit for the project in question, and it is called "in-lieu" because instead of requiring the developer to provide a ACE, the fee legally satisfies the developer's mitigation requirement.

The fee amount can be specified in various ways; a popular method is based on a set percentage of the project land's appraised value.

The collected in-lieu fee is deposited in a trust fund that is used exclusively for county approved, designated purposes, including both the purchase of ACEs, and for community benefits related to agriculture; this last being also known as a public-benefit program.[1]

2.3 Public-benefit Agreements. The public-benefit agreement is therefore utilized as an alternative to the purchase of ACEs in numerous counties of California. Imperial County, for instance has reportedly collected over $14 million as an alternative mitigation measure to benefit agricultural businesses, researchers, and local students; for instance, Imperial County has given out more than $1.6 million in grants to the University of California Cooperative Extension, $130,955 to the Imperial County Sheriff's Office, nearly $7.5 million in loans to several agricultural businesses, and more than $400,000 in scholarships to students in agriculture-related fields of study.

2.4 ALS Strategies. Riverside County should also consider how ALS Strategies can be utilize in-lieu mitigation fees to support and enhance the County's agricultural economy, which it has admitted will be negatively impacted by the project.

According to the California Department of Water Resources (DWR), ALS Strategies can help maintain agricultural lands that provide benefits to farmers and the environment.[2] DWR's web site lists a specific set of strategies for supportng the local agricultural economy:

– Develop area-wide economic and land use studies, such as plans for the protection and restoration of habitat areas that takes into consideration the vitality of the agricultural economy
– Promote economic development
– Improve transportation infrastructure
– Help farmers and landowners earn new revenue from recreation and tourism
– Assist farmers and landowners in working with governmental agencies

2.5 In-lieu fee mitigation measures fit County needs. These two in-lieu fee mitigation measures, the Public Benefit Agreement programs, and the ALS Strategies, both seem to be feasible and a perfect fit for Riverside County which, under its General Plan policies, seeks to

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[1] See Imperial County's public-benefit program: ⟨*https://imperial.granicus.com/MetaViewer.php?view_id=2&clip_id=1760&meta_id=290112*⟩.

[2] See ⟨*https://water.ca.gov/Programs/California-Water-Plan/Water-Resource-Management-Strategies/Agriculture-and-Land-Stewardship-Framework*⟩.

both support its local agricultural economy and to promote housing and economic development opportunities, while complying with CEQA in providing mitigation for the loss of agricultural land to urban development through this project.

3 Comment on County response to C-17

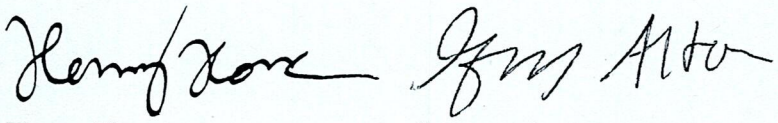
In this comment response the County mostly recycles talking points already made in C-7 and C-8. We refer the reader to our comments on these items, above, and our original comments prepared in our initial memo dated October 21, 2025. We add only the comment below.

3.1 Cumulative impacts. The County has argued that its general plan allows for up to 7 percent of agricultural land conversion apparently without any attempt at mitigation for the land loss. There has been no presentation of how the combination of this project and other past, present, and probable future projects may contribute to the overall significant negative environmental effect. The EIR needs to address this issue.

4 Closing

This concludes our current review of this project. A description of our professional qualifications is found in the appendix that follows.

Sincerely,



Henry House Gregory A. House

5 Appendix: Qualifications of House Agricultural Consultants

5.1 Qualifications of Henry House. Agricultural Economist · Agricultural Consultant · Licensed Appraiser · Farmer.

Summary of professional expertise:—

– California appraiser's license number AG-3010876 (Certified General Appraiser). This is the highest level of licensing for a real-estate appraiser and additionally qualifies Mr. House to value business interests, intellectual property, and other specialized assets and to opine on appraisals by others (the service of appraisal review).

– Agricultural economics and business lost profits; econometric controversies.

– Value of lost crops, emblements, and foodstuff inventory.

– Farm management: good farming practices in row crops and orchards, such as almonds and walnuts.

– Livestock management: carrying capacity of land, range management, standard of care for grazing animals, fencing.

– Right-to-farm issues, e.g., vehicle–agriculture, vehicle–livestock conflicts in agricultural districts, feasibility of agriculture on urban-proximate lands, spraying drift.

– Appraisal: valuation in disputes concerning real property, valuation of agricultural and rural land, valuation of valuation of agricultural personal property (e.g., chattel), valuation of agricultural-commercial facilities (e.g., aquaculture), valuation of development rights, assessed-value analysis for assessment appeal.

– Condemnation: valuation services for this appraisal specialty, including severance damages, in support of eminent-domain litigation.

– Conservation projects: Mr. House has assisted numerous land trusts in establishing conservation easements, including The Nature Conservancy, Yolo Land Trust, Solano Land Trust, Agricultural-Natural Resources Trust, River Partners, and Sutter Buttes Regional Land Trust.

– Management evaluation of commercial equestrian facilities.

– Management of rural property.

– Statistical analysis, geographic-information-system (GIS) analysis, and software engineering (analytics).

– Expert services to litigation on the foregoing with deposition and trial-testimony experience; partial list of matters below. Qualified expert in the counties of Butte, Colusa, Kern, and Riverside.

Representative recently concluded matters in which Mr. Henry House was retained by counsel as a forensic expert:—

County of Tulare, October 2025.—Topic: econometrics · agricultural irrigation · evapotranspiration · water rights · California Sustainable Groundater Management Act (SGMA). *Friant Water Authority v. Eastern Tule Groundwater Sustainability Agency* (case no. VCU306343). A matter of claimed economic damages due to the defendant's method of charging and accounting for groundwater drawn from a regulated basis by its memners, primarily farms growing diverse crops. Scope included econometrics and expertise in farm management.

County of Sacramento, September 2025.—Topic: farming standard of care · agricultural dust · walnuts. *Gerald Larson, et al. v. Robert Larson, et al.* (Sacramento County case no. 34-2021-00294930, consolidated with 34-2021-00311331 and 34-2022-00327390). An auto-accident case wherein dust allegedly originating from the defendants' walnut orchard obscured visibility on a public road, contributing to an accident with multiple vehicles involved. Mr. House was retained and designated to review the location of the incident, the crops and nature of agriculture in the area, and the standard of care used by the farming defendants, reasonableness of their actions, and their process for conducting agricultural operations, opining on the same and in rebuttal of other experts.

County of Butte, June 2025.—Topic: agricultural lost profits · olives. *Zih Jun Wang v. Pacific Gas & Electric Company, et al.*. A case regarding an olive grove in Butte County, where portion of the trees were destroyed by a utility company, in substantial excess of the utility's real-property rights under its easement to undertake fire-prevention activities. Mr. House opined on the economic impact of the trees' destruction, including cost of restoration, timeline to return to productive capacity, and lost profits, thereby assisting the client to obtain a settlement.

County of Wake, State of North Carolina, November 2024.—Topic: farm management, standard of care for labor contracting. *Carlos Moreno, et al. v. Florida Orange Gold, LLC, José Javier Gutierrez, Gilberto Gutierrez, and Howell Farming Co., Inc.* Mr. House was retained and designated for expertise on the client's standard of care in hiring contract labor in Wayne County, North Carolina. Plaintiff Moreno suffered a workplace injury, alleged to have been caused by heat sickness, while weeding watermelons as a contract laborer (as an employee of Florida Orange Gold) on the farmland of client Howell Farming Co. (defendant); the plaintiffs' cause of action against Howell was negligence. Mr. House opined on several controverted factual elements of the allegation of negligence, including the division of responsibility for workers' safety between farm-labor contractor (employer) and farmer hiring contract labor (nonemployer owner of the crop and possessor of the farmland), customary and accepted practices to manage risk of heat illness from hot weather, and whether summertime weeding in eastern North Carolina meets the characteristics of an "inherently dangerous activity" as defined by North Carolina law.

Federal venue, August 2024.—Topic: farm management, real-property rights. A federal-court matter, involving appraisal and farm-management expertise, which is confidential per our agreement with the client. This matter was venued in a federal district of California.

County of Sacramento, July 2024.—Topic: real-estate costs to cure · appraisal · conspiracy.—*Robert Williams and Christina Williams v. Dynamic Asset Solutions, LLC, Prato Real Estate, Inc., Bricker Construction, Inc., and Finley Home Services, Inc., et al.*. Mr. House was retained by Williams and opined in deposition on the fair market value of the subject property, a luxury home, in as-sold condition, its fair market value as if it had not suffered from damage discovered by buyer, and the market cost of repairs. Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Los Angeles, March 2024.—Topic: real-estate appraisal. *JP's Nevada Trust v. 2Bulls Conservation Ventures et al.* Mr. House was retained by JP's Nevada Trust and opined on valuation methodology and opined the fair market value of three ranch properties at the times of three controverted transactions in service of the plaintiff in a dispute in which the buyer (plaintiff) alleged conspiracy to defraud and a pattern of racketeering activity in violation of 19 U.S.C. § 1962(c), the Racketeer Influenced and Corrupt Organizations Act (RICO). Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Nevada, November 2023.—Topic: lost profits. *Andrew Hainsworth, et al. v. Pacific Gas & Electric Company.* A fire loss on a property in Rough and Ready. Mr. House was retained by Hainsworth and subsequently opined written findings regarding the plaintiff's lost profits from licensed *Cannabis* production in rural Nevada County, including an opinion on the market value of Nevada County-grown *Cannabis* relative to the market in aggregate.

County of Franklin, State of Washington, September 2023–June 2024.—Topic: real-estate appraisal. *Ice Harbor Properties, LLC and Certain Underwriters Subscribing to Certificate No. XLS0342717 v. Agri Control Technologies, Inc. d.b.a. BTU Ventilation and Parrish Stakkeland* (case no. 20-2-50118-11, Superior Court of the State of Washington, County of Franklin). A dispute over the compensation due by the defendants for the fire loss of the plaintiff's real property, a warehouse specialized for climate-controlled bulk storage of potatoes and onions. The plaintiffs retained and designated Mr. House as a rebuttal witness to opine on the fair market value of the lost building, the market for similar buildings, and other experts' opinions.

County of Tulare, July 2023.—Topic: livestock economics · real-estate appraisal. *Jones, et al. v. Pleasant Valley Canal Company, et al.* (Tulare County Superior Court case no. VCU274417). A dispute over a cattle-ranching and hay-growing operation which the plaintiffs alleged had been damaged by the operation of a canal crossing the plaintiffs' property. The scope for which Mr. House was retained and designated by the defendants included analyzing the plaintiffs' alleged diminution of value of real estate, analyzing the plaintiffs' alleged economic loss from death of cattle, and opining on the water company's standard of care in maintenance of its canal. Additionally, I assisted retaining counsel to engage an expert in veterinary pathology.

County of Minidoka, State of Idaho, March–August 2023.—Topic: standard of care for livestock fencing. *Michael O. Ottley v. Hanssen et al.* (case no. CV34-21-00168, District Court of the Fifth Judicial District of the State of Idaho). An auto-accident case wherein the defendants' cattle had escaped onto a public road and been struck by the plaintiff in rural Minidoka County, Idaho. The defendants retained and designated Mr. House to analyze the defendants' standard of care in managing the cattle, to opine on the quality of the defendants' fencing in comparison to locally accepted standards of adequacy, and for rebuttal of the plaintiff's fencing expert.

County of Imperial, November 2022–February 2024.—Topic: agricultural economics · hay. *Freddi Abatti et al. v. James Davis, et al.* (Imperial County Superior Court case no. ECU002597). The defendants retained and designated Mr. House to evaluate the lost profits in hay crops in Imperial County resulting from a fire.

County of Merced, September 2022–January 2024.—Topic: agricultural economics · lost profits · almonds. *Athwal Investments et al. v. San Luis Pump Co. et al.* (case no. 20CV03787). A matter of almond trees in Merced County allegedly damaged consequent to lack of irrigation water. Scope included analysis of the economic lost profits from orchard trees lost and replanted as well as from lost yield in service of two defendants.

See also.—Mr. House's separately provided listing of testimonies lists additional matters.

Partial list of management-consulting assignments:—

– Numerous consulting assignments for Leland Stanford Junior University on the management of its agricultural lands, which feature cattle, horses, and vegetable crops. Topics addressed have included livestock standard of care, carrying capacity of lands, safety of animals, safety of structures, and management of drainage and water quality.

– Consulting farm management for John and Marie Cronin Trust B, a landowner near Rio Vista, California. Lands were utilized for cattle grazing.

– Numerous appraisal assignments of farmland and rangeland properties utilized for crops and livestock (cattle, sheep, and aquaculture).

– A list of additional management-consulting clients served available on request.

Experience:—

Agricultural consultant, appraiser, consulting agricultural economist.— House Agricultural Consultants, providing agricultural science, economics, management, and appraisal services. 2000–present.

Farmer.— Coco Ranch, a family farm growing organic apples, peaches, cherries, and field crops and raising sheep, poultry, and goats. 2000–present.

Education:—

– B.S., "Natural History", University of California, Davis, 1999, with Honors. Coursework in agronomy, botany, ecology, entomology, geology, hydrology, nematology, plant pathology, soil biology, sustainable agriculture, statistics, and wildlife biology.

– Numerous courses of the American Society of Farm Managers & Rural Appraisers (ASFMRA) regarding farm management, agricultural consulting, and appraisal. Recently completed: *Livestock Ranch Seminar* (February 15, 2024) and *Appraisal of Water Rights Seminar* (March 8, 2024), both in ASFMRA's appraisal-education series.

– Numerous courses of the Appraisal Institute regarding real-estate appraisal.

– Courses from Savory Institute regarding livestock management.

Appointments & activities:—

– Member, Solano County Farm Bureau.

– Member, American Society of Farm Managers & Rural Appraisers.

– Board of Directors, Davis Media Access, Davis, California, 2014–2017.

– Board of Directors, Davis Farmers Market Association, 2001–2003.

– Assistant instructor, "Principles of Farm Management", course M-10, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

– Course proctor, "M-25: Enhanced Client Services", an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

Publications & speaking engagements:—

– Lecturer/instructor, "Farm Management", course ARE 140, and "Appraisal of Farms & Rural Resources", course ARE 145, University of California–Davis, 2015–present.

– *Principles of Farm Management*, Course M-10, a 40-hour professional credit Internet educational offering of the American Society of Farm Managers & Rural Appraisers

– Educational speaker at the annual meeting of the California Chapter of the American Society of Farm Managers & Rural Appraisers, November 19, 2021, Coalinga, California. Topic: valuation of conservation easements.

5.2 Qualifications of Gregory A. House. Agricultural Consultant · Agronomist · Professional Farm Manager · Rural Appraiser · Farmer.

Experience:—

– Agricultural consultant, 1983–present—House Agricultural Consultants, providing agricultural-science, economics, management, and appraisal services.

– Farmer, 1987–present.—Growing organic apples, peaches, cherries, apricots, field and seed crops.

– Corporation secretary and consulting agronomist, 1977–1983—Hannesson, Riddle & Associates, Inc.

Professional affiliations:—

– American Society of Farm Managers & Rural Appraisers
– American Society of Agronomy
– Crop Science Society of America
– Soil Science Society of America
– California Certified Organic Farmers
– California Farm Bureau.

Accreditations:—

– Accredited Farm Manager (AFM), American Society of Farm Managers & Rural Appraisers, certificate no. 501

– Certified Professional Agronomist (CPAg), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd., certificate no. 2319

– Certified Crop Advisor (CCA), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd.

N.B.—These credentials have continuing-education requirements with which I am in compliance.

Education:—

– B.S., Crop Ecology, University of California, Davis, 1975, with Honors

– Numerous courses from the University of California Extension in agricultural economics, crop management, real estate, & hazardous waste management

– Cornell University Certificate Program, Implementing Good Agricultural Practices: A Key to Produce Safety

– Courses of the American Society of Farm Managers & Rural Appraisers: Principles of Rural Appraisal · Advanced Rural Appraisal · Eminent Domain · Report Writing School · Economics of Farm Management · Principles of Farm Management · Standards and Ethics · Permanent Plantings Seminar · Standards and Ethics for Farm Managers · ASFMRA Code of Ethics

National Uniform Standards of Professional Appraisal Practice Courses of the Appraisal Institute: Basic Valuation Procedures · Real Estate Statistics and Valuation Modeling · Advanced Income Capitalization · Valuation of Conservation Easements Certificate Program · Condemnation Appraising: Principles and Applications · Appraising the Appraisal · How Tenants Create or Destroy Value: Leasehold Valuation and Its Impact on Value.

– Former Accredited Rural Appraiser (ARA), American Society of Farm Managers & Rural Appraisers, certificate no. 749 (retired).

Expert-witness court testimony:—

– Superior Court Qualified Expert Witness in the following California counties: Alameda, Colusa, Kern, Fresno, Madera, Merced, Monterey, Orange, Riverside, San Joaquin, San Luis Obispo, Santa Barbara, Santa Cruz, Solano, Sonoma, Sutter, Ventura, Yolo

– United States Tax Court qualified expert witness

– United States Bankruptcy Court qualified expert witness.

A comprehensive listing of Mr. House's depositions and trial appearances is available upon request. The list currently numbers seventy-two matters in which Mr. House gave sworn testimony (either deposition, trial or hearing appearance, or both), including thirty-two trial appearances.

Awards:—

– CCOF Presidential Award, California Certified Organic Farmers, February, 2001.

– Meritorious Service in Communications, American Society of Farm Managers & Rural Appraisers, November 2004.

– H.E. Buck Stalcup Excellence in Education Award, American Society of Farm Managers & Rural Appraisers, October, 2011.

Appointments & activities:—

– Adjunct Lecturer, University of California, Davis, Department of Agricultural & Resource Economics, current; Courses ARE 140 Farm Management; ARE 145 Appraisal of Farms & Rural Resources, 2015–2021.

– Instructor, *Principles of Farm Management*, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1996–2007.

– President, California Chapter American Society of Farm Managers & Rural Appraisers 1994–1995; Secretary–Treasurer, 1984–1990.

– Board of Directors, Yolo Land Trust, 1993–2001.

– Board of Directors, American Red Cross, Yolo County Chapter 1987–1989.

– Member, Yolo County Right to Farm Grievance Committee 1992–1995.

– Vice Chairman, Management Education Committee, American Society of Farm Managers & Rural Appraisers, 1998–2000 (committee member since 1986).

– Yolo County LAFCo Agricultural Forum LESA subcommittee, 1999.

– California Certified Organic Farmers: Treasurer of the Board of Directors, 1998–2003; Executive Director, 1999–2000; Member of the Finance Committee, 1998–current.

– CCOF Foundation Going Organic Program, Management Team member, 2006–2012.

– USDA Organic Grant Panel member, Washington, DC, 2002.

– City of Davis Open Space and Habitat Commission, 2006–2016, Chairman, 2007–2009.

– Member, Fruit Orchard Technical Advisory Group, Filoli Gardens, Woodside, California.

– Member, Organic and Sustainable Agriculture Program Steering Committee, University of California Cooperative Extension, Yolo and Solano Counties, California, 2008–2013.

– Member, Solano County Right to Farm Grievance Committee 2022–present.

Speaking engagements:—

– Guest lecturer, University of Florida at Gainesville–Vegetable Crops Department. Seminar on transition to organic agriculture, November 1994.

– Featured program speaker, 1995 annual *Eco-Farm Conference.* Lecture on economics of organic-apple production, Asilomar, California, 1995.

– Guest speaker, multiple events of Community Alliance with Family Farmers. Presentations on farm management and agricultural economics, 1996 and 1997.

– Instructor, American Society of Farm Managers & Rural Appraisers. Course "M-12", *Standards and Ethics for Professional Farm Managers*, March 1997.

– Guest speaker, American Horticultural Society. Lecture entitled *Challenges of Organic Stone Fruit Production*, Sacramento, California, July 2001.

– Organizer and presenter, *Going Organic Kickoff Meetings.* A program of California Certified Organic Farmers, November 2005 and December 2006.

– Master of ceremonies, annual meeting of California Certified Organic Farmers. Sacramento, California, February 2006.

– Featured program speaker, 2012 annual *Eco-Farm Conference.* Lecture entitled *Imitating Natural Systems: Towards an Indigenous Agro-forestry*, Asilomar, California, 2012.

– Seminar presentation, American Society of Farm Managers & Rural Appraisers. *Rapid Fire Seminar: What Makes for Comparable Sales in Condemnation Appraisal*—Reno, Nevada, October 2013.

– Featured program speaker, 2014 annual *Eco-Farm Conference.* Lecture entitled *Food Safety Regulatory Compliance in Fruit Orchards*, Asilomar, California, 2014.

Publications:—

– *Principles of Farm Management*, course "M-10", a forty-hour professional-credit online educational offering of the American Society of Farm Managers & Rural Appraisers.

– *Conservation Issues in Agriculture*, a unit of course "M-25", a fifteen-hour professional-credit online educational offering of the American Society of Farm Managers & Rural Appraisers.

– *A Primer on Organic Agriculture*, an article in *2006 Trends in Agricultural Land and Lease Values*, a publication of the California Chapter of the American Society of Farm Managers & Rural Appraisers.

– *Case Study: Using Indigenous Agroforestry Management Techniques to Support Sustainability in Production Agriculture*, a paper-poster presented at *Harlan II, An International Symposium on Biodiversity in Agriculture: Domestication, Evolution and Sustainability*, September 14–18, 2008, University of California–Davis.

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Memorandum

DATE: **December 16, 2025**

TO: **Board of Supervisors**

FROM: **Russell Brady, Project Planner**

RE: **Item 23.1 – CARE CA Public Comments**

Attached are additional public comments received from Californias Allied for a Responsible Economy (CARE CA) since completion of the package for the Board of Supervisors. There are additional reference materials that were provided with the letter that are not included with the memo, but will still be part of the record on the project. At this time there are no responses prepared for these comments, but review of the comments indicates that no substantially new comments are included that were not previously addressed.

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December 15, 2025

Via Email and Hand Delivery

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Vice-Chair Karen Spiegal
Supervisor Jose Medina
Supervisor Chuck Washington
Supervisor Yxstian Guitierrez
Riverside County Board of Supervisors
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Clerk of the Board
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Re: Agenda Item 23.1: Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624)

Dear Chair Perez, Vice-Chair Spiegal, Board Members, and Clerk of the Board:

On behalf of Californians Allied for a Responsible Economy ("CARE CA"), we submit these comments on Agenda Item 23.1 related to the Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624) ("Project") proposed by Thermal Ranch, LLC ("Applicant").

The Project's proposed entitlements include a General Plan Amendment (GPA No. 2300001), a Tentative Tract Map (TTM No. 38578), three Plot Plan applications (Plot Plan No.s 230005, -6, -16), and a Change of Zone (CZ No. 2300003) to construct a mix of residential and commercial uses centered around a 231-acre equestrian center and related show facilities, including barns, stabling and related equestrian services on a 619± acres.[1] The residential components of the Project would include a mix of residential neighborhoods ranging from seasonal and year-round workforce housing and RV park facilities to large single-family estate

[1] FEIR, p. ES-2.

printed on recycled paper

lots, single-family attached and detached homes and resort condominiums.[2] At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.67 to 27.3 units per acre and up to 320 RV spaces.[3] The commercial components of the Project would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space.[4] A 54.4±-acre mixed use resort with a 150± key resort hotel, beach club, pool and other recreational amenities, and ancillary retail is also proposed.[5] The proposed Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County.[6]

CARE CA respectfully requests that the Board of Supervisor's continue the December 16, 2025, hearing and remand the Project to Staff to revise and recirculate the EIR in compliance with the California Environmental Quality Act ("CEQA"). The County cannot certify the FEIR, adopt the Project's Mitigation Monitoring & Reporting Program ("MMRP"), adopt the Statement of Overriding Considerations, or approve the Projects entitlements based on the County's legally deficient environmental analysis and inadequate mitigation, and absent substantial evidence to support the necessary findings for Project approval.

I. EXECUTIVE SUMMARY AND BACKGROUND

On January 10, 2025, CARE CA submitted comments, supported by expert evidence, explaining that the Draft Environmental Impact Report ("DEIR") had substantial informational and evidentiary defects, and relied on unsupported conclusions to assert that the Project's impacts would be fully mitigated by the measures proposed in the Project's MMRP and conditions of approval. CARE CA's expert reports included substantial evidence demonstrating that the Project would result in potentially significant impacts on public health, noise, and agricultural resources that were not adequately disclosed, analyzed or fully mitigated in the DEIR. As a result of the DEIR's fundamental inadequacies and conclusory nature, the DEIR failed to disclose or fully mitigate many of the Project's significant impacts, resulting in an inadequate public review process.

For example, CARE CA's air quality expert demonstrated that the County improperly relied on Localized Significance Thresholds ("LSTs") to assess health

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[2] FEIR, p. ES-2.
[3] FEIR, p. ES-2.
[4] FEIR, p. ES-2.
[5] FEIR, p. ES-2.
[6] FEIR, p. 1-3.

risk, which failed to identify potentially significant health impacts from exposure of nearby residents and workers to toxic air contaminant ("TAC") emissions. CARE CA's noise expert provided substantial evidence that the DEIR underestimated operational noise impacts by failing to analyze impacts at the closest residence to the Project site and by underestimating HVAC run time. Finally, CARE CA's comments demonstrated that the DEIR lacked any mitigation for the Project's significant agricultural impacts and therefore did not provide substantial evidence to support its proposed statement of overriding considerations.

The County released the Final Environmental Impact Report ("FEIR") in September 2025, which included responses to CARE CA's comments. The Planning Commission held a hearing on October 22, 2025 to consider the FEIR and Project entitlements. On October 21, 2025, CARE CA submitted comments to the Planning Commission detailing that the FEIR still failed to comply with CEQA. CARE CA's agriculture expert provided substantial evidence demonstrating that the Project's agricultural impacts can feasibly be mitigated by an Agricultural Conservation Easement ("ACE"), which should have been implemented by the County. The Planning Commission nevertheless voted to recommend approval by the Board.

Prior to the Board hearing, Staff prepared responses to CARE CA's FEIR comments ("Responses to Comments").[7] However, neither the Responses nor the Board Staff Report resolve the FEIR's fundamental deficiencies and still fail to meaningfully respond to all of the Project's substantial evidence from CARE CA's experts. The County must revise and recirculate the EIR to comply with CEQA before the Board may consider approving the Project.

First, the County cannot certify the FEIR because it lacks substantial evidence to make the necessary CEQA Findings.[8] CEQA Findings must be supported by substantial evidence in the administrative record. The record before the Board does not contain substantial evidence demonstrating that the Project's significant environmental effects will be eliminated or substantially avoided, as required by law. In fact, substantial evidence in CARE CA's comments on the DEIR, FEIR, and expert consultant reports continue to demonstrate that the Project results in significant, unmitigated environmental impacts requiring revision and recirculation of the EIR.

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[7] Responses to Comments, pp. 1-202.
[8] Riverside County Board of Supervisors Resolution No. 2025-303, Attachment A: CEQA Findings, pp. 1-152.

Second, the County cannot adopt the MMRP because it lacks substantial evidence to conclude that the MMRP will reduce or avoid the Project's significant impacts.[9] Rather, CARE CA's expert consultant provides substantial evidence that the Project will result in significant air quality and public health impacts, notwithstanding the mitigation proposed in the MMRP, which were not addressed in the FEIR. These impacts must be analyzed and further mitigation required for any significant impacts found.

Third, the County cannot adopt the Statement of Overriding Considerations because it lacks substantial evidence to make the necessary findings.[10] The record before the Board demonstrates that there are changes or alterations that can be incorporated into the Project which would substantially lessen the significant environmental effect as identified in the FEIR. Specifically, CARE CA's expert provides substantial evidence that there are feasible mitigation measures that would substantially reduce the Project's significant impacts from the conversion of important agricultural land. These must be implemented in a revised EIR before adoption of the Statement of Overriding Considerations.

Fourth, as discussed in more detail below, the County cannot make the necessary findings to support approval of the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.

