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

ITEM: 23.1
(ID # 29450)
MEETING DATE:
Tuesday, December 16, 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–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 Specific Planzoning ordinance, 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, District 4. [Applicant Fees 100%].

RECOMMENDED MOTION: That the Board of Supervisors:

1. **TENTATIVELY CERTIFY the ENVIRONMENTAL IMPACT REPORT (EIR) (SCH2023050624)**, subject to final certification; and

Continued to Page 2

ACTION:Policy

John Hildebrand, Planning Director 12/9/2025

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Washington, seconded by Supervisor Perez and duly carried, IT WAS ORDERED that the above matter is approved as recommended.

Ayes:	Spiegel, Washington, Perez, and Gutierrez
Nays:	None
Absent:	Medina
Date:	December 16, 2025
xc:	Planning

Kimberly A. Rector
Clerk of the Board
By: _____
Deputy

RECOMMENDED MOTION: That the Board of Supervisors:

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.

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	$ 0	$ 0	$ 0	$ 0
NET COUNTY COST	$ 0	$ 0	$ 0	$ 0
SOURCE OF FUNDS: Applicant Fees 100%			Budget Adjustment:	No
			For Fiscal Year:	25-26

C.E.O. RECOMMENDATION: Approve

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 community 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. In addition, although the Planning Commission did not cite the additional capacity proposed by the project for water supply, staff has added conditions of approval to the project that also ensure the planned additional capacity is ultimately constructed by the project to create the general community benefit. Conditions have been added to the conditions of approval for the Tentative Tract Map and Plot Plans 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.

Community Benefits

As noted earlier, the project is proposing an IID substation and CVWD reservoir that will create additional electrical and water infrastructure capacity for the surrounding area. For the substation, the project is anticipated to require approximately 25 MegaVolt-Ampere (MVA) and in coordination with IID the project is proposing a substation anticipated to be at 50 MVA, providing approximately double the project's required demand. On the water reservoir, the project is anticipated to require approximately 2.5 million gallons (MG) of additional capacity and in coordination with CVWD the project is proposing an additional water tank reservoir at 5 MG, also providing approximately double the project's required demand. This additional capacity of electrical and water supply to the surrounding area represents a community benefit provided by the project above what the project is required to provide.

Environmental Impact Report

An Environmental Impact Report (EIR) has been prepared for this project in accordance with the California Environmental Quality Act (CEQA). The EIR represents the independent judgement of Riverside County. The Draft Environmental Impact Report was circulated on November 18, 2024 with the comment period closed on January 10, 2025 (extended from the original January 2, 2025. Below is a summary of the significant and unavoidable impacts identified in the circulated Draft EIR:

Agricultural Resources

The Project would result in the conversion of land designated Primary Farmland and Farmland of Statewide Importance to non-agricultural uses and conversion from an Agricultural zone to a non-agricultural zone that represents a potentially significant impact. No feasible mitigation exists to directly mitigate the loss of this agricultural land on this site. Conservation of other properties for agricultural use present potential limited mitigation, although not to a level that is less than significant based on court opinions on this specific matter. Additionally, based on CVWD notification regarding water supply to the Project site that imported water for irrigation will not be available for at least the next two years that sets a context for this specific site as well as in nearby areas that due to limited water supply such establishment of an agricultural easement or other conservation may have limited

effect to overall preservation of agricultural lands as it may not have adequate water supply to be productive.

Air Quality – Long Term Regional

The Project's long term operational emissions would exceed the SCAQMD regional thresholds for Carbon Monoxide (CO), Oxides of Nitrogen (NO_x) and Reactive Organic Gases (ROG).

Additionally, due to the proposed General Plan Amendment, the Project and its proposed land use designation is not consistent with the SCAQMD Air Quality Management Plan (AQMP) land use assumptions and resulting emission modeling that is based on current General Plan land use designations. Therefore, impacts related to AQMP consistency are determined to be potentially significant.

The EIR includes all feasible mitigation measures to reduce emissions and impacts from CO, NO_x, and ROG operation emissions, but emission levels remain above SCAQMD thresholds and are therefore significant.

Transportation - VMT

The Project would generate an increase in Vehicle Miles Traveled (VMT) of 31,389 compared to scenarios without the project based on a boundary method analysis. Although the increase in VMT is primarily due to the lack of urban development in the nearby area, the analysis still results in an increase and therefore a potential significant impact. The project is designed with the intent of increasing efficiency in a mix of land uses that provides greater opportunities for employment within the project where a resident lives that assists in minimizing VMT as a means of mitigating VMT impacts as much as possible for a project of this type and scale. Other options oriented around transit are not as feasible due to the relative non-urbanized nature of the surrounding area that makes such service not currently a priority.

Six comments were received during the 45-day public review period. These comments were reviewed, and detailed responses to each comment were prepared and included in the Final EIR, which was posted on September 24, 2025 and with emailed notices to commenters sent on the same day.

For the reasons set forth above and in the Environmental Impact Report prepared for this Project, the proposed project will potentially have a significant effect on the environment related to Transportation. Mitigation Measures from the Environmental Impact Report have been incorporated as conditions of approval on the project.

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. Board Resolution No. 2025-303
B. Responses to Planning Commission CEQA Comments
C. Planning Commission Report of Actions
D. Planning Commission Memo
E. Planning Commission Resolution No. 2025-006
F. Planning Commission Staff Report
G. GIS Exhibits
H. Specific Plan Document
I. Specific Plan Zoning Ordinance
J. TTM38578 Exhibits
K. PPT240016 Exhibits
L. PPT230005 Exhibits
M. PPT230006 Exhibits
N. PPT230006 Operations Manual
O. Fiscal Impact Analysis
P. Project Outreach Summary
Q. Draft EIR
R. Final EIR
S. Specific Plan Conditions of Approval
T. TTM38578 Conditions of Approval
U. PPT240016 Conditions of Approval
V. PPT230005 Conditions of Approval
W. PPT230006 Conditions of Approval
X. Environmental Justice Checklist
Y. Public Comments with Planning Commission Staff Report
Z. CVWD Water Supply Verification

Crystal Carrillo
Crystal Carrillo, Senior Management Analyst 12/10/2025

EXHIBIT A

SUPPLEMENTAL
RESPONSES TO PLANNING COMMISSION HEARING COMMENTS

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 comments on the Thermal Ranch Specific Plan project were received by the County Planning Department before or during the October 22, 2025 Planning Commission public hearing. Exhibit A provides responses to general or repeated comments, and to specific comments on the Final EIR 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 from interested parties, and subsequent responses. (Also see Appendix C).

A. Leadership Counsel: Ltr Dated Oct. 15, 2025: regards Thermal Community Council Ltr.
B. Leadership Counsel: Ltr Dated Oct. 15, 2025: regards Final EIR Responses
C. Adams, Broadwell, Joseph & Cardoza for CARE Cal: Ltr Dated October 21, 2025 (w/2 exhibits (memos)): Regards FEIR Responses
D. Lozeau Drury for SAFER: Ltr Dated October 21, 2025: new letter, their first
E. Mayra Zamora Cruz: Email Dated Oct. 15, 2025
F. Athens Marron: Email Dated Oct. 21, 2025
G. Allyson Jeffredo: Email Dated October 20, 2025
H. Francisco Carrillo: Email Dated Oct. 22, 2025
I. Geena Vescial: Email Dated Oct. 21 (?), 2025
J. Cecilia Lemus: Email: Dated October 21, 2025
K. Taylor Brown: Email: October 10, 2025

SECTION I

RESPONSE TO PLANNING COMMISSION HEARING COMMENTS

Overarching concerns expressed by commenters on the Thermal Ranch project include impacts to air quality, community noise, water supplies and quality impacts, housing, traffic safety, and manure management. Many of these expressions of concern repeat comments made and responded to in the Final EIR, as well as in the comments and supplemental responses provided herein. In addition to again responding to comments, this supplemental response includes Appendix A: Noise Technical Memorandum, Thermal Ranch Specific Plan Response to Noise Comments, Appendix B: Thermal Ranch Equestrian Center Operations Plan with attached service provider memorandum, and Appendix C: Bracketed Comment Letters.

SECTION I

RESPONSE TO SPECIFIC PLANNING COMMISSION HEARING COMMENTS

The following verbatim comments were received on the Final EIR, which was made available to various interested parties, and warrant a response. 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. Related comments may occasionally be combined to allow one response to address these related questions. The following responses have been prepared to address issues raised in the interested party comments. The bracketed and complete comment letters and emails are included in Section II of this Supplemental Response to Comments.

A. Leadership Counsel, Oct. 15, 2025 (Regarding Thermal/Oasis Community Counsel)

Comment A-1: Please see Letter A in Appendix A to this Exhibit A. The commenter relates their attendance at and communications with the Thermal/Oasis Community Council prior to the Planning Commission hearing. No CEQA issues raised.

Response A-1: Over the past two years, the project proponent and members of its planning team attended and made presentations to the Thermal/Oasis Community Council to apprise them of progress, explain the project and to request council support. Members of the Leadership Counsel attended many of these meetings and spoke. No specific CEQA issues have been raised that require addressing in this supplemental response to comments.

B. Leadership Counsel, Oct. 15, 2025 (Comments on the Final EIR)

Comment B-1: 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 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]

Response B-1: **Comment noted.** The County and other parties, including the Coachella Valley Water District (CVWD) have been working to upgrade and expand water and sewer service to the Eastern Coachella Valley (ECV). Investment by private development helps to pay for these facilities. As discussed in the Draft and Final EIR, the proposed Project is required to construct a new 5-million-gallon water storage tank, as well as extensions of water and sewer lines, which will facilitate service expansions beyond the needs of the proposed Project. CVWD and the State Water Boards are also working on both water and sewer system expansions in the Thermal/Oasis area. Rather than exacerbate conditions associated with inadequate domestic water and sewer service, the proposed Project will positively contribute to connecting unserved or underserved communities in the area.

Comment B-2: 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.

Response B-2: Comment noted. The existing air quality conditions raised in this comment are caused by a variety of natural and man-made conditions, including major rail and freeway transportation corridors to the east, the Salton Sea to the southeast, and agricultural operations in the area, among other causes. As confirmed in the air quality analysis in the Draft EIR (see Section

2.5) and as further address in the Final EIR, impacts to air quality from Project construction will be less than significant.

Fugitive Dust

Contrary to the assertion in this comment, the Project will not cause the release of large quantities of dust or diesel emissions. This issue is addressed in detail in Section 2.5 of the Draft EIR and Response to Comments B-4 set forth in the Final EIR. Fugitive dust emissions associated with Project construction and operations have been modeled in accordance with CARB and SCAQMD, and indicate that dust emissions (PM10 and PM2.5) will be less than significant. Also please see C-3 of these Supplemental Response to Comments.

Large expanses of the desert floor, including the Project planning area, are comprised of loose and sandy/silty soils that are very susceptible to wind and water erosion. Frequent strong winds increase the amount of particulate matter (dust) that is suspended in the air. This condition is aggravated by the ongoing disturbance of thousands of acres of farmland multiple times per year as crops are grown and harvested. To place the site and the proposed Project in context, the subject property has been in active cultivation for approximately 70 years. With a year-round growing season, the site has been disced and otherwise disturbed multiple times a year, generating a substantial amount of dust. Project buildout will take several years, and compliance with Mitigation Measures AQ-1 and AQ-2, as well as applicable state and SCAQMD regulatory requirements ensure that all construction related air quality impacts will be less than significant. In addition, development of the site will be incremental and areas not under active development will be stabilized using methods approved by the South Coast Air Quality Management District (SCAQMD) and Riverside County.

Manure Management

Manure management is not expected to be a meaningful source of fugitive dust or other air pollutants. As discussed in Section 2.5.6 of the Draft EIR,

> *"Project manure management will include distributed short-term (intra-day) concrete storage areas and centralized handling in the back-of-house area adjacent to the IID substation site and away from any sensitive receptors. From this handling area haulers will remove manure daily. Daily removal of manure from the Project site will further reduce potential odors, which are considered to be less than significant." (DEIR p. 2.5-25).*

As discussed in the Draft EIR, it is important to note that manure is rich in plant nutrients and minerals, including nitrogen (N), phosphorous (P_2O_5), and potassium (K_2O); it is biodegradable and can be composted and reused for applications such as fertilizer.[1] Moreover, manure is not considered to be a toxic or hazardous material by California or Riverside County, and in fact, the manure and shavings picked up from the existing DIHP operations are re-used in connection with ongoing agricultural operations within Riverside County (see attached Appendix B, correspondence from Southern California Mobile Griding, Inc. who services the current Desert International Horse Park on a daily basis during horse show operations and delivers the horse manure and shavings to farms throughout the Coachella Valley for fertilizer and dust control, attached to the Thermal Ranch Equestrian Center Operations plan). As discussed in Section 2.11 of the Draft EIR, manure handling and management is addressed in numerous Draft EIR mitigation measures, including AIR-3, AIR-6, HYD-7, HYD-8, to ensure that project operations do not pose a significant risk of contamination to waterways or water supplies.

It should also be noted that for half the year, there will only be a few horses (30±) that will be stabled at the Project equestrian center. Therefore, during the hottest months of the year, the generation of manure will be very limited.

Traffic

Traffic volumes on surrounding streets and the potential contribution of the Project to area traffic has been fully analyzed in the Final EIR (see Section 2.19 and Appendices K, L & M of the Draft EIR). Project traffic will not result in significant impacts to intersection/roadway capacity or travel safety.

Comment B-3: **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

[1] "Horse Manure Management: Bedding Use", Michael Westendorf, Ph.D., Uta Krogmann, Ph.D., Rutgers University. 2006.

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.

Response B-3: The commenter relates noise issues residents north of the Project site and west of Tyler Street are having with the Thermal Club motor sport center located to their east. The proposed Thermal Ranch Project is unrelated to the Thermal Club project and is in no way comparable in terms of noise generation. The potential noise impacts associated with the Thermal Ranch Project have been thoroughly analyzed in Section 2.15 and Appendix H of the Draft EIR. Noise concerns were also addressed at length in the Final EIR Responses to Comments and its Appendix A (supplemental noise memorandum). In addition, the attached second supplemental noise memo (Appendix A) of this Supplemental Response to Comments further demonstrates that Project construction and operation will not violate any County or state noise thresholds, will not cause a substantial increase to

existing noise levels, and will not have any significant noise impacts. As shown in the second supplemental noise memo attached as Appendix A, both daytime and nighttime noise levels will be substantially below permitted noise levels at all nearby sensitive receptors. Also see Response C-9 below.

Comment B-4: **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

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.”

Response B-4: The proposed Project does not pose serious traffic or safety risks, as affirmed by the County Planning and Transportation Departments (see Draft EIR Section 2.19.6). Public sidewalks, bikepaths and multi-modal paths are planned along Ave 62, Harrison Street, Tyler Street and the Ave 64 right of way, building out an important part of this multi-modal network and improving current conditions for pedestrians and bicyclists, including children walking to or from school along Tyler Street.

Referenced Ave 62 and Harrison Street are classified as "Expressway" on the County General Plan Roadway Classification Map (see Table C-1, Roadway Classifications, Circulation Element, Riverside County General Plan), which calls for six travel lanes within a 220-foot right of way. Tyler Street is designated a "Major Highway" and is to be built out to provide four travel lanes, a painted center median and 21-foot-wide parkways and sidewalks. In summary, the Project will improve, not worsen traffic and pedestrian safety conditions in the project vicinity.

Comment B-5: **<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.

Response B-5: A Water Supply Assessment (Appendix N of the Draft EIR) was prepared for the proposed Project and approved by the Coachella Valley Water District (CVWD), which determined that the Project will result in a net reduction in annual water use when compared to the existing annual demand associated with crop production on these lands. Furthermore, and as noted in Response B-1, above, the County and other parties, including the Coachella Valley Water District (CVWD) have been working to upgrade and expand water and sewer service to the Eastern Coachella Valley (ECV). Investment by private development helps to pay for these facilities. As discussed in the Draft and Final EIR, the proposed Project is required to construct a new 5-million-gallon water storage tank, as well as extensions of water and sewer lines, which will facilitate service expansions beyond the needs of the proposed Project. CVWD and the State Water Boards are also working on both water and sewer system expansions in the Thermal/Oasis area. Rather than exacerbate the existing conditions associated with inadequate domestic water and sewer service described in this comment, the proposed Project will positively contribute to connecting unserved or underserved communities in the area. With regard to potential groundwater contamination from Project manure management, please see Response B-2, above and further discussion below, which confirm that the Project poses no significant threat to water quality or water supplies.

Comment B-6: **<u>Manure Management Impacts</u>**

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

Response B-6: Please see Response B-2, above. It is also important to note that proper management of project-generated manure and shavings to avoid any odor or air quality impacts is of equal interest and concern to the developer. Up to 4,500± people will reside full- or part-time at Thermal Ranch and would directly experience any impacts from the mismanagement of manure or other Project materials and facilities. In short, the developer has a deeply vested interest in protecting Thermal Ranch and area-wide residents from adverse impacts to water or air quality (odor) that could result from this component of the Project. As explained in Response B-2 above, and in the Thermal Ranch Equestrian Center Operations plan, the manure and shavings from the Project will be properly managed and stored temporarily onsite and will be picked-up daily by Burrtec's green waste contractor and reused in other agricultural operations in the County.

Comment B-7: **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.

Response B-7: Comment noted. As reported to the County Planning Commission at its October 22, 2025 hearing, the Project proponent is completing the engineering and design process for the proposed new substation that will be entirely funded by private developers and will be dedicated at no cost to the Imperial Irrigation District's (IID) or its ratepayers. The construction of a much-needed substation would serve the Project and provide additional capacity for surrounding lands. While the details are still in technical review at IID, substation capacity is being planned for 40± megawatts (Mw), of which the Project would require approximately 20± Mw. The Project substation will not only stabilize the local electric power grid and reduce power outages, it will also provide additional grid capacity for the surrounding area.

C. Adams, Broadwell, Joseph & Cardoza for CARE California, October 21, 2025

Comment C-1: The FEIR fails to adequately describe the environmental setting against which the Project's environmental impacts are to be measured. This contravenes the fundamental purpose of the environmental review process, which is to determine whether there is a potentially substantial, adverse change compared to the existing setting.[17] CEQA requires that a lead agency include a description of the physical environmental conditions, or "baseline," in the vicinity of the project as they exist at the time environmental review commences.[18] As the courts have repeatedly held, the impacts of a project must be measured against the "real conditions on the ground."[19] The description of the environmental setting constitutes the "baseline" physical conditions against which the lead agency assesses the significance of a project's impacts.[20] An environmental setting is required "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.[21]

Response C-1: Comment noted. The Commenter provides no data, information or argument that could serve as the basis for this comment. In fact, each CEQA discussion topic provides a detailed description of the environmental setting and existing conditions (baseline). The statement is unsubstantiated and is incorrect.

Comment C-2: CARE CA's previous comments explained that the DEIR failed to accurately describe the existing noise environment by leaving out the closest sensitive receptor residence next to the Project site. The FEIR fails to resolve this deficiency.

Mr. Meighan [commenter's consultant] explains that the County still fails to consider the Project's potentially significant operational noise impacts on the closest residence to the Project site, which is located at 62101 Tyler Street.[22] Instead, the County reasserts that it adequately analyzed 62800 Tyler Street as the "nearest existing noise sensitive residential land use immediately east of the Project site."[23] This conclusion is not supported by substantial evidence.[24]

Mr. Meighan provides substantial evidence in his comments that 62101 Tyler Street is the closest residence by referring to aerial photographs of the two residences.[25] These photos demonstrate that 62101 Tyler Street is closer to the Project site.[26] Mr. Meighan goes on to explain that although 62101 Tyler Street is approximately 50 feet west of the 62800 Tyler Street

residence and farther from the clustered operational noise sources near the southern edge of the Project site, it may still experience greater noise impacts due to its closer proximity to noise sources located along the western portion of the site.[27] Therefore, the FEIR's continued failure to include 62101 Tyler Street in its analysis, renders the subsequent operational noise analysis unsupported and potentially underestimated.

The County must revise and recirculate the EIR to provide an accurate analysis of the Project site's existing noise environment against which to measure the Project's true construction noise impacts as required by CEQA.

Response C-2: Comment C-2 states the same exact comments raised by the commenter regarding the Draft EIR and was fully addressed in Final EIR (see Final EIR Response C-2, p. 38). In addition to being incorrect about the circumstances and facts of the noise analysis as it relates to sensitive receptors on the east side of Tyler Street, the commenter continues to make an erroneous and misleading claim to try to undermine the veracity of the EIR analysis.

To further respond to the commenter's marginal and inaccurate evaluation, the EIR noise consultant was asked to again address this comment[2]. Noting the commenter's continued focus on the distance of two single family homes on the east side of Tyler Street, citing that one residence is 18 feet closer to the Project site than is the other, and therefore the Project noise analysis is flawed, the EIR noise consultant conducted further analysis to confirm that the residence at 62800 Tyler Street is located closer to the Project noise source activities, as shown in attached Appendix A: Noise Memorandum of this Supplemental Response to Comments, and represents the worst-case sensitive receiver location.

As discussed at length in Section 2.15 and Appendix H of the Draft EIR and again addressed in Response C-2 and Appendix A[3] of the Final EIR, Receiver Location R2 at 62800 Tyler Street was intended to describe the nearest existing sensitive residential land use. This is consistent with the Wilson Ihrig noise comment stating: "*it is sometimes not feasible to list and analyze every receiver, and any noise and vibration analysis involving all three receivers would almost certainly be very similar due to project geometry and conditions."*

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2 Noise Technical Memorandum, Thermal Ranch Specific Plan Response to Noise Comments, prepared by William Lawson, P.E., INCE, Urban Crossroads, Inc. October 29, 2025.

3 Thermal Ranch Specific Plan Response to Comments Technical Memorandum, prepared by Urban Crossroads, Inc. January 24, 2025

An evaluation of the distribution of Project land uses shows that the primary sources of future Project noise are located closer to 62800 Tyler Street. It is important to recognize that the distances shown on Exhibit 9-A of the noise report prepared for the Draft EIR[4] represent the distance from each receiver to the Project site boundary and is not used to calculate the actual operational noise levels. The operational noise analysis is based on the distance from each of the 254 individual noise sources presented on Exhibit 1 of attached Appendix A. (also see Exhibit 10-A of the 2023 Noise Study[5]). The operational noise analysis fully considers the distance from individual noise source relative to each receiver location.

Based on the location of future Project operational noise source activities and noise sensitive residential land uses east of the Project site, Receiver Location R2 at 62800 Tyler Street, directly opposite a future CVWD well site, represents the worst-case sensitive receiver location. To confirm this, two additional receiver locations (R7 and R8) were added to the analysis to assess the noise levels at 62101 Tyler Street and 86025 Ave 62.

To further evaluate and compare the operational noise source levels at each of the R2, R7 and R8 receiver locations, the Project operational noise levels were calculated at each of these locations in the supplemental October 2025 analysis. As shown below on Table 1, the daytime operational noise levels of 42.4 dBA Leq at R2 are higher than the calculated daytime noise levels of 41.5 dBA Leq for receiver location R7 and 39.7 dBA Leq for receiver location R8, but noise levels at all locations are substantially below the established threshold of significance levels. In addition, Table 1 shows that the nighttime operational noise levels at R2 are higher than the calculated nighttime noise levels for receiver locations R7 and R8 but again are substantially below the established threshold of significance levels. The noise analysis confirms that the operational noise levels are higher at receiver R2 (the worst case), than at either 62101 Tyler Street or 86025 62nd Avenue (receivers R7 and R8), and are less than significant at all locations.

4 Thermal Ranch Specific Plan Noise and Vibration Analysis, prepared by Bill Lawson, PE, INCE, Urban Crossroads, Inc. July 2, 2023.

5 Ibid.

Table 1: Operational Noise Levels

Receiver Location[1]	Address	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R2	62800 Tyler St.	42.4	36.0	55	45	No	No
R7	62101 Tyler St.	41.5	34.9	55	45	No	No
R8	86025 62nd Av.	39.7	33.8	55	45	No	No

[1] See Exhibit 1 for the receiver locations.
[2] Proposed Project operational noise level CadnaA calculations are included Appendix 1.
[3] County of Riverside General Plan Municipal Code, Section 9.52.040.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Comment C-3: CARE CA's previous comments demonstrated that the DEIR's analysis of the Project's potential health risks was inadequate because it relied on LSTs. CARE CA's air quality expert explained that compliance with LSTs does not support a less than significant conclusion because LSTs only assesses criteria air pollutants, not TACs, which have a carcinogenic effect when inhaled. Additionally, LSTs assess 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 standards ("AAQS"). LSTs do not assess health risk from human exposure to toxic emissions.

In response, the County continues to claim that its reliance on LSTs was appropriate and adequately supports the FEIR's conclusion that the Project's construction activities will not create any significant health risks.[28] The County argues that because its analysis determined that PM2.5 emissions will not exceed the LST for PM2.5, that DPM emissions will also not cause health impacts.[29] However, this conclusion is misleading, unsupported, and contrary to CEQA because PM2.5 is not a TAC, and LSTs do not measure cancer risk.