These comments are supported by supplemental expert evidence. CARE CA's air quality consultant Paul E. Rosenfeld, Ph.D. of Soil Water Air Protection Enterprise ("SWAPE"),[11] transportation expert Norman Marshall,[12] and agriculture resources expert Henry House.[13] Our air quality consultant provides substantial evidence that the Project will result in significant project-specific and cumulative public health impacts from DPM emitted during construction and operation. Our agriculture resources expert provides substantial evidence demonstrating that there is feasible mitigation that would substantially reduce the Project's significant agricultural impacts that the County fails to adopt in violation of CEQA. Our

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[9] Resolution No. 2025-303, Attachment B: Mitigation Monitoring and Reporting Program, p. MMRP-1.
[10] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[11] See **Exhibit A,** Paul E. Rosenfeld, Ph.D., Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("SWAPE Comments").
[12] See **Exhibit B,** Norman Marshall, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("Marshall Comments").
[13] See **Exhibit C,** Henry House, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("House Comments").

transportation expert demonstrates that the County lacks substantial evidence to conclude that the Project will not result in significant impacts to the existing housing/jobs imbalance. These potentially significant impacts necessarily require the County to revise and recirculate the EIR prior to Project approval.

II. STATEMENT OF INTEREST

CARE CA is a non-profit organization which advocates for a sustainable construction industry and protecting the environment and health of its communities' workforces. CARE CA includes the Southern California Pipe Trades District Council 16 and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in and around Riverside County.

CARE CA advocates for protecting the environment and the health of their communities' workforces. CARE CA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits, and which minimize adverse environmental and other impacts on local communities. CARE CA members live, work, recreate, and raise their families in Riverside County and its communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

In addition, CARE CA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

III. THE BOARD OF SUPERVISORS CANNOT MAKE THE REQUISITE FINDINGS TO APPROVE THE PROJECT

The Project requires the County to certify the FEIR and approve several entitlements, including the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.[14] However, as

[14] FEIR, p. 4.

discussed herein, the Staff Report and the County's response to comments fails to adequately address several significant environmental and public health impacts. As a result, the County lacks substantial evidence to make the requisite findings to approve the Project or its entitlements.

General Plan Amendment

CARE CA's previous comments explained that in order to approve the Project's GPA, the Board must make all of the findings required in both Section 2.4 (Entitlement/Policy General Plan Amendment) and 2.7 (Agriculture Foundation Component General Plan Amendments) of Riverside County Ordinance 348:

1. Section 2.4: Entitlement/Policy General Plan Amendment

In order to approve an entitlement/policy amendment the Board must make the first two findings listed below and any one or more of the subsequent findings listed below:

- The proposed change does not involve a change in or conflict with:
  - the Riverside County Vision;
  - any general planning principle set forth in general plan Appendix B; or
  - any foundation component designation in the general plan.
- The proposed amendment would either contribute to the purposes of the general plan or, at a minimum, would not be detrimental to them;
- Special circumstances or conditions have emerged that were unanticipated in preparing the general plan;
- A change in policy is required to conform to changes in state or federal law or applicable findings of a court of law;
- An amendment is required to comply with an update of the housing element or change in state housing element law;
- An amendment is required to expand basic employment job opportunities (jobs that contribute directly to the county's economic base) and that would improve the ratio of jobs-to-workers in the county;
- An amendment is required to address changes in ownership of land or land not under the land use authority of the board of supervisors.[15]

[15] Ordinance No. 348 § 2.4

2. Section 2.7: Agricultural Foundation Component General Plan Amendment

The Board must make both of the following requirements to approve the GPA:

- A maximum of 7% of the Agricultural Foundation acreage shall be generally authorized for conversion from the Agricultural Foundation Component to any other Foundation Component within a 2 ½ year period. [16]
- The proposed amendment must either contribute to the achievement of the purposes of the General Plan or, at a minimum, not be detrimental to them. [17]

The Project is inconsistent with the General Plan and results in significant, unmitigated agricultural impacts which prevent the County from making the requisite findings above.

First, the GPA conflicts with the County's General Plan Vision Statement. By proposing the permanent conversion of over 619 acres of important farmland without any mitigation, the GPA directly contradicts the County's stated goals of preserving agricultural areas, which have historical importance in Riverside County, in the face of mounting growth pressures in agricultural areas.[18]

Second, the GPA conflicts with principles set forth in General Plan Appendix B. Similar to the General Plan, the Planning Principles encourage the preservation of agricultural land. Specifically, the Planning Principles state that "[a]griculture should be treated as an economic land use" and that incentives and policies should be put in place to stimulate agricultural production and protect agricultural areas from urban encroachment.[19] For the same reasons discussed above, the Amendment's conversion of agricultural land conflicts with these principles.

Third, the GPA involves a clear change to a foundational component designation in the General Plan. Specifically, the GPA proposes to change the current General Plan Foundation designation of Agriculture to Community Development.[20] Therefore, the Board cannot make the first required finding to approve the GPA under Section 2.4 of Ordinance No. 348.

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[16] Ordinance No. 348 § 2.7.B.3.
[17] General Plan Administration Element, p. A-16.
[18] Vision Statement, pp. V-20, V-21; see also Land Use Element, p. LU-44;
[19] General Plan Appendix B: Planning Principles, pp. 12-13.
[20] FEIR, p. 2.16-18.

The Board also cannot make the second required finding to approve the GPA under Section 2.7 of Ordinance No. 348. As discussed below, the Project is detrimental to the purposes of the General Plan because it still fails to mitigate the Project's conversion of agricultural land into non-agricultural use. This is detrimental to the purposes of Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land.

The County attempts to ignore this inconsistency by claiming that the Project is consistent with the General Plan because it is consistent with the General Plan's policy which allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. However, compliance with this single policy does not excuse the County's continued inconsistency with the other policies in the General Plan related to preserving agricultural land through conservation easements.

Therefore, the Board cannot make the requisite findings to approve the Project's GPA.

Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[21] The County continues to conclude that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[22] However, for the same reasons discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land. Therefore, the Board cannot make the requisite findings to approve the Specific Plan.

Plot Plan

The Project's three plot plan applications cannot be approved unless it complies with the requirements of Section 18.30 in Riverside County Ordinance No. 348, including:

[21] Riverside County Ordinance No. 348, §§ 2.8, 2.9, 2.1.
[22] Responses to Comments, Response C-12, p. 53.

1. The proposed use must conform to all the requirements of the general plan and with all applicable requirements of state law and the ordinances of Riverside County;
2. The overall development of the land shall be designed for the protection of the public health, safety and general welfare; to conform to the logical development of the land and to be compatible with the present and future logical development of the surrounding property. The plan shall consider the location and need for dedication and improvement of necessary streets and sidewalks, including the avoidance of traffic congestion; and shall take into account topographical and drainage conditions, including the need for dedication and improvements of necessary structures as a part thereof;
3. All Plot Plans which permit the construction of more than one structure on a single legally divided parcel shall, in addition to all other requirements, be subject to a condition which prohibits the sale of any existing or subsequently constructed structures on the parcel until the parcel is divided and a final map recorded in accordance with Ordinance No. 460 in such a manner that each building is located on a separate legally divided parcel.[23]

The Board cannot make the first two of these required findings. First, for the same reasons discussed above, the Project does not conform with all of the requirements of the General Plan by converting 619 acres of important farmland without proposing any mitigation. Second, the development of the land would not be designed for the protection of the public health, safety, and general welfare. As discussed below and in SWAPE's attached comments, the Project will result in significant project-specific and cumulative public health impacts from exposure to the DPM emitted during Project construction and operation.

Zone Change

The Project's Zone Change cannot be approved unless it complies with the requirements of Section 20.3 in Riverside County Ordinance No. 348. This Section requires the Board to find the Zone Change consistent with the General Plan. As discussed above, the Zone Change is not consistent with the General Plan because it would allow the permanent conversion of 619 acres of agricultural land to non-agricultural use without any mitigation. Therefore, the Board cannot approve the Zone Change.

[23] Ordinance No. 348 § 18.30(C).

Tentative Tract Map

The Project's Tentative Tract Map cannot be approved unless it complies with the requirements of Section 20.3 of Riverside County Ordinance No. 348., as well as the Subdivision Map Act. Accordingly, the Board must make the following findings:

- That the proposed map is consistent with the general plan or applicable specific plan, or other applicable provisions of the Municipal Code;
- That the site is physically suitable for the type of development;
- That the site is physically suitable for the proposed density of development;
- That the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- That the design of the subdivision or the type of improvements are not likely to cause serious public health problems;
- That the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.[24]

The Board cannot make these requisite findings for several reasons. First, as discussed above, the proposed map is not consistent with the General Plan's policies and goals related to the preservation of agricultural land. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments below demonstrate, the Project will have significant project-specific and cumulative public health impacts that were not adequately disclosed or analyzed. Specifically, the FEIR failed to analyze the Project's potential impacts from construction and operation-related TAC emissions. As a result, the County also has not provided substantial evidence to demonstrate that the proposed mitigation will adequately reduce these health risks to less than significant levels. Therefore, the Board cannot make the requisite findings to recommend approval of the Tentative Tract Map.

[24] Subdivision Map Act §§ 66474, 66473.5; Ordinance No. 348 § 20.3.

IV. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE THE PROJECT'S INDIVIDUAL AND CUMULATIVE HEALTH RISK IMPACTS REMAIN UNRESOLVED

a. The Record Contains Substantial Evidence of Significant, Unmitigated Health Risk Impacts

CARE CA's prior comments demonstrated that the County failed to analyze the potentially significant cancer risks from the Project's construction and operation-related DPM emissions. The County limited its health risk analysis to criteria air pollutants by relying on Localized Significance Thresholds ("LSTs"), which measure criteria pollutants but do not measure TACs, including DPM. Health risk from exposure to DPM is measured under a separate threshold for cancer risk. Since the County failed to measure the severity of DPM exposure against a relevant threshold, the FEIR lacks substantial evidence to support a conclusion that health risk would be less than significant. Moreover, CARE CA's expert conducted a screening level health risk analysis of the Project's DPM emissions, which demonstrated that the Project would cause significant health risk impacts that the FEIR failed to disclose or mitigate.

The County now incorrectly attempts to discredit SWAPE's screening-level health risk analysis by misrepresenting the results of its own LST analysis and improperly concluding that the County does not have a legal duty to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not expressly required by CEQA. This reasoning is legally flawed, misleading, and directly contrary to CEQA's requirement to analyze potentially significant environmental impacts.

First, the County claims that they do not need to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not required by CEQA. This is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR,[25] including the health risk caused by human exposure to the project's air emissions.[26] The absence of a requirement in the Guidelines to prepare a specific type of HRA does not relieve the County of its duty to fully analyze and mitigate the Project's potentially significant health impacts.

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[25] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[26] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.

Second, the County continues to erroneously assert that compliance with LSTs are sufficient to rule out health risk from the Project. The County further misrepresents the purpose of LSTs by claiming that, because LSTs evaluate particulate matter, they also account for cancer risks associated with the TAC fraction of DPM. This is incorrect. CARE CA previously explained that LSTs do not analyze TAC emissions and therefore cannot be used to determine whether a project would result in increased cancer risk, even where modeled criteria pollutant emissions fall below LSTs. LSTs are designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO2, CO, PM10, or PM2.5 to exceed the ambient air quality standards at nearby receptors.[27] TACS, by contrast, have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.[28] Accordingly, reliance on LST compliance to dismiss potential cancer risks from diesel-related TAC emissions is misleading and contrary to CEQA.

Third, the County criticizes SWAPE's use of *total* particulate matter in its screening-level HRA. At the same time, the County acknowledges that it did not disclose the *exhaust* PM2.5 and PM10 from its CalEEMod output files at the time public comments were being requested.[29] SWAPE also explains that, while the County criticizes the use of annual PM10 emissions as a surrogate for DPM, this is a standard practice in CEQA analysis and is consistent with SCAQMD guidance as it provides a conservative upper-bound estimate that captures the DPM fraction.[30] The County also asserts that SWAPE's health risk analysis is predicated on the incorrect assumption that the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. This is incorrect, as SWAPE explains in its updated screening-level HRA, the calculations rely on the County's own PM2.5 and PM10 emission estimates disclosed in the FEIR.[31] These updated calculations demonstrate that the Project will result in a residential lifetime cancer risk of 12.4 in one million, which exceeds SCAQMD's 10-in-one-million threshold.[32] This constitutes substantial evidence that the Project will result in a significant impact that the County failed to address in the FEIR.

The County next asserts that compliance with existing local and state regulations, together with Mitigation Measures AQ-1 and AQ-2—which requires a dust control plan and limits idling—will ensure impacts remain below significant

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[27] *Id.* at p. 5.
[28] *Id.*
[29] SWAPE Comments, p. 7.
[30] *Id.*
[31] *Id.*
[32] *Id.* at p. 8.

levels.[33] SWAPE considered these in its HRA and still found that impacts would be reduced to less than significant levels. The Board of Supervisors Staff Report also added a new measure to AQ-2 that requires the use of Tier 4 construction equipment. This was not available at the time SWAPE conducted its screening level analysis. Despite adding this condition, the County still refuses to quantify post-mitigation emissions or otherwise demonstrate, with substantial evidence, that this additional measure would reduce impacts below the applicable significance threshold. Because CEQA requires an agency's conclusions regarding significance of impacts and mitigation effectiveness to be supported by substantial evidence, the County's unsupported assertion is inadequate, and the impacts remain potentially significant.

For the reasons discussed above, the County must revise the EIR to include an analysis of the Project's potentially significant cancer risks.

b. The Record Contains Substantial Evidence of Significant, Unmitigated Cumulative Health Risks

CARE CA's prior comments demonstrated that the FEIR omitted an analysis of the Project's cumulative TAC emissions. We further explained that when conducting this analysis, the County should use the new draft guidance from South Coast Air Quality Management District ("SCAQMD") instead of SCAQMD's outdated White Paper on Potential Control Strategies to Address Cumulative Impacts from 2003.

In response, the County claims that it properly limited its cumulative impacts analysis to criteria air pollutants (CO, NOx, ROG). It reiterates its argument that impacts from TAC emissions did not need to be analyzed because an HRA is not required for the Project. As discussed above, this is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR.[34]

Nor can the County sidestep its obligation to analyze cumulative health risk by relying on an outdated SCAQMD threshold. Under CEQA, "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant."[35] CARE CA's air quality expert provides substantial evidence that the

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[33] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 30.
[34] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[35] 14 Cal. Code Regs. ("CEQA Guidelines") § 15064(b)(2).

Project may result in significant cumulative TAC emissions that the County failed to address in the FEIR. SWAPE applied SCAQMD's November 6, 2024, Working Group draft cumulative impacts guidance, which contrary to the County's assertion, was not developed solely for warehouse projects. These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review and meaningfully evaluate cumulative toxic air contaminant impacts.[36] This is particularly relevant to the Project because it will be located in an AB617 disadvantaged community.[37]

The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met.[38] These factors include:

1. Whether the background cancer risk, as indicated MATES, in the Project area is within the 50th-30th percentile;
2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.[39]

SWAPE's analysis found that the Project satisfies all three criteria, effectively reducing the significance threshold to 3 in one million.[40]

First, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin.[41] Specifically, the Project site has a cancer risk of 206 in one million, or within the 43rd percentile.[42] This lowers the significance threshold to 7 in one million.[43]

Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB617 community.[44] This lowers the significance threshold to 5 in one million.[45]

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[36] SWAPE Comments, p. 1.
[37] SWAPE Comments, p. 3.
[38] *Id.* at p. 1.
[39] *Id.* at pp. 1-2.
[40] *Id.* at pp. 4-5.
[41] *Id.* at p. 2.
[42] *Id.*
[43] *Id.*
[44] *Id.* at p. 3.
[45] *Id.* at pp. 3-4.

Third, the Project is likely to generate 951 heavy-duty truck trips.[46] As SWAPE explains, the Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips.[47] The FEIR states that "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips."[48] Based on these estimates, SWAPE concludes that the Project would likely generate 951 heavy-duty truck trips, which constitutes 4% to 7% of the total anticipated daily vehicle traffic.[49] Therefore, the cumulative health risk threshold would be reduced to 3 in one million.[50]

SWAPE's screening-level HRA of the Project's construction and operation-related DPM emissions calculated that the Project would result in a lifetime cancer risk of 12.4 in one million, an infant-specific cancer risk of 4.89 in one million, and a child-specific cancer risk of 6.48 in one million.[51] These all exceed the 3 in one million cumulative significance threshold.[52]

Therefore, there is substantial evidence that the Project may result in significant cumulative health risk impacts that the FEIR did not address. The County must revise and recirculate a new EIR to include this analysis.

V. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE AGRICULTURE IMPACTS REMAIN SIGNIFICANT AND UNMITIGATED

a. The County Fails to Adopt All Feasible Mitigation as Required by CEQA

CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project impacts from the conversion of agricultural land is significant and unavoidable because it failed to adopt any mitigation, let alone "all feasible mitigation" as required by CEQA to support its adoption of a statement of overriding considerations. CARE CA's agriculture expert

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[46] *Id.* at p. 4.
[47] *Id.*
[48] *Id.*
[49] *Id.*
[50] *Id.*
[51] *Id.* at p. 5.
[52] *Id.*

also provided substantial evidence that, contrary to the County's claim, an Agriculture Conservation Easement ("ACE") is feasible, effective mitigation for the conversion of Prime Farmland.

Despite this evidence, the County continues to erroneously reject an ACE based on generalized drought conditions in Riverside County, refuses to adopt any mitigation, and flagrantly misstates CEQA's requirement to adopt all feasible mitigation.

First, the County misstates the law, claiming that they are not required to adopt all feasible mitigation to reduce impacts to the greatest extent feasible before an impact can be declared significant and unavoidable. Instead, the County claims that "CEQA only requires the adoption of mitigation measures that will avoid or substantially lessen the significant environmental effect," citing to CEQA Guidelines Section 15091 as support.[53] This misinterprets Section 15091, which merely lays out findings an Agency must make before approving an EIR that identifies significant environmental impacts. Specifically, this section requires that agency's make one or more findings before approving an EIR that identifies significant environmental impacts. This includes demonstrating that the significant impact will either be avoided or substantially lessened[54] or that mitigation is infeasible.[55]

The County also directly contradicts CEQA Section 21002, which states that "public agencies should not approve projects as proposed if there are feasible alternative or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects."[56] When making these findings CEQA also requires the agency to adopt a Statement of Overriding Considerations.[57] Several courts have interpreted the requirements for adopting a statement of overriding considerations, which includes incorporating "all feasible mitigation."[58] For instance, the Supreme Court in *Sierra Club v. County of Fresno,* found that "[e]ven when a project's benefits outweigh its unmitigated effects, agencies are still required to implement all mitigation measures unless those

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[53] *Id.*
[54] 14 CCR § 15091 (a), (b)
[55] 14 CCR § 15091(c).
[56] See also PRC § 21002.1(b) ("[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so."
[57] PRC § 21081; 14 CCR § 15093
[58] *Covington v Great Basin Unif. Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879-883; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525; *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967.

measures are truly infeasible."[59] Accordingly, the County must adopt all feasible mitigation.

Second, the FEIR continues to argue that an ACE is infeasible because there is ongoing drought placing a strain on water supplies, citing to the fact that "CVWD has notified the property owner that no imported water will be provided to the subject property for at least the coming two years."[60] The County also points to CVWD's long-term water management plans as evidence regarding the scarcity of Colorado River water and the substantial demand for water caused by agricultural uses in the Coachella Valley.[61] The County claims that this "constitutes substantial evidence and supports the reasonable inference that an ACE would exacerbate existing water supply challenges resulting from drought conditions."[62] The County also argues that requiring an ACE is infeasible because it is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities. However, both of these reasons are speculative and inadequate to demonstrate that an ACE or other mitigation is infeasible. There is no evidence that conserving existing agricultural land would exacerbate drought conditions.[63] The County also has not provided any evidence demonstrating that an ACE is infeasible for financial reasons.[64] Furthermore, as demonstrated in Mr. House's previous comments and discussed further below, several General Plan policies also favor conserving agriculture land.[65] Therefore, the County has not provided the substantial evidence necessary to demonstrate that an ACE is infeasible.

In addition to an ACE, Mr. House identifies that an in-lieu fee is another feasible, unconsidered mitigation measure.[66] Mr. House also provides substantial evidence that the County failed to consider mitigation measures used in other California counties that would avoid conserving water-deprived lands.[67] For example, agriculture and land stewardship framework and strategies and public benefit agreements—a mitigation measure that has been successfully employed in nearby Imperial County since 2012.[68] The FEIR provides no explanation for why

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[59] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525 (citing *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967).
[60] Response to Comments, Response C-7.
[61] *Id.*
[62] *Id.*
[63] House Comments, p. 2.
[64] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 13; House Comments, p. 2.
[65] *Id.*
[66] House Comments, p. 3.
[67] *Id.*
[68] *Id.*

these alternatives would be infeasible. Because the County has failed to analyze or adopt these feasible mitigation measures, it lacks substantial evidence to adopt the Statement of Overriding Considerations.[69]

Third, the County relies on *Yerba Buena Neighborhood Consortium LLC v. Regents of University of California* to conclude that its argument that an ACE is infeasible because of ongoing drought in California is a policy judgment that is owed deference. This mischaracterizes the Court's findings in *Yerba Buena*. The Court did not state that the Agency's determination regarding the feasibility of a mitigation measure will be deferred to in all cases. In fact, the Court cites to the Sixth District's decision in *California Native Plant Society v. City of Santa Cruz,* which states that when an Agency's findings of fact are based on erroneous legal assumptions like "voluntary mitigation [being] impermissible" this is "an error of law invalidating their finding that voluntary mitigation payments to FORA do not represent a feasible method of mitigating CSU's off-campus environmental effects."[70] Similarly here, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE and all other alternative mitigation measures are infeasible. This is legal error and is not owed deference. Additionally, as demonstrated above, our expert provides substantial evidence demonstrating that these mitigation measures are commonly used and thus are feasible to substantially reduce the impacts from the Project's conversion of agricultural land to non-agricultural uses.

Fourth, the County mischaracterizes the findings of Riverside County General Plan EIR No. 441 and EIR No. 521 to improperly claim that no project-specific mitigation measures are available to address the Project's conversion of agricultural land to non-agricultural use. The County's reliance on these documents is misplaced. Those EIRs evaluated countywide growth on a program level. They do not—and cannot—relieve the County of its obligation under CEQA to consider and adopt feasible project-level mitigation measures.[71]

b. The Project Conflicts with the Agricultural Policies in the County's General Plan

CARE CA's previous comments demonstrated that the Project is inconsistent with several of Riverside County's General Plan policies, which emphasize the

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[69] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[70] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997 (citing *City of Marina v. Board of Trustee of California State University* (2006) 39 Cal.4th 341, 365).
[71] House Comments, p. 2.

importance of agricultural land of the region, promote the preservation of prime farmland, and encourage the use of conservation easements.

As discussed above, the County fails to correct these inconsistencies by failing to mitigate the Project's conversion of agricultural land to non-agricultural use. Instead, the County claims that it is consistent with the General Plan because it allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. This response is inadequate because it dismisses the eight General Plan policies CARE CA's previous comments demonstrated the Project was inconsistent with. This is particularly relevant to Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land, which the County does not implement as mitigation.

The County claims that despite the failure to include a conservation easement, it is still consistent with these General Plan policies because it determined that a conservation easement is infeasible and its determination of infeasibility is owed deference, citing *Yerba Buena Neighborhood Consortium, LLC v. Regents of University of California.* As discussed above, the County's determination that an ACE is infeasible mitigation is not owed deference because it is based on legal error.[72] Specifically, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE is infeasible due to pre-existing drought conditions. Additionally, our agriculture expert provides substantial evidence that an ACE is feasible mitigation.

Therefore, the Project, as proposed, still fails to comply with several of the County's General Plan policies and requires the County to revise the EIR.

VI. ADDITIONAL DEFECTS IN THE FEIR THAT VIOLATE CEQA

a. The FEIR Fails to Describe or Analyze the Project's Proposed Substation

The FEIR does not comply with CEQA because it omits critical details about the Project's proposed Imperial Irrigation District ("IID") electrical substation, thereby preventing meaningful analysis of the Project's environmental impacts and frustrating informed public review.

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[72] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997.

CEQA requires an EIR to set forth a project description that is sufficient to allow an adequate evaluation and review of the environmental impact.[73] California courts have repeatedly held that an "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[74] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the Project's impacts and undermining meaningful public review.[75]

Here, the FEIR's project description states only that "[a]n on-site electric power substation is also planned in consultation with Imperial Irrigation District (IID) in the southeast portion of PA-1."[76] The FEIR does not disclose the size or generation capacity of the proposed substation. Without this information, the FEIR cannot meaningfully evaluate or disclose the impacts associated with the substation's construction or operation.

As a result of this deficient project description, the FEIR fails to quantify or analyze air quality and greenhouse gas ("GHG") emissions from construction of the IID substation. Table 2.5-6 (CalEEMod Land Use Assumptions) in the FEIR includes only equestrian center barns, commercial uses, and office space within Planning Area 1.[77] This entirely omits the substation. Because the FEIR does not account for emissions associated with construction of this major infrastructure component, the County potentially underestimates the Project's construction-related impacts.

This omission is further underscored by a newly added condition of approval stating that the substation could be as large as 50 MegaVolt-Ampere (MVA). [78] The FEIR never disclosed or analyzed the potential impacts of a substation this size. This failure is particularly problematic given documented summer blackouts and ongoing electrical supply constraints in the region, which indicate that existing

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[73] CEQA Guidelines § 15124.
[74] *Santiago County Water Dist. v. County of Orange* (1981) 118 CA3d 81; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *Stopthemilleniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 85-89; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.
[75] CEQA Guidelines § 15124; see *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 192-193; see also *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591, 1597 ("An accurate and complete project description is necessary to fully evaluate the project's potential environmental effects.").
[76] FEIR, p. 1-7.
[77] FEIR, p. 2.5-11; CalEEMod Outputs, p. 12 of 139; AQ and GHG Appendix, p. 67.
[78] Specific Plan Conditions of Approval, Condition 8, p. 8.

distribution infrastructure may already be operating near capacity. Although the FEIR makes general references to existing distribution lines[79], it provides no analysis demonstrating that these facilities can accommodate the Project's new demand, nor does it evaluate whether off-site system upgrades or transmission improvements may be required.[80] In fact, the new condition of approval acknowledges this uncertainty by allowing the substation size to increase or decrease based on final design and feasibility determinations made by the Planning Director in consultation with IID.[81] Construction of the substation and any associated upgrades could result in potentially significant air quality, GHG, noise, and transportation impacts—none of which are evaluated in the FEIR.

The IID substation may also result in significant operational noise impacts that were not analyzed in the FEIR. Although the FEIR references operational noise measurements for an IID substation, it does not disclose the size or capacity of the substation used as the basis for those measurements. Instead, it vaguely asserts that the measurements were collected from "similar types of activities" and "assume the worst-case noise environment."[82] Without identifying whether the analyzed facility reflects a 50-MVA substation—or a smaller installation—the FEIR precludes meaningful evaluation of the Project's potentially significant operational noise impacts. For example, if the reference substation is smaller than the proposed facility, operational noise impacts could be significantly greater than analyzed in the FEIR.

Furthermore, as SWAPE comments, substations and associated high-voltage transmission facilities can introduce potential hazards, including increased wildfire ignition risk, electromagnetic field exposure concerns, and electrical arc-flash hazards, and risks related to equipment failure or transformer fire events.[83] Without disclosing the size of the substation or the extent of any required transmission or distribution upgrades, the FEIR cannot meaningfully assess these hazards risks or determine whether additional mitigation would be necessary.

By omitting this information from the Project description and failing to analyze the potentially significant impacts that could result from the construction

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[79] FEIR, p. 2.21-14.
[80] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 118.
[81] Specific Plan Conditions of Approval, Condition 8, p. 8 ("if less or greater substation sizing may be appropriate based on project final design. Any reduction substantially below double the project demand will be considered by the Planning Director in consultation with IID and based on reasonable information on technical or financial infeasibility").
[82] FEIR Appendix H, p. 61.
[83] SWAPE Comments, p. 9.

and operation of the substation, the FEIR deprives the public of a meaningful opportunity to comment on these impacts prior to project approval and denies decision-makers essential information required for informed decision-making. CEQA requires that where standard and accepted methodologies exist to evaluate potential impacts, an EIR must apply them or explain why it cannot do so.[84] The FEIR does neither.

As a result, the FEIR presents a misleading and incomplete description of the Project and its environmental impacts. The County must revise and recirculate the EIR to disclose the full scope of the proposed electrical infrastructure and to analyze the associated environmental impacts in compliance with CEQA.

b. The FEIR Lacks Substantial Evidence to Conclude That the Project Will Not Have Significant Population and Housing Impacts

CEQA requires an EIR to discuss the growth-inducing impacts of a proposed project, including the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment..."[85] The FEIR lacks substantial evidence to conclude that the Project will not have a significant adverse impact on housing or employment growth.[86] As Mr. Marshall's comments demonstrate, the FEIR overstates the Project's contribution to the existing jobs/housing ratio imbalance in the Eastern Unincorporated Coachella Valley.