In *Sierra Club v. County of Fresno*, the California Supreme Court affirmed CEQA's mandate to protect public health and safety by holding that a CEQA document fails as an informational document when it fails to disclose the public health impacts from air pollutants that would be generated by a development project.[30] As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact."[31] The Court concluded that the County's EIR was inadequate

for failing to disclose the nature and extent of public health impacts caused by the project's air pollution.[32] As the Court explained, the EIR failed to comply with CEQA because after reading the EIR, "'the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin.'"[33]

Similar to *Sierra Club,* the FEIR fails to provide an adequate analysis and discussion of the Project's potential health risks. While it is true that DPM is a subset of PM2.5, they are not the same.[34] Health risk from DPM is assessed based on inhalation exposure and unit risk factors (such as cancer potency), not based on total PM2.5 mass.[35] A recent study found that even when diesel exhaust is filtered to remove particles like DPM, the remaining gases can still harm health—especially the lungs, immune system, and during pregnancy.[36] This demonstrates that measuring total PM2.5 levels for exceedance of LST may not accurately capture the full health risks from diesel exhaust, and that a separate analysis of DPM needs to be conducted.

Response C-3: CARE CA made similar comments in their letter dated January 10, 2025, which the County refuted in FEIR Responses C-19, C-20, C-21 and D-11. Note: the original claims partly stemmed from a misunderstanding of the Project description and CalEEMod inputs. To most closely fit the available CalEEMod land use parameters with the proposed Project, the "warehouse" development and land use factors were used to model Project impacts. The commenter's misread of the Draft and Final EIR assumed the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. The Project proposes an equestrian center (barns etc.), residential and commercial uses, but no industrial development or land uses.

This comment makes two primary claims that the County again rejects:

1. The comment wrongly claims that LSTs do not ***support*** a less than significant conclusion because LSTs only assess criteria air pollutants (PM 2.5 is not considered a toxic air contaminant or TAC), implying that a TAC analysis of cancer risk is the only meaningful way to assess health risks and substantiate a less-than-significant impact finding in CEQA.

First, CEQA does not impose a statewide requirement to analyze cancer risks as a distinct subcategory of health risks. Under SCAQMD's CEQA Air Quality Significance Thresholds, health risks from air emissions are evaluated specifically through TAC-related metrics[6] in an HRA for certain

[6] SCAQMD TAC Thresholds measures: Incremental cancer risk, cancer burden, and chronic and acute hazard index.

types of higher risk projects. However, as the commenter acknowledges in Comment C-4 (below), the SCAQMD health risk procedures for an HRA do not apply to the Project, which does not have any of the higher-risk uses that require such analysis. Under CEQA, conducting an HRA is not always mandatory, but falls under the lead agency's discretion to determine if one is needed based on a project's potential impacts. The lead agency must evaluate whether a project's emissions could lead to significant health effects, but CEQA does not prescribe a single, rigid methodology for this evaluation. This process is informed by state requirements (Office of Environmental Health Hazard Assessment [OEHHA]) and local air district guidance (SCAQMD), which offer direction but generally do not remove or substitute the lead agency's ultimate judgment in applying them to the specific project. Therefore, the insinuation that a formal TAC analysis of cancer risk is the only meaningful way to assess health risks is not supported by CEQA or applicable case law. It is also noteworthy that neither the CEQA Lead Agency (Riverside County) nor the air resources district (SCAQMD) required or requested that an HRA be prepared for this Project.

The Project LST analysis provides valuable insight into the health risk issues associated with the proposed Project. Although LSTs primarily target criteria pollutants and do not directly or precisely quantify TACs or cancer risks, they serve as an effective proxy for localized health risks. LST analyses focus on the Project's on-site emissions of CO, NOx, PM10 and PM2.5. As shown in Tables 2.5-7 and 2.5-9 of the DEIR, construction-based particulate matter (PM) emissions (which include particulate emissions from diesel-fueled engines, classified as a TAC by CARB[7]) do not exceed any local or regional thresholds. To further expand upon the connection between LSTs and assessing health risks, FEIR Response D-11 explained that the SCAQMD Governing Board approved 23 Environmental Justice Enhancements in 2002 intended to further identify and address concerns regarding short- and long-term environmental justice issues. The creation of LSTs was Initiative I-4 under Category I: Further-Reduced Health Risks, which was created specifically to reduce health risks from pollutant emissions.[8] It is therefore both appropriate and consistent with regulatory guidance for the County to consider the LST analysis when evaluating Project-related health risks.

7 https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

8 *Environmental Justice Program Enhancements*. (2024). Aqmd.gov. http://www.aqmd.gov/nav/about/initiatives/environmental-justice/environmental-justice-program-enhancements

The County's approach to analyzing air quality-related health risks is also consistent with the guidance provided by the California Supreme Court. Specifically, the Court confirmed that CEQA requires that an EIR must provide a reasonable effort to substantively connect a project's air quality impacts to likely health consequences, with sufficient detail to support informed public participation and decision-making (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502). The DEIR has satisfied this requirement as described in response to claim 2, below.

2. The comment incorrectly asserts that the County relies solely on the LST analysis and does not provide an adequate analysis and discussion of the Project's potential health risks, citing *Sierra Club v. County of Fresno* as the basis of this claim.

In addition to the LST analysis (DEIR p. 2.5-15 through -24; FEIR Response C-21), the Air Quality and Greenhouse Gas report (AQ/GHG Report) for the Project (Appendix B of DEIR) discloses the nature and extent of public health impacts from seven criteria pollutants, including the most common sources, in Table 2-1 (DEIR Appendix B, p. 16-17). Although Table 2-1 of the AQ/GHG Report was referenced but not included in the body of the DEIR (it was included as Appendix B), the findings of the DEIR are based on the information and conclusions of the Project-specific AQ/GHG Report. Therefore, the CEQA document in its entirety (appendices included) plainly discloses the potential public health impacts from air pollutants that would be generated by development of the Project.

Furthermore, the DEIR described the scientific limitations in assessing health risks from air pollutant emissions citing the SCAQMD Amicus Curiae Brief in *Sierra Club v. County of Fresno*,[9] explaining that the SCAQMD does not currently have a methodology to consistently and meaningfully correlate the expected air pollutant emissions of a project to the likely health consequences of those emissions (DEIR p. 2.5-21 and -22). The SCAQMD's position remains unchanged, with guidance documents[10] emphasizing qualitative health effect descriptions for criteria pollutants, not project-specific quantifications. It should again be noted that SCAQMD did

[9] Amicus Curiae Brief of South Coast Air Quality Management District, Sierra Club v. County of Fresno (Friant Ranch). Case No. S219783. April 13, 2015

[10] SCAQMD's CEQA Air Quality Handbook (1993, still in use pending a full replacement expected in late 2025 or 2026) and supplemental resources (e.g., 2016 Air Quality Management Plan [AQMP] Appendix I: "Health Effects of Air Pollution"). The 2022 AQMP update reiterates that significance is determined by criteria pollutant emission thresholds or modeled concentrations, with health discussions limited to general risks (e.g., asthma exacerbation from ozone). For TACs, quantitative HRAs are mandatory under certain circumstances (e.g. Rule 1401, 1401.1, 212, AB2588/Rule 1402, or at SCAQMD or the Lead Agency's request).

not provide comment on the TRSP Notice of Preparation (NOP) or DEIR and did not request that an HRA (TAC analysis) be prepared for the Project. As stated above, the LST analyses performed in support of the DEIR have already assessed the impact from the Project's on-site (localized) emissions at the closest receptor locations. As discussed on pages 2.5-19 to 2.5-22 of the DEIR, the Project would not exceed any SCAQMD Localized Significance Thresholds and impacts and associated health effects resulting from the generation of Project-related criteria pollutants (including particulate emissions from diesel-fueled engines) would be less than significant. Per page 2.5-22 of the DEIR, the "Project will not expose sensitive receptors within one mile of the project site to substantial pollutant concentrations."

The County also considered existing local and state regulations that enforce construction equipment emission reductions, thereby reducing potential construction-related health risks, in its analysis of health risks. For example, the DEIR notes on page 2.5-21 that any heavy-duty diesel-fueled trucks involved in construction of the Project will be subject to the CARB Airborne Toxic Control Measure (CCR, Title 13, §2485), which prohibits idling for more than five minutes unless in possession of a certified Clean Idle sticker.

Also relevant and applicable to the Project, the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation which targets emissions reductions from diesel vehicles, such as construction equipment, requires the phasing out of older Tier 0–2 engines and replacing with Tier 4 Final or zero-emission equipment, and retrofitting equipment with the best available control technology (BACT). Furthermore, DEIR Mitigation Measures AQ-2 is designed to reduce construction equipment emissions by limiting heavy-duty diesel vehicle idling and requiring the use of oxidation catalysts on all construction equipment.

As outlined above, and contrary to claims that the County's health risk analysis relied solely on the LST assessment, the analysis was indeed comprehensive and addressed the following key elements:

Disclosure of public health impacts: The County explicitly described the potential health effects from air pollutants generated by Project development in the Project-specific Air Quality and Greenhouse Gas Report (DEIR Appendix B).

Scientific limitations in risk assessment: The County highlighted challenges in evaluating health risks from air pollutant emissions, citing the SCAQMD Amicus Curiae Brief in Sierra Club v. County of Fresno.

Regulatory measures and mitigation measures to reduce risks: The County accounted for existing local and state regulations that mandate emission reductions from construction equipment, thereby lowering potential construction-related health risks.

In summary, the County's multi-faceted approach ensured a thorough evaluation of health risks beyond just the LST analysis.

Comment C-4: The County also argues that a health risk analysis ("HRA") is not necessary because it is only required for facilities that are designated as "high priority." The County claims that the proposed Project does not qualify as a "high-priority" facility, since it is not one of eight specific categories of existing sources of TACs identified by the California Air Resources Board ("CARB"), nor is it located near such sources (i.e., high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations).[37] The FEIR also cites the South Coast Air Quality Management District ("SCAQMD") Risk Assessment Procedures for Rules 1401, 1401.1, and 212 as evidence that an HRA is not required.[38]

This argument is misplaced and inconsistent with guidance from both the Office of Environmental Health Hazard Assessment ("OEHHA") and SCAQMD. First, the County conflates "health risk assessments", which are required for certain industrial facilities pursuant to the Health and Safety Code and other air quality laws, with the analysis of health risk from human exposure to Project emissions which is required by CEQA for all projects. In *Sierra Club,* the Supreme Court clarified that CEQA does not require a "Health Risk Assessment," but that CEQA does require a detailed analysis of health risk which correlates a project's air emissions with the corresponding health risk from exposure to those emissions.[39] The FEIR ignores this distinction.

Second, even if a "health risk assessment" were at issue, which it is not, the list of eight facilities referenced in the FEIR is not an exclusive list of high-priority facilities. Rather, they represent facility types from which CARB recommends minimum separation distances for new sensitive land uses, not criteria for determining whether a project qualifies as high-priority under air toxics regulations. Moreover, the FEIR incorrectly relies on SCAQMD Risk Assessment Procedures for Rules 1401, 1401.1, and 212, which explicitly state that these procedures "should not be used for AB2588/Rule 1402," as those rules have their own separate risk assessment procedures.[40] These rules are inapplicable to the County's duty under

CEQA to analyze the cancer risk posed to nearby sensitive receptors from exposure to the Project's emissions. SCAQMD CEQA thresholds for health risk are contained in SCAQMD's CEQA Handbook, which provides the following thresholds for measuring the significance of exposure to TAC emissions under CEQA:[41]

> Maximum Incremental Cancer Risk ≥ 10 in 1 million
> Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)
> Chronic & Acute Hazard Index ≥ 1.0 (project increment)

The FEIR fails to apply these thresholds and does not provide any evidence demonstrating that the Project would not result in a cancer risk that exceeds the SCAQMD significance thresholds for health risk. Therefore, the County lacks substantial evidence to conclude that the Project will not result in significant health risk impacts from TAC emissions during construction. The EIR must be revised and recirculated to include this analysis.

Response C-4: The commenter again incorrectly claims that the County did not provide substantial evidence to conclude that the Project will not result in significant health risk impacts from TAC emissions. The FEIR refuted this claim and similar claims in FEIR Responses C-19, C-20, C-21 and D-11. Please also see Response C-3, above, regarding the DEIR's reasonable effort to substantively connect the Project's air quality impacts to likely health risks pursuant to guidance provided in *Sierra Club v. County of Fresno.*

As the commenter acknowledges, *Sierra Club v. County of* Fresno does not require that every project prepare a formal Health Risk Assessment. Instead, it requires that an EIR make a reasonable effort to draw a connection between potential project emissions and human health impacts (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 520-521). The commenter does not refute the County's determination that the Project is not subject to health risk assessment procedures for Rules 1401, 1401.1, 212, or AB2588/Rule 1402. The commenter claims instead that *"[t]hese rules are inapplicable to the County's duty under CEQA to analyze the cancer risk posed to nearby sensitive receptors from exposure to the Project's emissions*." While the commenter correctly describes the SCAQMD thresholds of significance for TAC impacts, the comment incorrectly describes the SCAQMD TAC thresholds as "*CEQA thresholds for health risk*." By citing SCAQMD TAC thresholds for maximum incremental cancer risk, cancer burden, and the chronic and acute hazard index, the comment wrongly implies again that an HRA is the only meaningful or proper way to assess health risks since those metrics are derived exclusively through an HRA. Instead, these thresholds apply only

when a project's emissions of TACs are substantial enough to warrant quantitative risk modeling.

As previously stated in Response C-3 above, the preparation of an HRA is not a requirement under CEQA but falls under the lead agency's discretion to determine if one is needed based on a project's potential impacts. This process is informed by state requirements (OEHHA) and local air district guidance (SCAQMD), which offer direction but generally do not remove or substitute the lead agency's ultimate judgment in applying them to the specific project. To reiterate, the insinuation that a formal TAC analysis of cancer risk is the only meaningful way to assess health risks is not supported by CEQA, and wrongly implies that an HRA is required since those metrics (cancer risk, caner burden etc.) are derived exclusively through an HRA.

The County did not conflate Health Risk Assessment requirements with CEQA requirements for the analysis of a project's air quality impacts. The SCAQMD CEQA Handbook (1993) describes the circumstances for evaluating toxic impacts on sensitive receptors in Chapter 5: *Sensitive Receptor Siting Criteria and Design Mitigation Measures* and Chapter 7: *Assessing Toxic Air Pollutants.* The 1993 SCAQMD CEQA Handbook explicitly states that "the District uses the standard of 1 in 1 million as the maximum individual cancer risk and 10 in 1 million if the source of the toxic emissions uses best available control technology for toxics (T-BACT) ***when approving permits for new or modified stationary sources***," (p 5-2) [emphasis added]. The DEIR properly referenced CARB's list of "high-priority" facilities and SCAQMD's risk procedures solely to demonstrate that the Project does not fall within categories typically requiring a formal HRA under applicable air quality regulations. As previously noted in Response C-3, above, the commenter's previous misread of the Draft and Final EIR assumed the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. The Project proposes an equestrian center (barns etc.), residential and commercial uses, but no industrial development or land uses that would require a permit through SCAQMD. The project's TAC emissions would be limited to short-term construction exhaust that are temporary and would not result in long-term exposure. Therefore, the SCAQMD TAC thresholds for operation do not apply to the Project.

In response to the claim that "*the County lacks substantial evidence to conclude that the Project will not result in significant health risk impacts from TAC emissions during construction*," the SCAQMD CEQA Air Quality

Handbook does not recommend analysis of TACs from short-term construction activities. Instead, SCAQMD focuses exclusively on estimating and mitigating construction-related criteria pollutant emissions, with no specific guidance or thresholds provided for construction TACs.[11] The SCAQMD TAC thresholds referenced in the comment are designed to apply to operational uses, not to construction activities, which involves intermittent, short-term, limited-duration emissions and exposure that results in negligible long-term health risks. According to SCAQMD, individual cancer risk is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer.[12] Given the temporary and intermittent nature of construction activities, Project construction would not result in a long-term (i.e., 70-year) source of TAC emissions. Therefore, the SCAQMD TAC Thresholds are not appropriate for assessing construction impacts.[13]

Here, DEIR Appendix B, Air Quality and Greenhouse Gas Report, Section 3, Project Air Quality Impact, reasonably correlates potential project emissions and human health impacts in accordance with *Sierra Club v. County of Fresno.* Section 3.10(c) addresses the connection between potential project emissions and human health impacts to sensitive receptors: "the application of the SCAQMD localized significance thresholds indicates that construction of the Project would have less than significant impacts to sensitive receptors, which means that the Project will not generate localized emissions that pose a significant health risk." (p. 50). The DEIR provides substantial evidence, based on emissions modeling, duration of construction activity, and distance to sensitive receptors, to support this analysis. See Responses C-3 and C-4 for additional information to support the County's determination that that the DEIR does, in fact, provide substantial evidence supporting the conclusion that the Project will

11 *Final Environmental Assessment for Proposed Amended Rules 307.1, 1401, and 1402* (SCAQMD, September 22, 2016). Page 2-23: "*SCAQMD currently does not have guidance on construction Health Risk Assessments and only applies the revised OEHHA Guidelines for operational impacts*." (p. 2-23). https://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/final-ea_par-307-1_1401_1402.pdf?sfvrsn=4

12 *South Coast Air Quality Management District RISK ASSESSMENT PROCEDURES for Rules 1401, 1401.1, and 212*. (2024). https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf

13 To clarify, SCAQMD regulates TAC levels through the permitting process that covers both construction and operation for projects that qualify as new or modified sources requiring a permit. The Project does not include new or modified sources of TACs that require a permit through SCAQMD; therefore this does not apply. SCAQMD CEQA Air Quality Handbook, 1993. Chapter 10.3 *District Permits.*

not result in significant health risk impacts. The DEIR does not require revision or recirculation in response to this comment.

Comment C-5: The FEIR omits an analysis of the Project's cumulative TAC emissions by failing to consider the Project's emissions together with emissions from existing and proposed development near the Project site. This violates CEQA, Attorney General warehouse guidance, and updated SCAQMD guidance.

Under CEQA, an environmental review document must evaluate a cumulative impact if the project's incremental effect combined with the effects of other projects is "cumulatively considerable."[42] This determination is based on an assessment of the project's incremental impacts "viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[43] Proper cumulative impact analysis is vital because "the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact."[44]

The recent Attorney General guidance document setting forth best practices for evaluating the environmental impacts of warehouse projects also mandates this analysis.[45] The County characterized the Equestrian Center as an "unrefrigerated warehouse" in its CalEEMod calculations, thus acknowledging that warehouse guidance is applicable to the Project.[46] With respect to cumulative air quality and GHG emissions analysis, the Attorney General's guidance states that best practices include "[w]hen analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, *even if the project's individual impacts alone do not exceed the applicable significance threshold.*"[47]

Lastly, the City of Fontana was recently sued by the State Attorney General for failing to consider project emissions combined with emissions from other projects to evaluate cumulative impacts, in reliance on SCAQMD's outdated 2003 White Paper which advocated this "drop in the bucket" approach to cumulative impacts.[48] The Attorney General's petition explained: "[t]o the extent that the 2003 SCAQMD White Paper asserts that any project with less than significant individual air quality impacts also necessarily has less

than significant cumulative air quality impacts, it is inconsistent with CEQA."[49] The Attorney General's litigation resulted in a settlement which requires compliance with an ordinance adopted on April 12, 2022 that establishes sustainability standards for warehouses in Fontana, including standards intended to address cumulative air quality impacts. For example, the standards include requirements that rooftop solar panels supply 100% of power for non-refrigerated portions of facilities with buildings over 400,000 square feet, trees in automobile parking areas, zero emission motorized operational equipment, other equipment electrification requirements, and solar-ready building roofs.[50]

Response C-5: The comment repeats the same incorrect interpretation of the Project description presented in the CARE CA letter dated January 10, 2025, and appears to ignore FEIR Response C-20 which clarified that the Project does not propose warehouse uses or any land use that would result in stationary emissions or heavy-duty truck idling. The Attorney General guidance document referenced in the comment defines "warehouse" or "logistics facility" as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers. The Project proposes an equestrian center (barns etc.), residential and commercial uses, but no industrial development or land uses.

The commentors confusion stems from the misunderstanding of the CalEEMod inputs, which used and modified the "Unrefrigerated Warehouse" land use to represent construction and operations (modified) of the proposed equestrian center (barns). As explained on DEIR page 2.5-11, "in instances where CalEEMod did not provide a land use category for a proposed use, the most applicable option was selected." CalEEMod does not provide a land use similar to an equestrian barn, therefore the "Unrefrigerated Warehouse" land use was selected to utilize default electricity assumptions for a large barn-like structures. The DEIR also noted that traffic trip rates were adjusted based on traffic count data collected at the existing Desert International Horse Show facility, as provided in the Project-specific TIA, and operational energy use was adjusted to account for no natural gas connections in the barns. Furthermore, the "Unrefrigerated Warehouse" land use did not include the use of stationary equipment or other on-site equipment typical of an industrial warehouse facility. Therefore, the assertion that the Project must adhere to the Attorney General's guidance for warehouse uses is categorically false.

Cumulative air quality impacts were analyzed in accordance with CEQA and SCAQMD guidance in DEIR Sections 2.5.6 (b) and 2.5.9. The SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution clearly states:

> "*…the AQMD [Air Quality Management District] uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the HI [Hazard Index] significance threshold for toxic air contaminant (TAC) emissions…Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The Project is located in a non-attainment area for PM_{10}, as well ozone, for which precursors include CO, NOx, and ROG. As shown in DEIR Tables 2.5-7 and 2.5-8, the Project's operational emissions of CO, NOx and ROG are expected to exceed the District's project-specific thresholds. The DEIR correctly determined that the Project's contributions of ozone precursors would be significant and unavoidable, and the resulting contributions to regional non-attainment will be cumulatively considerable. This is not to be confused with TAC significance thresholds for projects that require an HRA to assess health risks due to operational sources of TACs. The Project does not require an HRA, as explained in Responses C-3 and C-4 above.

Comment C-6: SCAQMD is in the process of updating its guidance to reflect modern science and CEQA's requirements, specifically referencing the City of Fontana case.[51] Although new protocols have not yet been formally adopted, SCAQMD comments on similar warehouse projects recommend that the draft protocols be applied.[52] This demonstrates that the new thresholds are supported by substantial evidence, unlike the outdated 2003 guidance. SCAQMD's November 6, 2024, Working Group's draft cumulative impacts guidance recommends that agencies lower the cancer risk significance threshold to better reflect cumulative impacts.[53] The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met, and require a multi-step approach to assess health risk factors caused by the proposed project as well as cumulative health risk factors from the surrounding environment.[54]

The Project does meet the requirements under Step 1 of the flowchart, which is to determine the background cancer risk affecting the Project area via the SCAQMD Multiple Air Toxics Exposure Study ("MATES"). Per the MATES V Data Visualization Tool, the location of the Project site is within the 63rd percentile of cancer risk. Thus, because the Project is within the 90th to 50th percentile of excess cancer risk, the threshold would be reduced from 10 in one million to 7 in one million.[55]

Step 2 of the WG 6 flow diagram, which is to determine if there are 951 daily heavy-duty truck trips.[56] The FEIR does not quantify the number of heavy duty trucks that will be used. If this criteria is met, the threshold would be reduced even further.

The Project does meet the requirements under Step 3, which is to determine if the Project is located in an SB535 disadvantaged community or an AB617 community. If the project is within such an area, then the threshold would be reduced from 7 in one million to 5 in one million.[57] The proposed Project is located in Thermal, CA, which is designated as an AB617 community.[58] Therefore, the Project's cumulative air quality impacts need to at least be assessed against a 5 in one million significance threshold. If it is later determined that the Project will involve more than 951 heavy duty truck trips, then the significance threshold would be reduced further to 3 in one million.

The County's failure to quantify the Project's cumulative health risk impacts is inconsistent with CEQA, AG guidance, and SCAQMD recommendations. The County must revise and recirculate a new EIR to include a cumulative health risk analysis.

Response C-6: The comment claims the County failed to properly quantify and assess the Project's cumulative health risk impacts by not following the recommendations in SCAQMD's November 6, 2024, Working Group draft cumulative impacts guidance created for warehouse projects. The commenter again wrongly assumes that the Project is a warehouse project and asserts that the Project meets Steps 1 and 3, and possibly Step 2, of the flowchart for determining background cancer risk in the Project area via the SCAQMD Multiple Air Toxics Exposure Study ("MATES"). Ultimately, the comment argues the Project's cumulative air quality impacts needed to at least be assessed against a 5 in one million significance threshold.

With regards to analyzing health risks from TACs, please see Responses C-3 and C-4, above. With regards to cumulative air quality impacts, please see Response C-5 above.

Although these claims are refuted in above Responses C-3 through C-5, it should be noted that the MATES V Data Visualization links provided in the comment to support some of these claims, specifically with regard to Step 1, did not use the correct site location, showing a site almost three miles north of the subject property and crossed by several impactive transportation corridors, including Union Pacific Railroad lines, State Highway 111 and the State Highway 86 Expressway. Also, the Project does not propose uses that would result in 951 daily heavy-duty truck trips, as required for Step 2. As stated in Response C-3, above, the commenter's original misread of the Draft and Final EIR assumed the Project would include industrial warehouse operations causing stationary emissions or heavy-duty truck idling. The Project proposes an equestrian center (barns etc.), residential and commercial uses, but no industrial development or land uses.