According to the FEIR, the Eastern Unincorporated Coachella Valley has a high unemployment rate, with 13% of working age adults being unemployed and 33.5% of individuals being considered low income (51% to 80% of median income).[87] The FEIR also acknowledges that there are 19,836 housing units currently in the eastern unincorporated areas of Riverside County, but 36.9% were used seasonally, mostly as vacation homes, but also for migrant workers.[88] So, although there is a healthy stock of owner-occupied housing available, there is a substantial deficit in available rental housing.[89] According to the Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research) ("LUCI"), a jobs-

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[84] *Berkeley Jet* (2001) 91 CA4th 1344, 1370.
[85] CEQA Guidelines §§ 15126, 15126.2.
[86] FEIR, p. 2.16-22; Resolution No. 2025-303, Attachment A: CEQA Findings, p. 103.
[87] FEIR, p. 2.16-11.
[88] FEIR, p. 2.16-8.
[89] FEIR, p. 2.16-8.

to-housing ratio of 1.5:1 is considered balanced.[90] According to the Riverside County Housing Element Background Report, eastern unincorporated areas of the County had a jobs-to-housing ratio of 1.02:1 in 2018, which is below the county-wide ratio (1.55:1) and the target ratio, according to LUCI.[91]

The FEIR claims that it will contribute both jobs and housing to address this jobs to housing imbalance. With respect to jobs, the FEIR states that "[t]he provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance."[92] As Mr. Marshall explains, this overstates the proposed Project's job benefits because many, and possibly, most of the jobs would be seasonal.[93] The employment numbers for these seasonal jobs would likely be lower during the off-season, since they are tied to the activities of the equestrian center, which is active only during the October to April event season.[94] Mr. Marshall also states that it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property.[95] Thus, in cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.[96]

With respect to housing, the FEIR exaggerates the Project's contribution by stating "[t]he Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages."[97] While this may be true during peak seasons, Mr. Marshall explains that the housing created by the Project is mostly for seasonal employees (Workforce Housing) or for short-term guests (resort condos, hotel).[98] The remaining housing types (Estate Residential and Medium Density Residential) would not be rental housing or would not be affordable for renters, which is the type of housing most needed in the Eastern Unincorporated Coachella Valley.[99]

The County also acknowledges that the Project has the potential to create a demand for additional housing, particularly housing affordable to households

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[90] FEIR, p. 2.16-10.
[91] *Id.*
[92] FEIR, p. 2.16-21.
[93] Marshall Comments, p. 2.
[94] FEIR, p. 2.16-16.
[95] Marshall Comments, p. 3.
[96] *Id.*
[97] FEIR, p. 2.16-17.
[98] Marshall Comments, p. 5.
[99] *Id.*

earning 80% or less of the County's median income."[100] However, the County attempts to claim that the "market will respond to any demand for additional housing resulting from the Project." This does not constitute substantial evidence.

As a result, the Project may increase housing demand while worsening the jobs/housing imbalance. Because the FEIR analyzes employment and housing as if the seasonal equestrian uses would be year round, this masks the potentially significant impacts the Project may have on the area's current jobs-housing imbalance. The FEIR should be revised to provide a more accurate analysis of the Project's potential impacts. Until this impact is accurately disclosed and analyzed, the Board lacks substantial evidence to find that the Project would not have adverse impacts in these areas.

VII. CONCLUSION

For the reasons discussed above, and in CARE CA's previous comments, the FEIR for the Project remains wholly inadequate under CEQA. The Board of Supervisors cannot make the necessary findings to approve the Project or its entitlements because the County has not adequately disclosed, analyzed, or mitigated the Project's potentially significant unmitigated environmental and land use impacts. The FEIR must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions require that the EIR be recirculated for additional public review.

CARE CA respectfully requests that the Board remand the Project back to County staff to prepare and recirculate a legally adequate EIR prior to further consideration. Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Alaura McGuire

Alaura McGuire

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[100] FEIR, p. 2.16-1.

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December 15, 2025

Via Email and Hand Delivery

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Re: Agenda Item 23.1: Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624)

Dear Chair Perez, Vice-Chair Spiegal, Board Members, and Clerk of the Board:

On behalf of Californians Allied for a Responsible Economy ("CARE CA"), we submit these comments on Agenda Item 23.1 related to the Thermal Ranch Specific Plan Project (Specific Plan No. 401; GPA No. 2300001; Change of Zone No. 2300003; TTM No. 38578; Plot Plan No. 240016, 230005, 230006; SCH 2023050624) ("Project") proposed by Thermal Ranch, LLC ("Applicant").

The Project's proposed entitlements include a General Plan Amendment (GPA No. 2300001), a Tentative Tract Map (TTM No. 38578), three Plot Plan applications (Plot Plan No.s 230005, -6, -16), and a Change of Zone (CZ No. 2300003) to construct a mix of residential and commercial uses centered around a 231-acre equestrian center and related show facilities, including barns, stabling and related equestrian services on a 619± acres.[1] The residential components of the Project would include a mix of residential neighborhoods ranging from seasonal and year-round workforce housing and RV park facilities to large single-family estate

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[1] FEIR, p. ES-2.

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lots, single-family attached and detached homes and resort condominiums.[2] At buildout, the Project will provide up to 1,362 dwelling units ranging in densities from 0.67 to 27.3 units per acre and up to 320 RV spaces.[3] The commercial components of the Project would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space.[4] A 54.4±-acre mixed use resort with a 150± key resort hotel, beach club, pool and other recreational amenities, and ancillary retail is also proposed.[5] The proposed Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County.[6]

CARE CA respectfully requests that the Board of Supervisor's continue the December 16, 2025, hearing and remand the Project to Staff to revise and recirculate the EIR in compliance with the California Environmental Quality Act ("CEQA"). The County cannot certify the FEIR, adopt the Project's Mitigation Monitoring & Reporting Program ("MMRP"), adopt the Statement of Overriding Considerations, or approve the Projects entitlements based on the County's legally deficient environmental analysis and inadequate mitigation, and absent substantial evidence to support the necessary findings for Project approval.

I. EXECUTIVE SUMMARY AND BACKGROUND

On January 10, 2025, CARE CA submitted comments, supported by expert evidence, explaining that the Draft Environmental Impact Report ("DEIR") had substantial informational and evidentiary defects, and relied on unsupported conclusions to assert that the Project's impacts would be fully mitigated by the measures proposed in the Project's MMRP and conditions of approval. CARE CA's expert reports included substantial evidence demonstrating that the Project would result in potentially significant impacts on public health, noise, and agricultural resources that were not adequately disclosed, analyzed or fully mitigated in the DEIR. As a result of the DEIR's fundamental inadequacies and conclusory nature, the DEIR failed to disclose or fully mitigate many of the Project's significant impacts, resulting in an inadequate public review process.

For example, CARE CA's air quality expert demonstrated that the County improperly relied on Localized Significance Thresholds ("LSTs") to assess health

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[2] FEIR, p. ES-2.
[3] FEIR, p. ES-2.
[4] FEIR, p. ES-2.
[5] FEIR, p. ES-2.
[6] FEIR, p. 1-3.

risk, which failed to identify potentially significant health impacts from exposure of nearby residents and workers to toxic air contaminant ("TAC") emissions. CARE CA's noise expert provided substantial evidence that the DEIR underestimated operational noise impacts by failing to analyze impacts at the closest residence to the Project site and by underestimating HVAC run time. Finally, CARE CA's comments demonstrated that the DEIR lacked any mitigation for the Project's significant agricultural impacts and therefore did not provide substantial evidence to support its proposed statement of overriding considerations.

The County released the Final Environmental Impact Report ("FEIR") in September 2025, which included responses to CARE CA's comments. The Planning Commission held a hearing on October 22, 2025 to consider the FEIR and Project entitlements. On October 21, 2025, CARE CA submitted comments to the Planning Commission detailing that the FEIR still failed to comply with CEQA. CARE CA's agriculture expert provided substantial evidence demonstrating that the Project's agricultural impacts can feasibly be mitigated by an Agricultural Conservation Easement ("ACE"), which should have been implemented by the County. The Planning Commission nevertheless voted to recommend approval by the Board.

Prior to the Board hearing, Staff prepared responses to CARE CA's FEIR comments ("Responses to Comments").[7] However, neither the Responses nor the Board Staff Report resolve the FEIR's fundamental deficiencies and still fail to meaningfully respond to all of the Project's substantial evidence from CARE CA's experts. The County must revise and recirculate the EIR to comply with CEQA before the Board may consider approving the Project.

First, the County cannot certify the FEIR because it lacks substantial evidence to make the necessary CEQA Findings.[8] CEQA Findings must be supported by substantial evidence in the administrative record. The record before the Board does not contain substantial evidence demonstrating that the Project's significant environmental effects will be eliminated or substantially avoided, as required by law. In fact, substantial evidence in CARE CA's comments on the DEIR, FEIR, and expert consultant reports continue to demonstrate that the Project results in significant, unmitigated environmental impacts requiring revision and recirculation of the EIR.

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[7] Responses to Comments, pp. 1-202.
[8] Riverside County Board of Supervisors Resolution No. 2025-303, Attachment A: CEQA Findings, pp. 1-152.

Second, the County cannot adopt the MMRP because it lacks substantial evidence to conclude that the MMRP will reduce or avoid the Project's significant impacts.[9] Rather, CARE CA's expert consultant provides substantial evidence that the Project will result in significant air quality and public health impacts, notwithstanding the mitigation proposed in the MMRP, which were not addressed in the FEIR. These impacts must be analyzed and further mitigation required for any significant impacts found.

Third, the County cannot adopt the Statement of Overriding Considerations because it lacks substantial evidence to make the necessary findings.[10] The record before the Board demonstrates that there are changes or alterations that can be incorporated into the Project which would substantially lessen the significant environmental effect as identified in the FEIR. Specifically, CARE CA's expert provides substantial evidence that there are feasible mitigation measures that would substantially reduce the Project's significant impacts from the conversion of important agricultural land. These must be implemented in a revised EIR before adoption of the Statement of Overriding Considerations.

Fourth, as discussed in more detail below, the County cannot make the necessary findings to support approval of the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.

These comments are supported by supplemental expert evidence. CARE CA's air quality consultant Paul E. Rosenfeld, Ph.D. of Soil Water Air Protection Enterprise ("SWAPE"),[11] transportation expert Norman Marshall,[12] and agriculture resources expert Henry House.[13] Our air quality consultant provides substantial evidence that the Project will result in significant project-specific and cumulative public health impacts from DPM emitted during construction and operation. Our agriculture resources expert provides substantial evidence demonstrating that there is feasible mitigation that would substantially reduce the Project's significant agricultural impacts that the County fails to adopt in violation of CEQA. Our

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[9] Resolution No. 2025-303, Attachment B: Mitigation Monitoring and Reporting Program, p. MMRP-1.
[10] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[11] See **Exhibit A,** Paul E. Rosenfeld, Ph.D., Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("SWAPE Comments").
[12] See **Exhibit B,** Norman Marshall, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("Marshall Comments").
[13] See **Exhibit C,** Henry House, Comments on 12/16 BOS Staff Report and Response to Comments for the Thermal Ranch Specific Plan Project ("House Comments").

transportation expert demonstrates that the County lacks substantial evidence to conclude that the Project will not result in significant impacts to the existing housing/jobs imbalance. These potentially significant impacts necessarily require the County to revise and recirculate the EIR prior to Project approval.

II. STATEMENT OF INTEREST

CARE CA is a non-profit organization which advocates for a sustainable construction industry and protecting the environment and health of its communities' workforces. CARE CA includes the Southern California Pipe Trades District Council 16 and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in and around Riverside County.

CARE CA advocates for protecting the environment and the health of their communities' workforces. CARE CA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits, and which minimize adverse environmental and other impacts on local communities. CARE CA members live, work, recreate, and raise their families in Riverside County and its communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

In addition, CARE CA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

III. THE BOARD OF SUPERVISORS CANNOT MAKE THE REQUISITE FINDINGS TO APPROVE THE PROJECT

The Project requires the County to certify the FEIR and approve several entitlements, including the Specific Plan, a General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.[14] However, as

[14] FEIR, p. 4.

discussed herein, the Staff Report and the County's response to comments fails to adequately address several significant environmental and public health impacts. As a result, the County lacks substantial evidence to make the requisite findings to approve the Project or its entitlements.

General Plan Amendment

CARE CA's previous comments explained that in order to approve the Project's GPA, the Board must make all of the findings required in both Section 2.4 (Entitlement/Policy General Plan Amendment) and 2.7 (Agriculture Foundation Component General Plan Amendments) of Riverside County Ordinance 348:

1. Section 2.4: Entitlement/Policy General Plan Amendment

In order to approve an entitlement/policy amendment the Board must make the first two findings listed below and any one or more of the subsequent findings listed below:

- The proposed change does not involve a change in or conflict with:
  - the Riverside County Vision;
  - any general planning principle set forth in general plan Appendix B; or
  - any foundation component designation in the general plan.
- The proposed amendment would either contribute to the purposes of the general plan or, at a minimum, would not be detrimental to them;
- Special circumstances or conditions have emerged that were unanticipated in preparing the general plan;
- A change in policy is required to conform to changes in state or federal law or applicable findings of a court of law;
- An amendment is required to comply with an update of the housing element or change in state housing element law;
- An amendment is required to expand basic employment job opportunities (jobs that contribute directly to the county's economic base) and that would improve the ratio of jobs-to-workers in the county;
- An amendment is required to address changes in ownership of land or land not under the land use authority of the board of supervisors.[15]

[15] Ordinance No. 348 § 2.4

2. Section 2.7: Agricultural Foundation Component General Plan Amendment

The Board must make both of the following requirements to approve the GPA:

- A maximum of 7% of the Agricultural Foundation acreage shall be generally authorized for conversion from the Agricultural Foundation Component to any other Foundation Component within a 2 ½ year period. [16]
- The proposed amendment must either contribute to the achievement of the purposes of the General Plan or, at a minimum, not be detrimental to them. [17]

The Project is inconsistent with the General Plan and results in significant, unmitigated agricultural impacts which prevent the County from making the requisite findings above.

First, the GPA conflicts with the County's General Plan Vision Statement. By proposing the permanent conversion of over 619 acres of important farmland without any mitigation, the GPA directly contradicts the County's stated goals of preserving agricultural areas, which have historical importance in Riverside County, in the face of mounting growth pressures in agricultural areas.[18]

Second, the GPA conflicts with principles set forth in General Plan Appendix B. Similar to the General Plan, the Planning Principles encourage the preservation of agricultural land. Specifically, the Planning Principles state that "[a]griculture should be treated as an economic land use" and that incentives and policies should be put in place to stimulate agricultural production and protect agricultural areas from urban encroachment.[19] For the same reasons discussed above, the Amendment's conversion of agricultural land conflicts with these principles.

Third, the GPA involves a clear change to a foundational component designation in the General Plan. Specifically, the GPA proposes to change the current General Plan Foundation designation of Agriculture to Community Development.[20] Therefore, the Board cannot make the first required finding to approve the GPA under Section 2.4 of Ordinance No. 348.

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[16] Ordinance No. 348 § 2.7.B.3.
[17] General Plan Administration Element, p. A-16.
[18] Vision Statement, pp. V-20, V-21; see also Land Use Element, p. LU-44;
[19] General Plan Appendix B: Planning Principles, pp. 12-13.
[20] FEIR, p. 2.16-18.

The Board also cannot make the second required finding to approve the GPA under Section 2.7 of Ordinance No. 348. As discussed below, the Project is detrimental to the purposes of the General Plan because it still fails to mitigate the Project's conversion of agricultural land into non-agricultural use. This is detrimental to the purposes of Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land.

The County attempts to ignore this inconsistency by claiming that the Project is consistent with the General Plan because it is consistent with the General Plan's policy which allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. However, compliance with this single policy does not excuse the County's continued inconsistency with the other policies in the General Plan related to preserving agricultural land through conservation easements.

Therefore, the Board cannot make the requisite findings to approve the Project's GPA.

Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[21] The County continues to conclude that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[22] However, for the same reasons discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land. Therefore, the Board cannot make the requisite findings to approve the Specific Plan.

Plot Plan

The Project's three plot plan applications cannot be approved unless it complies with the requirements of Section 18.30 in Riverside County Ordinance No. 348, including:

[21] Riverside County Ordinance No. 348, §§ 2.8, 2.9, 2.1.
[22] Responses to Comments, Response C-12, p. 53.

Tentative Tract Map

The Project's Tentative Tract Map cannot be approved unless it complies with the requirements of Section 20.3 of Riverside County Ordinance No. 348., as well as the Subdivision Map Act. Accordingly, the Board must make the following findings:

- That the proposed map is consistent with the general plan or applicable specific plan, or other applicable provisions of the Municipal Code;
- That the site is physically suitable for the type of development;
- That the site is physically suitable for the proposed density of development;
- That the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- That the design of the subdivision or the type of improvements are not likely to cause serious public health problems;
- That the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.[24]

The Board cannot make these requisite findings for several reasons. First, as discussed above, the proposed map is not consistent with the General Plan's policies and goals related to the preservation of agricultural land. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments below demonstrate, the Project will have significant project-specific and cumulative public health impacts that were not adequately disclosed or analyzed. Specifically, the FEIR failed to analyze the Project's potential impacts from construction and operation-related TAC emissions. As a result, the County also has not provided substantial evidence to demonstrate that the proposed mitigation will adequately reduce these health risks to less than significant levels. Therefore, the Board cannot make the requisite findings to recommend approval of the Tentative Tract Map.

[24] Subdivision Map Act §§ 66474, 66473.5; Ordinance No. 348 § 20.3.

IV. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE THE PROJECT'S INDIVIDUAL AND CUMULATIVE HEALTH RISK IMPACTS REMAIN UNRESOLVED

a. The Record Contains Substantial Evidence of Significant, Unmitigated Health Risk Impacts

CARE CA's prior comments demonstrated that the County failed to analyze the potentially significant cancer risks from the Project's construction and operation-related DPM emissions. The County limited its health risk analysis to criteria air pollutants by relying on Localized Significance Thresholds ("LSTs"), which measure criteria pollutants but do not measure TACs, including DPM. Health risk from exposure to DPM is measured under a separate threshold for cancer risk. Since the County failed to measure the severity of DPM exposure against a relevant threshold, the FEIR lacks substantial evidence to support a conclusion that health risk would be less than significant. Moreover, CARE CA's expert conducted a screening level health risk analysis of the Project's DPM emissions, which demonstrated that the Project would cause significant health risk impacts that the FEIR failed to disclose or mitigate.

The County now incorrectly attempts to discredit SWAPE's screening-level health risk analysis by misrepresenting the results of its own LST analysis and improperly concluding that the County does not have a legal duty to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not expressly required by CEQA. This reasoning is legally flawed, misleading, and directly contrary to CEQA's requirement to analyze potentially significant environmental impacts.

First, the County claims that they do not need to evaluate the Project's potentially significant health risks from TAC emissions because an HRA is not required by CEQA. This is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR,[25] including the health risk caused by human exposure to the project's air emissions.[26] The absence of a requirement in the Guidelines to prepare a specific type of HRA does not relieve the County of its duty to fully analyze and mitigate the Project's potentially significant health impacts.

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[25] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[26] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.

Second, the County continues to erroneously assert that compliance with LSTs are sufficient to rule out health risk from the Project. The County further misrepresents the purpose of LSTs by claiming that, because LSTs evaluate particulate matter, they also account for cancer risks associated with the TAC fraction of DPM. This is incorrect. CARE CA previously explained that LSTs do not analyze TAC emissions and therefore cannot be used to determine whether a project would result in increased cancer risk, even where modeled criteria pollutant emissions fall below LSTs. LSTs are designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO2, CO, PM10, or PM2.5 to exceed the ambient air quality standards at nearby receptors.[27] TACS, by contrast, have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.[28] Accordingly, reliance on LST compliance to dismiss potential cancer risks from diesel-related TAC emissions is misleading and contrary to CEQA.

Third, the County criticizes SWAPE's use of *total* particulate matter in its screening-level HRA. At the same time, the County acknowledges that it did not disclose the *exhaust* PM2.5 and PM10 from its CalEEMod output files at the time public comments were being requested.[29] SWAPE also explains that, while the County criticizes the use of annual PM10 emissions as a surrogate for DPM, this is a standard practice in CEQA analysis and is consistent with SCAQMD guidance as it provides a conservative upper-bound estimate that captures the DPM fraction.[30] The County also asserts that SWAPE's health risk analysis is predicated on the incorrect assumption that the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. This is incorrect, as SWAPE explains in its updated screening-level HRA, the calculations rely on the County's own PM2.5 and PM10 emission estimates disclosed in the FEIR.[31] These updated calculations demonstrate that the Project will result in a residential lifetime cancer risk of 12.4 in one million, which exceeds SCAQMD's 10-in-one-million threshold.[32] This constitutes substantial evidence that the Project will result in a significant impact that the County failed to address in the FEIR.

The County next asserts that compliance with existing local and state regulations, together with Mitigation Measures AQ-1 and AQ-2—which requires a dust control plan and limits idling—will ensure impacts remain below significant

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[27] *Id.* at p. 5.
[28] *Id.*
[29] SWAPE Comments, p. 7.
[30] *Id.*
[31] *Id.*
[32] *Id.* at p. 8.

levels.[33] SWAPE considered these in its HRA and still found that impacts would be reduced to less than significant levels. The Board of Supervisors Staff Report also added a new measure to AQ-2 that requires the use of Tier 4 construction equipment. This was not available at the time SWAPE conducted its screening level analysis. Despite adding this condition, the County still refuses to quantify post-mitigation emissions or otherwise demonstrate, with substantial evidence, that this additional measure would reduce impacts below the applicable significance threshold. Because CEQA requires an agency's conclusions regarding significance of impacts and mitigation effectiveness to be supported by substantial evidence, the County's unsupported assertion is inadequate, and the impacts remain potentially significant.

For the reasons discussed above, the County must revise the EIR to include an analysis of the Project's potentially significant cancer risks.

b. The Record Contains Substantial Evidence of Significant, Unmitigated Cumulative Health Risks

CARE CA's prior comments demonstrated that the FEIR omitted an analysis of the Project's cumulative TAC emissions. We further explained that when conducting this analysis, the County should use the new draft guidance from South Coast Air Quality Management District ("SCAQMD") instead of SCAQMD's outdated White Paper on Potential Control Strategies to Address Cumulative Impacts from 2003.

In response, the County claims that it properly limited its cumulative impacts analysis to criteria air pollutants (CO, NOx, ROG). It reiterates its argument that impacts from TAC emissions did not need to be analyzed because an HRA is not required for the Project. As discussed above, this is contrary to CEQA, which requires an Agency to identify and analyze all potentially significant environmental impacts that would result from the proposed Project in the EIR.[34]

Nor can the County sidestep its obligation to analyze cumulative health risk by relying on an outdated SCAQMD threshold. Under CEQA, "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant."[35] CARE CA's air quality expert provides substantial evidence that the

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[33] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 30.
[34] *Save Lake Tahoe Mtn. Area Preservation Found. V. County of Placer* (2022) 75 CA5th 63, 96.
[35] 14 Cal. Code Regs. ("CEQA Guidelines") § 15064(b)(2).

Project may result in significant cumulative TAC emissions that the County failed to address in the FEIR. SWAPE applied SCAQMD's November 6, 2024, Working Group draft cumulative impacts guidance, which contrary to the County's assertion, was not developed solely for warehouse projects. These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review and meaningfully evaluate cumulative toxic air contaminant impacts.[36] This is particularly relevant to the Project because it will be located in an AB617 disadvantaged community.[37]

The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met.[38] These factors include:

1. Whether the background cancer risk, as indicated MATES, in the Project area is within the 50th-30th percentile;
2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.[39]

SWAPE's analysis found that the Project satisfies all three criteria, effectively reducing the significance threshold to 3 in one million.[40]

First, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin.[41] Specifically, the Project site has a cancer risk of 206 in one million, or within the 43rd percentile.[42] This lowers the significance threshold to 7 in one million.[43]

Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB617 community.[44] This lowers the significance threshold to 5 in one million.[45]

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[36] SWAPE Comments, p. 1.
[37] SWAPE Comments, p. 3.
[38] *Id.* at p. 1.
[39] *Id.* at pp. 1-2.
[40] *Id.* at pp. 4-5.
[41] *Id.* at p. 2.
[42] *Id.*
[43] *Id.*
[44] *Id.* at p. 3.
[45] *Id.* at pp. 3-4.

Third, the Project is likely to generate 951 heavy-duty truck trips.[46] As SWAPE explains, the Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips.[47] The FEIR states that "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips."[48] Based on these estimates, SWAPE concludes that the Project would likely generate 951 heavy-duty truck trips, which constitutes 4% to 7% of the total anticipated daily vehicle traffic.[49] Therefore, the cumulative health risk threshold would be reduced to 3 in one million.[50]

SWAPE's screening-level HRA of the Project's construction and operation-related DPM emissions calculated that the Project would result in a lifetime cancer risk of 12.4 in one million, an infant-specific cancer risk of 4.89 in one million, and a child-specific cancer risk of 6.48 in one million.[51] These all exceed the 3 in one million cumulative significance threshold.[52]

Therefore, there is substantial evidence that the Project may result in significant cumulative health risk impacts that the FEIR did not address. The County must revise and recirculate a new EIR to include this analysis.

V. THE BOARD CANNOT APPROVE THE PROJECT BECAUSE AGRICULTURE IMPACTS REMAIN SIGNIFICANT AND UNMITIGATED

a. The County Fails to Adopt All Feasible Mitigation as Required by CEQA

CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project impacts from the conversion of agricultural land is significant and unavoidable because it failed to adopt any mitigation, let alone "all feasible mitigation" as required by CEQA to support its adoption of a statement of overriding considerations. CARE CA's agriculture expert

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[46] *Id.* at p. 4.
[47] *Id.*
[48] *Id.*
[49] *Id.*
[50] *Id.*
[51] *Id.* at p. 5.
[52] *Id.*

also provided substantial evidence that, contrary to the County's claim, an Agriculture Conservation Easement ("ACE") is feasible, effective mitigation for the conversion of Prime Farmland.

Despite this evidence, the County continues to erroneously reject an ACE based on generalized drought conditions in Riverside County, refuses to adopt any mitigation, and flagrantly misstates CEQA's requirement to adopt all feasible mitigation.

First, the County misstates the law, claiming that they are not required to adopt all feasible mitigation to reduce impacts to the greatest extent feasible before an impact can be declared significant and unavoidable. Instead, the County claims that "CEQA only requires the adoption of mitigation measures that will avoid or substantially lessen the significant environmental effect," citing to CEQA Guidelines Section 15091 as support.[53] This misinterprets Section 15091, which merely lays out findings an Agency must make before approving an EIR that identifies significant environmental impacts. Specifically, this section requires that agency's make one or more findings before approving an EIR that identifies significant environmental impacts. This includes demonstrating that the significant impact will either be avoided or substantially lessened[54] or that mitigation is infeasible.[55]

The County also directly contradicts CEQA Section 21002, which states that "public agencies should not approve projects as proposed if there are feasible alternative or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects."[56] When making these findings CEQA also requires the agency to adopt a Statement of Overriding Considerations.[57] Several courts have interpreted the requirements for adopting a statement of overriding considerations, which includes incorporating "all feasible mitigation."[58] For instance, the Supreme Court in *Sierra Club v. County of Fresno,* found that "[e]ven when a project's benefits outweigh its unmitigated effects, agencies are still required to implement all mitigation measures unless those

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[53] *Id.*
[54] 14 CCR § 15091 (a), (b)
[55] 14 CCR § 15091(c).
[56] See also PRC § 21002.1(b) ("[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so."
[57] PRC § 21081; 14 CCR § 15093
[58] *Covington v Great Basin Unif. Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879-883; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525; *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967.

measures are truly infeasible."[59] Accordingly, the County must adopt all feasible mitigation.