Comment C-7: CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project's impacts from the conversion of agricultural land is significant and unavoidable because the DEIR did not propose any mitigation as required by CEQA. Instead of resolving this issue by incorporating agricultural mitigation, the County merely asserts that an ACE would not be effective at reducing or avoiding impacts to less than significant levels and is infeasible for economic and policy reasons.[59] This conclusion is speculative and not supported by substantial evidence. Moreover, the County has rejected feasible mitigation to further reduce the Project's significant agricultural impacts, in violation of CEQA.

When an EIR identifies significant environmental impacts that may result from a project, the County must certify the EIR and make mandatory CEQA findings. Those findings include that the EIR complies with CEQA, that the County has mitigated all significant environmental impacts to the greatest extent feasible, and that any remaining significant environmental impacts are acceptable due to overriding considerations.[60] Accordingly, before an impact can be declared significant and unavoidable, the County must first adopt all feasible mitigation to reduce the impact to the greatest extent feasible, and must consider feasible mitigation recommended by commenters, when such measures would substantially lessen a significant environmental effect.[61] Mitigation is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and

technological factors."[62] Additionally, findings of economic infeasibility must be supported by relevant economic data.[63]

Here, the County concludes that there is no effective mitigation available to reduce the Project's agricultural resources impacts. Specifically, the County claims that an ACE is infeasible because it conflicts with broader policy goals of reducing reliance on Colorado River water and allowing limited agricultural land conversion to support housing and economic development.[64] This conclusion is incorrect for several reasons.

First, while it may be true that drought conditions are placing a strain on the County's water supply, the County does not provide any evidence that a conservation easement would exacerbate this problem. In fact, Mr. House explains that conserving remaining agricultural land in Coachella Valley would not exacerbate any existing water shortage or even effect it because the conserved land would already be in existing agricultural use. Furthermore, Mr. Meighan highlights the fact that drought in California has a long-term history of alternating drought and non-drought conditions, and that those facts do not support a conclusion that the loss of important farmland should not be mitigated.[65]

Second, contrary to the County's claim, conservation of remaining agricultural land would not make mitigating the Project's agricultural impacts infeasible due to policy reasons.[66] The General Plan expressly endorses the use of conservation easements to conserve the County's agricultural land. Open Space Policy 7.2 states "[t]he County of Riverside shall seek out available funding for farmland conservation. Examples of programs which may be employed include: land trusts; *conservation easements…* Land Conservation Contracts…to encourage conservation of productive agricultural land in Riverside County's Incentive Program…."[67]

Third, while the County does allow the conversion of up to 7% of land designated as agricultural to facilitate additional housing and economic development, this does not render an ACE infeasible as a mitigation measure under CEQA. Mitigation is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors."[68] ACE's clearly meet this definition. They are commonly used in CEQA mitigation for farmland conversion and have been repeatedly upheld by courts as a valid tool to offset impacts to agricultural resources.[69] Additionally, several policies in the County's own General Plan encourage conservation of agricultural land. This includes Open Space Policy 7.2, which, as discussed above, explicitly supports the use of

conservation easements as a way to conserve agricultural land in the County. Thus, an ACE remains a feasible and effective mitigation measure. The County also has not provided any evidence that other mitigation measures are infeasible or would not effectively reduce impacts from the Project's conversion of agricultural land. Nor could it, because there is substantial evidence in the record demonstrating that ACE's are feasible and effective mitigation.

Therefore, the FEIR lacks substantial evidence to conclude that impacts from the conversion of agricultural land will be significant and unavoidable. The County must revise the EIR to include the necessary analysis of mitigation measures recirculate it for public review.

Response C-7: Comment C-7 is essentially the same as Final EIR Comment C-10 by the same commenter. As explained in Section 2.4.7(i) of the Draft EIR and as further elaborated in Final EIR Response C-10, the conservation of agricultural lands elsewhere in the County will not be effective at substantially reducing or avoiding the impacts from the proposed conversion of the subject 619± acres to non-agricultural uses to a level of less than significant. The analysis and conclusions presented in Final EIR response remain valid and are incorporated by reference herein.

The County disagrees with the commenter's assertion that the FEIR lacks substantial evidence to support a Statement of Overriding Considerations for the Project's significant agriculture impacts because the DEIR fails to propose an agricultural conservation easement as feasible mitigation. The DEIR and FEIR provide substantial analysis and evidence in the form of relevant facts, and reasonable fact-based assumptions, to support the conclusion that the adoption of an agricultural conservation easement would not avoid or substantially lessen significant environmental impacts associated with the conversion of the agricultural land at issue here. (*see* 14 CCR § 15384).

For example, Section 2.4.7 of the DEIR cites a number of court opinions, including ***King & Gardiner Farms, LLC v. County of Kern*** (2020) 45 Cal.App.5th 814 and ***V Lions Farming, LLC v. County of Kern*** (2024) 100 Cal.App.5th 412, to support the conclusion that an agricultural conservation easement will not avoid or substantially lessen impacts to a less-then-significant level. (DEIR p. 2.4-22). Additionally, the DEIR states 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" to support the reasonable assumption that farming on Project land and other farmlands in the Project area may not be viable in the foreseeable future.

(*Id*. at 2.4-23). The FEIR states that "consultations with CVWD warn of increasing water scarcity facing regions dependent on Colorado River water" and that "climate change and other factors have put an increasing strain on water supplies." (FEIR Response C-10, p. 56). These facts and assumptions constitute substantial evidence and support the reasonable inference that a conservation easement would exacerbate existing water supply challenges resulting from drought conditions. The effects of the long-term drought conditions on the availability and priorities for use of Colorado River water are thoroughly documented in CVWD's long-term water management plans, including (i) the 2022 Indio Subbasin Water Management Plan Update, (ii) the 2020 Coachella Valley Regional Urban Water Management Plan, and (iii) the 2020 CVWD Water Shortage Contingency Plan. These reports contain further substantial evidence regarding the scarcity of Colorado River water and the substantial demand for water caused by agricultural uses in the Coachella Valley, which substantial evidence is hereby incorporated into these responses by this reference. Therefore, the County's determination that an agricultural conservation easement is considered infeasible on policy grounds is neither speculative nor is it unsupported by substantial evidence.

The County also disagrees that the lead agency must adopt all feasible mitigation to reduce impacts to the greatest extent feasible before an impact can be declared significant and unavoidable. CEQA does not require the adoption of <u>all</u> feasible mitigation measures for projects with significant environmental effects; instead, CEQA only requires the adoption of mitigation measures that will <u>avoid or substantially lessen the significant environmental effect</u>. (14 CCR § 15091). Here, the DEIR addresses potential mitigation measures for agriculture resources, including agricultural conservation easements, in Section 2.4.7, and the DEIR determines that an agricultural conservation easement would not effectively avoid or substantially reduce the significant impacts. Courts have held that CEQA does not require an EIR to propose a mitigation measure that would not be effective in substantially reducing a significant environmental impact. (***Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors*** (2001) 91 Cal.App.4th 342, 365 ("***Napa Citizens***").

In ***Napa Citizens***, the Court of Appeal held that mitigation measures related to traffic congestion need not be proposed when such measures would not effectively reduce significant impacts: "*We conclude that the FSEIR adequately identifies the Project's significant effects on traffic. It could have discussed the efficacy of imposing a mitigation fee or of using the existing mitigation fee as means of providing some funding for highway*

improvements, but the available evidence indicates that it would be unreasonable to view such fees as a potential solution to the region's traffic congestion and circulation problems." (*Id*. at 366). Regarding the subject Project, the FEIR acknowledges that agricultural conservation easements are legally permissible and may partially mitigate impacts to agricultural resources by providing substitute resources as held in ***V Lions Farming, LLC v. County of Kern*** (2024) 100 Cal.App.5th 412, 437. However, while a lead agency is required to respond to comments proposing concrete, facially feasible mitigation measures, it is not required to accept the suggested mitigation measures. (***A Local & Reg'l Monitor (ALARM) v. City of Los Angeles*** (1993) 12 Cal.App.4th 1773, 1809; *See also* ***Friends of the Kings River v. County of Fresno*** (2014) 232 Cal.App.4th 105, 126).

Courts have not addressed whether conservation easements might be sufficient to avoid or substantially lessen the impact of converting farmland in each particular situation, and reviewing courts will ordinarily defer to an agency's determination that a proposed measure will not provide effective mitigation for an impact if the determination is supported by substantial evidence. (*See* ***Natural Resources Defense Council, Inc. v. City of Los Angeles*** (2023) 98 CA5th 1176, 1206–07).

As was discussed in the County General Plan EIR No. 521 prepared for the 2015 Riverside County General Plan (GPA No. 960), it was found under "Impact 4.5.A" (Final EIR, page 1.0-29-32) that implementation of the General Plan would result in a net 74±-acre increase in designated "Farmlands of Local Importance" and would "*would offset project impacts associated with the direct loss of land designated by the State of California as Prime Farmland and Farmland of Statewide Importance (roughly 32 acres, respectively)."* Although the existing General Plan includes policies intended to identify and implement programs that would limit the conversion of agricultural land to non-agricultural uses, EIR No. 521 found that:

> *"the growth accommodated and facilitated by the project would also result in additional development and infrastructure demand that would further fuel conversion of agricultural uses to urban resulting in further loss of designated Farmlands. Compliance with existing Riverside County ordinances and General Plan policies would help reduce this indirect impact. However, consistent with the findings made previously for the General Plan in EIR No. 441, these indirect impacts would still be significant and unavoidable."* (GPA 960 Draft EIR 521, p. 4.5-31).

The 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)

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.

Given the above considerations, facts, data and information provided in the Thermal Ranch Specific Plan DEIR and FEIR, the County disagrees with the commenter's assertion that the EIR must be revised and recirculated. 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.

Comment C-8: The Project's proposed conversion of 568.3 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, conflicts with the County's general plan.[70] CEQA requires an agency to determine whether a Project would "[c]ause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."[71] Inconsistency with a general plan is both a land use impact and a significant impact under CEQA.[72]

The FEIR fails to adequately disclose that the Project's conversion of agriculture land for non-agriculture purposes contravenes the goals and objectives listed in the General Plans Vision Statement, Open Space Element, and Land Use Element. This includes:

Vision Statement	Agricultural land that remains economically viable either as a permanent or temporary economic resource, is well protected by policies, ordinances and design regulations applicable to new development that may be planned nearby.[73]
Vision Statement	Agriculture remains a strong component of the County's economy. Even though some agricultural land has been urbanized, there has also been expansion in other locations. The place of agriculture in the community remains strong and conflicts between agricultural operations and nearby development are rare. The Riverside County agricultural industry is a strong competitor in the global agricultural market.[74]
Land Use Policy 20.1	Encourage agriculturally designated lands where agricultural activity can be sustained at an operational scale, where it accommodates lifestyle choice, and in locations where impacts to and from potentially incompatible uses, such as residential uses, are minimized through incentives such as tax credits.[75]
Land Use Policy 20.2	Protect agricultural uses, including those with industrial characteristics (dairies, poultry, hog farms, etc.) by discouraging inappropriate land division in the immediate proximity and allowing only uses and intensities that are compatible with agricultural uses.[76]

Land Use Policy 20.4	Encourage conservation of productive agricultural lands. Preserve prime agricultural lands for high-value crop production.[77]
Land Use Policy 20.6	Require consideration of state agricultural land classification specifications when a 2.5-year Agriculture Foundation amendment to the General Plan is reviewed that would result in a shift from an agricultural to a non-agricultural use.[78]
Open Space Policy 7.3	Encourage conservation of productive agricultural lands and preservation of prime agricultural lands.[79]
Open Space Policy 7.2	In cooperation with individual farmers, farming organizations, and farmland conservation organizations, the County of Riverside shall employ a variety of agricultural land conservation programs to improve the viability of farms and ranches and thereby ensure the long-term conservation of viable agricultural operations within Riverside County. The County of Riverside shall seek out available funding for farmland conservation. Examples of programs which may be employed include: land trusts; conservation easements (under certain circumstances, these may also provide federal and state tax benefits to farmers); dedication incentives; Land Conservation Contracts; Farmland Security Act contracts; the Agricultural Land

	Stewardship Program Fund; agricultural education programs; transfer and purchase of development rights; providing adequate incentives (e.g. clustering and density bonuses) to encourage conservation of productive agricultural land in Riverside County's Incentive Program; and providing various resource incentives to landowners.[80]

The General Plan emphasizes the historic and economic importance of agriculture land in Riverside County, stating "it is agriculture that defines the unique character of many communities in Riverside County, and helps to define the edges of and provide separation between developed areas…there is a solid commitment to ensuring that these uses remain an integral part of Riverside County's future."[81] Consistent with this statement, the goals and policies above support the preservation of agricultural lands in Riverside County, especially for Prime Farmland.

The Project conflicts with these goals and policies for several reasons. First, as discussed in detail in CARE CA's previous comments and above, the proposed Project would convert 568.3 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, which is in active agricultural cultivation, into non-agricultural uses.[82] These are two of the highest soil classifications of important farmland, meaning they are the most ideal for agriculture production.[83] Land Use Policies 20.4 and 20.6, as well as Open Space Policy 7.3 discourage conversion of productive agricultural lands, especially lands that have high land use classifications.

Second, the Project not only considers conversion of these valuable agricultural lands, but it does not propose any mitigation to reduce impacts or demonstrate consistency with the General Plans policies. Open Space Policy 7.2 highlights the importance of conserving agricultural lands and provides several examples of ways to ensure this conservation occurs. The FEIR's failure to adequately disclose and analyze these inconsistencies constitutes a significant impact under CEQA.

Response C-8: The County disagrees that conversion of the agricultural land associated with this Project violates its General Plan policies. To the contrary, the County has determined that this conversion is consistent with the General

Plan's allowance of a limited amount of agricultural land conversion to promote additional housing and economic development opportunities. Likewise, the County's determination that requiring an offsite agricultural conservation easement as mitigation would be impractical and undesirable, and thus infeasible, for this Project on policy grounds is consistent with the prior County General Plan EIR findings that the limited conversion of agricultural land as permitted under the General Plan is a significant and unavoidable impact because the impact cannot be feasibly mitigated through agricultural conservation easements. 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), 15364). 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. Because feasibility ultimately is a policy judgment, a lead agency's conclusion regarding feasibility is owed deference. (***Yerba Buena Neighborhood Consortium, LLC v. Regents of Univ. of Cal***. (2023) 95 Cal.App.5th 779, 809).

In the case of the subject Thermal Ranch Project, the commenter asserts that a reliance on policy goals of reducing reliance on Colorado River water is not valid because drought conditions are cyclic and any conserved land would already be in existing agricultural use. However, the policy goal of reducing reliance on Colorado River water and achieving long-term water reliability for all uses is grounded in substantial evidence beyond cyclic drought conditions. Water conservation measures are meant to address not only drought, but also a long-term structural deficit in the Colorado River system as well as the documented effects of climate change. (*see* FEIR p. 56). Regarding conflicting areas of County policy, including General Plan endorsements of conservation easements versus provisions allowing the conversion of up to 7% of land designated as agricultural to facilitate additional housing and economic development, the County's determination as to infeasibility is owed deference. (***Yerba Buena Neighborhood Consortium, LLC v. Regents of Univ. of Cal***. (2023) 95 Cal.App.5th 779, 809). Therefore, requiring an agricultural conservation easement for this Project would be impractical and undesirable due to policy considerations.

Comment C-9: CARE CA's previous comments demonstrated that the Project would result in potentially significant operational noise impacts when more realistic HVAC run times are utilized. Instead of correcting this deficiency, the County continues to underestimate HVAC run times and asserts that "continuous

operation of Project HVAC systems is unreasonable" because HVAC systems are designed to cycle on and off for optimal performance and energy efficiency.[84]

While it is true that the HVAC systems would not run 100 percent of the time—Mr. Meighan clarifies that the system could run for a full hour or on hot days, instead of the maximum 39 minutes every hour that the FEIR analyzes.[85] Mr. Meighan's explains that Thermal, CA has a desert climate which regularly experiences high heat.[86] For example, climate data shows that Thermal has average summer highs above 110 °F on average 28 days per year, and exceed 120 °F every other year.[87] Additionally, during almost four months out of the year, the average daily high temperature is above 99 degrees Fahrenheit.[88] UCLA and the Public Health Alliance of Southern California project that portions of the Coachella Valley will have more than 200 days a year above 90 degrees by mid-century.[89] Therefore, these high temperatures and the need for HVAC systems to run for a full hour are reasonably foreseeable. CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are "substantial."[90] Therefore, because the FEIR still relies on a low HVAC run time, the County underestimates the Project's potentially significant operational noise impacts.

The County also claims that even though Mr. Meighan's previous comments demonstrated that the Project would exceed the absolute noise threshold of 45dBA, there is no significant impact because the noise levels would not exceed the ambient noise threshold.[91] This conclusion is contrary to CEQA. In applying significance thresholds, the lead agency must consider both the "absolute noise level" associated with a project as well as the increase in the level of noise that will result from a project.[92] A significant impact occurs when either one of these thresholds is exceeded.

The County further tries to discredit Mr. Meighan's analysis by pointing to Public Resources Code Section 21085, which states "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment." However, this law is not applicable to Mr. Meighan's analysis. Mr. Meighan's calculations evaluated the Project's operational noise, with a particular focus on rooftop HVAC equipment. HVAC noise is not noise generated by project occupants or their guests.

Lastly, the County claims, without providing any evidence, that the noise from HVAC units will be mitigated to less than significant levels. CEQA

requires an agency to support its conclusion with substantial evidence.93 Substantial evidence does not include argument, speculation, or unsubstantiated opinion. Therefore, without more, the County lacks substantial evidence to supports its conclusion.

In sum, the FEIR fails to analyze and mitigate the significant HVAC related noise impacts during Project operations. The County also lacks substantial evidence to conclude that these impacts would be mitigated to less than significant levels.

The County must correct this deficiency in a revised and recirculated EIR.

Response C-9: Comment 9 of this Supplemental Response to Comments is essentially the same as CARE CA's previous Comment C-9 responded to in the Final EIR (FEIR page 52). The commenter continues to misrepresent climatic conditions in the Project area in an effort to exaggerate the runtimes for Project HVAC units. As can be found on the Weather.gov web site, July is the hottest month in the Coachella Vally, with a Mean Maximum Temperature of 106.9°F and an Average Mean Temperature of 91.2°F. The assertions made by the commenter and his noise consultant appear to be based on "belief" rather than facts. They also ignore the fact that Project building envelopes will be required to comply with the most stringent building standards to ensure optimum HVAC energy efficiency.

To further explain the Project noise analysis and conclusions, Tables 2 and 3, below, present the operational noise levels associated with the HVAC units shown on Exhibit 1 of attached Appendix A. The HVAC operating assumptions are based on reference noise level measurement data collected over a period of 96 hours. It is important to recognize that HVAC systems cycle on and off for several hours daily, depending on factors like outdoor temperatures, thermostat settings, insulation, and system efficiency. Continuous operation is unrealistic because it significantly increases energy costs, leading to high utility bills. HVAC systems are designed to cycle on and off for optimal performance and energy efficiency. In addition, it is unreasonable to assume that all HVAC units are operating continuously for all hours of day and night. During any given time, a portion of these HVAC will be cycled off.

The October 21, 2025, Wilson Ihrig comment letter that accompanied subject Comment Letter C, insists despite the evidence outlined above, the HVAC systems will operate during the full hour for hot summer days. While the County maintains that HVAC systems are designed to cycle on and off for optimal performance and energy efficiency, the noise level impacts when

all the HVAC systems are operating has nevertheless been evaluated continuously for the full 60 minutes during the daytime and nighttime hours to ensure a full response to the Wilson Ihring letter.

Table 2, below, presents the individual noise source activity levels that make up the overall Daytime Project Operational Noise Levels from the 2023 Noise Study. Table 2 shows that the 2023 Noise Study calculated the daytime HVAC activities at the nearest noise sensitive receiver R2 at 28.8 dBA Leq. Table 3 shows that changing the HVAC daytime operating minutes from 39 minutes to the full 60 minutes increases the daytime noise levels at R2 to 30.7 dBA Leq. While the noise levels associated with HVAC activities may increase, the overall daytime noise levels will result in only a 0.1 dBA Leq daytime overall noise increase (42.3 dBA Leq to 42.4 dBA Leq) at the nearest noise sensitive receiver location R2. The noise level impacts due to increased minutes of HVAC activity do not meaningfully change the overall composite Project operational noise levels since the Horse Park and public address system represent the primary sources of noise Project noise activities.

Comment C-9 and the attached Wilson Ihring letter also misstate the applicable threshold of significance for noise impacts, which are set forth in Table 2.15-8 of the Draft EIR (p. 2.15-14). As shown in Table 2.15-8, operational noise levels from a project are considered significant if they exceed 55 dBA in the daytime or 45 dBA in the nighttime at the nearest sensitive receptors. As shown in Table 3 below, even assuming all HVAC units operated for the entire 60-minute period, the project operational noise levels in the daytime at the nearest sensitive receptor is 42.4 dBA, which is well below the County's threshold of significance of 55 dBA. This is addressed further in the Urban Crossroads Supplemental Technical Memorandum (attached Appendix A), which shows that nighttime operational noise levels at the same location, using the same assumption that all HVAC units are running 100% of the time, would be 36.0 dBA, which is substantially below the County's nighttime threshold of significance of 45 dBA. Accordingly, even using the unrealistic assumption for HVAC use requested by the commenter, project generated noise levels would be well below the County's established thresholds of significance and impacts would be less than significant. These conclusions are supported by substantial evidence, including three expert noise studies and technical reports prepared by Urban Crossroads and included in the Draft EIR, the Final EIR, and attached to these supplemental responses.

Table 2: Daytime Project Operational Noise Levels (2023 Noise Study)

Noise Source	Operational Noise Levels by Receiver Location (dBA Leq)					
	R1	R2	R3	R4	R5	R6
Horse Park Activities	36.1	39.4	37.4	32.4	42.6	32.4
Public Address System	34.6	38.0	36.0	30.8	40.5	30.9
CVWD Well Site	10.5	24.7	15.7	4.4	7.5	4.2
IID Substation	5.4	14.1	27.8	14.5	8.8	2.3
Roof-Top Air Conditioning Units[1]	27.3	**28.8**	32.6	27.5	41.7	26.5
Trash Enclosure Activity	22.5	24.3	23.5	18.7	37.4	20.7
Parking Lot Veh. Activity	25.7	26.6	29.4	24.1	39.7	24.2
Total (All Noise Sources)	**39.1**	**42.3**	**41.1**	**35.9**	**47.7**	**35.8**

[1] Represents 39 minutes of hourly activity during the daytime hours.

Table 3: Daytime Project Operational Noise Levels (Full HVAC Activity)

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)					
	R1	R2	R3	R4	R5	R6
Horse Park Activities	36.1	39.4	37.4	32.4	42.6	32.4
Public Address System	34.6	38.0	36.0	30.8	40.5	30.9
CVWD Well Site	10.5	24.7	15.7	4.4	7.5	4.2
IID Substation	5.4	14.1	27.8	14.5	8.8	2.3
Roof-Top AC Units[2]	29.2	**30.7**	34.5	29.4	43.5	28.4
Trash Enclosure Activity	22.5	24.3	23.5	18.7	37.4	20.7
Parking Lot Veh. Activity	25.7	26.6	29.4	24.1	39.7	24.2
Total (All Noise Sources)	**39.2**	**42.4**	**41.5**	**36.2**	**48.2**	**36.1**

[1] Represents 60 minutes of continuous hourly activity during the daytime hours.

Also please see Response C-2, above.

Comment C-10: The FEIR concludes that the Project will have less than significant energy impacts.[94] However, the FEIR fails to provide substantial evidence to support this conclusion by not quantifying the Project's construction-related energy consumption or analyzing energy conservation measures that might be available or appropriate for the Project, in violation of CEQA.

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."[95] The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide the following examples in Appendix F:

- Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
- The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- The potential for reducing peak energy demand.
- Alternate fuels (particularly renewable ones) or energy systems.
- Energy conservation which could result from recycling efforts.[96]

Courts have rejected CEQA documents that fail to include adequate analysis investigation into energy conservation measures that might be available or appropriate for a project.[97] In *California Clean Energy Commission v. City of Woodland* ("*CCEC*"), the Court of Appeal reviewed an EIR for a shopping center on undeveloped agricultural land.[98] Similar to the FEIR here, the EIR in *CCEC* concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations, the project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy.[99] But, the lead agency's EIR did not include a discussion regarding the different renewable energy options that might be available or appropriate for the project.[100] The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."[101] The lead agency argued that compliance with the Building Code sufficed to address energy impact concerns for the project.[102] But the Court explained:

Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines. These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.[103]

The Supreme Court of California agreed with the *CCEC* court's decision in *League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer* ("*Save Lake Tahoe*"), holding that even projects that find a less-than-significant energy impact must "discuss whether any renewable energy features could be incorporated into the project."[104] In *Save Lake Tahoe*, the Court considered an EIR for a land use specific plan and rezoning to permit residential and commercial development and preserve forest land near Truckee and Lake Tahoe.[105] The EIR did not consider whether it was feasible to power the project on 100 percent renewable electrical energy or some lesser percentage, nor evaluate strategies for reducing reliance on fossil fuels, increasing reliance on renewable resources, reducing peak loads, and reducing the impacts of relying on remote generation facilities.[106] The lead agency reasoned that this analysis was not required because energy impacts would be less than significant.[107] Citing CEQA Guidelines Section 15126.2, subdivision (b) and the decision in *CCEC*, the Court held that when an EIR analyzes the project's energy use to determine if it creates significant effects, it should discuss whether any renewable energy features could be incorporated into the project.[108] The Court found that the EIR violated CEQA for not discussing whether the project could increase its reliance on renewable energy sources to meet its energy demand.[109] As discussed below, the FEIR here suffers from the same flaws.

The FEIR concludes that the Project's construction-related energy use would be less than significant without quantifying them.[110] The FEIR instead reasons that because the electricity demand would be temporary and the building is required to comply with IID guidelines and requirements as well as the County's General Plan and CAP Update that use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.[111] However, this reasoning is flaws for several reasons.

First, without quantification, the FEIR's statement that electricity use during construction will be "temporary" and "nominal" is not supported. Energy that is temporary may still be wasteful, inefficient, and unnecessary. There is also no way to determine what "nominal" means and if that also constitutes a level that is not wasteful, inefficient, and unnecessary.

Second, similar to *League to Save Lake Tahoe*, the County did not discuss whether any renewable energy features could be incorporated into the Project's construction phase. For example, the County did not discuss the use of Tier 4 final diesel engines, electric-powered machinery, or use of alternative fuels like renewable diesel or biodiesel. This lack of analysis violates CEQA and does not constitute substantial evidence that justifies the FEIR's significance determination.

Third, compliance with the County's General Plan, CAP Update, and IID Guidelines do not ensure energy efficient measures that go beyond Title 24 standards will be implemented. The General Plan and CAP update merely require compliance with Title 24 standards.[112] There is no requirement that these standards be exceeded. Additionally, IID does not have guidelines specifically governing the efficiency of energy use during construction or in building design. The IID offers energy efficiency incentive programs, but these are voluntary and thus are not binding.

In sum, the FEIR's energy analysis fails to adequately analyze measures that would ensure the Project's consumption of energy during construction is not wasteful, inefficient, and unnecessary. It also fails to meaningfully address Appendix F's considerations of whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope.[113] This analysis must be provided in an EIR.

Response C-10: The commenter asserts that the energy analysis in the DEIR and FEIR are in violation of CEQA because 1) construction-related energy consumption was not quantified and construction-related energy conservation measures were not discussed, and 2) the DEIR or FEIR failed to "*meaningfully address Appendix F's considerations of whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope*."

1) Construction-Related Energy Consumption

Regarding the first claim, CEQA allows for qualitative discussions and analysis of construction energy impacts without exact quantification of fuel consumption by type (e.g., gallons of diesel or kWh of electricity), provided the analysis is supported by substantial evidence, applies the "rule of reason," and adequately informs decision-makers about potential significant effects under Public Resources Code § 21100(b)(3). The DEIR qualitatively analyzes construction-related consumption of electricity, natural gas, and transportation fuels (construction equipment and worker trips) on pages 2.8-8 and -9. Although not explicitly quantified by energy type, the DEIR correctly characterizes the consumption of energy during construction to be limited due to the temporary nature of construction activities.

Although specific regulations regarding construction equipment fuel efficiency were not specifically listed in the EIR Energy discussion (DEIR Section 2.8), the Project is subject to the applicable regulatory requirements including, for example, the CARB In-Use Off-Road Diesel-Fueled Fleets Regulations for diesel vehicles, such as construction equipment, that require the phasing out of older Tier 0–2 engines and replacing with Tier 4 Final or zero-emission equipment, limiting unnecessary idling to 5 consecutive minutes, retrofitting equipment with the best available control technology (BACT) (as an option for fleet average compliance), and requiring most fleets to use renewable diesel fuel (R99 or R100) as of January 1, 2024, with limited exceptions for factors like low temperatures.

The commenter cites *California Clean Energy Commission v. City of Woodland* ("*CCEC*") (2014) 225 Cal.App.4th 173 to allege that the DEIR is deficient because it relies on Title 24 guidelines and fails to include adequate analysis investigation into energy conservation measures that might be available or appropriate for the project. However, in CCEC, no mitigation measures were adopted to address transportation, construction, or operation energy impacts for the project. (*CCEC* at 186). Here, the DEIR does adopt mitigation measures related to construction-related emissions reductions, which are related to energy impacts. Although not required to ensure that Project construction will use limited energy resources in an efficient manner, the following ***bold*** text is hereby added to Mitigation Measure AQ-2 (Construction Equipment Emission Reductions; DEIR p. 2.5-26) to further CEQA Appendix F goals. This revision promotes energy efficiency through maximum compliance with Tier 4 engine standards and requires alternative-fueled equipment to the greatest extent feasible, thereby further ensuring that construction activities do not result in wasteful, inefficient, or unnecessary energy consumption.

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.***

2. Appendix F Considerations

The comment insinuates that because the DEIR did not "*meaningfully address…whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope"* that it failed to adequately address the considerations in Appendix F of the CEQA Handbook and therefore needs to be revised and recirculated. This argument is incorrect for several reasons.

First, Appendix F provides a list of potential energy impacts and conservation measures but clarifies that these are only to be addressed "*to the extent relevant and applicable*" to the specific project. Lead agencies have flexibility to determine which items apply, and CEQA does not require

that an EIR cover every element listed in Appendix F so long as the EIR adequately addresses significant impacts.

Second, the comment wrongly claims that the DEIR did not discuss renewable energy resources or anything external to a building's envelope, insinuating that reliance on Title 24 requirements is not enough to support a less-than-significant determination. CEQA does not explicitly require a project to demonstrate how it exceeds the mandatory Title 24 building energy efficiency standards. Title 24 standards are designed to ensure energy efficiency and are regularly updated to reflect technical advancements and state climate goals. Therefore, meeting these mandatory requirements often equates to the project's energy impacts being less than significant. However, the analysis here does not depend solely on Title 24 compliance.

In addition to Title 24 requirements, the DEIR states that the Project is subject to R2-CE1 of the Riverside County 2019 Climate Action Plan (CAP) and is required to provide on-site renewable energy production that meets at least 20 percent of energy demand for commercial, office, industrial, manufacturing, and multi-family residential uses, and at least 30 percent of single-family residential uses must be produced by renewable energy sources (DEIR p. 2.8-10 and -11). In addition, the DEIR addresses reductions in operational transportation fuel, stating that the Project "*has been designed with a network of internal routes for pedestrian, golf cart, bicycle, and equestrian transportation… intended to reduce the need for vehicle trips between planning areas within the Project.*" (DEIR p. 2.8-12).

Lastly, the Project proposes a Specific Plan, a tentative tract map, three plot plan applications, a General Plan Amendment, and Change of Zone. Essentially the Project is a well-coordinated land use master plan and concerns about "*whether a building should be constructed at all, how large it should be,* [or] *where it should be located,"* are not relevant at this project level, contrary to commenter's claim. Future applications for building permits in the County of Riverside, including the Project, are required to submit Title 24 energy compliance reports and forms, which are typically prepared by a certified energy analyst and use state-approved software to model the building's energy performance. The energy modeling process requires detailed architectural plans as inputs, including the **building's orientation**, floor plans, window schedules, and insulation details.

The commenter cites *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63 ("*Lake Tahoe Mountain"*), which it erroneously refers to as a California Supreme Court decision, to assert that

the DEIR is deficient because it did not discuss whether any renewable energy features could be incorporated into the Project's construction phase. This assertion misconstrues the holding in *Lake Tahoe Mountain*. In *Lake Tahoe Mountain*, the Third District Court of Appeal held that the project's determination of whether impacts on energy resources were significant did not comply with CEQA because the EIR did not address whether any renewable energy features could be incorporated into the project. (*Lake Tahoe Mountain* at 168). In *Lake Tahoe Mountain*, the Court noted that while the project would be required to meet Title 24 building efficiency standards and energy efficiency requirements, the project omitted an analysis of renewable energy options that might have been available or appropriate for the project despite the submission of multiple comments asking the County to evaluate options for placing the project on a feasible percentage of renewable electrical energy through the incorporation of rooftop solar. (*Id*. at 166). Notably, at the time of this CEQA analysis, Title 24 did not mandate rooftop solar for residential development. The commenter also cites *CCEC* to support the assertion that compliance with Title 24 guidelines alone is not sufficient because such reliance omits a discussion regarding the different renewable energy options that might be available or appropriate for the project.

CEQA requires that a project's energy impact analysis should consider building code compliance and other relevant considerations that may include the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. (14 CCR section 15126.2(b)). Here, Section 2.8 of the DEIR contains a detailed thirteen-page analysis of energy resources and impacts. In *CCEC,* the Third District Court of Appeal noted that the entirety of the City's energy impact analysis for the project comprised less than a page in the draft EIR. Notably here, the DEIR includes a discussion of renewable energy features that will be incorporated into the Project. These features, including solar energy requirements, are addressed as GHG mitigation measures (see p. ES-14). Although footnote 6 in the *CCEC* case states that air quality mitigation is not a substitute for an energy analysis, the air quality mitigation measures addressed in the *CCEC* case did not include solar energy requirements. Because Title 24 now requires the installation of rooftop solar, compliance with Title 24 now more directly addresses the CEQA guideline requirement to address renewable energy features that could be incorporated into the project.

Therefore, the County rejects the claim that the DEIR did not adequately address potential impacts to energy resources, and revisions and recirculation of the Draft EIR are not required. The above recommended addition to construction equipment mitigation measures in the Air Quality section further supports the determination that impacts would remain less than significant, but it does not constitute significant new information that would warrant recirculation.

Comment C-11: General Plan Amendment

The Project site currently has a General Plan Foundation of Agriculture and Land Use Designation of Agriculture.[115] The General Plan Amendment ("GPA") would propose to change the Foundation to Community Development and the land use designations to match those of the proposed Specific Plan, which include Commercial Tourist, Very Low Density Residential, Medium High Density Residential, Highest Density Residential, and Commercial Retail.[116] The GPA is defined as an Entitlement/Policy General Plan Amendment and an Agricultural Foundation Component Amendment.

Ordinance No. 348 sets forth different procedures based on the type of GPA being proposed. Accordingly, a GPA that would change the General Plan land use designation from "Agriculture" to a set of five different land use categories is governed by Section 2.4, while the GPA that would change the General Plan Foundation Element designation for the Project site from "Agriculture" to "Community Development" is governed by Section 2.7. Because the GPA includes two types of amendments, the County must make all of the findings required in both Section 2.4 and Section 2.7.

1. Entitlement/Policy General Plan Amendment

A planning commission resolution recommending approval of an entitlement/policy amendment must include 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.[117]

The County cannot make the required findings to approve this amendment for several reasons. First, the GPA conflicts with the County's General Plan Vision Statement and thus is detrimental to the purposes of the General Plan. As discussed above, the County's Vision Statement reflects the important historic and economic role agricultural uses have in Riverside County.[118] The County's Vision Statement also acknowledges the mounting growth pressures agricultural areas face and expresses the desire to preserve these agricultural areas.[119] By proposing the permanent For further information and responses to comments on this subject, please see Draft EIR Section 2.4 of over 619 acres of important farmland without offering any mitigation, the GPA directly contradicts the County's stated goals. Rather than supporting agricultural preservation, it accelerates the very pressures the Vision Statement seeks to resist.

Second, the GPA conflicts with general planning 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.[120] 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 foundation component designation—shifting land from the Agricultural Foundation Component to

the Community Development designation. Therefore, the County cannot make the first required finding to recommend approval of the GPA.

Therefore, the County cannot approve the GPA because it cannot make the requisite findings under Section 2.4 of Ordinance No. 348. The GPA directly conflicts with the core goals of the County Vision Statement and General Planning Principles. Thus, the Staff Report's conclusion that the GPA does not conflict with these documents is unsupported and contradicted by the Project's unmitigated conversion of over 619 acres of important farmland. The GPA also involves a Foundation change, which disqualifies it from approval under the County's required findings.

2. Agricultural Foundation Component General Plan Amendments

For an Agricultural Foundation Component General Plan Amendment to be made, the following findings are required to be made:

- 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.[121]
- 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.[122]

For the same reasons discussed above, the GPA's permanent conversion of over 619 acres of important farmland without offering any mitigation directly contradicts the General Plan's stated goals of preserving agricultural land

Response C-11: During the Project's pre-application review and the subsequent and extensive Specific Plan, tract map and plot plan reviews, the County determined that the proposed Thermal Ranch General Plan Amendment is consistent with applicable General Plan policies. A General Plan consistency analysis was prepared for this Project. It should be noted that the General Plan "Vision Statement" is not and does not carry the weight of a policy statement but rather that of a generalized county-wide goal. The contemplated and planned for conversion of agricultural lands to non-agricultural uses are discussed throughout the County General Plan (RivCo General Plan Policy OS-7.2, GP Admin. Element, Amendment Cycles).

Furthermore, the proposed Project does carry out the expectations of the General Plan, which makes provision for the conversion of limited amounts of agricultural lands for housing and economic development opportunities

in every 2 ½ year cycle to non-agricultural uses. The proposed Project provides important housing and economic development for the ECV area and also complements the ECV's need for employment opportunities, as the jobs to housing ratio or "balance" showing a significant need for new jobs in the area. Clearly, the proposed Project is consistent with the County General Plan's goals and policies.

With regard to the proposed Agricultural Foundation Component General Plan Amendment, the Project does not violate and is consistent with the County "Agriculture Foundation Amendment Cycle" (RivCo GP Chapter 11, Administration Element, p. A-16). As demonstrated above, the Project and associated General Plan Amendment (GPA) are consistent with GPA findings set forth in Sections 2.4 and 2.5 of County Ordinance 348.4997.

Comment C-12: Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[123] The Staff Report concludes that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[124] However, as discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land.

Additionally, the Specific Plan conflicts with policies in the General Plan's Noise Element Specifically, Policy N1.5 states that "excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County" should be prevented and mitigated.[125] Similarly, Policy N1.6 states "noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses" shall be minimized.[126] Our noise expert demonstrated that the FEIR failed to disclose and mitigate potentially significant operational noise impacts related to the Project's HVAC systems. Therefore, the Specific Plan would allow a land use that conflicts with the County's General Plan and cannot be approved as currently proposed.

Response C-12: As noted above in Response C-2, C-7, C-8 and C-9 above, the proposed Project has been found to be consistent with the vision, goals and policies of the County General Plan, including Policy N1.5 and N1.6 regarding noise impacts, and has also been shown to be consistent with the findings set forth in Sections 2.4 and 2.5 pf County Ordinance 348.4997. As demonstrated in previous analysis and responses to comments (see DEIR Section 2.15 and its Appendix H, FEIR Responses C-2, C-3, C-8, C-9, C-

25, C-26, C-27 and C-28 and FEIR Appendix A[14], and this Supplemental Response to Comments and associated Appendix A), the proposed Project will not result in significant construction or operational noise and impacts will be less than significant.

Comment C-13: Plot Plan

The Project includes three plot plans.[127] Section 18.30 of Ordinance No. 348 governs the processing of Plot Plans. Pursuant to this Section, no Plot Plan shall be approved unless it complies with the following standards:

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;

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.[128]

The County cannot make the first two of these required findings. First, as discussed above, the Project does not conform with all of the requirements of the General Plan because it conflicts with the General Plan's agriculture and noise policies by converting 619 acres of important farmland without proposing any mitigation and by failing to disclose and mitigate the Project's operational noise impacts. Second, the development of the land would not be designed for the protection of the public health, safety, and general welfare. Contrary to the Staff Report's conclusion, the County lacks

[14] Thermal Ranch Specific Plan Response to Comments Technical Memorandum, prepared by Urban Crossroads, Inc. January 24, 2025.

substantial evidence to conclude that the Project will not have significant public health and noise impacts.[129] Specifically, the FEIR failed to conduct a health risk analysis of the Project's TAC emissions. The FEIR also underestimated the Project's significant operational noise impacts related to HVAC units. Therefore, the Commission cannot make the requisite findings to recommend approval of the Plot Plans.

Response C-13: As discussed above and in the Project Draft and Final EIR, the Project Plot Plans and other components of the Thermal Ranch Specific Plan application, with its mitigation measures and conditions of approval, will conform to County General Plan goals and policies, requirements of the County Zoning Ordinance 348, and applicable state and federal requirements. The Project is also consistent and compatible with the present and emerging land use pattern in the area, and future logical development already approved and entitled, including the Kohl Ranch Specific Plan and other approved developments and subdivisions in the immediate area.

Also as discussed in detail in the Project Draft EIR, Final EIR and these Supplemental Response to Comments, the Project is consistent with County policies and programs regarding the conversion of agricultural lands to non-agricultural uses. These analyses also clearly show that the Project will not have any unmitigated significant noise or air quality impacts.

Comment C-14: Zone Change

The Project site has a split zoning classification of Controlled Development Areas (W-2) and Heavy Agriculture, ten-acre minimum (A-2-10).[130] The Change of Zone proposes to change the zoning of the site to entirely Specific Plan with the associated proposed Specific Plan zoning ordinance that would specify the permitted uses and development standards for each of the Specific Plan Planning Areas and the map that would define the Specific Plan Planning Area boundaries.[131]

A planning commission resolution recommending approval of a Zone Change requires compliance with Section 20.3 of Ordinance No. 348. This Section requires the Commission 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. It would also allow significant operational noise impacts that violates the Noise Element policies. Therefore, the Commission cannot recommend approval of the Zone Change.

Response C-14: As discussed in detail in Section 2.4 of the Draft EIR, in Final EIR Responses B-8, C-10 and C-11, and in these Supplemental Response to Comments C-7, C-8 and C-11, above, there is no feasible or meaningful mitigation to effectively offset the loss of agricultural lands associated with the proposed Project, and impacts will be significant and unmitigable. As discussed at length above, the use of an agricultural conservation easement for this Project was specifically considered and rejected on multiple policy grounds. This conclusion is also consistent with County General Plan findings for the 2003 and 2015 County General Plan updates.

Regarding Project operational noise impacts to community noise levels, this was addressed in detail in Draft EIR Section 2.15 and associated Appendix H. Community noise concerns were also further addressed in the Final EIR Responses C-2, C-8, C-9, C-25, C-26, C-27, C-28 and FEIR Appendix A.[15]

Based on the whole of the Project application and the comprehensive CEQA analysis conducted to evaluate its potential environmental effects, including the loss of agricultural lands and possible community noise impacts, the County finds that the Project Plot Plans, along with the various related applications, may be approved in conformance with CEQA.

Comment C-15 Tentative Tract Map

The Tentative Tract Map is a proposal for a Schedule A subdivision to subdivide the entire 619.1 gross acre site into 330 lots.[132]

A planning commission resolution recommending approval of a Tentative Tract Map requires compliance with Section 20.3 of Ordinance No. 348, as well as the Subdivision Map Act. Accordingly, the County 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;

[15] Thermal Ranch Specific Plan Response to Comments Technical Memorandum, prepared by Urban Crossroads, Inc. January 24, 2025

- 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.[133]

The Commission 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. The Project also conflicts with the General Plans Noise Element policies related to prevention and mitigation of excessive noise levels. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments above demonstrate, the Project will have significant public health and noise impacts that were not adequately disclosed, analyzed or mitigated.[134] Specifically, the FEIR failed to conduct a health risk analysis of the Project's TAC emissions. The FEIR also underestimated the Project's significant operational noise impacts related to HVAC units. Therefore, the Commission cannot make the requisite findings to recommend approval of the Tentative Tract Map.

Response C-15: The commenter continues to repeat the same comment with no or marginal and inaccurate data and analysis to substantiate its claims. As elaborated in the Project Draft and Final EIR and associated technical memoranda, these concerns regarding health impacts (air quality and noise) are unfounded and have been refuted in the aforementioned Project analysis and the further detailed responses above. Furthermore, the County has determined that the requirement for an agricultural conservation easement (ACE) is not warranted and will not provide feasible mitigation in this case. As the noise, air quality, and agricultural resources assertions that form the basis for this comment are fully addressed in the responses above, those prior responses are incorporated into this response. For the reasons stated in those responses and in the Planning Commission Staff Report, all requisite findings required to approve the tentative tract map can properly be made.

Comment C-16: These comments respond to my previous comment that not all worst-case sensitive receivers were analyzed, notably 62101 Tyler Street. The FEIR reaffirms that the City omitted this residence from its impact analysis, stating "the Project noise analyst identified the closest residence on the east side

of Tyler Street, which is identified in the DEIR as R2" (FEIR, page 38). And that receiver location "R2 at 62800 Tyler Street was intended to describe the nearest existing noise sensitive residential land use immediately east of the Project site" (FEIR, page 81).

There is no evidence provided that shows 62800 Tyler Street is the closest or worst-case receiver, especially when compared to 62101 Tyler Street. *Figure 1* below compares the footprint of the Project to both single-family residences. 62101 Tyler Street is on the top, with a red line drawn at the closest façade to the Project. The line travels south, and is roughly 50 feet west of the closest façade of 62800 Tyler Street. *Figure 3* and *Figure 2* show each of the two sites, respectively, where it can be seen that both are single family residences that need to be considered.

The FEIR states that when "considering the location of the actual operational noise source activities in relation to the noise sensitive residential land uses east of the Project site, Receiver Location R2 at 62800 Tyler Street represents the worst-case sensitive receiver location" (FEIR, page 82). The operational noise sources are clustered more to the southern edge of the site. However, with the large distances from the operational noise sources, it is likely that 62101 Tyler Street will experience louder noise levels due to being closer to the noise sources to the west, resulting in a potentially significant noise impact that the County has not addressed. Since the FEIR did not consider noise impacts to 62101 Tyler Street, the conclusion that noise impacts on local residents would be either less than significant, or fully mitigated, lacks support. The EIR should be amended to include this site as a receiver to verify that there are no unreported significant operational noise impacts.