Second, the FEIR continues to argue that an ACE is infeasible because there is ongoing drought placing a strain on water supplies, citing to the fact that "CVWD has notified the property owner that no imported water will be provided to the subject property for at least the coming two years."[60] The County also points to CVWD's long-term water management plans as evidence regarding the scarcity of Colorado River water and the substantial demand for water caused by agricultural uses in the Coachella Valley.[61] The County claims that this "constitutes substantial evidence and supports the reasonable inference that an ACE would exacerbate existing water supply challenges resulting from drought conditions."[62] The County also argues that requiring an ACE is infeasible because it is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities. However, both of these reasons are speculative and inadequate to demonstrate that an ACE or other mitigation is infeasible. There is no evidence that conserving existing agricultural land would exacerbate drought conditions.[63] The County also has not provided any evidence demonstrating that an ACE is infeasible for financial reasons.[64] Furthermore, as demonstrated in Mr. House's previous comments and discussed further below, several General Plan policies also favor conserving agriculture land.[65] Therefore, the County has not provided the substantial evidence necessary to demonstrate that an ACE is infeasible.

In addition to an ACE, Mr. House identifies that an in-lieu fee is another feasible, unconsidered mitigation measure.[66] Mr. House also provides substantial evidence that the County failed to consider mitigation measures used in other California counties that would avoid conserving water-deprived lands.[67] For example, agriculture and land stewardship framework and strategies and public benefit agreements—a mitigation measure that has been successfully employed in nearby Imperial County since 2012.[68] The FEIR provides no explanation for why

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[59] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-525 (citing *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967).
[60] Response to Comments, Response C-7.
[61] *Id.*
[62] *Id.*
[63] House Comments, p. 2.
[64] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 13; House Comments, p. 2.
[65] *Id.*
[66] House Comments, p. 3.
[67] *Id.*
[68] *Id.*

these alternatives would be infeasible. Because the County has failed to analyze or adopt these feasible mitigation measures, it lacks substantial evidence to adopt the Statement of Overriding Considerations.[69]

Third, the County relies on *Yerba Buena Neighborhood Consortium LLC v. Regents of University of California* to conclude that its argument that an ACE is infeasible because of ongoing drought in California is a policy judgment that is owed deference. This mischaracterizes the Court's findings in *Yerba Buena.* The Court did not state that the Agency's determination regarding the feasibility of a mitigation measure will be deferred to in all cases. In fact, the Court cites to the Sixth District's decision in *California Native Plant Society v. City of Santa Cruz,* which states that when an Agency's findings of fact are based on erroneous legal assumptions like "voluntary mitigation [being] impermissible" this is "an error of law invalidating their finding that voluntary mitigation payments to FORA do not represent a feasible method of mitigating CSU's off-campus environmental effects."[70] Similarly here, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE and all other alternative mitigation measures are infeasible. This is legal error and is not owed deference. Additionally, as demonstrated above, our expert provides substantial evidence demonstrating that these mitigation measures are commonly used and thus are feasible to substantially reduce the impacts from the Project's conversion of agricultural land to non-agricultural uses.

Fourth, the County mischaracterizes the findings of Riverside County General Plan EIR No. 441 and EIR No. 521 to improperly claim that no project-specific mitigation measures are available to address the Project's conversion of agricultural land to non-agricultural use. The County's reliance on these documents is misplaced. Those EIRs evaluated countywide growth on a program level. They do not—and cannot—relieve the County of its obligation under CEQA to consider and adopt feasible project-level mitigation measures.[71]

b. The Project Conflicts with the Agricultural Policies in the County's General Plan

CARE CA's previous comments demonstrated that the Project is inconsistent with several of Riverside County's General Plan policies, which emphasize the

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[69] Resolution No. 2025-303, Attachment A: CEQA Findings, p.10.
[70] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997 (citing *City of Marina v. Board of Trustee of California State University* (2006) 39 Cal.4th 341, 365).
[71] House Comments, p. 2.

importance of agricultural land of the region, promote the preservation of prime farmland, and encourage the use of conservation easements.

As discussed above, the County fails to correct these inconsistencies by failing to mitigate the Project's conversion of agricultural land to non-agricultural use. Instead, the County claims that it is consistent with the General Plan because it allows the conversion of up to 7% of agricultural land every 2.5 year cycle to promote additional housing and economic development opportunities. This response is inadequate because it dismisses the eight General Plan policies CARE CA's previous comments demonstrated the Project was inconsistent with. This is particularly relevant to Open Space Policy 7.2, Open Space Policy 7.3 and Land Use Policy 20.4, which all encourage the use of conservation easements for agricultural land, which the County does not implement as mitigation.

The County claims that despite the failure to include a conservation easement, it is still consistent with these General Plan policies because it determined that a conservation easement is infeasible and its determination of infeasibility is owed deference, citing *Yerba Buena Neighborhood Consortium, LLC v. Regents of University of California.* As discussed above, the County's determination that an ACE is infeasible mitigation is not owed deference because it is based on legal error.[72] Specifically, the County incorrectly assumes that it does not need to adopt "all feasible mitigation" and erroneously concludes that an ACE is infeasible due to pre-existing drought conditions. Additionally, our agriculture expert provides substantial evidence that an ACE is feasible mitigation.

Therefore, the Project, as proposed, still fails to comply with several of the County's General Plan policies and requires the County to revise the EIR.

VI. ADDITIONAL DEFECTS IN THE FEIR THAT VIOLATE CEQA

a. The FEIR Fails to Describe or Analyze the Project's Proposed Substation

The FEIR does not comply with CEQA because it omits critical details about the Project's proposed Imperial Irrigation District ("IID") electrical substation, thereby preventing meaningful analysis of the Project's environmental impacts and frustrating informed public review.

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[72] *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 997.

CEQA requires an EIR to set forth a project description that is sufficient to allow an adequate evaluation and review of the environmental impact.[73] California courts have repeatedly held that an "accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[74] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the Project's impacts and undermining meaningful public review.[75]

Here, the FEIR's project description states only that "[a]n on-site electric power substation is also planned in consultation with Imperial Irrigation District (IID) in the southeast portion of PA-1."[76] The FEIR does not disclose the size or generation capacity of the proposed substation. Without this information, the FEIR cannot meaningfully evaluate or disclose the impacts associated with the substation's construction or operation.

As a result of this deficient project description, the FEIR fails to quantify or analyze air quality and greenhouse gas ("GHG") emissions from construction of the IID substation. Table 2.5-6 (CalEEMod Land Use Assumptions) in the FEIR includes only equestrian center barns, commercial uses, and office space within Planning Area 1.[77] This entirely omits the substation. Because the FEIR does not account for emissions associated with construction of this major infrastructure component, the County potentially underestimates the Project's construction-related impacts.

This omission is further underscored by a newly added condition of approval stating that the substation could be as large as 50 MegaVolt-Ampere (MVA). [78] The FEIR never disclosed or analyzed the potential impacts of a substation this size. This failure is particularly problematic given documented summer blackouts and ongoing electrical supply constraints in the region, which indicate that existing

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[73] CEQA Guidelines § 15124.
[74] *Santiago County Water Dist. v. County of Orange* (1981) 118 CA3d 81; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *Stopthemilleniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 85-89; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.
[75] CEQA Guidelines § 15124; see *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 192-193; see also *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591, 1597 ("An accurate and complete project description is necessary to fully evaluate the project's potential environmental effects.").
[76] FEIR, p. 1-7.
[77] FEIR, p. 2.5-11; CalEEMod Outputs, p. 12 of 139; AQ and GHG Appendix, p. 67.
[78] Specific Plan Conditions of Approval, Condition 8, p. 8.

distribution infrastructure may already be operating near capacity. Although the FEIR makes general references to existing distribution lines[79], it provides no analysis demonstrating that these facilities can accommodate the Project's new demand, nor does it evaluate whether off-site system upgrades or transmission improvements may be required.[80] In fact, the new condition of approval acknowledges this uncertainty by allowing the substation size to increase or decrease based on final design and feasibility determinations made by the Planning Director in consultation with IID.[81] Construction of the substation and any associated upgrades could result in potentially significant air quality, GHG, noise, and transportation impacts—none of which are evaluated in the FEIR.

The IID substation may also result in significant operational noise impacts that were not analyzed in the FEIR. Although the FEIR references operational noise measurements for an IID substation, it does not disclose the size or capacity of the substation used as the basis for those measurements. Instead, it vaguely asserts that the measurements were collected from "similar types of activities" and "assume the worst-case noise environment."[82] Without identifying whether the analyzed facility reflects a 50-MVA substation—or a smaller installation—the FEIR precludes meaningful evaluation of the Project's potentially significant operational noise impacts. For example, if the reference substation is smaller than the proposed facility, operational noise impacts could be significantly greater than analyzed in the FEIR.

Furthermore, as SWAPE comments, substations and associated high-voltage transmission facilities can introduce potential hazards, including increased wildfire ignition risk, electromagnetic field exposure concerns, and electrical arc-flash hazards, and risks related to equipment failure or transformer fire events.[83] Without disclosing the size of the substation or the extent of any required transmission or distribution upgrades, the FEIR cannot meaningfully assess these hazards risks or determine whether additional mitigation would be necessary.

By omitting this information from the Project description and failing to analyze the potentially significant impacts that could result from the construction

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[79] FEIR, p. 2.21-14.
[80] Resolution No. 2025-303, Attachment A: CEQA Findings, p. 118.
[81] Specific Plan Conditions of Approval, Condition 8, p. 8 ("if less or greater substation sizing may be appropriate based on project final design. Any reduction substantially below double the project demand will be considered by the Planning Director in consultation with IID and based on reasonable information on technical or financial infeasibility").
[82] FEIR Appendix H, p. 61.
[83] SWAPE Comments, p. 9.

and operation of the substation, the FEIR deprives the public of a meaningful opportunity to comment on these impacts prior to project approval and denies decision-makers essential information required for informed decision-making. CEQA requires that where standard and accepted methodologies exist to evaluate potential impacts, an EIR must apply them or explain why it cannot do so.[84] The FEIR does neither.

As a result, the FEIR presents a misleading and incomplete description of the Project and its environmental impacts. The County must revise and recirculate the EIR to disclose the full scope of the proposed electrical infrastructure and to analyze the associated environmental impacts in compliance with CEQA.

b. The FEIR Lacks Substantial Evidence to Conclude That the Project Will Not Have Significant Population and Housing Impacts

CEQA requires an EIR to discuss the growth-inducing impacts of a proposed project, including the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment..."[85] The FEIR lacks substantial evidence to conclude that the Project will not have a significant adverse impact on housing or employment growth.[86] As Mr. Marshall's comments demonstrate, the FEIR overstates the Project's contribution to the existing jobs/housing ratio imbalance in the Eastern Unincorporated Coachella Valley.

According to the FEIR, the Eastern Unincorporated Coachella Valley has a high unemployment rate, with 13% of working age adults being unemployed and 33.5% of individuals being considered low income (51% to 80% of median income).[87] The FEIR also acknowledges that there are 19,836 housing units currently in the eastern unincorporated areas of Riverside County, but 36.9% were used seasonally, mostly as vacation homes, but also for migrant workers.[88] So, although there is a healthy stock of owner-occupied housing available, there is a substantial deficit in available rental housing.[89] According to the Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research) ("LUCI"), a jobs-

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[84] *Berkeley Jet* (2001) 91 CA4th 1344, 1370.
[85] CEQA Guidelines §§ 15126, 15126.2.
[86] FEIR, p. 2.16-22; Resolution No. 2025-303, Attachment A: CEQA Findings, p. 103.
[87] FEIR, p. 2.16-11.
[88] FEIR, p. 2.16-8.
[89] FEIR, p. 2.16-8.

to-housing ratio of 1.5:1 is considered balanced.[90] According to the Riverside County Housing Element Background Report, eastern unincorporated areas of the County had a jobs-to-housing ratio of 1.02:1 in 2018, which is below the county-wide ratio (1.55:1) and the target ratio, according to LUCI.[91]

The FEIR claims that it will contribute both jobs and housing to address this jobs to housing imbalance. With respect to jobs, the FEIR states that "[t]he provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance."[92] As Mr. Marshall explains, this overstates the proposed Project's job benefits because many, and possibly, most of the jobs would be seasonal.[93] The employment numbers for these seasonal jobs would likely be lower during the off-season, since they are tied to the activities of the equestrian center, which is active only during the October to April event season.[94] Mr. Marshall also states that it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property.[95] Thus, in cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.[96]

With respect to housing, the FEIR exaggerates the Project's contribution by stating "[t]he Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages."[97] While this may be true during peak seasons, Mr. Marshall explains that the housing created by the Project is mostly for seasonal employees (Workforce Housing) or for short-term guests (resort condos, hotel).[98] The remaining housing types (Estate Residential and Medium Density Residential) would not be rental housing or would not be affordable for renters, which is the type of housing most needed in the Eastern Unincorporated Coachella Valley.[99]

The County also acknowledges that the Project has the potential to create a demand for additional housing, particularly housing affordable to households

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[90] FEIR, p. 2.16-10.
[91] *Id.*
[92] FEIR, p. 2.16-21.
[93] Marshall Comments, p. 2.
[94] FEIR, p. 2.16-16.
[95] Marshall Comments, p. 3.
[96] *Id.*
[97] FEIR, p. 2.16-17.
[98] Marshall Comments, p. 5.
[99] *Id.*

earning 80% or less of the County's median income."[100] However, the County attempts to claim that the "market will respond to any demand for additional housing resulting from the Project." This does not constitute substantial evidence.

As a result, the Project may increase housing demand while worsening the jobs/housing imbalance. Because the FEIR analyzes employment and housing as if the seasonal equestrian uses would be year round, this masks the potentially significant impacts the Project may have on the area's current jobs-housing imbalance. The FEIR should be revised to provide a more accurate analysis of the Project's potential impacts. Until this impact is accurately disclosed and analyzed, the Board lacks substantial evidence to find that the Project would not have adverse impacts in these areas.

VII. CONCLUSION

For the reasons discussed above, and in CARE CA's previous comments, the FEIR for the Project remains wholly inadequate under CEQA. The Board of Supervisors cannot make the necessary findings to approve the Project or its entitlements because the County has not adequately disclosed, analyzed, or mitigated the Project's potentially significant unmitigated environmental and land use impacts. The FEIR must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions require that the EIR be recirculated for additional public review.

CARE CA respectfully requests that the Board remand the Project back to County staff to prepare and recirculate a legally adequate EIR prior to further consideration. Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Alaura McGuire

Alaura McGuire

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[100] FEIR, p. 2.16-1.

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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December 15, 2025

Alaura McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd #1000
South San Francisco, CA 94080

Subject: Comments on the Thermal Ranch Specific Plan (SCH No. 2023050624)

Dear Ms. McGuire,

We have reviewed the July 2025 Final Environmental Impact Report ("FEIR") and November 2024 Draft Environmental Impact Report ("DEIR") for the Thermal Ranch Specific Plan ("Specific Plan/Project") located in the County of Riverside ("County"). After our review of the FEIR, we find that the FEIR is insufficient in addressing some of our concerns regarding the Project's health risk impacts. As we asserted in our January 6, 2025 comment letter, a revised EIR should be prepared to adequately evaluate the Project's potential impacts.

Air Quality

Inadequate Analysis of Cumulative Air Quality Impacts

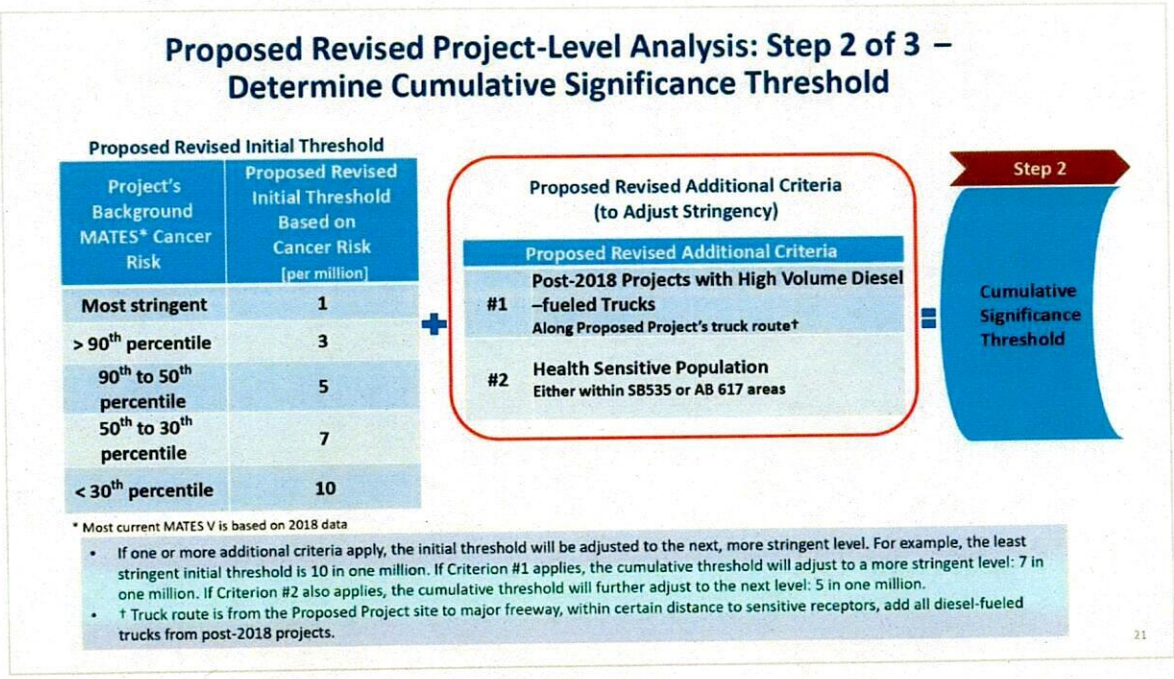
The FEIR provides an inadequate analysis of the Project's cumulative health risk impacts as it fails to analyze the potential cumulative cancer risks of the Project. The County should employ the draft cumulative cancer-risk significance thresholds published by the South Coast Air Quality Management District ("SCAQMD"). These thresholds were developed specifically to address the heightened air pollutant exposure burdens experienced by environmental justice communities and to ensure that projects under CEQA review meaningfully evaluate cumulative toxic air contaminant ("TAC") impacts.

SCAQMD's Working Group Meeting #6 presentation from November 2024 outlines a tiered methodology that reduces the standard 10-in-one-million cancer-risk threshold when one or more screening criteria are met, including:

1. Whether the background cancer risk, as indicated by MATES, in the Project area is within the 50th–30th percentile;

2. Whether ≥951 daily heavy-duty truck trips traverse the truck route; and
3. Whether the project is located in an SB 535 disadvantaged community or AB 617 community.

The tiered methodology, as proposed by SCAQMD, states that "if one or more additional criteria apply, the initial threshold will be adjusted to the next, more stringent level" (see screenshot below).[1]

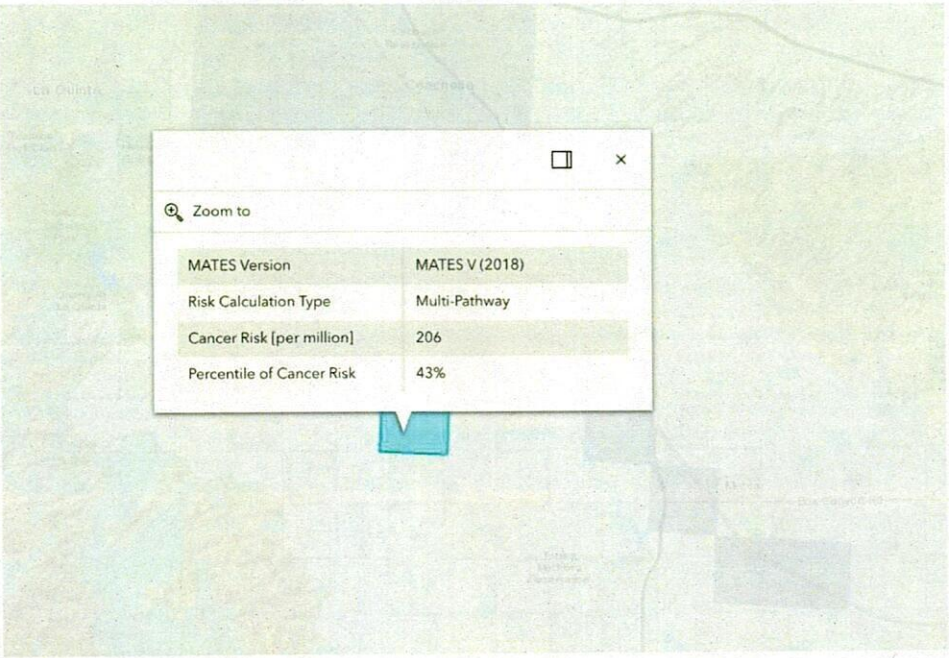


The Project satisfies multiple criteria that require a cumulative health risk analysis and the application of a more stringent cancer risk threshold under SCAQMD's framework.

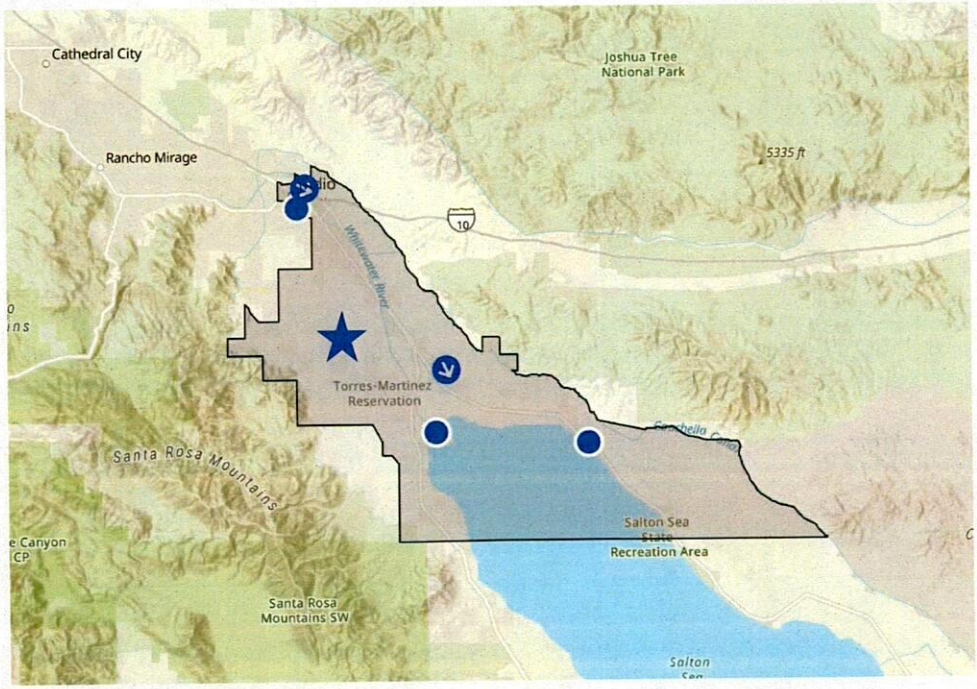
First, The Data Visualization Tool for Mates V, a monitoring and evaluation study conducted by SCAQMD, demonstrates that the County already exhibits a heightened residential carcinogenic risk from exposure to air toxics.[2] Specifically, the location of the Specific Plan is located in the 50th to 30th percentile of highest cancer burdens in the South Coast Air Basin—and thus meets the criteria for a 7-in-one-million threshold—with a cancer risk of 206 in one million, or 43% (see screenshot below).

[1] "Working Group Meeting #6 Cumulative Impacts from Air Toxics for CEQA Projects," SCAQMD, November 2024, available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13, p. 21.

[2] "Residential Air Toxics Cancer Risk Calculated from Model Data in Grid Cells." MATES V, 2018, *available at:* https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk; see also: "MATES V Multiple Air Toxics Exposure Study." SCAQMD, *available at:* http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

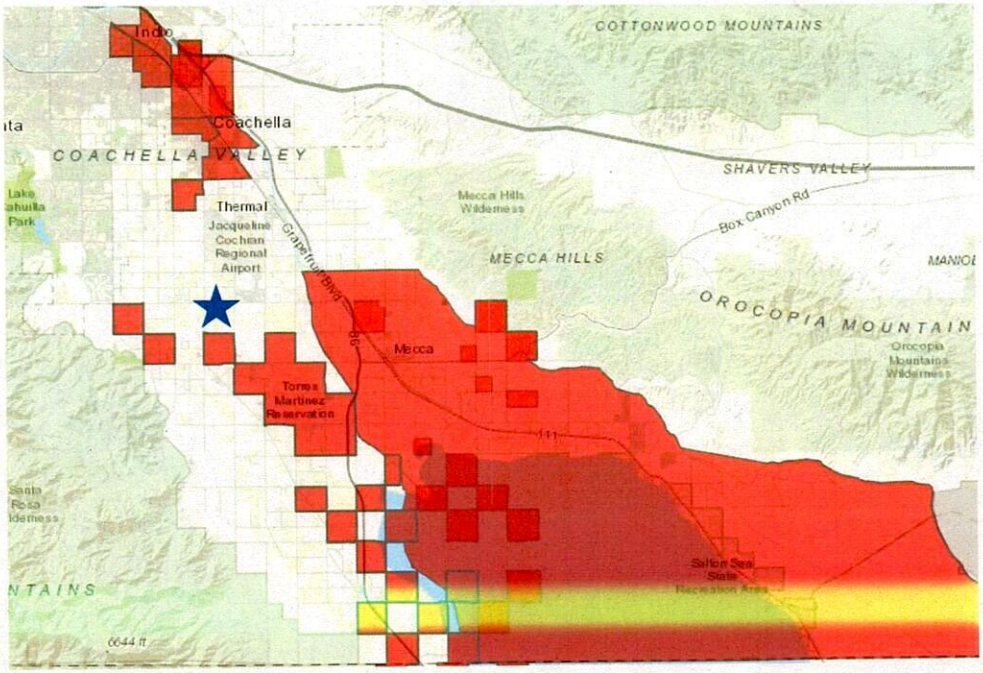


Second, the Project site is located in the Eastern Coachella Valley, which SCAQMD and CARB have designated as an AB 617 community, which signals that the region already experiences elevated cumulative air pollution burdens (see screenshot below).[3]



[3] "AB 617 Community Air Monitoring." SCAQMD, available at: http://xappprod.aqmd.gov/AB617CommunityAirMonitoring/Home/Index.

The Project area is also located adjacent to an SB 535 disadvantaged community, which further demonstrates that residents already face disproportionate environmental hazards and the Specific Plan may therefore worsen health risks for community members within the immediate area (see screenshot below).[4]



As such, the Project would move up to the next stringent tier of SCAQMD's draft framework of 5-in-one-million.

Third, the Project includes land uses that are reasonably expected to generate heavy-duty truck activity over its lifespan. The Specific Plan proposes a large equestrian center, associated visitor-serving amenities, commercial development, lodging, and workforce housing—each of which typically involves ongoing delivery, service, maintenance, and waste-hauling truck trips. Although the FEIR does not disclose whether the Project would exceed 951 heavy-duty truck trips per day, the FEIR does disclose that, "at buildout, the Project will generate an average of 18,939 weekday trips, 21,523 Saturday trips, and 13,995 Sunday trips" (p. 2.5-11). Thus, it is reasonable to assume that the Project would generate 951 heavy-duty truck trips, which would constitute roughly 4% to 7% of the total anticipated daily vehicle traffic. Assuming the Specific Plan meets SCAQMD's additional high-volume diesel truck criteria, the FEIR must then be evaluated against a 3-in-one-million cumulative threshold.

[4] "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, *available at:* https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/

Because the Project is located within a MATES 30th to 50th percentile background cancer risk and AB 617 community, as well as likely meets the 951-truck trip threshold, the FEIR should prepare a cumulative air toxics analysis using the 3-in-one-million threshold.

According to the screening-level HRA analysis below, the Project's construction and operation-related DPM emissions would result in a lifetime cancer risk of 12.4 in one million. The Project would also result in an infant and child-specific cancer risk of 4.89 and 6.48 in one million, respectively. These exceed the 3 in one million significance threshold and constitute potentially significant cumulative impacts that were not analyzed or mitigated in the FEIR.

CEQA requires a good-faith, evidence-based analysis of cumulative impacts. SCAQMD has indicated in both its Working Group presentations and in comment letters, such as those submitted on the DJT4 Parcel Delivery Facility Project,[5] that lead agencies should use this cumulative-risk framework when evaluating TAC and diesel particulate matter ("DPM") impacts in overburdened communities. A revised EIR should be prepared to identify which SCAQMD cumulative-risk criteria apply to the Project, disclose the appropriate cumulative cancer-risk threshold, model construction and operational emissions accordingly, and provide mitigation where exceedances occur.