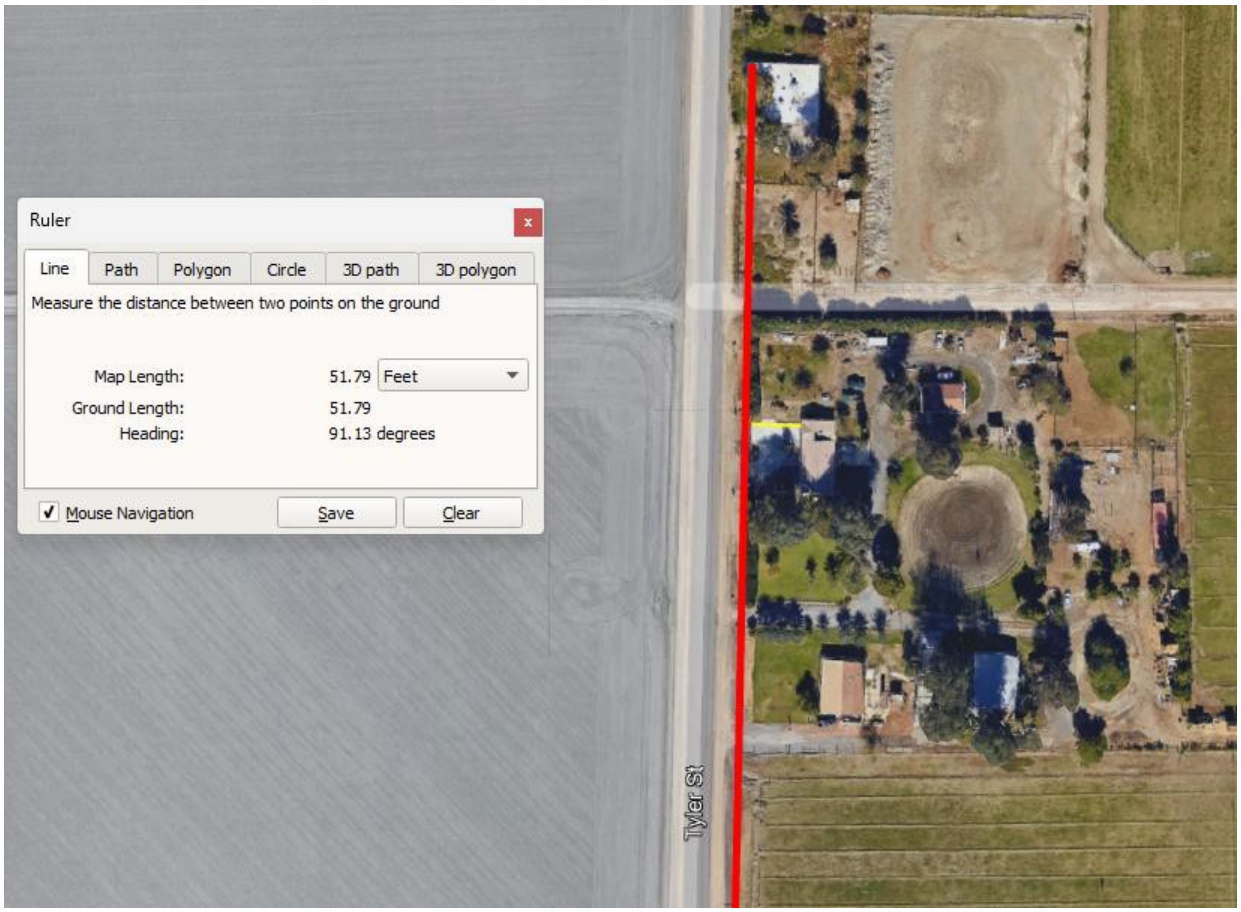


Figure 1: Comparison of both 62800 and 62101 Tyler Street to Project Footprint

Figure 2: Street View of 62800 Tyler Street

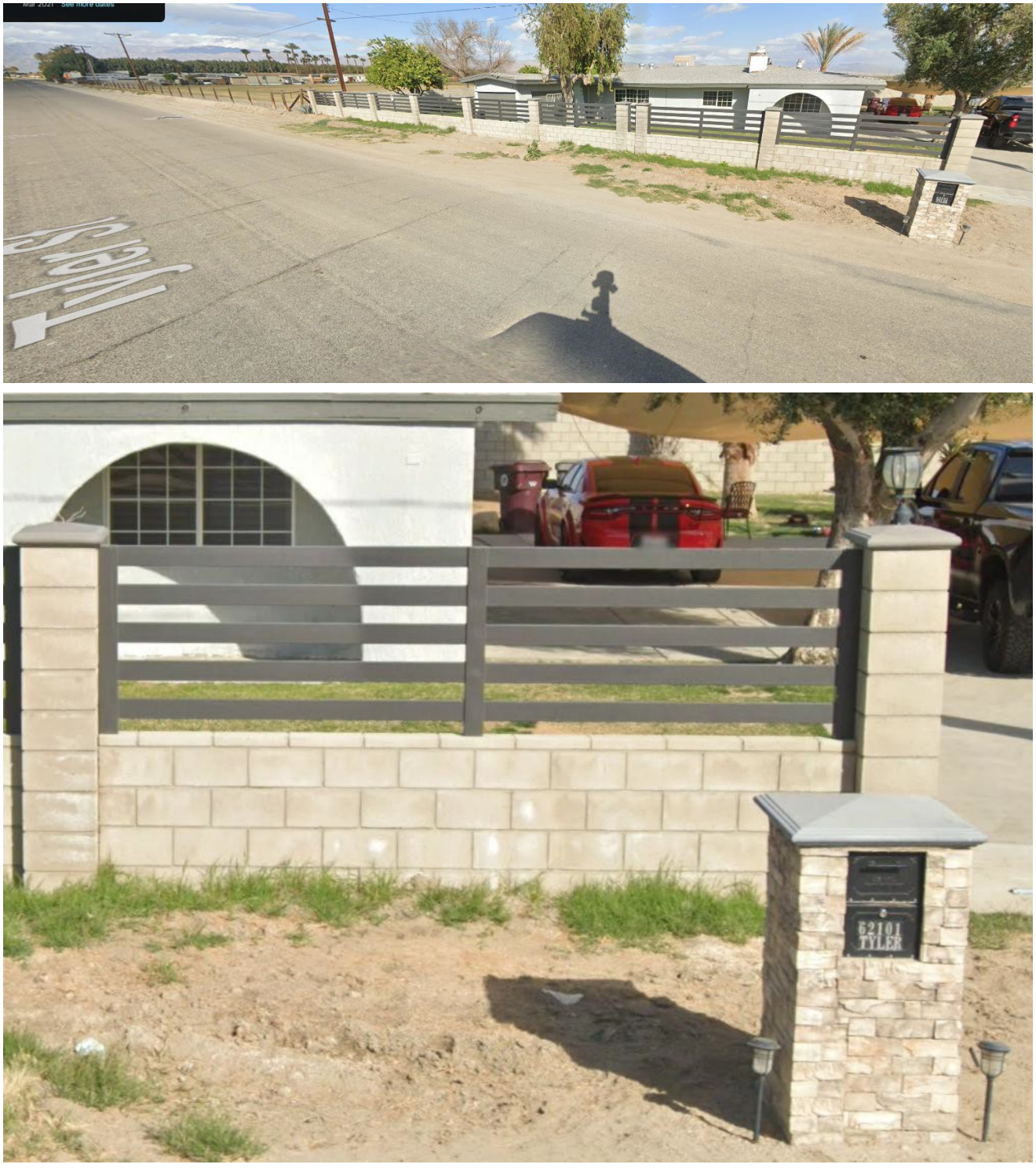


Figure 3: Street View of 62101 Tyler Street

Response to Comments C-9, C-26, and C-27

This comment is in response to my previous comment that the EIR's noise analysis underestimated the time HVAC systems would run under worst-case conditions in the notoriously hot Coachella Valley region. The FEIR

asserts that “continuous operation of Project HVAC systems is unreasonable. HVAC systems are designed to cycle on and off for optimal performance and energy efficiency and current California Building Codes are designed for maximum building insulation” (FEIR, page 53).

This statement underestimates the reasonably foreseeable extent of HVAC use at the Project site given regional climate conditions.

While an HVAC system may not run 100 percent of the time, it may run for a full hour or more on hot days. On days that are exceptionally hot, which is common in Thermal CA, as documented in our previous letter, it is reasonable to presume a full hour of continuous air conditioning operation at a time. Under CEQA, project applicants are required to evaluate noise impacts under reasonably foreseeable operating conditions to ensure that potential environmental effects are fully disclosed and mitigated. For HVAC systems, this means estimating noise assuming continuous operation for a foreseeable amount of time, even though such systems would not typically run nonstop. This approach is necessary because CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are “substantial”.[1] Evaluating only average or intermittent operation could underestimate actual impacts during peak conditions—such as extreme heat, which is not uncommon at the project site—when the system may run continuously. Thermal, CA has a desert climate which regularly experiences high heat. For example, climate data shows that Thermal has average summer highs above 110 °F (43 °C) on average 28 days per year, and exceed 120 °F (49 °C) every other year.[2] By failing to analyze HVAC use during reasonably foreseeable high temperature scenarios, the FEIR understates impacts associated with extended HVAC use, and fails to ensure that appropriate mitigation measures are incorporated into the Project to protect local residents and surrounding land uses.

The FEIR also states that the “comment suggesting that an increase 0.1 dBA (45.0 to 45.1 dBA) is significant completely fails to recognize that the existing nighttime ambient noise levels at the nearest noise sensitive receiver locations currently range from 61.1 to 67.4 dBA” (FEIR, page 54). The threshold of significance chosen within the noise analysis was 45 dBA. Our comment was following the County’s own threshold. An impact may be significant if an absolute noise threshold is exceeded, even if the ambient threshold is not exceeded.

The FEIR continues, saying that “CEQA states that for residential projects, the effect of noise generated by project occupants and their guests is not a

significant effect on the environment" (FEIR, page 54). This is immaterial to the HVAC analysis because HVAC's are mechanical equipment installed as Project components. The FEIR's assertion does not affect the finding within our letter. The FEIR also argues that the "HVAC units for residences planned in PA-3 are expected to be pad-mounted, while any roof-top HVAC units would be screened with an acoustical barrier. Furthermore, the east boundary of the project will be bounded by six-foot masonry walls," (FEIR, page 83). The County has not included any analysis to prove that these project features would reduce noise levels below significance thresholds and has not made them mandatory Project components.

As it stands, reasonable usage of an HVAC system at the Project site under regional heat conditions would increase noise levels over the FEIR's chosen significance threshold, as documented in our previous letter. We believe that this is an unreported significant impact and should be corrected with analysis of mitigation. The analysis must detail noise levels before and after implementation of mitigation. And any proposed mitigation must demonstrate that noise levels would be reduced to below the applicable thresholds.

Response C-16: The commenter again raises inaccurate and inappropriate arguments in an effort to demonstrate that residences on the east side of Tyler Street will be adversely impacted by Project operational noise, especially from HVAC operations. It is important to note that excepting future CVWD well sites, Project development on the west side of Tyler Street will be residential. These arguments have already been addressed in detail in Section 2.15 of the Draft EIR and associated Appendix N, the Final EIR and again in these Supplemental Response to Comments in Responses C-2, C-8, C-9, C-25, C-26, C-27 and C-28. The Supplemental Responses to Comments are further supported by the substantial evidence contained in the expert technical memorandum from Urban Crossroads attached hereto as Appendix A, which directly address the assertions in this Comment C-16 from the Wilson Ihring firm and which are incorporated into this response. The Project will not generate any significant, unmitigated noise impacts associated either with its construction or operation.

Comment C-17: **1 The FEIR and reply to Comment C-10 fail to comply with CEQA and Riverside County's General Plan**

To achieve its agenda of converting 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, without mitigation, the FEIR reply comment C-10 deliberately confuses ongoing and predicted

irrigation water shortages with an alleged inability, or uselessness, of mitigation through an agricultural conservation easement (*ACE*). This is contradictory: on the one hand the comment states,

The Coachella Valley does not support dry dirt farming, and all crops are reliant upon limited and precious groundwater and primarily imported Colorado River water.

Then the comment develops its water-shortage argument:

The DEIR and consultations with CVWD warn of increasing water scarcity facing regions dependent on Colorado River water. As climate change and other factors have put an increasing strain on water supplies, agriculture remains the largest consumer use of water in California. The question facing farmers served by Colorado River water is when the subject long-term drought may cease, and whether adequate and stable water supplies will return in the future.

It is significant here that the reply comment wonders when the long-term drought will end so that stable water supplies will return in the future because such qualitative reasoning is speculation, not a logical argument about the instant issue. The only supported conclusion that can be made about drought is that California (and the West as a whole) has a long-term history of periodic droughts alternating with non-drought conditions.

Then the reply to comment C-10 takes a contradictory turn to argue for the viability of agriculture in the Coachella Valley:

Moreover, it is arguable that, in the long-term, reduced demand for agricultural irrigation water may benefit other existing farm operations by improving the availability of Colorado River water and reducing pressure on increased costs of irrigation water. In this respect, the subject conversion may serve to make agricultural use elsewhere in the Coachella Valley more financially viable, as recognized by Riverside County numerous General Plan policies.

This is a statement about land elsewhere in the Coachella Valley. The FEIR implicitly argues that the project's conversion of agricultural land, if not mitigated, would somehow benefit long-term agricultural production in the Coachella Valley. This argument is non-sensical. The argument for conserving remaining agricultural land in Coachella Valley, far from the subject, does not in any logical way lead to a conclusion of the infeasibility or nonutility of mitigating for agricultural land lost to the subject project, because it is an orthogonal issue. Moreover, conserving other land

elsewhere in the Coachella Valley would not in any way exacerbate any existing water shortage or even affect it, as the conserved land would be in existing agricultural use—but the FEIR presents it as such:

These facts would support a conclusion by the County Board of Supervisors that requiring agricultural conservation easements as mitigation is infeasible for policy reasons (not just economic reasons), as well as being insufficient to substantially reduce the project's impacts to a level of less than significant.

In actuality, per CEQA, Riverside County is obliged to mitigate this significant impact to the greatest extent feasible. The FEIR has not only failed to demonstrate it is infeasible to do so, but has actually admitted very clearly in its reply to comment C-10 that its general plan has as an objective that requires "the preservation of the physical and economic integrity of agricultural lands".[1] It is inarguable that losing 619 acres of important farmland would be inconsistent with this objective, and that preserving 619 acres of agricultural land in the Coachella Valley with an ACE would both meet this general-plan objective and effectively reduce impacts, as required by CEQA. The fact that an ACE may not fully mitigate the loss of farmland does not diminish its ability to mitigate agricultural impacts to the greatest extent feasible.

Throughout California, for decades, cities and counties have obtained ACEs to mitigate the loss of important farmland. To wit, it is the industry-standard means of mitigating the loss of important farmland. To remain consistent with its general plan and to comply with CEQA, Riverside County must obtain an ACE and include it as mitigation for this significant environmental impact of converting 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance.

2 Conclusion

In closing, our review of this project has led us to conclude that the FEIR does not support its conclusion that mitigation by ACE is infeasible. Available evidence supports the opposite conclusion: mitigation of agricultural-land loss is feasible. Mitigation is an offset to impacts, not a cancellation of impact, as the FEIR incorrectly asserts. The County's conclusion also contradicts our understanding of CEQA requirements as established by California court precedent (see *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412.). This project's conversion of agricultural land must be mitigated.

Response C-17: The commenter appears to refute the substantial scientific evidence that the southwestern US is in a long-term drought that is exacerbated and prolonged by ongoing heating of the planet and climate change. The circumstances faced by growers in the Coachella Valley and other desert regions that require irrigation to grow crops are widely acknowledged and are being acted upon by water managers, including CVWD, and state and federal agencies. Over the past several decades, CVWD and its water management partner Desert Water Agency have secured additional long-term sources of water the delivery of which is largely contingent upon improved, dependable flows along the Colorado River. These agencies' assessment of near and long-term circumstances has encouraged implementation of additional conservation measures. It is nonetheless correct that reductions in the use of Colorado River water at the Project site could conceivably free up supplies for other growers in the valley. The bottom line is that in drought conditions, there is not sufficient water from the Colorado River to supply all existing agricultural uses in the Coachella and Imperial Valleys, which is why farmers are being paid not to farm their land as a means of reducing overall demand for the limited Colorado River water supplies during extreme drought conditions. These Colorado River water supply concerns are thoroughly documented in CVWD and IID plans, including the CVWD Colorado River Water Agricultural Water Conservation Plan (Dec. 2021), the Lower Colorado Conservation and Efficiency Program and the associated CVWD Board Resolution No. 2024-08, and the Imperial Irrigation District Water & QSA 2024 Implementation Report, which documents are incorporated by this reference.

The County maintains that an agricultural conservation easement would be impractical and undesirable due to policy considerations in this instance. 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), 15364). 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. Because feasibility ultimately is a policy judgment, a lead agency's conclusion regarding feasibility is owed deference. (***Yerba Buena Neighborhood Consortium, LLC v. Regents of Univ. of Cal***. (2023) 95 Cal.App.5th 779, 809). Here, the commenter asserts that a reliance on policy goals of reducing reliance on Colorado River water is not valid because drought conditions are cyclic and any conserved land would already be in existing agricultural use. However, the policy goal of reducing reliance on Colorado River water and achieving long-term water

reliability for all uses is grounded in substantial evidence beyond cyclic drought conditions, as described in the CVWD and IID documents referenced above. Water conservation measures are meant to address not only drought, but also a long-term structural deficit in the Colorado River system as well as the documented effects of climate change. (*see* FEIR p. 56). Regarding conflicting areas of County policy, including General Plan endorsements of conservation easements versus provisions allowing the conversion of up to 7% of land designated as agricultural to facilitate additional housing and economic development, the County's determination as to infeasibility is owed deference. (***Yerba Buena Neighborhood Consortium, LLC v. Regents of Univ. of Cal***. (2023) 95 Cal.App.5th 779, 809). In light of the foregoing, the County is justified in finding that requiring conservation easements over farmland in the eastern Coachella Valley is undesirable and infeasible on policy grounds.

For additional information on Project agricultural lands please also see Draft EIR Section 2.4, Final EIR Responses B-8, C-10 and C-11, and in these Supplemental Response to Comments C-7, C-8 and C-11, above, there is no economically viable or meaningful mitigation to offset the loss of agricultural lands and impacts will be significant and unmitigable. This conclusion is consistent with County General Plan findings for the 2003 and 2015 County General Plan updates.

D. Lozeau Drury LLP, Oct. 21, 2025

Comment D-1: 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 D-1: The County disagrees with the commenter's assertion that expanding Mitigation Measure MM AQ-3 to require Title 24 Tier 1 and Tier 2 voluntary measures is required or would be effective in further substantially reducing the Project's emissions of carbon monoxide (CO), nitrogen oxides (NOx), and reactive organic gases (ROG). CEQA does not require the adoption of mitigation measures that will not avoid or substantially lessen significant environmental impacts (Public Resources Code section 21002). In other words, a proposed measure that may be feasible, or capable of being accomplished in a successful manner within a reasonable period of time, need not be adopted if the proposed measure will not avoid or substantially lessen a significant environmental impact. (*see* 14 CCR section 15364). Here, the commenter provides no evidence to support the conclusion that there will be inadequate EV charging stations at the Project or that requiring additional EV chargers will reduce mobile source emissions. As described on page 2.5-18 of the Draft EIR, compliance with Riverside County's CAP update already requires the installation of EV chargers in all residential garages. Merely requiring additional EV chargers will not effectively reduce mobile source emissions; more resident and visitor use of electric vehicles is the only way to accomplish the desired further reduction in mobile source emissions, and that can only be achieved through consumer choice, not land use regulation. Again, the Draft EIR contains substantial evidence that the County's existing EV charger requirements, along with the Project design features incorporating complimentary land uses and internal multi-modal connectivity, substantially reduces the Project's mobile source emissions to the maximum extent feasible. *See, e.g.,* page 2.5-17 of the Draft EIR, stating that the "*proposed development has already been designed with an extensive internal multi-modal trail network that is intended to enhance onsite connectivity for golf carts, bicycles and pedestrians, thereby reducing the need for vehicle trips within the property.".*

A response that provides a reasoned analysis of the agency's determination that a proposed measure would not be useful is sufficient under CEQA. (*Residents Against Specific Plan 380 v County of Riverside* (2017) 9 Cal.App.5th 941, 971). For the reasons stated above, the County finds that the requirement for additional EV charging stations will not be effective in further substantially reducing the Project's emissions of CO, NOx, and ROG.

Comment D-2: 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 D-2: Comment noted. These same arguments were raised in comments on the Draft and Final EIR and are once again addressed in detail in Draft EIR Section 2.4, Final EIR Responses B-8, C-10 and C-11, and in these Supplemental Response to Comments C-7, C-8 and C-11, above. Moreover, the County is not rejecting the requirement for an agricultural conservation easement because it is economically infeasible as stated in the comment. Rather, the County is rejecting the requirement on policy grounds because the requirement would be inconsistent with the need to further curtail the use of Colorado River water, would be inconsistent with the adopted County General Plan policy allowing for the conversion of limited (up to 7% in every 2 ½ year cycle) conversion of agricultural land for housing and other economic development, and would increase the cost of providing such desired housing and economic development, which the County finds undesirable and unacceptable. This conclusion is also consistent with County General Plan findings for the 2003 and 2015 County General Plan updates.

E. Ivette Zamora Cruz, Oct. 15, 2025

Comment E-1: 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.

Response E-1: The proposed Project would result in the development of a wide range of housing types and affordability, including up to 500 units of workforce housing and the generation of up to 1,400 full and part-time jobs. Both the Project equestrian center and future retail center will also provide small business opportunities ranging from equestrian services and goods, to restaurants, salons and other commercial services that can be entry level business and employment opportunities for the local population. In short, the Project could be an important economic engine that could enhance economic opportunities for existing residents of the area.

Comment E-2: 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.

Response E-2: Based on the detailed analysis of potential health effects addressed in the Draft and Final EIR and related responses to comments, the Project will not significantly impact surrounding communities or result in a disproportionate exposure to environmental hazards. The Draft EIR analyzed such local exposure to soil contamination, air pollution and water quality, and determined that the Project would not have any significant environmental effects on the surrounding community. Moreover, the entire Project site has been in active cultivation for decades and there are essentially no ecological resources on the site. It is important to note that any adverse impacts the Project could generate would be first and most substantially experienced by residents of the proposed Project. The developer and the future residents and business owners will have a vested interest in protecting local water and air resources.

F. Athens Marron, Oct. 21, 2025 (No CEQA response required)

G. Allyson Jeffredo, Oct. 20, 2025

Comment G-1: Based on the project's Environmental Impact Report, the project poses substantial threats to the Thermal and larger communities where the full risks and consequences cannot be fully evaluated or understood until the project is developed. Because of this, the cumulative impacts of this project are not and cannot be fully realized without putting the Thermal community at great risk. Noteworthy impacts include but are not limited to:

- Threats to the environment with increased traffic and incredible amounts of expected animal waste
- Strains on public utilities infrastructure, such as water, waste management, 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 is going to drastically change the landscape of the primarily agricultural and rural Eastern Coachella Valley, which is in direct opposition to the County's own General Plan especially those elements in the Chapter 10: Healthy Communities Element, includes Environmental Justice that states, "The policies in the Healthy Communities Element are intended to address Riverside County's key health issues and challenges with the goal of fostering the overall health and well-being of Riverside County residents. In addition, particular attention is paid to those residents who are considered especially vulnerable to public health risks, including children, the elderly, the disabled, and those in poverty." Based on Census data, the Thermal community is likely to fall within the purview of a community the County has identified it will pay close attention to:

- 12% are children 0 – 19 years of age
- 12% are 65 years or older; 69% of that group is 85 years or older
- 21.5% are considered disabled 30% are those experiencing poverty

Response G-1: First, it should be noted that the full risks and consequences of the proposed Project, including cumulative impacts, have fully evaluated, are well understood and do not require Project development before impacts are known. Potential issues associated with Project traffic and waste management have been thoroughly analyzed and mitigated. Rather than

strain existing infrastructure, the project will result in major investments in water, sewer and electric infrastructure.

The proposed Project is not the first to propose conversion of agricultural lands to non-agricultural uses, including the Thermal Club, the approved Thermal Beach Club and other parts of the approved Kohl Ranch Specific Plan, as well as the Jacqueline Cochran Regional Airport. The EIR analysis also indicates that the Project will not increase local health risk or challenges. Finally, as discussed in detail in Section 2.16: Population, Housing and Environmental Justice, the challenging economic conditions, including a relatively low tax base, in the east valley are well understood. The proposed Project and various efforts of the County are expected to improve economic conditions for local residents, not worsen them as stated in the comment.

Comment G-2: Additionally, this project will convert agricultural land to commercial use in an area that is in no way equipped or retrofitted for this type of development. Among many points in the General Plan this project does not align with, I would like to specifically outline the General Plan element Countywide Land Uses HC 2.1.b that outlines, “Directing new growth to existing, urbanized areas while reducing new growth in undeveloped areas of Riverside County.” This project will draw from limited resources and rely on public infrastructure that is already underinvested that includes but is not limited to:

- Significant burden on water resources with a 5-million-gallon water storage reservoir that will divest public water for private use
- Significant burden on the electrical grid that will require the investment and installation of a power grid
- Production of tons of animal waste byproduct with no comprehensive plan for waste maintenance and removal

Approval of this project will be in direct opposition of H.C. 1.2, “Promote an understanding of the connections between the built environment and the on-going health challenges in Riverside County.” The Environmental Impact Report itself, along with numerous community members, has outlined many impacts this project will have on the Thermal and larger community that will no doubt impact ongoing health challenges and the overall communities’ safety and wellbeing.

Response G-2: Please see Response G-1, above. The Project area is already in transition and has been for almost two decades. The Project is a master planned mixed-use community that will have a complementary mix of residential,

commercial, and recreational uses that provide local services and limit off-site travel. The site is on the urbanizing edge of development and substantial utility infrastructure has already been built. The Project will also construct new water, sewer and electric infrastructure that only a portion of which will serve the development, and the balance will be available to meeting both existing and future needs of the surrounding community. Many of the ongoing health challenges of the area are associated with poor air quality affected primarily by land cultivation and other ground-disturbing activities. Tainted groundwater is being addressed through new CVWD wells in areas where groundwater is not contaminated, transmission facilities, and connections to the nearby CVWD WRP 4 water reclamation plant.

H. Francisco Carrillo, Oct. 22, 2025 (No CEQA response required)

I. Geena Vescial, Oct. 21, 2025 (No CEQA response required)

J. Cecilia Lemus, Oct. 21, 2025 (No CEQA response required)

K. Taylor Brown, Oct. 10, 2025 (No CEQA response required)

APPENDIX A

Noise Technical Memorandum,

Thermal Ranch Specific Plan Response to Noise Comments

Prepared by William Lawson, P.E., INCE, Urban Crossroads, Inc.

October 29, 2025

TECHNICAL MEMORANDUM

DATE: November 4, 2025
TO: John Criste, Terra Nova Planning & Research Inc.
FROM: Bill Lawson, Urban Crossroads, Inc.
JOB NO: 14497-07 NA RTC

SUBJECT: THERMAL RANCH SPECIFIC PLAN NOISE RESPONSE TO COMMENTS

Urban Crossroads, Inc. has completed the following Noise Response to Comments for the Thermal Ranch Specific Plan (Project), which is located south of Avenue 62, east of Harrison Street, and west of Tyler Street in the Thermal area of the County of Riverside. On January 24, 2025, Urban Crossroads, prepared a detailed response to the comments from Wilson Ihrig on behalf of Adams Broadwell Joseph and Cardozo of Californians Allied for a Responsible Economy – January 10, 2025. As a follow up to our first response letter, Wilson Ihrig prepared a second comment letter on October 21, 2025. This technical memorandum has been prepared in response to the second January 24, 2025 comment letter included in Appendix 1.