Diesel Particulate Matter Emissions Inadequately Evaluated

As discussed in our January 6th comment letter, the DEIR failed to adequately evaluate potential Project-level health risk impacts. Review of the FEIR demonstrates that the analysis of the Project's health risk impacts is again lacking. For the reasons discussed below, we maintain our January 6th comment that the FEIR is inadequate and recommend that a revised EIR be prepared to adequately evaluate the Project's potential health risk impacts on nearby sensitive receptors.

First, the FEIR states that "[b]ecause the Project did not exceed LSTs, additional air dispersion modeling and/or construction-related health risk assessments are therefore not required or warranted" (p. 64). We reiterate that the SCAQMD Localized Significance Threshold ("LST") methodology is designed solely to assess whether a project's criteria air pollutant emissions would cause localized concentrations of NO_2, CO, PM_{10}, or $PM_{2.5}$ to exceed the ambient air quality standards at nearby receptors. Unlike criteria pollutants, TACs are regulated under separate state frameworks administered by OEHHA and CARB, which require a health risk assessment ("HRA") when generated. TACs have no ambient air quality standards, and their health risks cannot be evaluated using concentration-based LST thresholds that do not quantify cancer risks.

In regard to existing guidelines, the FEIR states:

> "Because the Project does not propose industrial warehouse uses, the Project is not subject to the CA DOJ recommendation to prepare a quantitative HRA in accordance with the Office of

[5] "Draft Environmental Impact Report (DEIR) for the December 20, 2024 Proposed DJT4 Parcel Delivery Facility Project (Proposed Project) (SCH No. 2023070241)." SCAQMD, December 2024, https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/orc241106-09-deir-djt4-parcel-delivery-facility-project.pdf.

> Environmental Health Hazard Assessment ('OEHHA'). Additionally, CEQA does not mandate or even recommend in-depth health risk assessments for all projects. The SCAQMD requires the preparation of an operational Health Risk Assessment (HRA) for facilities associated with emission of high levels of toxic air contaminants; the Project proposes none of these land uses or surrounding conditions" (p. 66).

Furthermore, regarding the Project's projected operational toxic air contaminant ("TAC") emissions, the FEIR continues by stating:

> "The eight categories of existing sources of TACs include high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations. The TRSP neither proposes the development of any such facilities, nor is it situated in proximity to any such facility. With regard to high-traffic freeways and roads, CARB defines freeways and high traffic roads as including rural roads with 50,000 vehicles per day. As discussed on page 2.5-22 of the DEIR, nearby roadways have average daily traffic (ADT) volumes of up to 39,300 vehicles per day in horizon year (2045) with Project weekday conditions" (p. 100).

While we acknowledge that current guidance may not explicitly require the certain land uses to prepare an HRA, this reasoning misconstrues current agency recommendations and ignores that diesel truck activity—not land-use labels—is the primary driver of cancer risk from DPM emissions. SCAQMD comment letters have recommended that, for projects that generate or attract substantial vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile-source HRA.[6] Similarly, SCAQMD has long recommended HRAs for projects with more than 100 daily heavy-duty diesel truck trips.[7]

As previously mentioned, the Specific Plan includes several land uses that inherently require ongoing delivery, service, and hauling operations that will involve trucks, including the large equestrian center and commercial and retail development. The DEIR itself identifies up to 21,523 daily vehicle trips at buildout, indicating a scale of development where even a modest percentage of truck activity could easily exceed 100 trucks per day. Given the Project's size and trip generation, the FEIR's assumption that the Project's truck activity would be negligible is not supported by substantial evidence. The FEIR also misuses CARB's definition of rural freeways and high-traffic roads as those with 50,000 vehicles per day to argue that the Project does not warrant an HRA. This is incorrect, as CARB uses this definition to recommend that projects "avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day."[8] Thus, this threshold pertains to the

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[6] "A-2 Notice of Preparation Comments." Los Angeles World Airports (LAWA), May 2017, *available at:* https://www.lawa.org/sites/lawa/files/documents/12_Appendix_A-2_Notice_of_Preparation_Comment_Letters.pdf.

[7] "Air Quality Analysis Handbook." SCAQMD, 1993, *available at:* https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

[8] "AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE." CARB, 2005, *available at:* https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

placement of new sensitive receptors near existing emission sources, not whether an evaluation of future DPM emissions generated by a project is necessary.

Given the Project's proposed land use sizes and types, anticipated vehicular activity, and the community's existing vulnerability, preparing a quantitative HRA is both best practice and necessary to satisfy CEQA's good-faith disclosure requirements. Without quantifying Project-level and cumulative TAC/DPM emissions and comparing them to the appropriate SCAQMD thresholds, the FEIR does not provide substantial evidence demonstrating that significant health-risk impacts would not occur.

Screening-Level Analysis Demonstrates Potentially Significant Health Risk Impact

As discussed in our January 6th comment letter, the proposed Project results in a potentially significant health risk impact. The FEIR raises concerns regarding the emission rate and parameters used in our screening-level HRA, which we have addressed and subsequently prepared an updated screening-level HRA. For the reasons discussed below, we maintain our January 6th comment that the FEIR may result in a significant health risk impact and a refined HRA is warranted to further evaluate the impact of the Project's DPM emissions on nearby, sensitive receptors.

The FEIR criticizes our use of *total* particulate matter ("PM") but acknowledges that *exhaust* $PM_{2.5}$ and PM_{10} were not originally displayed in the DEIR's CalEEMod output files. The FEIR indicates that, for both construction and operational emissions, "Appendix B of this Final EIR provides the TRSP CalEEMod Detailed Report that displays the PM2.5E emissions" (p. 71). We have prepared an updated screening-level HRA using the annual exhaust $PM_{2.5}$ emissions provided in the FEIR's updated CalEEMod air modeling.

In regard to our use of operational PM_{10} emissions estimates, the FEIR states:

> "Review of the health risk calculations in Attachment A of the SWAPE letter confirms that the HRA data inputs SWAPE applied are incorrect. As shown in the screenshot from the SWAPE letter below, the operational inputs show 22.6 tons per year was used, which correlates to the Project's total PM10T emissions, not the Project's PM2.5 emissions, and more importantly its PM2.5E emissions" (p. 73).

As demonstrated above, the FEIR criticizes the use of annual PM_{10} emissions as a surrogate for DPM. However, it is standard practice in CEQA analyses to use PM_{10} emissions as a proxy for DPM, pursuant to SCAQMD guidance, as it provides a conservative upper-bound estimate that captures the DPM fraction. For example, the construction HRA for the 2111–2139 South Pacific Avenue Project located in Los Angeles states that "the off-road PM_{10} exhaust estimates reported by CalEEMod were used as a surrogate for DPM emissions" (p. 2).[9] Regardless, as mentioned above, we prepared an updated screening-level HRA using the FEIR's annual $PM_{2.5}$ exhaust emission estimates in order to address the FEIR's concerns.

[9] See attachment D for 2111 South Pacific Avenue Construction Health Risk Assessment.

Additionally, the FEIR clarifies that the nearest sensitive receptor is 25 meters from the eastern boundary of the Project site (p. 76). Regardless, according to the AERSCREEN output files and as previously specified in our January 6th comment letter, the maximally exposed individual receptor ("MEIR") is located approximately 1,225 meters downwind of the site. Thus, DPM concentrations at 1,225 meters were used in our updated screening-level HRA.

All other methodologies were consistent with those described in our January 6th comment letter. The results of our calculations are shown in the table below.

The Maximally Exposed Individual at an Existing Residential Receptor

Age Group	Emissions Source	Duration (years)	Concentration (ug/m3)	Cancer Risk
3rd Trimester	Construction	0.25	0.0149	2.03E-07
Infant (0 - 2)	Construction	2	0.0149	4.89E-06
	Construction	*4.67*	*0.0149*	*1.80E-06*
	Operation	*9.33*	*0.0194*	*4.68E-06*
Child (2 - 16)	Total	14		6.48E-06
Adult (16 - 30)	Operation	14	0.0194	7.80E-07
Lifetime		**30**		**1.24E-05**

The excess cancer risks for the 3rd trimester of pregnancy, infants, children, and adults at the MEIR located approximately 1,225 meters away, over the course of construction and operation of future projects, are approximately 0.203, 4.89, 6.48, and 0.780 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) is approximately 12.4 in one million, which exceeds the SCAQMD threshold of 10-in-one-million (as well as the cumulative thresholds discussed above). The Specific Plan thus results in a potentially significant Project-level health risk impact not previously addressed or identified by the FEIR.

A revised EIR should be prepared to conduct a refined HRA evaluating the Project's construction and operational DPM emissions in AERMOD, which can account for more detailed parameters, and mitigate significant cancer risk impacts, if applicable.

Energy

Inadequate Analysis of Energy Demand

The FEIR fails to disclose the anticipated size or capacity of the proposed on-site substation and thus fails to provide the information necessary to evaluate whether adequate electrical infrastructure exists

to support the Project. Although the FEIR states that the substation will serve the Project and supply excess capacity to the surrounding area, the FEIR acknowledges that the Project Applicant is still coordinating with the Imperial Irrigation District to determine available transmission capacity. Without disclosure of the substation's planned load capacity, the FEIR does not provide substantial evidence that the expected electrical demand associated with Project buildout can be reliably met.

This omission is particularly consequential given the region's documented summer blackouts and ongoing electrical supply constraints, which indicate that existing distribution lines may already be operating near capacity. While the DEIR generally references existing distribution infrastructure, it conducts no analysis demonstrating that these lines can accommodate substantial new demand, nor does it evaluate whether off-site upgrades may be required. CEQA requires a good-faith effort to disclose and evaluate the full scope of a project's infrastructure needs, including reasonably foreseeable off-site energy improvements. By failing to disclose the substation size, the FEIR precludes meaningful evaluation of whether additional infrastructure will be required, whether such improvements may result in significant impacts, or whether the Project could exacerbate the strain on existing energy infrastructure.

Moreover, substations and associated high-voltage transmission facilities can introduce potential hazards—such as increased wildfire ignition risk, electromagnetic field exposure concerns, electrical arc-flash hazards, and risks related to equipment failure or transformer fire events—each of which must be evaluated when new or expanded electrical infrastructure is required. Without identifying the substation's size or the extent of necessary transmission upgrades, the FEIR cannot meaningfully assess these potential hazard impacts or disclose whether additional mitigation would be required.

In the absence of detailed information about the proposed substation, the FEIR's conclusion that the Project would not result in significant energy or utility impacts is unsupported by substantial evidence. A revised EIR is necessary to disclose the substation's capacity and evaluate the associated environmental impacts.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: Health Risk Calculations
Attachment B: AERSCREEN Output Files, Construction
Attachment C: AERSCREEN Output FIles, Operations

Construction

2026	
Annual Emissions (tons/year)	0.22
Daily Emissions (lbs/day)	1.205479452
Construction Duration (days)	365
Total DPM (lbs)	440
Total DPM (g)	199584
Start Date	1/1/2026
End Date	1/1/2027
Construction Days	365

2027	
Annual Emissions (tons/year)	0.13
Daily Emissions (lbs/day)	0.712328767
Construction Duration (days)	365
Total DPM (lbs)	260
Total DPM (g)	117936
Start Date	1/1/2027
End Date	1/1/2028
Construction Days	365

2028	
Annual Emissions (tons/year)	0.09
Daily Emissions (lbs/day)	0.493150685
Construction Duration (days)	366
Total DPM (lbs)	180.4931507
Total DPM (g)	81871.69315
Start Date	1/1/2028
End Date	1/1/2029
Construction Days	366

2029	
Annual Emissions (tons/year)	0.08
Daily Emissions (lbs/day)	0.438356164
Construction Duration (days)	365
Total DPM (lbs)	160
Total DPM (g)	72576
Start Date	1/1/2029
End Date	1/1/2030
Construction Days	365

2030	
Annual Emissions (tons/year)	0.08
Daily Emissions (lbs/day)	0.438356164
Construction Duration (days)	365
Total DPM (lbs)	160
Total DPM (g)	72576
Start Date	1/1/2030
End Date	1/1/2031
Construction Days	365

2031	
Annual Emissions (tons/year)	0.08
Daily Emissions (lbs/day)	0.438356164
Construction Duration (days)	365
Total DPM (lbs)	160
Total DPM (g)	72576
Start Date	1/1/2031
End Date	1/1/2032
Construction Days	365

2032	
Annual Emissions (tons/year)	0.07
Daily Emissions (lbs/day)	0.383561644
Construction Duration (days)	335
Total DPM (lbs)	128.4931507
Total DPM (g)	58284.49315
Start Date	1/1/2032
End Date	12/1/2032
Construction Days	335

Total	
Total DPM (lbs)	1488.986301
Total DPM (g)	675404.1863
Emission Rate (g/s)	0.003094686
Release Height (meters)	3
Total Acreage	619
Max Horizontal (meters)	2,238.31
Min Horizontal (meters)	1,119.15
Initial Vertical Dimension (meters)	1.5
Setting	Urban
Population	1,420
Start Date	1/1/2026
End Date	12/1/2032
Total Construction Days	2526
Total Years of Construction	6.92
Total Years of Operation	23.08

Operation

Emission Rate	
Annual Emissions (tons/year)	0.14
Daily Emissions (lbs/day)	0.767123288
Total DPM (lbs)	280
Emission Rate (g/s)	0.004027397
Release Height (meters)	3
Total Acreage	619
Max Horizontal (meters)	2,238.31
Min Horizontal (meters)	1,119.15
Initial Vertical Dimension (meters)	1.5
Setting	Urban
Population	1,420

The Maximally Exposed Individual at an Existing Residential Receptor				
Age Group	**Emissions Source**	**Duration** (years)	**Concentration** (ug/m3)	**Cancer Risk**
3rd Trimester	Construction	0.25	0.0149	2.03E-07
Infant (0 - 2)	Construction	2	0.0149	4.89E-06
	Construction	*4.67*	*0.0149*	*1.80E-06*
	Operation	*9.33*	*0.0194*	*4.68E-06*
Child (2 - 16)	Total	14		6.48E-06
Adult (16 - 30)	Operation	14	0.0194	7.80E-07
Lifetime		**30**		**1.24E-05**

AERSCREEN 21112 / AERMOD 21112 11/19/25
11:26:20

TITLE: Thermal Ranch, Construction

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.309E-02	g/s	0.246E-01	lb/hr
AREA EMISSION RATE:	0.124E-08	g/(s-m2)	0.980E-08	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	2238.31	meters	7343.54	feet
AREA SOURCE SHORT SIDE:	1119.15	meters	3671.75	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1420			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.1490	10	1125.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	12	12	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	208.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.1167	2525.00	0.5635E-01

25.00	0.1176
50.00	0.1186
75.00	0.1196
100.00	0.1205
125.00	0.1215
150.00	0.1224
175.00	0.1233
200.00	0.1242
225.00	0.1250
250.00	0.1259
275.00	0.1267
300.00	0.1276
325.00	0.1284
350.00	0.1292
375.00	0.1300
400.00	0.1307
425.00	0.1315
450.00	0.1323
475.00	0.1330
500.00	0.1337
525.00	0.1345
550.00	0.1352
575.00	0.1359
600.00	0.1366
625.00	0.1373
650.00	0.1379
675.00	0.1386
700.00	0.1392
725.00	0.1399
750.00	0.1405
775.00	0.1411
800.00	0.1418
825.00	0.1424
850.00	0.1430
875.00	0.1436
900.00	0.1442
925.00	0.1447
950.01	0.1453
975.00	0.1459
1000.00	0.1464
1025.00	0.1470
1050.00	0.1476
1075.00	0.1481
1100.00	0.1487
1125.00	0.1490
1149.99	0.1489
1175.00	0.1486
1200.00	0.1473
1225.00	0.1474
1249.99	0.1386
2550.00	0.5629E-01
2575.00	0.5621E-01
2600.00	0.5615E-01
2625.00	0.5608E-01
2650.00	0.5601E-01
2675.00	0.5594E-01
2700.00	0.5586E-01
2725.00	0.5579E-01
2750.00	0.5572E-01
2775.00	0.5565E-01
2800.00	0.5558E-01
2825.00	0.5551E-01
2850.00	0.5543E-01
2875.00	0.5535E-01
2900.00	0.5527E-01
2925.00	0.5519E-01
2950.00	0.5511E-01
2975.00	0.5503E-01
3000.00	0.5495E-01
3025.00	0.5487E-01
3050.00	0.5480E-01
3075.00	0.5471E-01
3100.00	0.5463E-01
3125.00	0.5455E-01
3150.00	0.5447E-01
3175.00	0.5438E-01
3200.00	0.5429E-01
3225.00	0.5421E-01
3250.00	0.5412E-01
3275.00	0.5403E-01
3300.00	0.5394E-01
3325.00	0.5385E-01
3350.00	0.5377E-01
3375.00	0.5369E-01
3400.00	0.5360E-01
3425.00	0.5351E-01
3450.00	0.5342E-01
3475.00	0.5333E-01
3500.00	0.5325E-01
3525.00	0.5315E-01
3550.00	0.5306E-01
3575.00	0.5297E-01
3600.00	0.5288E-01
3625.00	0.5278E-01
3650.00	0.5269E-01
3675.00	0.5259E-01
3700.00	0.5250E-01
3725.00	0.5241E-01
3750.00	0.5231E-01
3775.00	0.5222E-01

1275.00	0.1265
1300.00	0.1178
1325.00	0.1124
1350.00	0.1077
1375.00	0.1037
1400.00	0.9900E-01
1425.00	0.9619E-01
1450.00	0.9361E-01
1475.00	0.9124E-01
1500.00	0.9023E-01
1525.00	0.8824E-01
1550.00	0.8638E-01
1574.99	0.8463E-01
1600.00	0.8297E-01
1625.00	0.8142E-01
1650.00	0.7994E-01
1675.01	0.7853E-01
1700.00	0.7719E-01
1725.00	0.7591E-01
1750.00	0.7469E-01
1775.00	0.7352E-01
1800.00	0.7239E-01
1825.00	0.7131E-01
1850.00	0.7027E-01
1875.00	0.6927E-01
1899.99	0.6830E-01
1925.00	0.6738E-01
1950.00	0.6647E-01
1975.00	0.6560E-01
2000.00	0.6478E-01
2025.00	0.6402E-01
2050.00	0.6328E-01
2075.00	0.6257E-01
2100.00	0.6187E-01
2125.00	0.6118E-01
2150.00	0.6052E-01
2175.00	0.5987E-01
2200.00	0.5924E-01
2225.00	0.5862E-01
2250.00	0.5801E-01
2275.00	0.5742E-01
2300.00	0.5688E-01
2325.00	0.5683E-01
2350.00	0.5677E-01
2375.00	0.5671E-01
2400.00	0.5665E-01
2425.00	0.5659E-01
2450.00	0.5653E-01
2475.00	0.5647E-01
2500.00	0.5641E-01
3800.00	0.5213E-01
3825.00	0.5205E-01
3850.00	0.5196E-01
3875.00	0.5186E-01
3900.00	0.5177E-01
3925.00	0.5167E-01
3950.00	0.5158E-01
3975.00	0.5148E-01
4000.00	0.5138E-01
4025.00	0.5129E-01
4050.00	0.5119E-01
4075.00	0.5110E-01
4100.00	0.5101E-01
4125.00	0.5092E-01
4150.00	0.5082E-01
4175.00	0.5072E-01
4200.00	0.5063E-01
4225.00	0.5053E-01
4250.00	0.5044E-01
4275.00	0.5035E-01
4300.00	0.5025E-01
4325.00	0.5016E-01
4350.00	0.5007E-01
4375.00	0.4998E-01
4400.00	0.4990E-01
4425.00	0.4981E-01
4450.00	0.4971E-01
4475.00	0.4961E-01
4500.00	0.4952E-01
4525.00	0.4942E-01
4550.00	0.4932E-01
4575.00	0.4923E-01
4600.00	0.4913E-01
4625.00	0.4904E-01
4650.00	0.4895E-01
4675.00	0.4885E-01
4700.00	0.4876E-01
4725.00	0.4867E-01
4750.00	0.4858E-01
4775.00	0.4850E-01
4800.00	0.4841E-01
4825.00	0.4831E-01
4850.00	0.4822E-01
4875.00	0.4813E-01
4900.00	0.4803E-01
4925.00	0.4794E-01
4950.00	0.4785E-01
4975.00	0.4776E-01
5000.00	0.4767E-01

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1492	0.1492	0.1492	0.1492	N/A
DISTANCE FROM SOURCE	1135.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1167	0.1167	0.1167	0.1167	N/A
DISTANCE FROM SOURCE	1.00 meters				

AERSCREEN 21112 / AERMOD 21112 11/19/25
11:36:31

TITLE: Thermal Ranch, Operations

********** AREA PARAMETERS **********

SOURCE EMISSION RATE:	0.403E-02	g/s	0.320E-01	lb/hr
AREA EMISSION RATE:	0.161E-08	g/(s-m2)	0.128E-07	lb/(hr-m2)
AREA HEIGHT:	3.00	meters	9.84	feet
AREA SOURCE LONG SIDE:	2238.31	meters	7343.54	feet
AREA SOURCE SHORT SIDE:	1119.15	meters	3671.75	feet
INITIAL VERTICAL DIMENSION:	1.50	meters	4.92	feet
RURAL OR URBAN:	URBAN			
POPULATION:	1420			
INITIAL PROBE DISTANCE =	5000.	meters	16404.	feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** FLOW SECTOR ANALYSIS **********

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFACE ROUGHNESS	1-HR CONC (ug/m3)	RADIAL (deg)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.1940	10	1125.0	WIN

* = worst case diagonal

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	12	12	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-1.30	0.043	-9.000	0.020	-999.	208.	6.0	1.000	1.50	0.35	0.50

HT	REF TA	HT
10.0	310.0	2.0

********** AERSCREEN AUTOMATED DISTANCES **********
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	0.1519	2525.00	0.7336E-01

25.00	0.1532
50.00	0.1545
75.00	0.1557
100.00	0.1569
125.00	0.1581
150.00	0.1593
175.00	0.1605
200.00	0.1617
225.00	0.1628
250.00	0.1639
275.00	0.1650
300.00	0.1661
325.00	0.1671
350.00	0.1682
375.00	0.1692
400.00	0.1702
425.00	0.1712
450.00	0.1722
475.00	0.1732
500.00	0.1741
525.00	0.1751
550.00	0.1760
575.00	0.1769
600.00	0.1778
625.00	0.1787
650.00	0.1796
675.00	0.1804
700.00	0.1813
725.00	0.1821
750.00	0.1830
775.00	0.1838
800.00	0.1846
825.00	0.1854
850.00	0.1862
875.00	0.1869
900.00	0.1877
925.00	0.1884
950.01	0.1892
975.00	0.1899
1000.00	0.1907
1025.00	0.1914
1050.00	0.1921
1075.00	0.1929
1100.00	0.1936
1125.00	0.1940
1149.99	0.1939
1175.00	0.1935
1200.00	0.1918
1225.00	0.1919
1249.99	0.1805
2550.00	0.7328E-01
2575.00	0.7319E-01
2600.00	0.7310E-01
2625.00	0.7301E-01
2650.00	0.7292E-01
2675.00	0.7283E-01
2700.00	0.7274E-01
2725.00	0.7264E-01
2750.00	0.7255E-01
2775.00	0.7246E-01
2800.00	0.7237E-01
2825.00	0.7227E-01
2850.00	0.7217E-01
2875.00	0.7207E-01
2900.00	0.7197E-01
2925.00	0.7186E-01
2950.00	0.7176E-01
2975.00	0.7165E-01
3000.00	0.7155E-01
3025.00	0.7145E-01
3050.00	0.7135E-01
3075.00	0.7124E-01
3100.00	0.7113E-01
3125.00	0.7103E-01
3150.00	0.7092E-01
3175.00	0.7080E-01
3200.00	0.7069E-01
3225.00	0.7058E-01
3250.00	0.7046E-01
3275.00	0.7035E-01
3300.00	0.7023E-01
3325.00	0.7012E-01
3350.00	0.7001E-01
3375.00	0.6990E-01
3400.00	0.6979E-01
3425.00	0.6967E-01
3450.00	0.6956E-01
3475.00	0.6944E-01
3500.00	0.6933E-01
3525.00	0.6920E-01
3550.00	0.6908E-01
3575.00	0.6897E-01
3600.00	0.6885E-01
3625.00	0.6872E-01
3650.00	0.6860E-01
3675.00	0.6848E-01
3700.00	0.6835E-01
3725.00	0.6823E-01
3750.00	0.6811E-01
3775.00	0.6800E-01

1275.00	0.1647
1300.00	0.1534
1325.00	0.1464
1350.00	0.1403
1375.00	0.1350
1400.00	0.1289
1425.00	0.1252
1450.00	0.1219
1475.00	0.1188
1500.00	0.1175
1525.00	0.1149
1550.00	0.1125
1574.99	0.1102
1600.00	0.1080
1625.00	0.1060
1650.00	0.1041
1675.01	0.1022
1700.00	0.1005
1725.00	0.9883E-01
1750.00	0.9724E-01
1775.00	0.9572E-01
1800.00	0.9425E-01
1825.00	0.9284E-01
1850.00	0.9149E-01
1875.00	0.9019E-01
1899.99	0.8893E-01
1925.00	0.8773E-01
1950.00	0.8655E-01
1975.00	0.8542E-01
2000.00	0.8434E-01
2025.00	0.8336E-01
2050.00	0.8240E-01
2075.00	0.8147E-01
2100.00	0.8055E-01
2125.00	0.7966E-01
2150.00	0.7880E-01
2175.00	0.7795E-01
2200.00	0.7713E-01
2225.00	0.7632E-01
2250.00	0.7554E-01
2275.00	0.7476E-01
2300.00	0.7407E-01
2325.00	0.7399E-01
2350.00	0.7392E-01
2375.00	0.7384E-01
2400.00	0.7376E-01
2425.00	0.7368E-01
2450.00	0.7360E-01
2475.00	0.7352E-01
2500.00	0.7344E-01
3800.00	0.6788E-01
3825.00	0.6776E-01
3850.00	0.6765E-01
3875.00	0.6752E-01
3900.00	0.6740E-01
3925.00	0.6728E-01
3950.00	0.6715E-01
3975.00	0.6703E-01
4000.00	0.6690E-01
4025.00	0.6678E-01
4050.00	0.6666E-01
4075.00	0.6654E-01
4100.00	0.6642E-01
4125.00	0.6629E-01
4150.00	0.6617E-01
4175.00	0.6604E-01
4200.00	0.6592E-01
4225.00	0.6579E-01
4250.00	0.6567E-01
4275.00	0.6555E-01
4300.00	0.6543E-01
4325.00	0.6531E-01
4350.00	0.6520E-01
4375.00	0.6508E-01
4400.00	0.6497E-01
4425.00	0.6485E-01
4450.00	0.6473E-01
4475.00	0.6460E-01
4500.00	0.6447E-01
4525.00	0.6434E-01
4550.00	0.6422E-01
4575.00	0.6410E-01
4600.00	0.6397E-01
4625.00	0.6385E-01
4650.00	0.6373E-01
4675.00	0.6361E-01
4700.00	0.6349E-01
4725.00	0.6337E-01
4750.00	0.6326E-01
4775.00	0.6314E-01
4800.00	0.6303E-01
4825.00	0.6290E-01
4850.00	0.6278E-01
4875.00	0.6266E-01
4900.00	0.6254E-01
4925.00	0.6242E-01
4950.00	0.6231E-01
4975.00	0.6219E-01
5000.00	0.6207E-01

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration as referenced in
SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1942	0.1942	0.1942	0.1942	N/A
DISTANCE FROM SOURCE	1135.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1519	0.1519	0.1519	0.1519	N/A
DISTANCE FROM SOURCE	1.00 meters				

EXHIBIT B

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White River Junction VT 05075

Norman Marshall, President
(802) 356-2969

nmarshall@smartmobility.com

December 15, 2025

Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Subject: Thermal Ranch Specific Plan

Dear Ms. McGuire,

I have reviewed the vehicle miles traveled ("VMT) impacts of the Thermal Ranch Specific Plan as described in the Draft Environmental Impact Report ("DEIR") dated November 2024 and Final Environmental Impact Report ("FEIR") dated July 16, 2025. I make the following findings:

1) The proposed Thermal Ranch project uses would be highly seasonal. The FEIR analyzes the employment, housing and VMT impacts of the project as if the uses would be year-round. This is misleading and fails to fully account for the project's impacts.
2) The FEIR states that 80% of the equestrian center employment would be seasonal. Many of the other jobs also would be seasonal. This would do little to alleviate the area's jobs/housing imbalance.
3) Although the area generally has an excess of jobs, it also has a deficit of affordable housing. The project would not significantly address this issue.
4) The only project component that is a regular year-round use is the housing that is not allocated to seasonal workers and not labeled "tourist" or "resort." This housing is likely to result in a significant VMT impact given the area's jobs/housing imbalance. The mean commute distance in Census data for workers residing in project area is 27 miles one-way. Building large amounts of new housing in VMT-inefficient areas exacerbates the jobs/housing imbalance and should be avoided.