PROJECT OVERVIEW

On July 24, 2023, Urban Crossroads, Inc. prepared a detailed noise and vibration impact analysis (2023 Noise Study) report for the proposed Thermal Ranch Specific Plan Project. The proposed Project consists of a mix of uses including and centered around a 223-acre equestrian center and related show facilities, including barns, stabling and related equestrian services. Other components of the Thermal Ranch Specific Plan provide a mix of residential neighborhoods including seasonal and year-round workforce housing and RV park facilities, single-family and multi-family lots, and extended stay condominiums. Proposed commercial areas would include a commercial village adjacent to Harrison Street, resort commercial uses near a proposed hotel (150± keys) and supporting commercial uses within the equestrian center.

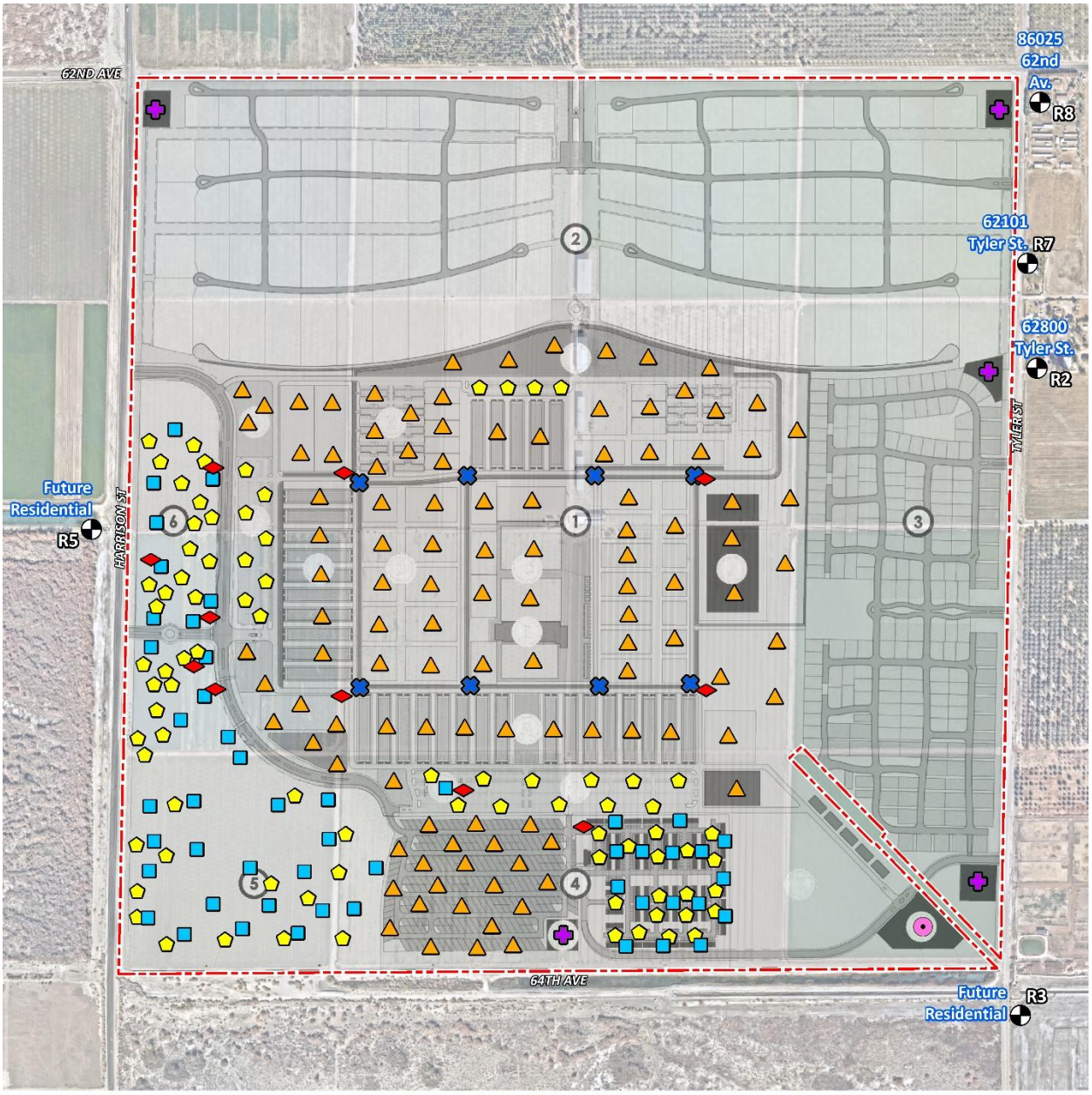
NOISE COMMENT 1:

DEIR Does not Consider All Sensitive Receivers. Missing from sensitive receivers R1 through R6 is 62101 Tyler St, the closest residence to the site. The closest façade at 62101 Tyler is 130 feet from the project instead of the 148 feet at 62800. Additionally, the sensitive residence of Galindo & Leary Ranch at 86025 62nd Ave is also omitted entirely.

RESPONSE TO NOISE COMMENT 1:

According to the second comment letter on October 21, 2025, Wilson Ihrig continues to focus on the distance from the Project site to 62101 Tyler Street but still fails to acknowledge that 62800 Tyler Street is located closer to the Project noise source activities shown on Exhibit 1 below and on Exhibit 10-A of the 2023 Noise Study, and therefore, represents the worst-case sensitive receiver location.

EXHIBIT 1: ADDITIONAL RECEIVER LOCATIONS



Receiver Location R2 at 62800 Tyler Street was intended to describe the existing noise sensitive residential land use east of the Project site. This is consistent with the Wilson Ihrig noise comment stating: *it is sometimes not feasible to list and analyze every receiver, and any noise and vibration analysis involving all three receivers would almost certainly be very similar due to project geometry and conditions.* In addition, a review of the Project land uses shows that the primary source of noise activities are located closer to 62800 Tyler Street. It is important to recognize that the distances shown on Exhibit 9-A represent the distance from each receiver to the Project site boundary. This is shown for illustrative purposes only and is not used to calculate the actual operational noise levels.

Accordingly, the operational noise analysis is based on the distance from each of the 254 individual noise sources presented on Exhibit 1 (Exhibit 10-A of the 2023 Noise Study). The CadnaA operational noise analysis fully considers the distance from individual noise source relative to each receiver location within noise prediction model. When considering the location of the actual operational noise source activities in relation to the noise sensitive residential land uses east of the Project site, Receiver Location R2 at 62800 Tyler Street represents the worst-case sensitive receiver location. To show that Receiver Location R2 represents the worst-case noise condition, two additional receiver locations were added as shown on Exhibit 1 to assess the noise levels at 62101 Tyler Street and 86025 62nd Avenue.

Exhibit 1 shows that these two new receivers labeled R7 and R8, are located further away from the operational noise source activities when compared to receiver location R2. However, to fully describe the operational noise source levels at each of these receiver locations, the Project operational noise levels were calculated for receivers R7 and R8. As shown below on Table 1, the daytime operational noise levels of 42.4 dBA L_{eq} at R2 are higher than the calculated daytime noise levels of 41.5 dBA L_{eq} for receiver location R7 and 39.7 dBA L_{eq} for receiver location R8. In addition, Table 1 shows that the nighttime operational noise levels at R2 are higher than the calculated nighttime noise levels for receiver locations R7 and R8. The CadnaA noise analysis shows that the operational noise levels are higher at receiver R2, than at either 62101 Tyler Street or 86025 62nd Avenue (receivers R7 and R8).

TABLE 1: OPERATIONAL NOISE LEVELS

Receiver Location[1]	Address	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R2	62800 Tyler St.	42.4	36.0	55	45	No	No
R7	62101 Tyler St.	41.5	34.9	55	45	No	No
R8	86025 62nd Av.	39.7	33.8	55	45	No	No

[1] See Exhibit 1 for the receiver locations.
[2] Proposed Project operational noise level CadnaA calculations are included Appendix 1.
[3] County of Riverside General Plan Municipal Code, Section 9.52.040.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Therefore, Table 1 provides evidence demonstrating that receiver location R2 represents the worst-case sensitive receiver. In effect, the noise levels at 62800 Tyler Street are higher than those expected at 62101 Tyler Street and 86025 62nd Avenue consistent with our January 24, 2025, Response to Comments letter. In addition, Table 1 shows the operational noise levels associated with Thermal Ranch Specific Plan Project at 62800 Tyler Street (R2), 62101 Tyler Street (R7) or 86025 62nd Avenue (R8) will not exceed the County of Riverside daytime and nighttime exterior noise standards.

NOISE COMMENT 2:

Operational Noise Includes Optimistic Assumptions. Source levels and assumptions for the air conditioning units and state that HVAC units are estimated to operate for an average of 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. This may not be realistic for conditions in the Project vicinity. The County's failure to analyze the impacts that would result from continuous operation of the HVAC system could underestimate the Project's nighttime noise levels by close to 50%, which would result in a potentially significant impact that the DEIR failed to analyze or disclose.

RESPONSE TO NOISE COMMENT 2:

Tables 2 and 3 present the operational noise levels associated with the HVAC units shown on Exhibit 1. The HVAC operating assumptions are based on reference noise level measurement data collected over a period of 96 hours. It is important to recognize that HVAC systems cycle on and off for several hours daily, depending on factors like outdoor temperatures, thermostat settings, insulation, and system efficiency. Continuous operation is unreasonable because it significantly increases energy costs, leading to high utility bills. HVAC systems are designed to cycle on and off for optimal performance and energy efficiency. In addition, it is unreasonable to assume that all 50 HVAC units are operating continuously for all hours of day and night. During any given time, a portion of these HVAC will be cycled off.

The October 21, 2025, Wilson Ihrig comment letter, insists despite the evidence outlined above, the HVAC systems will operate during the full hour for hot summer days. While we maintain that HVAC systems are designed to cycle on and off for optimal performance and energy efficiency, we have nevertheless evaluated the noise level impacts when all the HVAC systems are operating continuously for the full 60 minutes during the daytime and nighttime hours. Table 2 presents the individual noise source activity levels that make up the overall Daytime Project Operational Noise Levels from the 2023 Noise Study. Table 2 shows that the 2023 Noise Study calculated the daytime HVAC activities at the nearest noise sensitive receiver R2 at 28.8 dBA L_{eq}. Table 3 shows that changing the HVAC daytime operating minutes from 39 minutes to the full 60 minutes increases the daytime noise levels at R2 to 30.7 dBA L_{eq}. While the noise levels associated with HVAC activities may increase, the overall daytime noise levels will result in only a 0.1 dBA L_{eq} daytime overall noise increase (42.3 dBA L_{eq} to 42.4 dBA L_{eq}) at the nearest noise sensitive receiver location R2. The noise level impacts due to increased minutes of HVAC activity do not meaningfully change the overall composite Project operational noise levels since the Horse Park and public address system represent the primary sources of noise Project noise activities.

TABLE 2: DAYTIME PROJECT OPERATIONAL NOISE LEVELS (2023 NOISE STUDY)

Noise Source	Operational Noise Levels by Receiver Location (dBA Leq)
	R2
Horse Park Activities	39.4
Public Address System	38.0
CVWD Well Site	24.7
IID Substation	14.1
Air Conditioning Units[1]	28.8
Trash Enclosure Activity	24.3
Parking Lot Vehicle Activity	26.6
Total (All Noise Sources)	**42.3**

[1] Represents 39 minutes of hourly activity during the daytime hours.

TABLE 3: DAYTIME PROJECT OPERATIONAL NOISE LEVELS (FULL HVAC ACTIVITY)

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)
	R2
Horse Park Activities	39.4
Public Address System	38.0
CVWD Well Site	24.7
IID Substation	14.1
Air Conditioning Units[2]	30.7
Trash Enclosure Activity	24.3
Parking Lot Vehicle Activity	26.6
Total (All Noise Sources)	**42.4**

[1] Represents 60 minutes of continuous hourly activity during the daytime hours.

Table 3 shows that the 2023 Noise Study calculated the nighttime HVAC activities at the nearest noise sensitive receiver R2 at 26.4 dBA L_{eq}. Table 3 shows that changing the HVAC nighttime operating minutes from 28 minutes to the full 60 minutes increases the nighttime noise levels at R2 to 29.7 dBA L_{eq}. While the noise levels associated with HVAC activities may increase, the overall nighttime noise levels will result in a 0.6 dBA L_{eq} nighttime noise increase (35.4 dBA L_{eq} to 36.0 dBA L_{eq}) at the nearest noise sensitive receiver location R2. The noise level impacts due to increased minutes of HVAC activity do not meaningfully change the overall composite Project operational noise levels. The calculated HVAC daytime noise increases of 0.1 and 0.6 dBA L_{eq} are considered "barely perceptible" and will likely be overshadowed by the existing ambient noise levels. The calculated HVAC daytime noise increase of 0.1 and 0.6 dBA L_{eq} represents are "barely perceptible" impact. Increasing the minutes of HVAC activities does not result in any changes to the findings of 2023 Noise Study. Therefore, the daytime and nighttime operational noise levels with continuous HVAC activity will not exceed the County of Riverside daytime and nighttime exterior noise level standards.

TABLE 3: NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS (2023 NOISE STUDY)

Noise Source	Operational Noise Levels by Receiver Location (dBA Leq)
	R2
Horse Park Activities	33.6
Public Address System	0.0
CVWD Well Site	24.7
IID Substation	14.1
Roof-Top Air Conditioning Units[1]	26.4
Trash Enclosure Activity	18.6
Parking Lot Vehicle Activity	25.6
Total (All Noise Sources)	**35.4**

[1] Represents 28 minutes of hourly activity during the nighttime hours.

TABLE 4: NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS (FULL HVAC ACTIVITY)

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)
	R2
Horse Park Activities	33.6
Public Address System	0.0
CVWD Well Site	24.7
IID Substation	14.1
Roof-Top Air Conditioning Units[2]	29.7
Trash Enclosure Activity	18.6
Parking Lot Vehicle Activity	25.6
Total (All Noise Sources)	**36.0**

[1] Represents 60 minutes of continuous hourly activity during the nighttime hours.

APPENDIX 1:

THERMAL RANCH SPECIFIC PLAN COMMENTS ON NOISE ANALYSIS

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WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.43

October 21, 2025

Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: Thermal Ranch FEIR
Riverside County, California
Review and Comment on Noise Analysis

Dear Ms. McGuire,

Per your request, we have reviewed the Final Environmental Impact Report (FEIR) for the Thermal Ranch Specific Plan, state clearinghouse number 2023050624. The responses to our comments are contained in comments C-2, C-8, C-9, C-24, C-25, C-26, C-27, and C-28. These comments are a response to a letter regarding our concerns with the project, dated January 10th, 2025.

Response to Comments C-2 and C-25

These comments respond to my previous comment that not all worst-case sensitive recievers were analyzed, notably 62101 Tyler Street. The FEIR reaffirms that the City omitted this residence from its impact analysis, stating "the Project noise analyst identified the closest residence on the east side of Tyler Street, which is identified in the DEIR as R2" (FEIR, page 38). And that receiver location "R2 at 62800 Tyler Street was intended to describe the nearest existing noise sensitive residential land use immediately east of the Project site" (FEIR, page 81).

There is no evidence provided that shows 62800 Tyler Street is the closest or worst-case reciever, especially when compared to 62101 Tyler Street. ***Figure 1*** below compares the footprint of the Project to both single-family resdnces. 62101 Tyler Street is on the top, with a red line drawn at the closest façade to the Project. The line travels south, and is roughly 50 feet west of the closest façade of 62800 Tyler Street. ***Figure 3*** and ***Figure 2*** show each of the two sites, resepctivley, where it can be seen that both are single family residences that need to be considered.

The FEIR states that when "considering the location of the actual operational noise source activities in relation to the noise sensitive residential land uses east of the Project site, Receiver Location R2 at 62800 Tyler Street represents the worst-case sensitive receiver location" (FEIR, page 82). The operational noise sources are clustered more to the southern edge of the site. However, with the large distances from the operational noise sources, it is likely that 62101 Tyler Street will experience louder noise levels due to being closer to the noise sources to the west, resulting in a potenitally significant noise impact that the County has not addressed. Since the FEIR did not consider noise impacts to 62101 Tyler Street, the conclusion that noise impacts on local residents would be either less than significant, or fully mitigated, lacks support. The EIR should be amended to include this site as a reciever to verify that there are no unreported significant operational noise impacts.

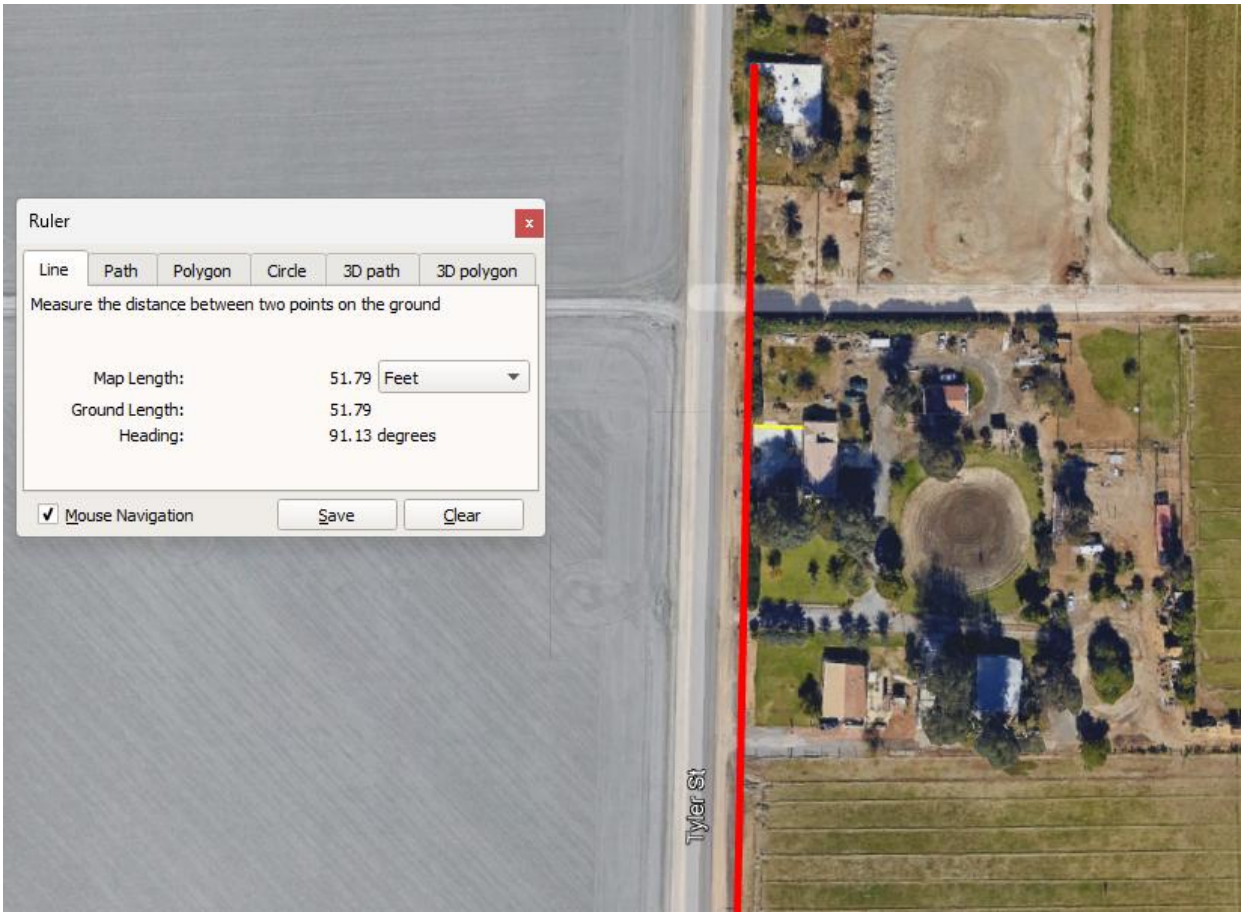

Figure 1: Comparison of both 62800 and 62101 Tyler Street to Project Footprint

Figure 2: Street View of 62800 Tyler Street

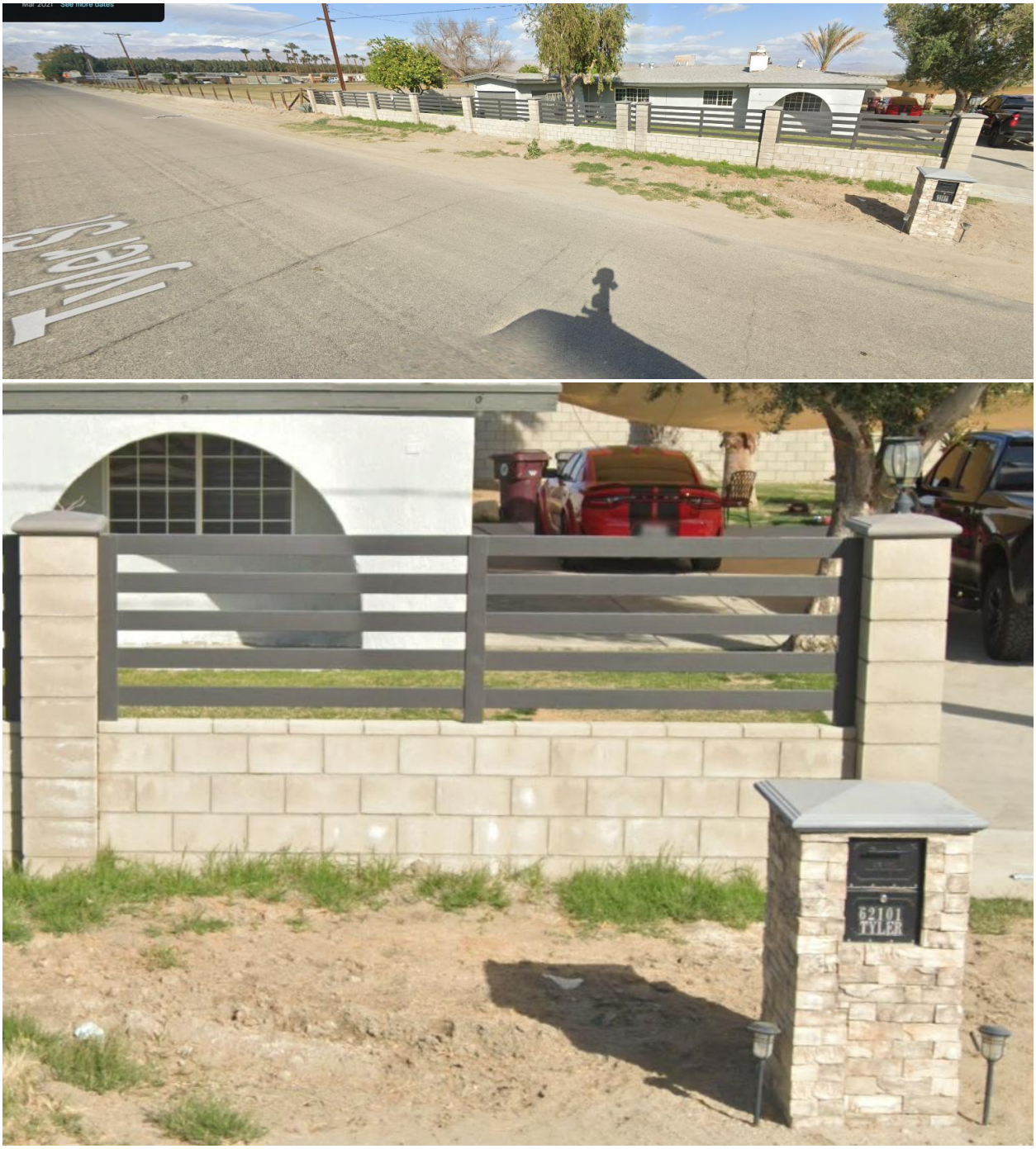

Figure 3: Street View of 62101 Tyler Street

Response to Comments C-9, C-26, and C-27

This comment is in response to my previous comment that the EIR's noise analysis underestimated the time HVAC systems would run under worst-case conditions in the notoriously hot Coachella Valley region. The FEIR asserts that "continuous operation of Project HVAC systems is unreasonable. HVAC systems are designed to cycle on and off for optimal performance and energy efficiency and current California Building Codes are designed for maximum building insulation" (FEIR, page 53).

This statement underestimates the reasonably foreseeable extent of HVAC use at the Project site given regional climate conditions.

While an HVAC system may not run 100 percent of the time, it may run for a full hour or more on hot days. On days that are exceptionally hot, which is common in Thermal CA, as documented in our previous letter, it is reasonable to presume a full hour of continuous air conditioning operation at a time. Under CEQA, project applicants are required to evaluate noise impacts under reasonably foreseeable operating conditions to ensure that potential environmental effects are fully disclosed and mitigated. For HVAC systems, this means estimating noise assuming continuous operation for a foreseeable amount of time, even though such systems would not typically run nonstop. This approach is necessary because CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are "substantial".[1] Evaluating only average or intermittent operation could underestimate actual impacts during peak conditions—such as extreme heat, which is not uncommon at the project site—when the system may run continuously. Thermal, CA has a desert climate which regularly experiences high heat. For example, climate data shows that Thermal has average summer highs above 110 °F (43 °C) on average 28 days per year, and exceed 120 °F (49 °C) every other year.[2] By failing to analyze HVAC use during reasonably foreseeable high temperature scenarios, the FEIR understates impacts associated with extended HVAC use, and fails to ensure that appropriate mitigation measures are incorporated into the Project to protect local residents and surrounding land uses.