Seasonal Factors Not Adequately Analyzed

The proposed Thermal Ranch project uses would be highly seasonal. The FEIR analyzes the employment, housing and VMT impacts of the project as if the uses would be year-round. As discussed below, this is misleading and fails to fully account for the project's impacts.

Employment

The FEIR states:

> The commercial, hotel, and equestrian components of the proposed development are estimated to generate approximately 1,325 jobs. The provision of these jobs would help balance the deficit of approximately 9,579 jobs in the area, based on the current jobs-housing imbalance. (FEIR 2.16-21)

This statement overstates the proposed project's job benefits because many, and possibly, most of the jobs would be seasonal. The breakdown of the 1,325 jobs is in the FEIR table reproduced below. (FEIR, p. 2.16-16

Table 2.16-10
Estimated Project Employment

Land Use	Quantity	Estimated Employees
Commercial Retail	200,000 square feet	800
Hotel	150 rooms	225
Equestrian Center	223.1 acres	300
	Total	**1,325**

Source: Thermal Ranch Specific Plan Vehicles Miles Traveled Analysis, prepared by Urban Crossroads, January 30, 2023.

The FEIR states that 80% of the equestrian center jobs would be seasonal:

> Of the 300± jobs to be generated by the equestrian center, approximately 80% would be seasonal in nature, active only during the October to April event season. (FEIR p. 2.16-16)

The FEIR also states that the hotel use also is directly tied to the seasonal equestrian use:

> In this case, the proposed the hotel would not be provided if the adjacent Horse Park were not located at the site, so it is reasonable to assume that visitors which select this location are considering the proximity to the Horse Park use. (App. L, PDF p. 5 of 26)

Therefore, the hotel would likely have a very high vacancy rate during the May to September period, and also have lower employment during this off-season.

Regarding the commercial retail uses, the FEIR states:

> Proposed commercial areas would provide 275,000± square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space at the equestrian center; and up to 150,000 square feet of retail space. (FEIR, p. ES-2)

These numbers do not add up:

> 75,000 + 10,000 + 150,000 equals 235,000, not 275,000.

The FEIR states:

> The Project would include 275,000± gross leasable square feet of retail and other commercial space, including 75,000± square feet of equestrian event-related retail space, and 10,000 square feet of office space; 50,000 square feet of resort retail space, 150,000 square feet of commercial retail space, and a 150-room hotel. (FEIR, p. 5)

These numbers are different and don't add up either:

> 75,000 + 10,000 + 50,000 + 150,000 equals 285,000, not 275,000.

Like the hotel use, this commercial/retail space would not be provided if the adjacent Horse Park were not located at the site. Therefore, much of the employment would be seasonal. Three of the categories listed in the excerpts above are directly tied to the equestrian center including: "equestrian event retail", "resort retail space," and "office space at the equestrian center." The other category of 150,000 square feet of "commercial retail space" is not further defined. However, it is probable that these usages would also be highly seasonal if they are built at all, because it does not appear that the year-round population in the area is sufficient to support this amount of year-round retail.

The FEIR acknowledges the seasonality of the employment, stating:

> As previously stated, at full buildout, the non-equestrian portions of the Project are projected to employ approximately 800 full-time and part-time staff for the proposed commercial uses, and approximately 225 staff for the proposed hotel. Some of these jobs may be seasonal in nature, given that demand for staff may fluctuate with the additional business generated by visitors and area residents attending competitions at the equestrian center. (FEIR, p. 2.16-17)

Given the seasonal nature of much, or possibly most, of the jobs, the benefits of the project in addressing the jobs/housing imbalance in the area is overstated.

It is also questionable that these seasonal jobs will be filled by local residents. In particular, it is likely that most of the seasonal equestrian center jobs will be filled by workers from outside the area as they would be provided with seasonal housing on the property. The FEIR states:

> The proposed PA-4 workforce housing would provide up to 500 units of workforce housing to accommodate the approximate 300 jobs generated by the equestrian center. (FEIR, p. 2.16-16)

In cases where workers move in from outside the area to fill seasonal jobs, this will not improve the area's jobs/housing imbalance.

Housing

Although the area has a deficit of jobs relative to housing overall, it also has a significant workforce housing affordability problem. The FEIR documents "a substantial deficit in available rental housing." (FEIR, p. 2.16-8)

The FEIR acknowledges that the project will add to needed workforce housing when it states:

> The estimated 1,025 hotel and commercial staff could create a demand for additional housing, including housing affordable to households earning 80% of less of the County's median income. According to the U.S. Bureau of Labor Statistics, the mean hourly wage for food preparation and serving related occupations in the Riverside-San Bernardino-Ontario Metropolitan Statistical Area is $16.81 as of May 2022. Based on the same source, the mean hourly wage for sales and related occupations is $22.98.14 converted to annual salaries and compared to the County's median income, these wages would fall into the very-low income (up to 50% of median income or $0 - $37,650 per year) and low income (51% to 80% of median income or $37,651 - $60,250) categories.
>
> For the reasons stated above, the jobs generated by the Project could create demand for housing, including affordable housing. (FEIR p. 2.16-17)

The FEIR then exaggerates the project's contribution towards addressing the workforce housing problems. It states:

> The Project will provide up to 1,362 residential units, including attached and detached single family housing, as well as workforce cottages. While the proposed workforce housing is primarily intended for employees of the equestrian center, some of the units may be available for other employees of the Project. Moreover, as discussed below, it is likely that the majority of commercial retail, restaurant and hotel jobs generated by the Project would be filled by existing residents of the Coachella Valley that are already housed. As previously stated, eastern unincorporated areas of Riverside County have a below average jobs-to-housing ratio. (FEIR p. 2.16-17)

All of the housing totals in the FEIR are labeled "up to." FEIR Table 1-1 (p. 1-17) lists the "Workforce Cottages" as totaling 300-500. Given that these units are primarily to house the "approximate 300 jobs generated by the equestrian center," the lower 300 number appears more probably than the upper 500 number, particularly given that some units likely will house more than one worker in the same family.

The FEIR table (FEIR p. 2.16-15) reproduced below shows the breakdown of the "up to 1,362" units.

Table 2.16-9 Project Land Use Summary				
Planning Area	**Land Use**	**Acres (Net)**	**Residential Dwelling Units**	**RV Spaces**
PA 1	Commercial Tourist	223.1		
PA 2	Estate Residential	194.3	132	
PA 3	Medium Density Residential	69.5	390	
PA 4	High Density Residential	41.1	500	320
PA 5	Commercial Tourist	54.4	340	
PA 6	Commercial Retail	21.4		
	Totals	**603.8±**	**1,362**	**320**

In the table, the 500 "high density residential" units in the table are more likely fewer than 500 and are primarily for seasonal equestrian center workers who likely are drawn from outside the area. Therefore, they would not serve as workforce housing, either for the other employees in the project, or for the general area.

The FEIR says that these units might be available for rent to others including farmworkers during the "May to September offseason." (FEIR, p. 2-16-17) However, the FEIR provides no evidence that these short-term rentals would provide any practical benefit, as it is likely a period when other tourist-related seasonal employment and the associated workforce housing demand are at their low points. It also is not the peak period for agricultural work.

> The main harvest and peak season for farm work in the Coachella Valley is from **October through June**, due to the area's three distinct growing seasons. [1] While there are tasks throughout the year, the most intensive periods for planting and harvesting occur during these months, with specific crops like dates and grapes having peak harvests at different times within that window.[2]

The other categories in the FEIR table reproduced above are unlikely to provide any workforce housing. The "Estate Residential" with an average of 0.6 units per acre will be very expensive. The Commercial Tourist category proposed for Planning Area 5 includes expensive amenities, including resort condominiums and a hotel, which are not intended for year-round occupancy. The least expensive category will be the 390 Medium Density Residential Units with an average density of 5.6 units per acre., but few of these will be rental properties and the rents will likely be high.

Therefore, the County overestimates its contribution to the jobs/housing in the region. The FEIR should be revised to include more accurate assumptions reflecting the highly seasonal nature of the Project.

---

[1] Coachella Valley Irrigated Lands Coalition, *Water Quality Monitoring Plan* (May 20, 2014), p. 5, available at: https://www.waterboards.ca.gov/rwqcb7/board_decisions/adopted_orders/orders/2014/0046attach_e.pdf; The Weather Channel, *Crowing The Holiday MVP: Why The #1 Vegetable At Thanksgiving Is The One You Least Expect,* available at: https://weather.com/features/news/2025-11-24-coachella-valley-celery-harvest-thanksgiving-weather-climate-change?utm_source=chatgpt.com.

[2] *Id.*

Considering the jobs/housing ration is already imbalanced and the County admits that the Project will lead to more housing demand, this may reveal potentially significant impacts that require mitigation.

The Year-Round Housing Component Would Likely Result in a Significant VMT Impact

The only project component that is a regular year-round use is the part of the housing that is not allocated to seasonal works and not labeled "tourist" or "resort." This housing is likely to result in a significant VMT impact given the jobs/housing imbalance in the area discussed in the FEIR. The jobs/housing imbalance is forecast to worsen in the Eastern Coachella Valley as shown in this table reproduced from the FEIR (p. 2.16-6).

Table 2.16-3
Eastern Coachella Valley Population and Employment Forecasts

Eastern Coachella Valley Area Plan	Population			Housing Units			Employment		
	2010	2020	2035	2010	2020	2035	2010	2020	2035
Incorporated	42,500	76,500	135,00	9,300	19,010	36,542	6,351	12,700	30,400
Unincorporated	32,454	89,606	206,313	7,363	22,971	55,286	6,878	15,849	35,577
Total	**74,954**	**166,106**	**341,313**	**16,663**	**41,981**	**91,828**	**13,229**	**28,549**	**65,977**

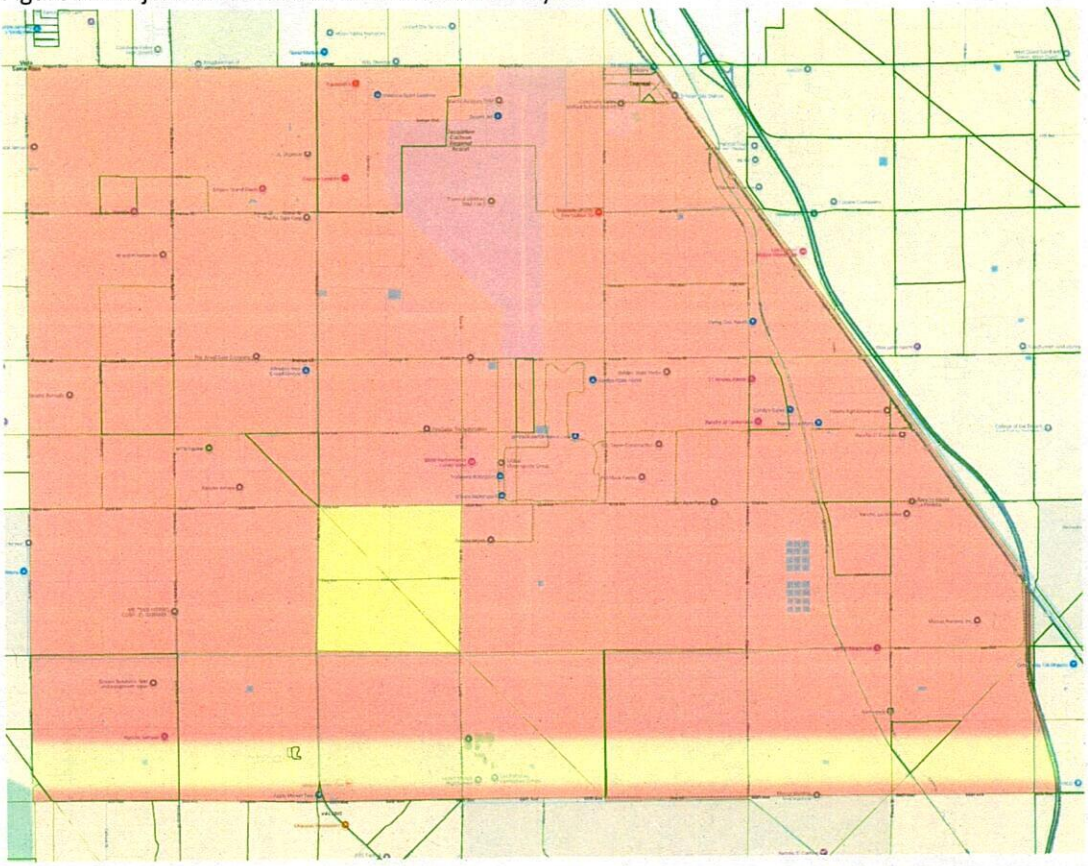
Source: Riverside County General Plan Appendix F-1 Population and Employment Forecasts

The table shows 49,847 additional housing units between 2020 and 2035, but only 37,428 more jobs over the same period. The FEIR includes an estimated 89,434 in the labor force in 2021 (FEIR, p. 2.16-94). This implies that there are over two workers per housing in the area, on average. Applying a ratio of 2 to the 2035 forecasts shown in the table above, this results in an increase of about 100,000 workers vs. 37,428 jobs over the period 2020-2035, requiring a huge increase in net out-commuting.

There are many long-distance commutes from those living in the vicinity of the project today. The U.S. Census Bureau publishes Longitudinal Employer-Household Dynamics ("LEHD") Origin-Destination Employment Statistics ("LODES") data that provide detailed geographic data about workers' commutes to jobs.[3] In order to focus on existing commutes from the immediate project area, I have extracted LODES data for the shaded area in the Figure 1 below, where the project area is shown in yellow.

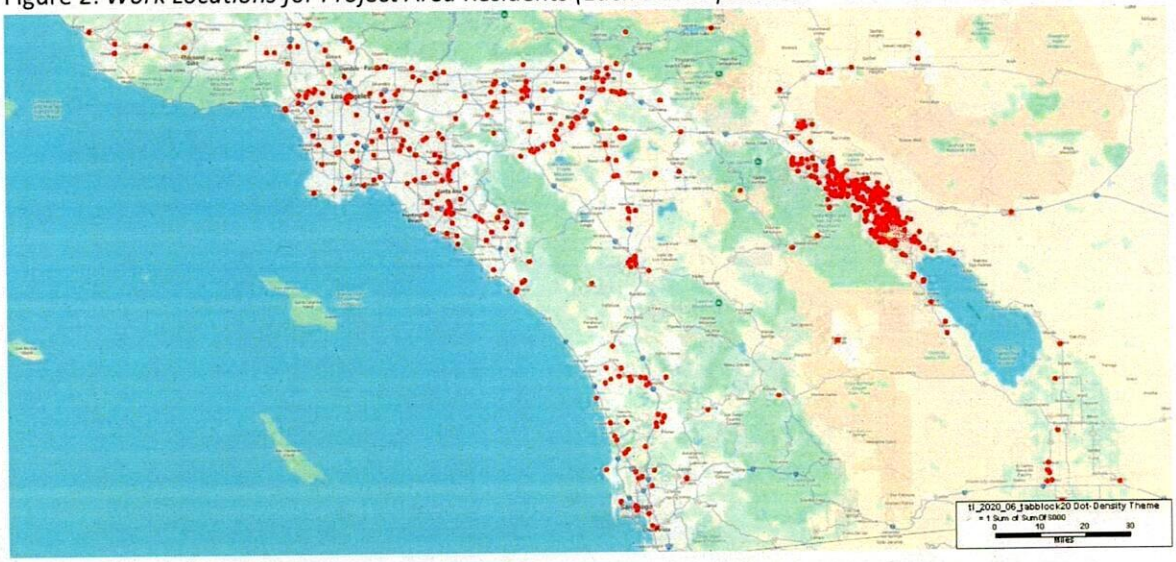
[3] The LODES data represent "covered" employment which excludes non-profits and some other categories.

Figure 1: Project Area Used for Census Data Analysis



The map below maps work locations for residents in the area shaded in Figure 1.

Figure 2: *Work Locations for Project Area Residents (Each Dot Represents 1 Job*



As shown in the Figure 2, about 60 percent of project area residents work in the Coachella Valley. However, there are also are many project area residents who commute long distances to destinations throughout the greater Los Angeles region. The mean commute distance in the LODES data for workers residing in project area (including the short commutes) is 27 miles one-way.[4]

Given the local/jobs housing imbalance and the existing long commute patterns, the assertion that "The Project is located in a low VMT area for residential uses" based on the RIVTAM model (FEIR, Appendix L, PDF p. 5 of 26) is not credible. I have 35 years experience in regional travel demand modeling. The models were not developed for this purpose and are not capable of matching the long real-world commutes.

Building large amounts of new housing in VMT-inefficient areas that exacerbates the jobs/housing imbalance should be avoided.

Sincerely,

Norman L. Marshall

Norman L. Marshall

[4] This calculation excludes records where the apparent commute distance is greater than 100 miles one-way.

Resume

NORMAN L. MARSHALL, PRESIDENT

nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (37 Years, 23 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in $250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced

model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additional analyzed using the City's Synchro model

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka'ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Caroline including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

MEMBERSHIPS/AFFILIATIONS

Associate Member, Transportation Research Board (TRB)

Member and Co-Leader Project for Transportation Modeling Reform, Congress for the New Urbanism (CNU)

EXHIBIT C

HOUSE AGRICULTURAL CONSULTANTS

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December 15, 2025 (via electronic mail)

To: Ms. Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
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From: Greg and Henry House
House Agricultural Consultants
gahouse@houseag.com, hajhouse@houseag.com

Re: Expert review of County Response to Public Comments of Thermal Ranch Project, Riverside County, with respect to agricultural matters

Dear Ms. McGuire:

At your request, we have reviewed Riverside County's responses to public comments on the EIR (FEIR) for the *Thermal Ranch Specific Plan Project* (Thermal Ranch Specific Plan SP No. 00401)—hereinafter, the *Thermal Ranch project*, or, the *project*—to comment on agricultural resources in our capacity as agriculture experts. These are our second set of comments on this project.

We, House Agricultural Consultants (hereinafter, HAC), are an agricultural-consulting firm that has analyzed agricultural impacts of numerous similar projects as well as agricultural-reclamation plans over a period of many years. A description of our qualifications as consultants follows as an appendix to this memorandum.

We reply to three county responses, those to comments C-7, C-8, and C-17.

1 Comment on Response to C-7

In its response to comment C-7 the County makes this assertion (on page 34 in the PDF):

> Pursuant to County General Plan EIR No. 441 and EIR 521, no additional project-specific mitigation measures are feasible. Thus, impacts due to conflict with existing agricultural zoning or uses, including those leading to the conversion of designated Farmlands, as well as encroachment impacts, would be significant and unavoidable.

1.1 A dereliction of duty? On the same page the County quotes General Plan EIR No. 521, saying

> General Plan EIR No. 521 further concluded, reiterating the findings of the General Plan EIR No. 441) that General Plan policies: "do not set specific requirements that would limit the conversion of agricultural lands to non-agricultural uses. Further, EIR No. 441 (for 2003 General Plan Update) finds the policies do not identify the amount, extent or location of agricultural land to be conserved and that it is impossible to assess if policies would effectively reduce potentially significant impacts associated with the conversion of agricultural land to non-agricultural uses." (GPA 960 EIR No. 521, p. 4.5-35).

This passage from the General Plan is very revealing in that:

1) it does not set specific requirements that would limit conversion of agricultural lands, and

2) it states that it is "impossible to assess" if its policies would be effective in reducing significant impacts from the conversion of agricultural land to non-agricultural uses.

Impossible? Is it not the duty and mission of the County to follow CEQA and serve its constituent public? What this reveals is a complete lack of interest in conserving agricultural land, in complete contrast to the goals and objectives listed in the General Plan's Vision Statement, Open Space Element, and Land Use Element, which we have previously cited and enumerated in our original comment.

Nevertheless, if it were impossible to figure out, then the County certainly could not assert that "no additional project-specific mitigation measures are feasible". This finding in the County's General Plan EIR does not excuse the County from its duty under CEQA to analyze and adopt all feasible mitigation to reduce impacts to less-than-significant levels.

1.2 There is a way to assess the cost of an ACE. The County states that an agricultural conservation easement (ACE) would threaten its promotion of housing and economic-development opportunities:

> Rather, the County has determined that the requirement of an ACE will not serve to effectively mitigate Project impacts and is inconsistent with the County's adopted policies to allow a limited conversion of agricultural land to promote housing and economic development opportunities, which would be unnecessarily encumbered and threatened by a requirement for agricultural conservation easements as a condition of project development.

How does an ACE threaten this project's development? Since the County policy is in favor of conserving agriculture, we are not amiss to conclude that this means an ACE would cost money that the developer does not want to pay. However, no assessment of the cost has been done, yet the cost is certainly not "impossible" to determine; the valuation of agricultural conservation easements is a well established discipline that can be performed by many licensed real estate appraisers throughout California.

2 Comment on County response to C-8

In this comment response the County quotes California Code of Regulations to argue that an ACE is infeasible:

> To determine whether a mitigation measure or alternative is infeasible, an agency must necessarily weigh and balance its pros and cons taking account of a broad range of factors. (See 14 CCR §§15091(a)(3)). After weighing these factors, an agency may conclude that a mitigation measure or alternative is impractical or undesirable from a policy standpoint and reject it as infeasible on that ground.

2.1 Specific reasoning is required. However, 14 CCR §§15091(a)(3), 15364 states:

> Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The County has misstepped again by not providing *specific* reasons why the mitigation measure of an ACE is infeasible. Instead the County has used a circular argument: that in essence it has a policy to find this kind of mitigation infeasible as it finds such mitigation conflicts with its policy of promoting housing and economic-development opportunities. It also again depends on generalized references to ongoing drought in the community without providing any specific evidence to demonstrate that the Project's use of an ACE would exacerbate the issue. As mentioned in our previous comments, an ACE only conserves existing agricultural land—it does not create new agricultural land.

14 CCR §§15091(a)(3) requires that the County must provide specific, tangible reasons, not generalities, and the pros and cons of these specific reasons are to be weighed and balanced before the County can reject a potential mitigation measure even if it does not fully mitigate the significant impact.

2.2 A reasonable alternative mitigation measure. The County appears to have failed to consider other alternative measures being used in other California counties to mitigate the significant impact of loss of agricultural land to urban conversion; and importantly, these alternative measures meet the County's concerns about water shortages by not requiring a conservation easement on nearby water-deprived lands.

There are several agricultural mitigation measure alternatives to ACE's that are being utilized in other California counties, including Agriculture and Land Stewardship (ALS) Framework and Strategies (ALS Strategies), and public benefit agreements, a mitigation measure that has been successfully employed in nearby Imperial County since 2012.

2.2.1 IN-LIEU FEES. Agricultural land-loss mitigation is accomplished by the establishment of an "in-lieu" fee-collection program by the county. The fee is collected at time of issuance of the grading permit for the project in question, and it is called "in-lieu" because instead of requiring the developer to provide a ACE, the fee legally satisfies the developer's mitigation requirement.

The fee amount can be specified in various ways; a popular method is based on a set percentage of the project land's appraised value.

The collected in-lieu fee is deposited in a trust fund that is used exclusively for county approved, designated purposes, including both the purchase of ACEs, and for community benefits related to agriculture; this last being also known as a public-benefit program.[1]

2.3 Public-benefit Agreements. The public-benefit agreement is therefore utilized as an alternative to the purchase of ACEs in numerous counties of California. Imperial County, for instance has reportedly collected over $14 million as an alternative mitigation measure to benefit agricultural businesses, researchers, and local students; for instance, Imperial County has given out more than $1.6 million in grants to the University of California Cooperative Extension, $130,955 to the Imperial County Sheriff's Office, nearly $7.5 million in loans to several agricultural businesses, and more than $400,000 in scholarships to students in agriculture-related fields of study.

2.4 ALS Strategies. Riverside County should also consider how ALS Strategies can be utilize in-lieu mitigation fees to support and enhance the County's agricultural economy, which it has admitted will be negatively impacted by the project.

According to the California Department of Water Resources (DWR), ALS Strategies can help maintain agricultural lands that provide benefits to farmers and the environment.[2] DWR's web site lists a specific set of strategies for supportng the local agricultural economy:

– Develop area-wide economic and land use studies, such as plans for the protection and restoration of habitat areas that takes into consideration the vitality of the agricultural economy
– Promote economic development
– Improve transportation infrastructure
– Help farmers and landowners earn new revenue from recreation and tourism
– Assist farmers and landowners in working with governmental agencies

2.5 In-lieu fee mitigation measures fit County needs. These two in-lieu fee mitigation measures, the Public Benefit Agreement programs, and the ALS Strategies, both seem to be feasible and a perfect fit for Riverside County which, under its General Plan policies, seeks to

[1] See Imperial County's public-benefit program: ⟨*https://imperial.granicus.com/MetaViewer.php?view_id=2&clip_id=1760&meta_id=290112*⟩.

[2] See ⟨*https://water.ca.gov/Programs/California-Water-Plan/Water-Resource-Management-Strategies/Agriculture-and-Land-Stewardship-Framework*⟩.

both support its local agricultural economy and to promote housing and economic development opportunities, while complying with CEQA in providing mitigation for the loss of agricultural land to urban development through this project.

3 Comment on County response to C-17

In this comment response the County mostly recycles talking points already made in C-7 and C-8. We refer the reader to our comments on these items, above, and our original comments prepared in our initial memo dated October 21, 2025. We add only the comment below.

3.1 Cumulative impacts. The County has argued that its general plan allows for up to 7 percent of agricultural land conversion apparently without any attempt at mitigation for the land loss. There has been no presentation of how the combination of this project and other past, present, and probable future projects may contribute to the overall significant negative environmental effect. The EIR needs to address this issue.

4 Closing

This concludes our current review of this project. A description of our professional qualifications is found in the appendix that follows.

Sincerely,

Henry House Gregory A. House

5 Appendix: Qualifications of House Agricultural Consultants

5.1 Qualifications of Henry House. Agricultural Economist · Agricultural Consultant · Licensed Appraiser · Farmer.

Summary of professional expertise:—

– California appraiser's license number AG-3010876 (Certified General Appraiser). This is the highest level of licensing for a real-estate appraiser and additionally qualifies Mr. House to value business interests, intellectual property, and other specialized assets and to opine on appraisals by others (the service of appraisal review).

– Agricultural economics and business lost profits; econometric controversies.

– Value of lost crops, emblements, and foodstuff inventory.

– Farm management: good farming practices in row crops and orchards, such as almonds and walnuts.

– Livestock management: carrying capacity of land, range management, standard of care for grazing animals, fencing.

– Right-to-farm issues, e.g., vehicle–agriculture, vehicle–livestock conflicts in agricultural districts, feasibility of agriculture on urban-proximate lands, spraying drift.

– Appraisal: valuation in disputes concerning real property, valuation of agricultural and rural land, valuation of valuation of agricultural personal property (e.g., chattel), valuation of agricultural-commercial facilities (e.g., aquaculture), valuation of development rights, assessed-value analysis for assessment appeal.

– Condemnation: valuation services for this appraisal specialty, including severance damages, in support of eminent-domain litigation.

– Conservation projects: Mr. House has assisted numerous land trusts in establishing conservation easements, including The Nature Conservancy, Yolo Land Trust, Solano Land Trust, Agricultural-Natural Resources Trust, River Partners, and Sutter Buttes Regional Land Trust.

– Management evaluation of commercial equestrian facilities.

– Management of rural property.

– Statistical analysis, geographic-information-system (GIS) analysis, and software engineering (analytics).

– Expert services to litigation on the foregoing with deposition and trial-testimony experience; partial list of matters below. Qualified expert in the counties of Butte, Colusa, Kern, and Riverside.

Representative recently concluded matters in which Mr. Henry House was retained by counsel as a forensic expert:—

County of Tulare, October 2025.—Topic: econometrics · agricultural irrigation · evapotranspiration · water rights · California Sustainable Groundater Management Act (SGMA). *Friant Water Authority v. Eastern Tule Groundwater Sustainability Agency* (case no. VCU306343). A matter of claimed economic damages due to the defendant's method of charging and accounting for groundwater drawn from a regulated basis by its memners, primarily farms growing diverse crops. Scope included econometrics and expertise in farm management.

County of Sacramento, September 2025.—Topic: farming standard of care · agricultural dust · walnuts. *Gerald Larson, et al. v. Robert Larson, et al.* (Sacramento County case no. 34-2021-00294930, consolidated with 34-2021-00311331 and 34-2022-00327390). An auto-accident case wherein dust allegedly originating from the defendants' walnut orchard obscured visibility on a public road, contributing to an accident with multiple vehicles involved. Mr. House was retained and designated to review the location of the incident, the crops and nature of agriculture in the area, and the standard of care used by the farming defendants, reasonableness of their actions, and their process for conducting agricultural operations, opining on the same and in rebuttal of other experts.

County of Butte, June 2025.—Topic: agricultural lost profits · olives. *Zih Jun Wang v. Pacific Gas & Electric Company, et al.*. A case regarding an olive grove in Butte County, where portion of the trees were destroyed by a utility company, in substantial excess of the utility's real-property rights under its easement to undertake fire-prevention activities. Mr. House opined on the economic impact of the trees' destruction, including cost of restoration, timeline to return to productive capacity, and lost profits, thereby assisting the client to obtain a settlement.

County of Wake, State of North Carolina, November 2024.—Topic: farm management, standard of care for labor contracting. *Carlos Moreno, et al. v. Florida Orange Gold, LLC, José Javier Gutierrez, Gilberto Gutierrez, and Howell Farming Co., Inc.* Mr. House was retained and designated for expertise on the client's standard of care in hiring contract labor in Wayne County, North Carolina. Plaintiff Moreno suffered a workplace injury, alleged to have been caused by heat sickness, while weeding watermelons as a contract laborer (as an employee of Florida Orange Gold) on the farmland of client Howell Farming Co. (defendant); the plaintiffs' cause of action against Howell was negligence. Mr. House opined on several controverted factual elements of the allegation of negligence, including the division of responsibility for workers' safety between farm-labor contractor (employer) and farmer hiring contract labor (nonemployer owner of the crop and possessor of the farmland), customary and accepted practices to manage risk of heat illness from hot weather, and whether summertime weeding in eastern North Carolina meets the characteristics of an "inherently dangerous activity" as defined by North Carolina law.

Federal venue, August 2024.—Topic: farm management, real-property rights. A federal-court matter, involving appraisal and farm-management expertise, which is confidential per our agreement with the client. This matter was venued in a federal district of California.

County of Sacramento, July 2024.—Topic: real-estate costs to cure · appraisal · conspiracy.—*Robert Williams and Christina Williams v. Dynamic Asset Solutions, LLC, Prato Real Estate, Inc., Bricker Construction, Inc., and Finley Home Services, Inc., et al.*. Mr. House was retained by Williams and opined in deposition on the fair market value of the subject property, a luxury home, in as-sold condition, its fair market value as if it had not suffered from damage discovered by buyer, and the market cost of repairs. Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Los Angeles, March 2024.—Topic: real-estate appraisal. *JP's Nevada Trust v. 2Bulls Conservation Ventures et al.* Mr. House was retained by JP's Nevada Trust and opined on valuation methodology and opined the fair market value of three ranch properties at the times of three controverted transactions in service of the plaintiff in a dispute in which the buyer (plaintiff) alleged conspiracy to defraud and a pattern of racketeering activity in violation of 19 U.S.C. § 1962(c), the Racketeer Influenced and Corrupt Organizations Act (RICO). Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Nevada, November 2023.—Topic: lost profits. *Andrew Hainsworth, et al. v. Pacific Gas & Electric Company.* A fire loss on a property in Rough and Ready. Mr. House was retained by Hainsworth and subsequently opined written findings regarding the plaintiff's lost profits from licensed *Cannabis* production in rural Nevada County, including an opinion on the market value of Nevada County-grown *Cannabis* relative to the market in aggregate.

County of Franklin, State of Washington, September 2023–June 2024.—Topic: real-estate appraisal. *Ice Harbor Properties, LLC and Certain Underwriters Subscribing to Certificate No. XLS0342717 v. Agri Control Technologies, Inc. d.b.a. BTU Ventilation and Parrish Stakkeland* (case no. 20-2-50118-11, Superior Court of the State of Washington, County of Franklin). A dispute over the compensation due by the defendants for the fire loss of the plaintiff's real property, a warehouse specialized for climate-controlled bulk storage of potatoes and onions. The plaintiffs retained and designated Mr. House as a rebuttal witness to opine on the fair market value of the lost building, the market for similar buildings, and other experts' opinions.

County of Tulare, July 2023.—Topic: livestock economics · real-estate appraisal. *Jones, et al. v. Pleasant Valley Canal Company, et al.* (Tulare County Superior Court case no. VCU274417). A dispute over a cattle-ranching and hay-growing operation which the plaintiffs alleged had been damaged by the operation of a canal crossing the plaintiffs' property. The scope for which Mr. House was retained and designated by the defendants included analyzing the plaintiffs' alleged diminution of value of real estate, analyzing the plaintiffs' alleged economic loss from death of cattle, and opining on the water company's standard of care in maintenance of its canal. Additionally, I assisted retaining counsel to engage an expert in veterinary pathology.

County of Minidoka, State of Idaho, March–August 2023.—Topic: standard of care for livestock fencing. *Michael O. Ottley v. Hanssen et al.* (case no. CV34-21-00168, District Court of the Fifth Judicial District of the State of Idaho). An auto-accident case wherein the defendants' cattle had escaped onto a public road and been struck by the plaintiff in rural Minidoka County, Idaho. The defendants retained and designated Mr. House to analyze the defendants' standard of care in managing the cattle, to opine on the quality of the defendants' fencing in comparison to locally accepted standards of adequacy, and for rebuttal of the plaintiff's fencing expert.

County of Imperial, November 2022–February 2024.—Topic: agricultural economics · hay. *Freddi Abatti et al. v. James Davis, et al.* (Imperial County Superior Court case no. ECU002597). The defendants retained and designated Mr. House to evaluate the lost profits in hay crops in Imperial County resulting from a fire.

County of Merced, September 2022–January 2024.—Topic: agricultural economics · lost profits · almonds. *Athwal Investments et al. v. San Luis Pump Co. et al.* (case no. 20CV03787). A matter of almond trees in Merced County allegedly damaged consequent to lack of irrigation water. Scope included analysis of the economic lost profits from orchard trees lost and replanted as well as from lost yield in service of two defendants.

See also.—Mr. House's separately provided listing of testimonies lists additional matters.

Partial list of management-consulting assignments:—

– Numerous consulting assignments for Leland Stanford Junior University on the management of its agricultural lands, which feature cattle, horses, and vegetable crops. Topics addressed have included livestock standard of care, carrying capacity of lands, safety of animals, safety of structures, and management of drainage and water quality.

– Consulting farm management for John and Marie Cronin Trust B, a landowner near Rio Vista, California. Lands were utilized for cattle grazing.

– Numerous appraisal assignments of farmland and rangeland properties utilized for crops and livestock (cattle, sheep, and aquaculture).

– A list of additional management-consulting clients served available on request.

Experience:—

Agricultural consultant, appraiser, consulting agricultural economist.— House Agricultural Consultants, providing agricultural science, economics, management, and appraisal services. 2000–present.

Farmer.— Coco Ranch, a family farm growing organic apples, peaches, cherries, and field crops and raising sheep, poultry, and goats. 2000–present.

Education:—

– B.S., "Natural History", University of California, Davis, 1999, with Honors. Coursework in agronomy, botany, ecology, entomology, geology, hydrology, nematology, plant pathology, soil biology, sustainable agriculture, statistics, and wildlife biology.

– Numerous courses of the American Society of Farm Managers & Rural Appraisers (ASFMRA) regarding farm management, agricultural consulting, and appraisal. Recently completed: *Livestock Ranch Seminar* (February 15, 2024) and *Appraisal of Water Rights Seminar* (March 8, 2024), both in ASFMRA's appraisal-education series.

– Numerous courses of the Appraisal Institute regarding real-estate appraisal.

– Courses from Savory Institute regarding livestock management.

Appointments & activities:—

– Member, Solano County Farm Bureau.

– Member, American Society of Farm Managers & Rural Appraisers.

– Board of Directors, Davis Media Access, Davis, California, 2014–2017.

– Board of Directors, Davis Farmers Market Association, 2001–2003.

– Assistant instructor, "Principles of Farm Management", course M-10, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

– Course proctor, "M-25: Enhanced Client Services", an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

Publications & speaking engagements:—

– Lecturer/instructor, "Farm Management", course ARE 140, and "Appraisal of Farms & Rural Resources", course ARE 145, University of California–Davis, 2015–present.

– *Principles of Farm Management*, Course M-10, a 40-hour professional credit Internet educational offering of the American Society of Farm Managers & Rural Appraisers

– Educational speaker at the annual meeting of the California Chapter of the American Society of Farm Managers & Rural Appraisers, November 19, 2021, Coalinga, California. Topic: valuation of conservation easements.

5.2 Qualifications of Gregory A. House. Agricultural Consultant · Agronomist · Professional Farm Manager · Rural Appraiser · Farmer.

Experience:—

– Agricultural consultant, 1983–present—House Agricultural Consultants, providing agricultural-science, economics, management, and appraisal services.

– Farmer, 1987–present.—Growing organic apples, peaches, cherries, apricots, field and seed crops.

– Corporation secretary and consulting agronomist, 1977–1983—Hannesson, Riddle & Associates, Inc.

Professional affiliations:—

– American Society of Farm Managers & Rural Appraisers
– American Society of Agronomy
– Crop Science Society of America
– Soil Science Society of America
– California Certified Organic Farmers
– California Farm Bureau.

Accreditations:—

– Accredited Farm Manager (AFM), American Society of Farm Managers & Rural Appraisers, certificate no. 501

– Certified Professional Agronomist (CPAg), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd., certificate no. 2319

– Certified Crop Advisor (CCA), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd.

N.B.—These credentials have continuing-education requirements with which I am in compliance.

Education:—

– B.S., Crop Ecology, University of California, Davis, 1975, with Honors

– Numerous courses from the University of California Extension in agricultural economics, crop management, real estate, & hazardous waste management

– Cornell University Certificate Program, Implementing Good Agricultural Practices: A Key to Produce Safety

– Courses of the American Society of Farm Managers & Rural Appraisers: Principles of Rural Appraisal · Advanced Rural Appraisal · Eminent Domain · Report Writing School · Economics of Farm Management · Principles of Farm Management · Standards and Ethics · Permanent Plantings Seminar · Standards and Ethics for Farm Managers · ASFMRA Code of Ethics

National Uniform Standards of Professional Appraisal Practice Courses of the Appraisal Institute: Basic Valuation Procedures · Real Estate Statistics and Valuation Modeling · Advanced Income Capitalization · Valuation of Conservation Easements Certificate Program · Condemnation Appraising: Principles and Applications · Appraising the Appraisal · How Tenants Create or Destroy Value: Leasehold Valuation and Its Impact on Value.

– Former Accredited Rural Appraiser (ARA), American Society of Farm Managers & Rural Appraisers, certificate no. 749 (retired).

Expert-witness court testimony:—

– Superior Court Qualified Expert Witness in the following California counties: Alameda, Colusa, Kern, Fresno, Madera, Merced, Monterey, Orange, Riverside, San Joaquin, San Luis Obispo, Santa Barbara, Santa Cruz, Solano, Sonoma, Sutter, Ventura, Yolo

– United States Tax Court qualified expert witness

– United States Bankruptcy Court qualified expert witness.

A comprehensive listing of Mr. House's depositions and trial appearances is available upon request. The list currently numbers seventy-two matters in which Mr. House gave sworn testimony (either deposition, trial or hearing appearance, or both), including thirty-two trial appearances.

Awards:—

– CCOF Presidential Award, California Certified Organic Farmers, February, 2001.

– Meritorious Service in Communications, American Society of Farm Managers & Rural Appraisers, November 2004.

– H.E. Buck Stalcup Excellence in Education Award, American Society of Farm Managers & Rural Appraisers, October, 2011.

Appointments & activities:—

– Adjunct Lecturer, University of California, Davis, Department of Agricultural & Resource Economics, current; Courses ARE 140 Farm Management; ARE 145 Appraisal of Farms & Rural Resources, 2015–2021.

– Instructor, *Principles of Farm Management*, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1996–2007.

– President, California Chapter American Society of Farm Managers & Rural Appraisers 1994–1995; Secretary–Treasurer, 1984–1990.

– Board of Directors, Yolo Land Trust, 1993–2001.

– Board of Directors, American Red Cross, Yolo County Chapter 1987–1989.

– Member, Yolo County Right to Farm Grievance Committee 1992–1995.

– Vice Chairman, Management Education Committee, American Society of Farm Managers & Rural Appraisers, 1998–2000 (committee member since 1986).

– Yolo County LAFCo Agricultural Forum LESA subcommittee, 1999.

– California Certified Organic Farmers: Treasurer of the Board of Directors, 1998–2003; Executive Director, 1999–2000; Member of the Finance Committee, 1998–current.

– CCOF Foundation Going Organic Program, Management Team member, 2006–2012.

– USDA Organic Grant Panel member, Washington, DC, 2002.

– City of Davis Open Space and Habitat Commission, 2006–2016, Chairman, 2007–2009.

– Member, Fruit Orchard Technical Advisory Group, Filoli Gardens, Woodside, California.

– Member, Organic and Sustainable Agriculture Program Steering Committee, University of California Cooperative Extension, Yolo and Solano Counties, California, 2008–2013.

– Member, Solano County Right to Farm Grievance Committee 2022–present.

Speaking engagements:—

– Guest lecturer, University of Florida at Gainesville–Vegetable Crops Department. Seminar on transition to organic agriculture, November 1994.

– Featured program speaker, 1995 annual *Eco-Farm Conference*. Lecture on economics of organic-apple production, Asilomar, California, 1995.

– Guest speaker, multiple events of Community Alliance with Family Farmers. Presentations on farm management and agricultural economics, 1996 and 1997.

– Instructor, American Society of Farm Managers & Rural Appraisers. Course "M-12", *Standards and Ethics for Professional Farm Managers*, March 1997.

– Guest speaker, American Horticultural Society. Lecture entitled *Challenges of Organic Stone Fruit Production*, Sacramento, California, July 2001.

– Organizer and presenter, *Going Organic Kickoff Meetings*. A program of California Certified Organic Farmers, November 2005 and December 2006.

– Master of ceremonies, annual meeting of California Certified Organic Farmers. Sacramento, California, February 2006.

– Featured program speaker, 2012 annual *Eco-Farm Conference*. Lecture entitled *Imitating Natural Systems: Towards an Indigenous Agro-forestry*, Asilomar, California, 2012.

– Seminar presentation, American Society of Farm Managers & Rural Appraisers. *Rapid Fire Seminar: What Makes for Comparable Sales in Condemnation Appraisal*—Reno, Nevada, October 2013.

– Featured program speaker, 2014 annual *Eco-Farm Conference*. Lecture entitled *Food Safety Regulatory Compliance in Fruit Orchards*, Asilomar, California, 2014.

Publications:—

– *Principles of Farm Management*, course "M-10", a forty-hour professional-credit online educational offering of the American Society of Farm Managers & Rural Appraisers.

– *Conservation Issues in Agriculture*, a unit of course "M-25", a fifteen-hour professional-credit online educational offering of the American Society of Farm Managers & Rural Appraisers.

– *A Primer on Organic Agriculture*, an article in *2006 Trends in Agricultural Land and Lease Values*, a publication of the California Chapter of the American Society of Farm Managers & Rural Appraisers.

– *Case Study: Using Indigenous Agroforestry Management Techniques to Support Sustainability in Production Agriculture*, a paper-poster presented at *Harlan II, An International Symposium on Biodiversity in Agriculture: Domestication, Evolution and Sustainability*, September 14–18, 2008, University of California–Davis.

RECEIVED RIVERSIDE COUNTY
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Riverside County Board of Supervisors
%Clerk of the Board
4080 Lemon Street, 1st Floor
P.O. Box 1147
Riverside, CA 92502-1147

✓

Riverside County Board of Supervisors
Request to Speak

Submit request to the Clerk of the Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

SPEAKER'S NAME: MARTIN MAGAÑA

Address: 80730 SUNNY COVE CT.

City: INDIO CA Zip: 92201

Phone #: (760) 831-3215

Date: 12/16/25 Agenda # 3.49 & 23.1

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: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

BOARD RULES

Requests to Address Board on "Agenda" Items:
You may request to be heard on a published agenda item. Requests to be heard must be submitted to the Clerk of the Board before the scheduled meeting time.

Requests to Address Board on items that are "NOT" on the Agenda:
Notwithstanding any other provisions of these rules, member of the public shall have the right to address the Board during the mid-morning "Oral Communications" segment of the published agenda. Said purpose for address must pertain to issues which are under the direct jurisdiction of the Board of Supervisors. YOUR TIME WILL BE LIMITED TO THREE (3) MINUTES. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

Power Point Presentations/Printed Material:
Speakers who intend to conduct a formalized Power Point presentation or provide printed material must notify the Clerk of the Board's Office by 12 noon on the Monday preceding the Tuesday Board meeting, ensuring that the Clerk's Office has sufficient copies of all printed materials and at least one (1) copy of the Power Point CD. Copies of printed material given to the Clerk (by Monday noon deadline) will be provided to each Supervisor. If you have the need to use the overhead "Elmo" projector at the Board meeting, please ensure your material is clear and with proper contrast, notifying the Clerk well ahead of the meeting, of your intent to use the Elmo. Speakers are prohibited from bringing signs, placards, or posters into the hearing room.

Individual Speaker Limits:
Individual speakers are limited to a maximum of three (3) minutes. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board. Please step up to the podium when the Chair calls your name and begin speaking immediately. Pull the microphone to your mouth so that the Board, audience, and audio recording system hear you clearly. Once you start speaking, the "green" podium light will light. The "yellow" light will come on when you have one (1) minute remaining. When you have 30 seconds remaining, the "yellow" light will begin flash, indicating you must quickly wrap up your comments. Your time is up when the "red" light flashes. The Chair adheres to a strict three (3) minutes per speaker. ***Note: If you intend to give your time to a "Group/Organized Presentation", please state so clearly at the very bottom of the reverse side of this form.***

Group/Organized Presentations:
Group/organized presentations with more than one (1) speaker will be limited to nine (9) minutes at the Chair's discretion. The organizer of the presentation will automatically receive the first three (3) minutes, with the remaining six (6) minutes relinquished by other speakers, as requested by them on a completed "Request to Speak" form, and clearly indicated at the front bottom of the form.

Addressing the Board & Acknowledgement by Chair:
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Online

Riverside County Board of Supervisors
Request to Speak

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SPEAKER'S NAME: Maria Ortega

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

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_____**Support** _____**Oppose** _____**Neutral**

I give my 3 minutes to: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

BOARD RULES

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Online Did not Speak

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SPEAKER'S NAME: AJ Pisano

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

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I give my 3 minutes to: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Stephanie Ambriz

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Jennifer Jenkins

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Dr. Frances Esparza

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

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_____**Support** _____**Oppose** _____**Neutral**

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I give my 3 minutes to: _____

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(Revised: 04/23/2025)

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On line

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SPEAKER'S NAME: Yvonne Carrillo

Address: _____

City: _____ Zip: _____

Phone #: _____

Date: _____ Agenda # 23.1

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Position on "Regular" (non-appealed) Agenda Item:

_____Support _____Oppose _____Neutral

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I give my 3 minutes to: _____

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SPEAKER'S NAME: Nancy Ocegueda

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

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SPEAKER'S NAME: Luz Gallegos

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

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Online ✓

Riverside County Board of Supervisors
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SPEAKER'S NAME: Brian Flynn

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

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: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

BOARD RULES

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SPEAKER'S NAME: Juan De Lara

Address: 83-392 San Asis Dr.

City: Coachella Zip: 92236

Phone #: 760 485-2763

Date: 12/16/2023 Agenda # 23.1

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: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: AIDAN MARSHALL

Address: _____

City: _____ **Zip:** _____

Phone #: 818 571 2137

Date: 11/16/25 **Agenda #** 23.1

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: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Amy Smith (CARECA)

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** X **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: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Robert Ramos Ironworkers 416

Address: _____

City: _____ **Zip:** _____

Phone #: (562) 455-8443

Date: 12-15-25 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** _____**Oppose** _____**Neutral**

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I give my 3 minutes to: _____

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(Revised: 04/23/2025)

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4 6 minutes ✓

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SPEAKER'S NAME: Ivanna Viviate

Address: _____

City: Thermal CA **Zip:** 92274

Phone #: 760-799-5418

Date: 12/16/2025 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** ✓ **Oppose** _____ **Neutral**

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_____ **Support** _____ **Oppose** _____ **Neutral**

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SPEAKER'S NAME: Thairy Martinez

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: 12/16/2025 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** ✓ **Oppose** _____**Neutral**

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_____**Support** _____**Oppose** _____**Neutral**

I give my 3 minutes to: Ivanna Uriarte

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(Revised: 04/23/2025)

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✓ x 4

Riverside County Board of Supervisors
Request to Speak

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SPEAKER'S NAME: Brenda Wilson

Address: 51285 Pinnacle Vista Dr

City: INDIO Zip: 92201

Phone #: 530 304-0140

Date: _____ Agenda # 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

X 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: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

BOARD RULES

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x6

Riverside County Board of Supervisors
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SPEAKER'S NAME: Ted Wilson

Address: 51285 Pinnacle Vista

City: Indio Zip: 92201

Phone #: 509-295-3258

Date: _____ Agenda # 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

X Support _____ Oppose _____ Neutral

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_____ Support _____ Oppose _____ Neutral

I give my 3 minutes to: Bernie Wilson

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

Neck Surgery [illegible]

BOARD RULES

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SPEAKER'S NAME: SETH ALSTON

Address: 2210 SAN JOAQUIN ST.

City: FRESNO **Zip:** 93721

Phone #: 650-646-2039

Date: 12/16/25 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** __X__ **Oppose** _____ **Neutral**

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_____ **Support** _____ **Oppose** _____ **Neutral**

I give my 3 minutes to: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: SABINO M. Alejos

Address: 91560 3RD ST

City: Mecca ca **Zip:** 92254

Phone #: 760 485 8450

Date: 12-16-2025 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** X **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:

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I give my 3 minutes to: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Joanna Perez

Address: _____

City: _____ **Zip:** _____

Phone #: (760) 362-3929

Date: 12/16/25 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** X **Oppose** _____**Neutral**

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_____**Support** _____**Oppose** _____**Neutral**

I give my 3 minutes to: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: Ashley Vega

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: 12/16/25 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____**Support** X **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: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

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SPEAKER'S NAME: Al Gmela Allal

Address: 48-267 Van Buren St.

City: Coachella Ca **Zip:** 92236

Phone #: 760 7749327

Date: 12/16/2025 **Agenda #** #23.1 Thermal Ranch

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

X **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: _____

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(Revised: 04/23/2025)

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SPEAKER'S NAME: MIKE JONES

Address: 85900 JONES COURT

City: COACHELLA **Zip:** 92236

Phone #: 760 861 1813

Date: 12-16-25 **Agenda #** THERMAL RANCH 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

X **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:

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I give my 3 minutes to: _____

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SPEAKER'S NAME: Dave Lippert

Address: 45090 Golf Center Pkwy #G

City: Indio **Zip:** 92201

Phone #: 760-601-7437

Date: 12/16/25 **Agenda #** 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

X **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: _____

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(Revised: 04/23/2025)

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* No translation needed ✓

Junta de Supervisores del Condado de Riverside
Solicitud de uso de la palabra

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NOMBRE DEL ORADOR: Richard Kratz

Dirección: 72265 Manufacturing Road
(solo si se solicita respuesta por correo electrónico de seguimiento)

Cuidad y Código postal: ~~951-20~~ Thousand Oaks, CA 92276

Teléfono #: 951-206-2842

Fecha: 12/16/25 **Agenda #** 23.1

POR FAVOR, INDIQUE SU POSTURA A CONTINUACIÓN:

Postura sobre el tema del orden del día "ordinario" (no apelado):

__X__ **Apoyo** ____ **Oposición** ____ **Neutral**

Nota: Si está aquí para un tema de la agenda que se presentó para "Apelación", indique por separado su postura sobre la apelación a continuación:

____ **Apoyo** ____ **Oposición** ____ **Neutral**

Le doy mis 3 minutos a: ____

¿Necesitas traductor de español? Sí____ **No**____

Si desea escuchar la reunión en español, los auriculares están disponibles en el área del Secretario de la Junta.

Las validaciones de estacionamiento están disponibles solo para oradores: consulte al Secretario de la Junta.

(Revisado: 06/13/2024)

REGLAS DE LA JUNTA

Solicitudes para dirigirse a la Junta sobre temas de la "Agenda":
Puede solicitar ser escuchado sobre un tema publicado en la agenda. Las solicitudes de audiencia deben presentarse al Secretario de la Junta antes de la hora programada para la reunión.

Solicitudes para dirigirse a la Junta sobre temas que "NO" están en la Agenda:
Sin perjuicio de cualquier otra disposición de estas reglas, el miembro del público tendrá derecho a dirigirse a la Junta durante el segmento de media mañana "Comunicación verbal" de la agenda publicada. Dicho propósito de dirección deberá corresponder a temas que estén bajo la jurisdicción directa de la Junta de Supervisores. SU TIEMPO SERÁ LIMITADO A TRES (3) MINUTOS. La Junta Directiva puede limitar el tiempo del público sobre cualquier tema, según el número de personas que soliciten hablar y los asuntos de la junta.

Presentaciones de Power Point/Material Impreso:
Los oradores que tengan la intención de realizar una presentación formal de PowerPoint o proporcionar material impreso deben notificar a la Oficina del Secretario de la Junta antes de las 12 del mediodía del lunes previo a la reunión de la Junta del martes, asegurándose de que la Oficina del Secretario tenga suficientes copias de todos los materiales impresos y al menos una (1) copia del CD de PowerPoint. Se proporcionará a cada supervisor copias del material impreso entregado al secretario (antes de la fecha límite del lunes al mediodía). Si necesita utilizar el proyector "Elmo" en la reunión de la Junta, asegúrese de que su material sea claro y tenga el contraste adecuado, notificando al Secretario con suficiente antelación a la reunión su intención de utilizarlo. Se prohíbe a los oradores traer carteles a la sala de audiencias.

Límites de oradores individuales:
Los oradores individuales están limitados a un máximo de tres (3) minutos. La Junta Directiva puede limitar el tiempo del público sobre cualquier tema, según el número de personas que soliciten halar y los asuntos de la junta. Suba al podio cuando el Presidente diga su nombre y comience a hablar de inmediato. Lleve el micrófono a su boca para que la junta directiva, la audiencia y el sistema de grabación de audio lo escuchen claramente. Una vez que comiences a hablar, se encenderá la luz "verde" del podio. La luz "amarilla" se encenderá cuando le quede un (1) minuto. Cuando le queden 30 segundos, la luz "amarilla" comenzará a parpadear, lo que indica que debe terminar rápidamente sus comentarios. Se acaba el tiempo cuando la luz "roja" parpadea. El Presidente respeta estrictamente un límite de tres (3) minutos por orador. ***Nota: Si tiene la intención de dedicar su tiempo a una "Presentación grupal /organizada", indíquelo claramente en la parte inferior del reverso de este formulario.***

Presentaciones Grupales/Organizadas:
Las presentaciones grupales/organizadas con más de un (1) orador se limitarán a nueve (9) minutos a discreción del Presidente. El organizador de la presentación recibirá automáticamente los primeros tres (3) minutos, y los seis (6) minutos restantes cedidos por otros oradores, según lo solicitaron en un formulario de "Solicitud para hablar" completado y claramente indicado en la parte inferior delantera de la forma.

Dirigiéndose a la Consejo y Reconocimiento por parte del Presidente:
El Presidente determinará el orden en que los oradores se dirigirán al Consejo, y convocará a todos los oradores en pares. El primer orador debe subir inmediatamente al podio y comenzar a dirigirse a la Junta. El segundo orador deberá ubicarse en uno de los pasillos de la cámara para poder subir rápidamente al podio después del orador anterior. Esto es para permitir una reunión de la Junta eficiente y oportuna, brindando a todos los asistentes la oportunidad de exponer sus argumentos. Los oradores tienen prohibido realizar ataques personales y/o utilizar lenguaje vulgar, grosero, o profano mientras hablan con los miembros de la Junta, el personal, el público en general y/o los participantes de la reunión. Tal comportamiento, a discreción del Presidente de la Junta, puede resultar en la expulsión de las Cámaras de la Junta por parte de los Agentes del Alguacil.