The FEIR also states that the "comment suggesting that an increase 0.1 dBA (45.0 to 45.1 dBA) is significant completely fails to recognize that the existing nighttime ambient noise levels at the nearest noise sensitive receiver locations currently range from 61.1 to 67.4 dBA" (FEIR, page 54). The threshold of significance chosen within the noise analysis was 45 dBA. Our comment was following the County's own threshold. An impact may be significant if an absolute noise threshold is exceeded, even if the ambient threshold is not exceeded.

The FEIR continues, saying that "CEQA states that for residential projects, the effect of noise generated by project occupants and their guests is not a significant effect on the environment" (FEIR, page 54). This is immaterial to the HVAC analysis because HVAC's are mechanical equipment installed as Project components. The FEIR's assertion does not affect the finding within our letter. The FEIR also argues that the "HVAC units for residences planned in PA-3 are expected to be pad-mounted, while any roof-top HVAC units would be screened with an acoustical barrier. Furthermore, the east boundary of the project will be bounded by six-foot masonry walls," (FEIR, page 83). The County has not included any analysis to prove that these project features would reduce noise levels below significance thresholds and has not made them mandatory Project components.

As it stands, reasonable usage of an HVAC system at the Project site under regional heat conditions would increase noise levels over the FEIR's chosen significance threshold, as documented in our previous letter. We believe that this is an unreported significant impact and should be corrected with analysis of mitigation. The analysis must detail noise levels before and after implementation of

[1] CEQA Appendix G, Section 13 (Noise Impacts).
[2] See NOAA Climate data for Thermal, California, 1950-present, available at https://en.wikipedia.org/wiki/Thermal,_California (10/21/25).

mitigation. And any proposed mitigation must demonstrate that noise levels would be reduced to below the applicable thresholds.

Very truly yours,
WILSON IHRIG

Jack Meighan
Associate

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

JACK MEIGHAN

Associate

Jack joined Wilson Ihrig in 2021 and is an experienced acoustics engineer with expertise in projects involving rail transit systems, highways, CEQA analysis, environmental noise reduction, mechanical drawing reviews, and construction noise and vibration mitigation. He has hands-on experience with project management, including client coordination and presentations, as well as in designing, developing, and testing MATLAB code used in acoustics applications. Additionally, his expertise includes taking field measurements, developing test plans and specifying, purchasing, setting up and repairing acoustic measurement equipment. He has experience in using Traffic Noise Model (TNM), CadnaA, EASE, Visual Basic, LabView, and CAD software.

Education

- B.S. in Mechanical Engineering, University of Southern California, Los Angeles, CA

Project Experience

Metro Regional Connector, Los Angeles CA
Planned, took, and processed measurements as part of a team to determine the effectiveness of floating slab trackwork for a new subway in downtown Los Angeles that travels below the Walt Disney Concert Hall and the Colburn School of Music.

Rodeo Credit Enterprise CEQA Analysis for New Construction, Palmdale, CA
Wrote an accepted proposal and executed it for a noise study project to determine noise mitigation requirements on a new housing development. Led all aspects of the project and managed the budget during all phases of project completion. Completed 5 separate projects of this type for this developer.

Blackhall Studios, Santa Clarita, CA
Led the vibration measurement effort for a new soundstage directly adjacent to an existing freight and commuter rail line. Tested equipment, processed data, and analyzed results to determine the vibration propagation through the soil to the proposed soundstage locations, and was part of the team that developed mitigation techniques for the office spaces directly next to the rail line.

Octavia Residential Condos CEQA Study, San Francisco, CA
Calculated the STC ratings for the proposed windows to meet Title 24 requirements, modeled the acoustic performance of floor and ceiling structures, researched noise codes, helped with a mechanical design review, and wrote a report summarizing the results for a new Condominium project being developed in San Francisco.

San Diego International Airport Terminal I Replacement, CA
Conducted interior noise and vibration measurements, analyzed measurement data to help determine project criteria, modeled the existing and future terminals in CadnaA, and was part of a team that did a complete HVAC analysis of the entire terminal, as part of a CEQA analysis where a new terminal for the airport is being designed.

Five Points Apartments Noise Study, Whittier, CA
Took measurements, researched sound data and solutions, and recommended mitigation for a new apartment complex that was located next to an existing car wash, as part of a CEQA review.

USC Ellison Vibration Survey, Los Angeles, CA
Conducted vibration measurements as part of a survey to determine the effectiveness of vibration isolation platforms that are used to insulate cell growth in a cancer research facility. Determined the effectiveness and presented this information to the client. Researched and recommended a permanent monitoring system so the client could view data in real time.

TEN50 Condos 'Popping' Noise Investigation, Los Angeles, CA
Was part of a team that investigated the noise source of an unwanted popping noise in luxury condos in Downtown Los Angeles. Helped isolate the noise source location with accelerometers to determine where vibrations were occurring first and used an acoustic camera to determine where in the condo the noise was coming from.

2000 University Project, Berkely, CA
Wrote a construction noise monitoring plan based on environmental noise calculations, wrote a report summarizing the results, and attending a meeting with the client to discuss options.

Bay Area Rapid Transit (BART) On-Track, CA, San Francisco Bay Area, CA*
Day to day project manager, responsible for meetings, presentations, and coordination with the client for an ongoing noise study on the BART system. Developed MATLAB code to process measurements and determine areas where high corrugation was present, contributing to excessively high in-car noise levels. Performed noise measurements inside both the right of way and the vehicle cabin, in addition to rail corrugation measurements.

California I-605/SR-60 Interchange Improvement, Los Angeles, CA*
Developed a noise model of the area that predicted sound levels for abatement design, in addition to conducting noise measurements and analysis. Led the Team in use of the FHWA Traffic Noise Model Software for the project, involving three major highways and two busy interchanges extending over 17 miles in southern California.

Sound Transit On-Track, Seattle, WA*
Took measurements, fixed equipment, and developed software in MATLAB to process Corrugation Analysis Trolley measurements as part of an ongoing noise study on the Sound Transit Link system. Tested vibration data to determine the best measurement and processing techniques to store the data in an online database for in-car measurements.

LA Metro CRRC Railcar Testing, Los Angeles, CA*
Led the effort to plan the measurements, determine measurement locations and finalize the test plan. Formulated a method to capture speed data directly from legacy train vehicles. Executed noise and vibration specification measurements for new rail cars delivered by CRRC.

City of Los Angeles, Pershing Square Station Rehabilitation Noise Monitoring, CA*
Built noise models, wrote a construction noise plan, and assisted in on-site construction noise issues as they arose for a renovation of the Pershing Square metro station in downtown Los

Angeles. Trained construction personnel in techniques for noise reduction and how to conduct noise monitoring measurements to meet project specifications.

City of Orange Metrolink Parking Garage Construction Monitoring, CA*
Wrote an adaptive management vibration monitoring plan, set up equipment to monitor live vibration levels, and generated weekly reports as part of an effort to build a new parking garage. Designed, planned, and completed measurements to predict and mitigate pile driving construction impacts at three historic building locations adjacent to the construction site. Coordinated with the client whenever an on-site problem arose.

LA Metro Westside Subway Construction, Los Angeles, CA*
Planned, organized, and processed noise measurements for the Purple Line extension construction. Implemented both long term microphones to measure noise levels and accelerometers to measure vibration levels in existing subway tunnels. Oversaw noise monitoring at sensitive construction sites for the project and worked with the contractor to find ways to reduce construction noise levels by approximately 10dB.

Montreal Réseau Express Métropolitain, Canada*
Conducted vibration propagation measurements used to create models to predict operational vibration levels for an under-construction transit line. Managed equipment, solved problems in the field, and wrote parts of the report summarizing the findings of the acoustic study.

NHCRP Barrier*
Took on-highway measurements and wrote, designed, developed, and tested MATLAB code to identify specific spectrograms to use for analyses for a project evaluating barrier reflected highway traffic noise differences in the presence of a single absorptive or reflective noise barrier.

Siemens Railcar Testing for Sound Transit, Seattle, WA*
Measured in-car noise and vibration for new rail cars delivered by Siemens. Developed new internal techniques for measurements based on the written specifications. Contributed to the team that helped identify issues that new cars had in meeting the Sound Transit specifications for noise and vibration. Participated in developing the test plan and specified then acquired new equipment for the measurement.

Toronto/Ontario Eglinton Crosstown Light Rail, Final Design, Canada*
Assisted in vibration propagation measurements, analysis, and recommendations for mitigation for a 12-mile light-rail line both on and under Eglinton Avenue. Set up and ran equipment for at-grade measurements with an impact hammer for underground measurements with an impact load cell that was used during pre-construction borehole drilling.

APPENDIX 2:

CADNAA OPERATIONAL NOISE CALCULATIONS

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14497 - Thermal Ranch

CadnaA Noise Prediction Model: 14497-07.cna
Date: 27.10.25
Analyst: B. Lawson

Calculation Configuration

Configuration	
Parameter	**Value**
General	
Max. Error (dB)	**0.00**
Max. Search Radius (ft)	**9000.00**
Min. Dist Src to Rcvr	**0.00**
Partition	
Raster Factor	**0.50**
Max. Length of Section (ft)	**3280.80**
Min. Length of Section (ft)	**3.30**
Min. Length of Section (%)	**0.00**
Proj. Line Sources	**On**
Proj. Area Sources	**On**
Ref. Time	
Daytime Penalty (dB)	**0.00**
Recr. Time Penalty (dB)	**5.00**
Night-time Penalty (dB)	**10.00**
DTM	
Standard Height (m)	**0.00**
Model of Terrain	**Triangulation**
Reflection	
max. Order of Reflection	**2**
Search Radius Src	**328.08**
Search Radius Rcvr	**328.08**
Max. Distance Source - Rcvr	**3280.84 3280.84**
Min. Distance Rvcr - Reflector	**3.28 3.28**
Min. Distance Source - Reflector	**0.33**
Industrial (ISO 9613 (1996))	
Lateral Diffraction	**some Obj**
Obst. within Area Src do not shield	**On**
Screening	**Incl. Ground Att. over Barrier**
	Dz with limit (20/25)
Barrier Coefficients C1,2,3	**3.0 20.0 0.0**
Temperature (°F)	**50**
rel. Humidity (%)	**70**
Ground Absorption G	**0.50**
Wind Speed for Dir. (mph)	**6.7**
Roads (TNM)	
Railways (FTA/FRA)	
Aircraft (???)	
Strictly acc. to AzB	

Receiver Noise Levels

Name	M.	ID	Level Lr			Limit. Value			Land Use			Height		Coordinates		
			Day	Night	CNEL	Day	Night	CNEL	Type	Auto	Noise Type			X	Y	Z
			(dBA)	(dBA)	(dBA)	(dBA)	(dBA)	(dBA)				(ft)		(ft)	(ft)	(ft)
RECEIVERS		R01	39.2	33.2	40.8	55.0	45.0	0.0				5.00	a	6583571.86	2162439.75	5.00
RECEIVERS		R02	42.4	36.0	43.8	55.0	45.0	0.0				5.00	a	6587943.06	2159633.60	5.00
RECEIVERS		R03	41.5	37.1	44.2	55.0	45.0	0.0				5.00	a	6587846.04	2155836.73	5.00
RECEIVERS		R04	36.2	31.5	38.7	55.0	45.0	0.0				5.00	a	6587940.35	2153186.05	5.00
RECEIVERS		R05	48.3	45.0	51.8	55.0	45.0	0.0				5.00	a	6582392.19	2158688.40	5.00
RECEIVERS		R06	36.1	31.0	38.3	55.0	45.0	0.0				5.00	a	6579847.12	2161430.84	5.00
RECEIVERS		R07	41.5	34.9	42.7	55.0	45.0	0.0				5.00	a	6587887.97	2160248.73	5.00
RECEIVERS		R08	39.7	33.8	41.4	55.0	45.0	0.0				5.00	a	6587960.50	2161193.62	5.00

Point Source(s)

Name	M.	ID	Result. PWL			Lw / Li			Operating Time			Height		Coordinates		
			Day	Evening	Night	Type	Value	norm.	Day	Special	Night			X	Y	Z
			(dBA)	(dBA)	(dBA)			dB(A)	(min)	(min)	(min)	(ft)		(ft)	(ft)	(ft)
POINTSOURCE		AC01	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583486.01	2157071.79	20.00
POINTSOURCE		AC02	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583781.04	2157101.29	20.00
POINTSOURCE		AC03	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583784.73	2156872.64	20.00
POINTSOURCE		AC04	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583640.90	2156680.87	20.00
POINTSOURCE		AC05	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6584061.32	2156703.00	20.00
POINTSOURCE		AC06	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583932.25	2156463.28	20.00
POINTSOURCE		AC07	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583747.85	2156452.22	20.00
POINTSOURCE		AC08	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583604.02	2156319.45	20.00
POINTSOURCE		AC09	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583434.38	2156481.72	20.00
POINTSOURCE		AC10	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583275.80	2156345.27	20.00
POINTSOURCE		AC11	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583323.74	2156703.00	20.00
POINTSOURCE		AC12	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583106.15	2156489.10	20.00

Name	M.	ID	Result. PWL			Lw / Li			Operating Time			Height		Coordinates		
			Day	Evening	Night	Type	Value	norm.	Day	Special	Night			X	Y	Z
			(dBA)	(dBA)	(dBA)			dB(A)	(min)	(min)	(min)	(ft)		(ft)	(ft)	(ft)
POINTSOURCE		AC13	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582936.51	2156312.08	20.00
POINTSOURCE		AC14	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582722.61	2156407.96	20.00
POINTSOURCE		AC15	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582729.98	2156684.56	20.00
POINTSOURCE		AC16	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582759.49	2156857.89	20.00
POINTSOURCE		AC17	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583010.27	2156809.95	20.00
POINTSOURCE		AC18	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582991.83	2157093.92	20.00
POINTSOURCE		AC19	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582733.67	2157064.41	20.00
POINTSOURCE		AC20	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6586108.12	2156857.89	20.00
POINTSOURCE		AC21	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6586100.75	2156640.30	20.00
POINTSOURCE		AC22	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6586111.81	2156419.03	20.00
POINTSOURCE		AC23	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585967.98	2156249.38	20.00
POINTSOURCE		AC24	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585746.70	2156245.69	20.00
POINTSOURCE		AC25	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585529.12	2156242.01	20.00
POINTSOURCE		AC26	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585481.17	2156592.36	20.00
POINTSOURCE		AC27	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585625.00	2156496.47	20.00
POINTSOURCE		AC28	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585805.71	2156496.47	20.00
POINTSOURCE		AC29	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585956.92	2156492.78	20.00
POINTSOURCE		AC30	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585975.36	2156798.88	20.00
POINTSOURCE		AC31	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585802.02	2156791.51	20.00
POINTSOURCE		AC32	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585625.00	2156798.88	20.00
POINTSOURCE		AC33	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585473.80	2156798.88	20.00
POINTSOURCE		AC34	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585846.28	2156979.59	20.00
POINTSOURCE		AC35	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6585466.42	2156972.21	20.00
POINTSOURCE		AC36	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6584470.68	2157171.36	20.00
POINTSOURCE		AC37	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583264.73	2157348.38	20.00
POINTSOURCE		AC38	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583194.66	2157470.08	20.00
POINTSOURCE		AC39	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582914.38	2157569.66	20.00
POINTSOURCE		AC40	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583054.52	2157709.80	20.00
POINTSOURCE		AC41	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582988.14	2158148.66	20.00
POINTSOURCE		AC42	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583091.40	2158266.67	20.00
POINTSOURCE		AC43	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583061.90	2157938.45	20.00
POINTSOURCE		AC44	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582741.05	2157997.46	20.00
POINTSOURCE		AC45	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582755.80	2158167.10	20.00
POINTSOURCE		AC46	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582800.06	2158469.51	20.00
POINTSOURCE		AC47	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582774.24	2158727.66	20.00
POINTSOURCE		AC48	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582755.80	2158960.00	20.00
POINTSOURCE		AC49	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6583102.46	2158982.13	20.00
POINTSOURCE		AC50	88.9	88.9	88.9	Lw	88.9		900.00	0.00	540.00	20.00	a	6582881.19	2159273.48	20.00
POINTSOURCE		CAR01	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582659.91	2156566.54	5.00
POINTSOURCE		CAR02	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582656.23	2156839.45	5.00
POINTSOURCE		CAR03	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583663.03	2156525.98	5.00
POINTSOURCE		CAR04	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583445.44	2156610.80	5.00
POINTSOURCE		CAR05	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582829.56	2156776.75	5.00
POINTSOURCE		CAR06	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583843.74	2156677.18	5.00
POINTSOURCE		CAR07	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583884.30	2156902.14	5.00
POINTSOURCE		CAR08	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582881.19	2157075.48	5.00
POINTSOURCE		CAR09	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583585.58	2157127.11	5.00
POINTSOURCE		CAR10	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583865.86	2156289.95	5.00
POINTSOURCE		CAR11	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583522.89	2156289.95	5.00
POINTSOURCE		CAR12	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583176.22	2156282.57	5.00
POINTSOURCE		CAR13	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582832.45	2156256.10	5.00
POINTSOURCE		CAR14	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582658.83	2156414.40	5.00
POINTSOURCE		CAR15	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585466.42	2156308.39	5.00
POINTSOURCE		CAR16	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585606.56	2156326.83	5.00
POINTSOURCE		CAR17	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585783.58	2156301.01	5.00
POINTSOURCE		CAR18	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585934.79	2156308.39	5.00
POINTSOURCE		CAR19	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6586052.80	2156448.53	5.00
POINTSOURCE		CAR20	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6586056.49	2156570.23	5.00
POINTSOURCE		CAR21	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585883.16	2156426.40	5.00
POINTSOURCE		CAR22	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585886.85	2156551.79	5.00
POINTSOURCE		CAR23	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585709.83	2156426.40	5.00
POINTSOURCE		CAR24	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585724.58	2156540.73	5.00
POINTSOURCE		CAR25	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585470.11	2156500.16	5.00
POINTSOURCE		CAR26	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6586049.11	2156750.94	5.00
POINTSOURCE		CAR27	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6586034.36	2156905.83	5.00
POINTSOURCE		CAR28	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585890.53	2156806.26	5.00
POINTSOURCE		CAR29	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585717.20	2156769.38	5.00
POINTSOURCE		CAR30	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585706.14	2156913.21	5.00
POINTSOURCE		CAR31	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585543.87	2156832.07	5.00
POINTSOURCE		CAR32	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585374.22	2156765.69	5.00
POINTSOURCE		CAR33	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585370.54	2156905.83	5.00
POINTSOURCE		CAR34	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585149.26	2159520.57	5.00
POINTSOURCE		CAR35	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584994.37	2159520.57	5.00
POINTSOURCE		CAR36	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584835.79	2159520.57	5.00
POINTSOURCE		CAR37	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584669.83	2159520.57	5.00
POINTSOURCE		CAR38	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583013.95	2157971.64	5.00
POINTSOURCE		CAR39	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582936.51	2157934.76	5.00

Name	M.	ID	Result. PWL			Lw / Li			Operating Time			Height		Coordinates		
			Day	Evening	Night	Type	Value	norm.	Day	Special	Night			X	Y	Z
			(dBA)	(dBA)	(dBA)			dB(A)	(min)	(min)	(min)	(ft)		(ft)	(ft)	(ft)
POINTSOURCE		CAR40	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582825.87	2157857.32	5.00
POINTSOURCE		CAR41	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582862.75	2157776.18	5.00
POINTSOURCE		CAR42	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582663.60	2157462.71	5.00
POINTSOURCE		CAR43	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582704.17	2157366.82	5.00
POINTSOURCE		CAR44	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582811.12	2157484.83	5.00
POINTSOURCE		CAR45	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582774.24	2157628.66	5.00
POINTSOURCE		CAR46	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582759.49	2157779.87	5.00
POINTSOURCE		CAR47	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582696.79	2157897.88	5.00
POINTSOURCE		CAR48	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582825.87	2158318.31	5.00
POINTSOURCE		CAR49	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582729.98	2158366.25	5.00
POINTSOURCE		CAR50	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582774.24	2158237.17	5.00
POINTSOURCE		CAR51	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583002.89	2158292.49	5.00
POINTSOURCE		CAR52	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582921.76	2158406.82	5.00
POINTSOURCE		CAR53	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583084.03	2158502.70	5.00
POINTSOURCE		CAR54	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582969.70	2158576.46	5.00
POINTSOURCE		CAR55	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582995.51	2158723.98	5.00
POINTSOURCE		CAR56	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583098.78	2158760.86	5.00
POINTSOURCE		CAR57	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583028.71	2158849.37	5.00
POINTSOURCE		CAR58	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582921.76	2158960.00	5.00
POINTSOURCE		CAR59	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583058.21	2159085.39	5.00
POINTSOURCE		CAR60	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582991.83	2159184.97	5.00
POINTSOURCE		CAR61	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582796.37	2159085.39	5.00
POINTSOURCE		CAR62	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6582729.98	2159207.09	5.00
POINTSOURCE		CAR63	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585838.90	2157215.62	5.00
POINTSOURCE		CAR64	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585687.70	2157064.41	5.00
POINTSOURCE		CAR65	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585573.37	2157211.93	5.00
POINTSOURCE		CAR66	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585422.17	2157071.79	5.00
POINTSOURCE		CAR67	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585326.28	2157219.30	5.00
POINTSOURCE		CAR68	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6585138.20	2157075.48	5.00
POINTSOURCE		CAR69	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584979.62	2157215.62	5.00
POINTSOURCE		CAR70	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584795.22	2157064.41	5.00
POINTSOURCE		CAR71	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584691.96	2157226.68	5.00
POINTSOURCE		CAR72	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584544.44	2157071.79	5.00
POINTSOURCE		CAR73	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6584385.86	2157245.12	5.00
POINTSOURCE		CAR74	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583382.75	2158181.85	5.00
POINTSOURCE		CAR75	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583294.24	2158274.05	5.00
POINTSOURCE		CAR76	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583415.94	2158384.69	5.00
POINTSOURCE		CAR77	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583294.24	2158510.08	5.00
POINTSOURCE		CAR78	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583415.94	2158635.47	5.00
POINTSOURCE		CAR79	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583297.92	2158786.67	5.00
POINTSOURCE		CAR80	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583408.56	2158893.62	5.00
POINTSOURCE		CAR81	84.3	84.3	84.3	Lw	84.3		900.00	0.00	540.00	5.00	a	6583297.92	2159037.45	5.00
POINTSOURCE		HORSE00	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583806.86	2159129.65	5.00
POINTSOURCE		HORSE01	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583803.17	2159435.75	5.00
POINTSOURCE		HORSE01	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584964.87	2156961.15	5.00
POINTSOURCE		HORSE02	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583618.77	2159140.71	5.00
POINTSOURCE		HORSE02	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584647.70	2156964.84	5.00
POINTSOURCE		HORSE03	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583607.71	2159439.43	5.00
POINTSOURCE		HORSE03	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584511.25	2156846.82	5.00
POINTSOURCE		HORSE04	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583308.99	2159317.73	5.00
POINTSOURCE		HORSE04	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584754.65	2156846.82	5.00
POINTSOURCE		HORSE05	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583404.87	2159417.31	5.00
POINTSOURCE		HORSE05	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585090.25	2156857.89	5.00
POINTSOURCE		HORSE06	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583275.80	2159509.50	5.00
POINTSOURCE		HORSE06	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584902.17	2156732.50	5.00
POINTSOURCE		HORSE07	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584164.59	2157215.62	5.00
POINTSOURCE		HORSE07	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584585.01	2156732.50	5.00
POINTSOURCE		HORSE08	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583832.67	2157315.19	5.00
POINTSOURCE		HORSE08	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584337.92	2156732.50	5.00
POINTSOURCE		HORSE09	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583692.53	2157440.58	5.00
POINTSOURCE		HORSE09	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584422.74	2156603.42	5.00
POINTSOURCE		HORSE10	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583828.99	2157547.53	5.00
POINTSOURCE		HORSE10	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585068.13	2156621.86	5.00
POINTSOURCE		HORSE11	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583618.77	2157665.54	5.00
POINTSOURCE		HORSE11	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584754.65	2156603.42	5.00
POINTSOURCE		HORSE12	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583460.19	2157562.28	5.00
POINTSOURCE		HORSE12	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584916.92	2156478.03	5.00
POINTSOURCE		HORSE13	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583408.56	2157787.24	5.00
POINTSOURCE		HORSE13	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584562.88	2156481.72	5.00
POINTSOURCE		HORSE14	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583301.61	2157971.64	5.00
POINTSOURCE		HORSE14	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584315.79	2156492.78	5.00
POINTSOURCE		HORSE15	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584739.90	2156363.71	5.00
POINTSOURCE		HORSE16	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584865.29	2156253.07	5.00
POINTSOURCE		HORSE17	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584655.08	2156238.32	5.00
POINTSOURCE		HORSE18	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584382.17	2156242.01	5.00
POINTSOURCE		HORSE19	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584142.46	2156352.64	5.00
POINTSOURCE		HORSE20	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584160.90	2156584.98	5.00