Riverside County Board of Supervisors
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SPEAKER'S NAME: GREG JOHNSON

Address: ~~[illegible]~~ 81680 DRY CREEK LN

City: INDIO Zip: CA

Phone #: 760 272 0780

Date: 12/16/25 Agenda # 23.1

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

✓ Support _____ Oppose _____ Neutral

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(Revised: 04/23/2025)

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SPEAKER'S NAME: America Noriega

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

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SPEAKER'S NAME: Julien Plascencia

Address: _____

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

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* * 23.1 Applicant ✓

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SPEAKER'S NAME: Jeremy Smith

Address: 55103 Sunnylyn CT

City: LA QUINTA **Zip:** 92253

Phone #: 801-368-9536

Date: 12-16-2025 **Agenda #** 23.1

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Position on "Regular" (non-appealed) Agenda Item:

X **Support** _____ **Oppose** _____ **Neutral**

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(Revised: 04/23/2025)

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Donate time to Applicant Jeremy Smith

Junta de Supervisores del Condado de Riverside
Solicitud de uso de la palabra

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NOMBRE DEL ORADOR: Paul DePaolis

Dirección: 34200 Bob Hope Drive
(solo si se solicita respuesta por correo electrónico de seguimiento)

Cuidad y Código postal:

Teléfono #: 760-898-5332

Fecha: _____ **Agenda #** _____

POR FAVOR, INDIQUE SU POSTURA A CONTINUACIÓN:

Postura sobre el tema del orden del día "ordinario" (no apelado):

✓ **Apoyo** _____ **Oposición** _____ **Neutral**

Nota: Si está aquí para un tema de la agenda que se presentó para "Apelación", indique por separado su postura sobre la apelación a continuación:

_____ **Apoyo** _____ **Oposición** _____ **Neutral**

Le doy mis 3 minutos a: Granting time to Jeremy Smith

¿Necesitas traductor de español? Sí_____ **No**_____

Si desea escuchar la reunión en español, los auriculares están disponibles en el área del Secretario de la Junta.

Las validaciones de estacionamiento están disponibles solo para oradores: consulte al Secretario de la Junta.

(Revisado: 06/13/2024)

REGLAS DE LA JUNTA

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Solicitudes para dirigirse a la Junta sobre temas que "NO" están en la Agenda:
Sin perjuicio de cualquier otra disposición de estas reglas, el miembro del público tendrá derecho a dirigirse a la Junta durante el segmento de media mañana "Comunicación verbal" de la agenda publicada. Dicho propósito de dirección deberá corresponder a temas que estén bajo la jurisdicción directa de la Junta de Supervisores. SU TIEMPO SERÁ LIMITADO A TRES (3) MINUTOS. La Junta Directiva puede limitar el tiempo del público sobre cualquier tema, según el número de personas que soliciten hablar y los asuntos de la junta.

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Los oradores que tengan la intención de realizar una presentación formal de PowerPoint o proporcionar material impreso deben notificar a la Oficina del Secretario de la Junta antes de las 12 del mediodía del lunes previo a la reunión de la Junta del martes, asegurándose de que la Oficina del Secretario tenga suficientes copias de todos los materiales impresos y al menos una (1) copia del CD de PowerPoint. Se proporcionará a cada supervisor copias del material impreso entregado al secretario (antes de la fecha límite del lunes al mediodía). Si necesita utilizar el proyector "Elmo" en la reunión de la Junta, asegúrese de que su material sea claro y tenga el contraste adecuado, notificando al Secretario con suficiente antelación a la reunión su intención de utilizarlo. Se prohíbe a los oradores traer carteles a la sala de audiencias.

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Presentaciones Grupales/Organizadas:
Las presentaciones grupales/organizadas con más de un (1) orador se limitarán a nueve (9) minutos a discreción del Presidente. El organizador de la presentación recibirá automáticamente los primeros tres (3) minutos, y los seis (6) minutos restantes cedidos por otros oradores, según lo solicitaron en un formulario de "Solicitud para hablar" completado y claramente indicado en la parte inferior delantera de la forma.

Dirigiéndose a la Consejo y Reconocimiento por parte del Presidente:
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** 23.1 - Applicant's Counsel ✓

Riverside County Board of Supervisors
Request to Speak

Submit request to the Clerk of the Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

SPEAKER'S NAME: James Vaughn

Address: 200 Spectrum Center Drive, Suite 1650

City: Irvine, CA **Zip:** 92618

Phone #: 805-351-0688

Date: 12-16-25 **Agenda #** 23.1

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: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 04/23/2025)

BOARD RULES

Requests to Address Board on "Agenda" Items:
You may request to be heard on a published agenda item. Requests to be heard must be submitted to the Clerk of the Board before the scheduled meeting time.

Requests to Address Board on items that are "NOT" on the Agenda:
Notwithstanding any other provisions of these rules, member of the public shall have the right to address the Board during the mid-morning "Oral Communications" segment of the published agenda. Said purpose for address must pertain to issues which are under the direct jurisdiction of the Board of Supervisors. YOUR TIME WILL BE LIMITED TO THREE (3) MINUTES. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

Power Point Presentations/Printed Material:
Speakers who intend to conduct a formalized Power Point presentation or provide printed material must notify the Clerk of the Board's Office by 12 noon on the Monday preceding the Tuesday Board meeting, ensuring that the Clerk's Office has sufficient copies of all printed materials and at least one (1) copy of the Power Point CD. Copies of printed material given to the Clerk (by Monday noon deadline) will be provided to each Supervisor. If you have the need to use the overhead "Elmo" projector at the Board meeting, please ensure your material is clear and with proper contrast, notifying the Clerk well ahead of the meeting, of your intent to use the Elmo. Speakers are prohibited from bringing signs, placards, or posters into the hearing room.

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Addressing the Board & Acknowledgement by Chair:
The Chair will determine what order the speakers will address the Board and will call on all speakers in pairs. The first speaker should immediately step to the podium and begin addressing the Board. The second speaker should take up a position in one of the chamber aisles to quickly step up to the podium after the preceding speaker. This is to afford an efficient and timely Board meeting, giving all attendees the opportunity to make their case. Speakers are prohibited from making personal attacks, and/or using course, crude, profane or vulgar language while speaking to the Board members, staff, the public and/or meeting participants. Such behavior, at the discretion of the Board Chair may result in removal from the Board Chambers by Sheriff Deputies.

* Donate time to James Vaughn

Junta de Supervisores del Condado de Riverside
Solicitud de uso de la palabra

Presentar la solicitud al Secretario de la Junta (a la derecho del podio), Los oradores tienen derecho a tres (3) minutos, sujeto a de las Reglas de la Junta enumeradas en el reverso de este formulario. La Junta Directiva puede limitar la opinión del público sobre cualquier tema, según el número de personas que soliciten halar y los asuntos de la junta.

NOMBRE DEL ORADOR: MATTHEW ABBOT

Dirección: GIVE TIME TO JAMES VAUGHN
(solo si se solicita respuesta por correo electrónico de seguimiento)

Cuidad y Código postal: 92067

Teléfono #: 361 646 3458

Fecha: 12.16.25 **Agenda #** 23.1

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Le doy mis 3 minutos a: ____

¿Necesitas traductor de español? **Sí** ____ **No** ✓

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(Revisado: 06/13/2024)

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Did not speak

Online

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SPEAKER'S NAME: Julian DeLaTorre

Address: Principal Engineer for consultant available for questions

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 23.1

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REVISADO AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 16 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

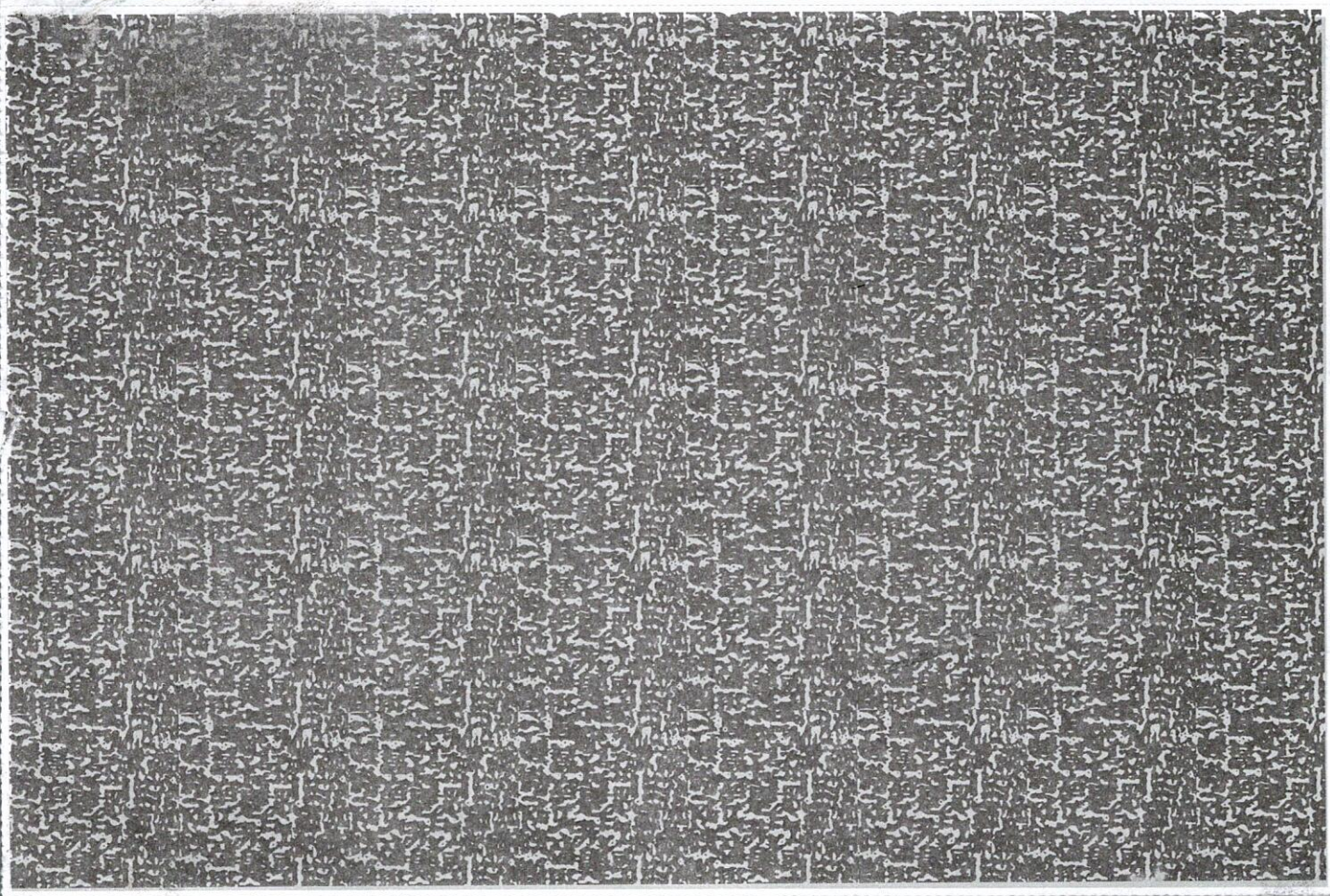
Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 20 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

REMOVE SIDE EDGES FIRST
THEN FOLD AND TEAR THIS STUB ALONG PERFORATION



Riverside County Clerk of the Board
County Administrative Center
4080 Lemon Street, 1st Floor Annex
P. O. Box 1147
Riverside, CA 92502-1147

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CLERK/BOARD OF SUPERVISORS
2026 MAY -6 AM 10: 33

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LOS ANGELES CA 90049

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UNABLE TO FORWARD
BC: 92502114747 *2252-02916-02-17

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ISJLRM 92502-1147

NOTICE OF PUBLIC HEARING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A SPECIFIC PLAN, GENERAL PLAN AMENDMENT, CHANGE OF ZONE, TENTATIVE TRACT MAP, AND PLOT PLANS IN THE FOURTH SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public hearing at which all interested persons will be heard, will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, December 9, 2025 at 10:00 A.M.** or as soon as possible thereafter, to consider the Planning Commission's recommendation to approve **Specific Plan No. 401, General Plan Amendment No. 230001, Change Of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, and Plot Plan No. 230006.** The Specific Plan is a proposal for a development program on 619.1 acres that consists of an Equestrian Center, Very Low Density Residential, Medium High Density Residential, High Density Residential, Commercial Tourist, and Commercial Retail. The General Plan Amendment is a proposal to establish the Specific Plan and modify the land use designations of the General Plan to match those as proposed by the Specific Plan. The Change of Zone is a proposal to rezone the properties from A-2-10 and W-2 to Specific Plan, create the zoning ordinance of the Specific Plan, and define the Planning Area boundaries of the Specific Plan. The Tentative Tract Map is a subdivision of the 619.1 acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing, 2 lots for commercial purposes, 110 lots for large lot single-family residential, 161 lots for small lot detached single-family, 10 lots for 191 attached condominium units, and 45 lots for various open space lots, well sites, and I.I.D substation. Plot Plan No. 240016 is a development plan for the 191 attached condominium units. Plot Plan No. 230005 is for Horse Park Workforce Housing on 41.3 acres that includes 500 units and an RV park with 300 RV parking stalls. Plot Plan No. 230006 is for the equestrian center on 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. This proposed project is located: east of Harrison, south of 62nd, west of Tyler, north of 64th in the Fourth Supervisorial District.

The Riverside County Planning Department and the Planning Commission recommend that the Board of Supervisors **ADOPT a Resolution Certifying the Environmental Impact Report, TENTATIVELY APPROVE General Plan Amendment No. 2300001, TENTATIVELY APPROVE Specific Plan No. 401, TENTATIVELY APPROVE Change of Zone No. 2300003, TENTATIVELY APPROVE Tentative Tract Map No. 38578, TENTATIVELY APPROVE Plot Plan No. 240016, TENTATIVELY APPROVE Plot Plan No. 230005, and TENTATIVELY APPROVE Plot Plan No. 230006.**

On October 22, 2025, the Planning Commission recommended approval of the project as stated to the Board of Supervisors on a vote of 3-1. The Planning Department meeting documents for the proposed project may be viewed online under the Planning Commission hearing date on the Public Hearing page of the Planning Department website: https://planning.rctlma.org/Public-Hearings.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT RUSSELL BRADY, PROJECT PLANNER, AT (951) 955-3025 OR EMAIL RBRADY@RIVCO.ORG.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public hearing or may appear and be heard at the time and place noted above. All written comments received prior to the public hearing will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence to the Planning Department or Board of Supervisors at, or prior to, the public hearing. Be advised that as a result of the public hearing and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation please contact Clerk of the Board at (951) 955-1069.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147 Riverside, CA 92502-1147 or email cob@rivco.org

Dated: November 13, 2025

Kimberly A. Rector, Clerk of the Board
By: Naomy Sicra, Clerk of the Board Assistant

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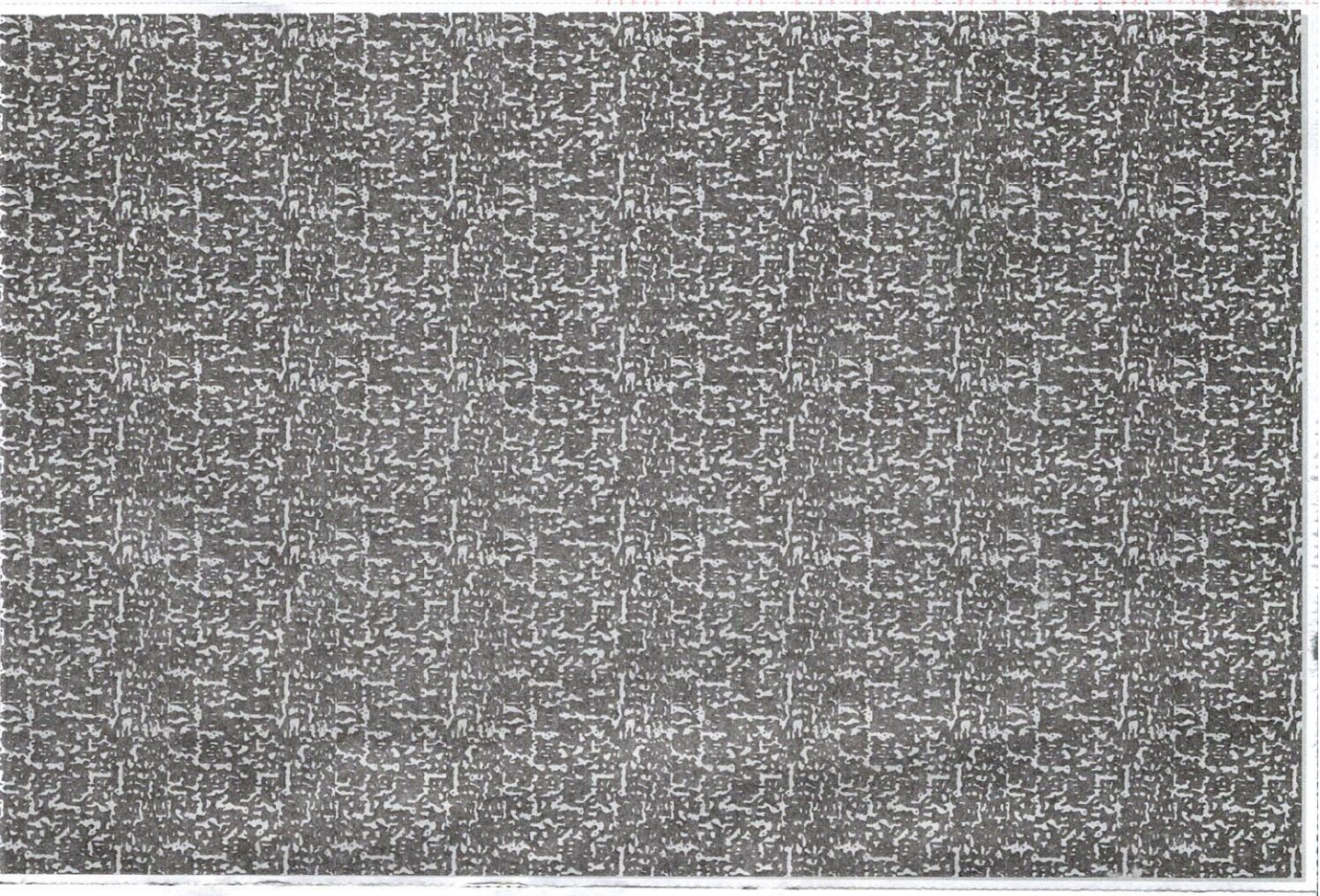

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AVISO DE AUDIENCIA PÚBLICA ANTE LA JUNTA DE SUPERVISORES DEL CONDADO DE RIVERSIDE SOBRE UN PLAN ESPECÍFICO, UNA ENMIENDA AL PLAN GENERAL, UN CAMBIO DE ZONIFICACIÓN, UN MAPA DE TERRENOS PROVISIONAL Y PLANOS DE PARCELAS EN EL CUARTO DISTRITO DE SUPERVISIÓN

POR LA PRESENTE SE NOTIFICA que se celebrará una audiencia pública ante la Junta de Supervisores del Condado de Riverside, California, en la Sala de Sesiones del Primer Piso del Centro Administrativo del Condado, ubicado en 4080 Lemon Street, Riverside, el **martes 9 de diciembre de 2025 a las 10:00 a. m.** o tan pronto como sea posible después de esa fecha, en la que se escuchará a todas las personas interesadas, para considerar la recomendación de la Comisión de Planificación de aprobar el **Plan Específico N.° 401, la Enmienda al Plan General N.° 230001, el Cambio de Zonificación N.° 2300003, el Mapa de Parcelación Provisional N.° 38578, el Plano de Parcelación N.° 240016, el Plano de Parcelación N.° 230005 y el Plano de Parcelación N.° 230006**. El Plan Específico es una propuesta de desarrollo para un terreno de 619.1 acres que incluye un centro ecuestre, viviendas de muy baja, media y alta densidad, zonas comerciales turísticas y locales comerciales minoristas. La Enmienda al Plan General propone establecer el Plan Específico y modificar las designaciones de uso de suelo del Plan General para que coincidan con las propuestas por el Plan Específico. El Cambio de Zonificación propone reclasificar las propiedades de A-2-10 y W-2 al Plan Específico, crear la ordenanza de zonificación del Plan Específico y definir los límites del Área de Planificación del mismo. El plano de subdivisión preliminar del terreno de 619.1 acres se divide en 330 lotes, incluyendo 1 lote para el Centro Ecuestre, 2 lotes para Viviendas para Trabajadores del Parque Ecuestre, 2 lotes para uso comercial, 110 lotes para viviendas unifamiliares grandes, 161 lotes para viviendas unifamiliares pequeñas independientes, 10 lotes para 191 condominios adosados y 45 lotes para diversos espacios abiertos, pozos y una subestación de I.I.D. El plano de parcelación n.° 240016 corresponde al plan de desarrollo para los 191 condominios adosados. El plano de parcelación n.° 230005 corresponde a Viviendas para Trabajadores del Parque Ecuestre en 41.3 acres, que incluye 500 unidades y un parque de casas rodantes con 300 espacios. El plano de parcelación n.° 230006 corresponde al centro ecuestre en 223.2 acres. APN(s): 751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-010. Este proyecto propuesto está ubicado: al este de Harrison, al sur de la 62, al oeste de Tyler, al norte de la 64 en el Cuarto Distrito de Supervisión.

El Departamento de Planificación del Condado de Riverside y la Comisión de Planificación recomiendan que la Junta de Supervisores **ADOPTE una Resolución que certifique el Informe de Impacto Ambiental, APRUEBE PROVISIONALMENTE la Enmienda al Plan General No. 2300001, APRUEBE PROVISIONALMENTE el Plan Específico No. 401, APRUEBE PROVISIONALMENTE el Cambio de Zonificación No. 2300003, APRUEBE PROVISIONALMENTE el Mapa Provisional de Parcelaciones No. 38578, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 240016, APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230005 y APRUEBE PROVISIONALMENTE el Plano de Parcelación No. 230006.**

El 22 de octubre de 2025, la Comisión de Planificación recomendó la aprobación del proyecto, tal como se presentó a la Junta de Supervisores, con una votación de 3-1. Los documentos de la reunión del Departamento de Planificación para el proyecto propuesto se pueden consultar en línea en la página de Audiencias Públicas del sitio web del Departamento de Planificación, en la fecha de la audiencia de la Comisión de Planificación: https://planning.rctlma.org/Public-Hearings.

PARA OBTENER MÁS INFORMACIÓN SOBRE ESTE PROYECTO, COMUNÍQUESE CON RUSSELL BRADY, PLANIFICADOR DE PROYECTOS, AL (951) 955-3025 O ENVÍE UN CORREO ELECTRÓNICO A RBRADY@RIVCO.ORG.

Cualquier persona que desee testificar a favor o en contra del proyecto podrá hacerlo por escrito entre la fecha de este aviso y la audiencia pública, o bien, podrá comparecer y ser escuchada en el lugar y la fecha indicados anteriormente. Todos los comentarios escritos recibidos antes de la audiencia pública se presentarán a la Junta de Supervisores, la cual los considerará, junto con cualquier testimonio oral, antes de tomar una decisión sobre el proyecto.

Si desafía el punto anterior ante los tribunales, es posible que solo pueda plantear las cuestiones que usted u otra persona hayan planteado en la audiencia pública descrita en este aviso, o en la correspondencia escrita dirigida al Departamento de Planificación o a la Junta de Supervisores antes o durante dicha audiencia. Tenga en cuenta que, como resultado de la audiencia pública y la consideración de todos los comentarios del público, tanto escritos como orales, la Junta de Supervisores podrá modificar, total o parcialmente, el proyecto o el documento ambiental correspondiente. Por consiguiente, las designaciones, las normas de desarrollo, el diseño o las mejoras, o cualquier propiedad o terreno dentro de los límites del proyecto, podrían modificarse de una manera distinta a la específicamente propuesta.

Se ofrecen formatos alternativos a solicitud de personas con discapacidad. Si necesita alguna adaptación razonable, comuníquese con la Secretaría de la Junta al (951) 955-1069.

Por favor, envíe toda la correspondencia escrita a: secretaria de la Junta, 4080 Lemon Street, 1er piso, Apartado de correos 1147, Riverside, CA 92502-1147 o por correo electrónico a cob@rivco.org

Fecha: 13 de noviembre de 2025

Kimberly A. Rector, secretaria de Junta
Por: Naomy Sicra, asistente de secretaria de Junta

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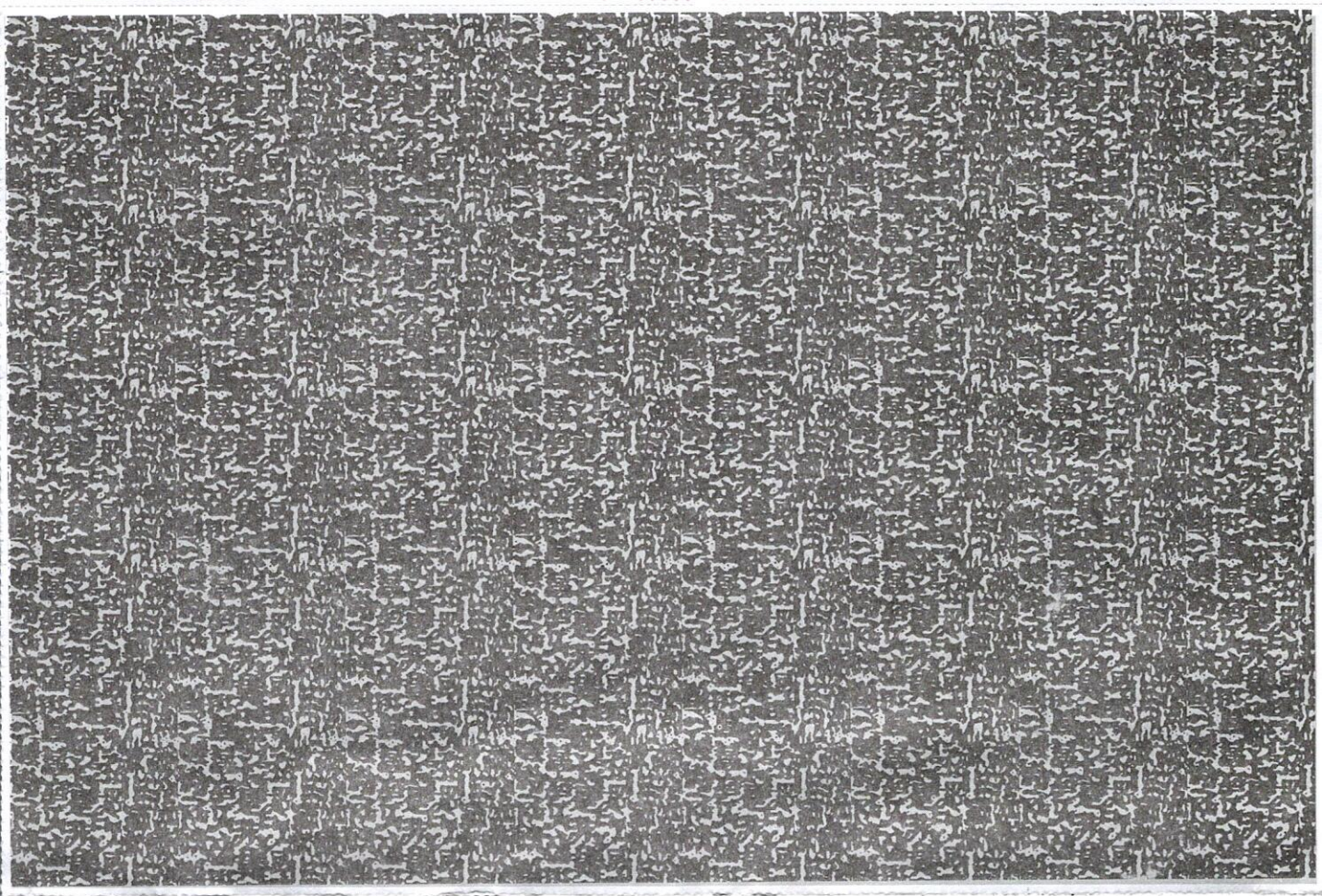

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