Name	M.	ID	Result. PWL			Lw / Li			Operating Time			Height		Coordinates		
			Day	Evening	Night	Type	Value	norm.	Day	Special	Night			X	Y	Z
			(dBA)	(dBA)	(dBA)			dB(A)	(min)	(min)	(min)	(ft)		(ft)	(ft)	(ft)
POINTSOURCE		HORSE21	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584194.09	2156817.32	5.00
POINTSOURCE		HORSE22	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584371.11	2156957.46	5.00
POINTSOURCE		HORSE23	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586178.19	2157171.36	5.00
POINTSOURCE		HORSE24	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586130.25	2157481.15	5.00
POINTSOURCE		HORSE25	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586403.15	2157709.80	5.00
POINTSOURCE		HORSE26	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586082.31	2157827.81	5.00
POINTSOURCE		HORSE27	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586414.22	2158034.34	5.00
POINTSOURCE		HORSE28	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586462.16	2158491.64	5.00
POINTSOURCE		HORSE29	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586491.66	2158875.18	5.00
POINTSOURCE		HORSE30	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586532.23	2159273.48	5.00
POINTSOURCE		HORSE31	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586163.44	2158318.31	5.00
POINTSOURCE		HORSE32	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586148.69	2158639.15	5.00
POINTSOURCE		HORSE33	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586152.38	2158853.05	5.00
POINTSOURCE		HORSE34	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585813.09	2158052.77	5.00
POINTSOURCE		HORSE35	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585813.09	2158381.00	5.00
POINTSOURCE		HORSE36	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585816.78	2158712.91	5.00
POINTSOURCE		HORSE37	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585536.49	2157861.00	5.00
POINTSOURCE		HORSE38	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585540.18	2158026.96	5.00
POINTSOURCE		HORSE39	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585543.87	2158192.92	5.00
POINTSOURCE		HORSE40	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585536.49	2158358.87	5.00
POINTSOURCE		HORSE41	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585536.49	2158539.58	5.00
POINTSOURCE		HORSE42	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585532.81	2158687.10	5.00
POINTSOURCE		HORSE43	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585543.87	2158878.87	5.00
POINTSOURCE		HORSE44	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584975.93	2158860.43	5.00
POINTSOURCE		HORSE45	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584986.99	2158576.46	5.00
POINTSOURCE		HORSE46	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584964.87	2158288.80	5.00
POINTSOURCE		HORSE47	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584983.30	2157920.01	5.00
POINTSOURCE		HORSE48	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584688.27	2157901.57	5.00
POINTSOURCE		HORSE49	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584684.58	2158318.31	5.00
POINTSOURCE		HORSE50	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584699.33	2158569.08	5.00
POINTSOURCE		HORSE51	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584695.65	2158856.74	5.00
POINTSOURCE		HORSE52	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586056.49	2159387.80	5.00
POINTSOURCE		HORSE53	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585872.09	2159505.82	5.00
POINTSOURCE		HORSE54	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586270.39	2159159.15	5.00
POINTSOURCE		HORSE55	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586299.89	2159432.06	5.00
POINTSOURCE		HORSE56	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585967.98	2159148.09	5.00
POINTSOURCE		HORSE57	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585665.57	2159144.40	5.00
POINTSOURCE		HORSE58	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585669.26	2159409.93	5.00
POINTSOURCE		HORSE59	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585400.04	2159133.34	5.00
POINTSOURCE		HORSE60	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585374.22	2159398.87	5.00
POINTSOURCE		HORSE61	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6586023.30	2159638.58	5.00
POINTSOURCE		HORSE62	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585658.19	2159701.28	5.00
POINTSOURCE		HORSE63	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585414.79	2159738.16	5.00
POINTSOURCE		HORSE64	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585108.69	2159771.35	5.00
POINTSOURCE		HORSE65	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584839.48	2159686.52	5.00
POINTSOURCE		HORSE66	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584511.25	2159671.77	5.00
POINTSOURCE		HORSE67	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585023.87	2159236.60	5.00
POINTSOURCE		HORSE68	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584773.09	2159262.41	5.00
POINTSOURCE		HORSE69	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584452.24	2159089.08	5.00
POINTSOURCE		HORSE70	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584452.24	2159295.60	5.00
POINTSOURCE		HORSE71	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584452.24	2159468.94	5.00
POINTSOURCE		HORSE72	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584382.17	2157894.19	5.00
POINTSOURCE		HORSE73	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584083.45	2157905.26	5.00
POINTSOURCE		HORSE74	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584079.76	2158133.91	5.00
POINTSOURCE		HORSE75	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584393.24	2158141.29	5.00
POINTSOURCE		HORSE76	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584382.17	2158369.94	5.00
POINTSOURCE		HORSE77	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584098.20	2158381.00	5.00
POINTSOURCE		HORSE78	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584098.20	2158609.65	5.00
POINTSOURCE		HORSE79	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584393.24	2158605.96	5.00
POINTSOURCE		HORSE80	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584404.30	2158845.68	5.00
POINTSOURCE		HORSE81	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584094.52	2158849.37	5.00
POINTSOURCE		HORSE82	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585790.96	2157503.27	5.00
POINTSOURCE		HORSE83	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585562.31	2157510.65	5.00
POINTSOURCE		HORSE84	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585329.97	2157514.34	5.00
POINTSOURCE		HORSE85	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6585101.32	2157518.03	5.00
POINTSOURCE		HORSE86	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584824.72	2157518.03	5.00
POINTSOURCE		HORSE87	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584581.32	2157529.09	5.00
POINTSOURCE		HORSE88	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584356.36	2157532.78	5.00
POINTSOURCE		HORSE89	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584124.02	2157536.47	5.00
POINTSOURCE		HORSE90	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583747.85	2157964.26	5.00
POINTSOURCE		HORSE91	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583744.16	2158181.85	5.00
POINTSOURCE		HORSE92	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583736.79	2158428.94	5.00
POINTSOURCE		HORSE93	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583729.41	2158657.59	5.00
POINTSOURCE		HORSE94	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6583729.41	2158882.56	5.00
POINTSOURCE		HORSE95	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584065.01	2159059.58	5.00
POINTSOURCE		HORSE96	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584249.41	2159151.78	5.00
POINTSOURCE		HORSE97	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584053.95	2159269.79	5.00

Name	M.	ID	Result. PWL			Lw / Li			Operating Time			Height		Coordinates		
			Day	Evening	Night	Type	Value	norm.	Day	Special	Night			X	Y	Z
			(dBA)	(dBA)	(dBA)			dB(A)	(min)	(min)	(min)	(ft)		(ft)	(ft)	(ft)
POINTSOURCE		HORSE98	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584264.16	2159373.05	5.00
POINTSOURCE		HORSE99	92.0	92.0	92.0	Lw	92		900.00	0.00	180.00	5.00	a	6584053.95	2159487.38	5.00
POINTSOURCE		PA01	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6585905.29	2157783.56	25.00
POINTSOURCE		PA02	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6585931.10	2159004.26	25.00
POINTSOURCE		PA03	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6585370.54	2157768.80	25.00
POINTSOURCE		PA04	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6585344.72	2159004.26	25.00
POINTSOURCE		PA05	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6584596.07	2159004.26	25.00
POINTSOURCE		PA06	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6584614.51	2157772.49	25.00
POINTSOURCE		PA07	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6583965.44	2157761.43	25.00
POINTSOURCE		PA08	100.0	100.0	100.0	Lw	100		900.00	0.00	0.00	25.00	a	6583961.75	2158963.69	25.00
POINTSOURCE		SUB01	87.3	87.3	87.3	Lw	87.3					8.00	a	6587273.50	2156356.33	8.00
POINTSOURCE		TRASH01	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6584573.95	2157156.61	5.00
POINTSOURCE		TRASH02	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6585278.34	2156942.71	5.00
POINTSOURCE		TRASH03	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6585997.48	2157742.99	5.00
POINTSOURCE		TRASH04	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6585990.11	2158982.13	5.00
POINTSOURCE		TRASH05	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6583858.49	2157709.80	5.00
POINTSOURCE		TRASH06	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6583873.24	2159019.01	5.00
POINTSOURCE		TRASH07	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6583117.22	2157750.37	5.00
POINTSOURCE		TRASH08	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6582991.83	2157883.13	5.00
POINTSOURCE		TRASH09	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6583084.03	2158170.79	5.00
POINTSOURCE		TRASH10	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6582737.36	2158510.08	5.00
POINTSOURCE		TRASH11	89.0	89.0	89.0	Lw	89		900.00	0.00	180.00	5.00	a	6583106.15	2159048.51	5.00
POINTSOURCE		WELL01	77.0	77.0	77.0	Lw	77					5.00	a	6587657.05	2159612.77	5.00
POINTSOURCE		WELL02	77.0	77.0	77.0	Lw	77					5.00	a	6585160.33	2156308.39	5.00
POINTSOURCE		WELL03	77.0	77.0	77.0	Lw	77					5.00	a	6587594.35	2156621.86	5.00
POINTSOURCE		WELL04	77.0	77.0	77.0	Lw	77					5.00	a	6587719.74	2161150.63	5.00
POINTSOURCE		WELL05	77.0	77.0	77.0	Lw	77					5.00	a	6582766.86	2161150.63	5.00

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APPENDIX B

Thermal Ranch Equestrian Center Operations Plan

and

Memorandum from

Southern California Mobile Griding, Inc.

November, 2025

Thermal Ranch Equestrian Center
Operations Plan
2025-02-14

Overview

The Thermal Ranch Equestrian center is planned on 231 acres at the center of the Thermal Ranch development. The equestrian Center will be a world class facility that hosts equestrian competitions from October through April. The equestrian center will be the winter home of horse competitions on the west coast, with over 2.5 million square feet of riding arenas including 19 competition arenas and horse stabling for up to 2,800 horses. Limited by the desert temperatures the equestrian center opens and starts receiving horses in October and operates continuously through April every year when the facility closes. The Equestrian Center is open to the public every day when competitions are taking place. All visitors enter through the main gates which are operated 24 hours a day.

The horse show industry estimates that for every horse at a horse show there will be 3 people attending to either ride, caring for horses or in support the horse show. Using this ratio, 8,100 people a day will visit the Equestrian Center throughout a horse show day with an average of 40% onsite at any given time or 3,240 people.

The Equestrian Center is closed from May to September and access is limited to staff.

Events

The Equestrian Center is built specifically to host horses and horse competitions and will be used for that purpose. The equestrian center will host equestrian competitions and provide entertainment and services for guest attending those competitions which could include live music. Live music is planned to be generally located in the central area of the equestrian center (Grand Prix, Grand Ring, and VIP Barn Areas). The equestrian center will not be used for ticketed concerts, or public events that are not complementary to the equestrian lifestyle.

Competitions take place in many arenas simultaneously throughout the day. We also have the ability to host evening classes in our arenas that have lighting. Each riding arena will have amplified public address systems, similar to the existing horse show operations. Our Grand Prix and Grand Hunter arenas located at the center of the facility will have lighting to hold evening and night classes. These night classes end before 10:00 p.m.

The operation of the horse show requires over 300 staff which work to put on the show each week. An estimated 150 people work in the dining services, 150 people in putting on the show and maintaining the facility. Though most employees are seasonal the horse park maintains 20 to 30 year-round employees. In addition to staff working directly for the horse show there are trainers and groomers that work for the horse owners, as well as outside vendors and suppliers that operate onsite with their own employees, including veterinary, farriers, food, and retail shops. These additional suppliers and workers are included in the 8,100 person estimate provided above.

PA systems will be integrated throughout the horse park (including horse park and warm up areas). All competition rings have a PA system so that the judges can address the riders. These systems are local in nature and operate through multiple speakers located around each ring in the planters

vs a larger system mounted to overhead poles. The typical decibel range for each ring is limited to 75db to keep instruction in one ring from being heard in another ring. Our larger event rings also follow this direction and rely on many smaller speakers vs larger pole mounted address speakers.

Facilities

As a full-service show grounds, the Equestrian Center will have everything needed onsite to keep horses happy and healthy including 47 barns, indoor riding arena, a veterinary clinic, food and bedding supplies and horse supply stores.

For attendees including riders, trainers, staff and spectators, the onsite facilities will offer everything needed to have an amazing day with the horses. The equestrian Center will have 75,000 square feet of equestrian based retail and dining options located in center of the show in the Grand Prix Plaza. Other onsite buildings include a VIP great hall which overlooks the Grand Hunter and Grand Prix arenas, a show office located near the south horse stables and restrooms located throughout the property.

Feed Staging Area: The feed staging area will consist of a large gravel lot for receiving, storing, and distributing hay shavings, and grain for all the horses in the horse park. The hay and shavings are stored in the open air on pallets or in rows on the ground. We receive the deliveries of hay, shavings and grain via trucks which are unloaded in the feed staging area by forklifts.

In the southeast corner of the property is the back of house operations for the Equestrian Center. There will be five buildings as described below. There will also be a nursery to maintain our landscaping plants year-round.

Building 1- Food Services

To be used for receiving and storage of all food and beverage deliveries for the horse park.

The building will include the following.

- Receiving dock;
- Commercial freezer and refrigerator;
- Commercial kitchen for food prep;
- Restrooms for employees;
- Small office for food service.

Building 2- Facilities- Landscaping Maintenance building

This building will be the base for facilities maintenance for the horse show grounds. This building will include the following,

- Restroom;
- Break room for employees;
- Office;
- Supplies storage area;
- Tool storage area;
- Supply storage area.

Building 3- Horse show maintenance building

This building will be the base for horse show maintenance operations. This building will include the following,

- Restroom,
- Break room for employees,
- Office.
- Supplies storage area,

- Tool storage area
- Supply storage area

Building 4- Horse Show Jump storage building
This building will be where we store and maintain all the jumps and ring decorations for the horse show. This warehouse will include a restroom and small office area.

Building 5- Summer storage
This building will store equipment during the summer months. This warehouse will be open so we can park and secure our equipment from the harsh heat of the summer. It will be an open warehouse.

Below is a detailed explanation of the other operations that take place in the back of house area.

Manure: During horse park operations from October through April every year, horses are boarded on the property in 12x12 horse stalls. Prior to a horse entering its stall, each stall has about 10 bags of pine shavings installed to create bedding for the horses. This bedding serves a dual purpose. First, it creates a soft place for the horses to lay on. Second, the shavings stick to the manure and absorb the urine from the horses and absorb any odors from the urine and manure.

Typically, two to four times a day the horse care takers use wheelbarrows and specifically designed rakes or pitch forks to remove wet shavings and manure from each stall and dump it into piles in special corrals constructed at the end of each barn access road for removal to the centralized staging area for offsite transport.

Throughout the day, horse park staff collect the wet shavings and manure from the barn area holding corrals using a loader and a dump truck and transports them to the centralized staging area for pick up. At Thermal Ranch, the staging area will be located in the back of house area toward the southern portion of the site and setback at least 500 feet from all project perimeter boundaries. The staging area is rectangle and has concrete walls on three sides containing the manure and shavings. The approximate size is 50 feet wide by 100 feet long with 6-foot walls on the sides and back. Tarps are available in case it rains to cover any shavings to prevent them from absorbing the rain and becoming heavy

Our removal contractor, Southern California Mobile Grinding, Inc. (SCMG), removes the shavings and manure from the holding area on a daily basis throughout the season using a loader and covered trailers. The manure and shavings mixture is then delivered to farmers throughout the Coachella valley. The manure is used as fertilizer, mulch and for dust control. This disposal process has been confirmed by SCMG in the attached memo describing their manure disposal process. Additional options for manure disposal exist including using the local landfill operated by Burrtec Waste & Recycling.

Trash - Trash will be collected throughout the day by the show trash crew using tractors and trailers and taken to the trash area in back of house where it will be placed in large roll off dumpsters to be picked up daily during the season and as needed during the offseason.

PA 4-a Workforce Housing.
A few of the challenges facing many of the support staff required to hold a horse show are housing availability, location to the horse show and the cost of housing. To address the cost and availability of housing, we are offering onsite affordable Workforce housing. When complete, our workforce housing community will have 50-10 unit buildings with each unit measuring 10x30 and include a bedroom, bathroom and shower, kitchenet and living area. In all there will be 500 units available for rent.

From October 15th to March 30th every year the housing will be available weekly to workers at the Equestrian Center and from April 1st to October 14th the housing is available for weekly rental to farm workers in the local area.

The Workforce housing community will have outdoor community areas, awnings and picnic tables. There will be a management office and laundromat onsite. Trash dumpsters will be located near each building and will be picked up as needed.

PA 4-B. RV PARK

The RV park sits on 23 acres and can accommodate 301 Recreational Vehicles. Many of the attendees of the horse show prefer to bring their accommodations with them making it a requirement for a horse show facility to operate a RV park when the show is running. The RV Park will be operational from October to April and will offer spaces for rent to horse show exhibitors. Bookings will be handled through the horse show office. Guest of the RV park will have access to the laundromat in PA 4A. All RV spots will be provided Sewer, Power, water, and Internet connections. Trash dumpsters will be located throughout the RV park and will be picked up as needed.

SOUTHERN CALIFORNIA MOBILE GRINDING, INC

1611 S MELROSE DRIVE, A-290

VISTA, CA 92081

Southern California Mobile Grinding, Inc. is a trucking company. We have been in business since 2003. We haul for Burrtec Waste & Recycling, SA Recycling and the farmer in the Coachella Valley.

Our yard is located at 86-100 Fargo Canyon Road, where I also reside. We currently have 6 employees including myself. We have 8 trucks available for use.

We 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 facility at Thermal Ranch, including any expansion of existing operations at the new location.

APPENDIX C

Comment Letters

A. Leadership Counsel: Ltr Dated Oct. 15, 2025: regards Thermal Community Council Ltr.
B. Leadership Counsel: Ltr Dated Oct. 15, 2025: regards Final EIR Responses
C. Adams, Broadwell, Joseph & Cardoza for CARE Cal: Ltr Dated October 21, 2025 (w/2 exhibits (memos)): Regards FEIR Responses
D. Lozeau Drury for SAFER: Ltr Dated October 21, 2025: new letter, their first
E. Mayra Zamora Cruz: Email Dated Oct. 15, 2025
F. Athens Marron: Email Dated Oct. 21, 2025
G. Allyson Jeffredo: Email Dated October 20, 2025
H. Francisco Carrillo: Email Dated Oct. 22, 2025
I. Geena Vescial: Email Dated Oct. 21 (?), 2025
J. Cecilia Lemus: Email: Dated October 21, 2025
K. Taylor Brown: Email: October 10, 2025

LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

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

B

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

B-1

[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]

B-1 Cont.

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

[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. B-2

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.

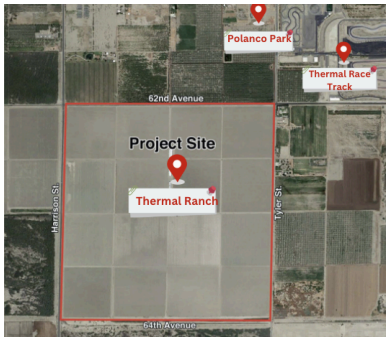

Figure 1

B-3

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.

B-3 Cont.

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.

B-4

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."

B-4 Cont.

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

B-5

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.

B-5 Cont.

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.

B-6

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.

b-6 cont.

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.

B-7

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,

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Re: Agenda Item No.: 3.3: Specific Plan No. 401, General Plan Amendment No. 2300001, Change of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, Plot Plan No. 230006 (Thermal Ranch Specific Plan) (SCH 2023050624)

Dear Chair Ruiz, Commissioners, Director Hildebrand, and Mr. Brady:

On behalf of Californians Allied for a Responsible Economy ("CARE CA"), we submit these comments on Agenda Item No. 3.3: Specific Plan No. 401, General Plan Amendment No. 2300001, Change of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, Plot Plan No. 230005, Plot Plan No. 230005 for the Thermal Ranch Specific Plan Project (SCH 2023050624) ("Project") proposed by Thermal Ranch, LLC ("Applicant"). The Staff Report asks the Commission to recommend that the Board of Supervisors certify the Project's

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Final Environmental Impact Report ("FEIR") and approve the Specific Plan, General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plans.[1]

CARE CA's review of the FEIR and Staff Report, in conjunction with its experts, demonstrates that the County has not complied with CEQA or applicable land use requirements. Accordingly, the Planning Commission should continue the hearing on the Project until after County Staff has prepared and circulated a revised EIR for public review.

In addition to the FEIR, 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.[2] 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 lots, single-family attached and detached homes and resort condominiums.[3] 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.[4] 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.[5] 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.[6] The proposed Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County.[7]

On January 10, 2025, CARE CA submitted comments on the Project's Draft Environmental Impact Report ("DEIR"). The comments were supported by expert evidence and demonstrated that the Project will result in potentially significant

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[1] County of Riverside Planning Department, Staff Report on Agenda Item No. 3.3, available at: https://riversidecountyca.iqm2.com/Citizens/FileOpen.aspx?Type=30&ID=193487&MeetingID=3235.
[2] DEIR, p. ES-2.
[3] DEIR, p. ES-2.
[4] DEIR, p. ES-2.
[5] DEIR, p. ES-2.
[6] DEIR, p. ES-2.
[7] DEIR, p. 1-3.

impacts related to public health, noise, and agricultural resources that were not adequately disclosed, analyzed or mitigated in the DEIR. CARE CA's air quality expert demonstrated that the County improperly relied on Localized Significance Thresholds ("LSTs") to assess health risk, which failed to identify potentially significant impacts from 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 FEIR and Staff Report fail to resolve the majority of these issues. There is substantial evidence in the record before the Planning Commission demonstrating that the Project will result in significant public health, noise, agriculture, and energy impacts that are not adequately disclosed, analyzed, or mitigated in the FEIR.

For example, CARE CA's noise expert, Jack Meighan[8] of Wilson Ihrig demonstrates that the County failed to address his previous comments by continuing to underestimate operational noise impacts due to inaccurate baseline noise measurements and underestimated HVAC usage.

CARE CA's agricultural resources consultant, Henry House[9] provides substantial evidence demonstrating that an agricultural conservation easement ("ACE") would be feasible and effective mitigation that would substantially reduce the Project's significant impacts from converting important farmland.

Furthermore, there is substantial evidence demonstrating that the Project may have significant project-specific and cumulative health risk impacts that the County failed to disclose because of continued reliance on inapplicable LSTs to assess health risks. The County also failed to quantify the Project's expected energy consumption during construction or consider available energy conservation measures in violation of CEQA. Finally, the Project is inconsistent with the County's General Plan.

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[8] See **Exhibit A,** Jack Meighan Comments on the Final Environmental Impact Report for Thermal Ranch Specific Plan ("Meighan Comments").
[9] See **Exhibit B,** Henry House Comments on the Final Environmental Impact Report for Thermal Ranch Specific Plan ("House Comments").

The Planning Commission cannot recommend approval of the Project until the errors and omissions in the FEIR are remedied, and until the County demonstrates compliance with the General Plan. Accordingly, the Planning Commission should continue the hearing on the Project until after County Staff has prepared a revised EIR and recirculated it for public review and comment.

I. 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.

II. THE COUNTY HAS NOT COMPLIED WITH CEQA

CEQA requires public agencies to analyze the potential environmental impacts of their proposed actions in an EIR.[10] "The foremost principle under CEQA is that the Legislature intended the act to be interpreted in such manner as to

[10] Public Resources Code ("PRC") § 21100.

afford the fullest possible protection to the environment within the reasonable scope of the statutory language."[11]

While 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."[12] As the courts have explained, a prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process."[13] "The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail 'to enable who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'"[14]

Recirculation of an EIR prior to certification is addressed in CEQA Section 21092.1, and CEQA Guidelines Section 15088.5. "When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 … ***but prior to certification***, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report." PRC § 21092.1.

"Significant new information" includes:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project.

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[11] *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal ("Laurel Heights I")* (1988) 47 Cal.3d 376, 390 (internal quotations omitted).

[12] *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (emphasis added) (quoting *Laurel Heights I*, 47 Cal.3d at 391, 409, fn. 12).

[13] *Berkeley Jets*, 91 Cal.App.4th at p. 1355; *see also San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722 (error is prejudicial if the failure to include relevant information precludes informed decision making and informed public participation, thereby thwarting the statutory goals of the EIR process); *Galante Vineyards*, 60 Cal.App.4th at p. 1117 (decision to approve a project is a nullity if based upon an EIR that does not provide decision-makers and the public with information about the project as required by CEQA); *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946 (prejudicial abuse of discretion results where agency fails to comply with information disclosure provisions of CEQA).

[14] *Sierra Club,* 6 Cal.5th at p. 516 (quoting *Laurel Heights I*, 47 Cal.3d at 405).

> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
> 14 CCR §15088.5; *Mountain Lion Coal. v. Fish and Game Comm'n* (1989) 214 Cal.App.3d 1043.

The courts have held that "Section 21092.1 was intended to encourage meaningful public comment."[15] Therefore, where, as here, the draft EIR was "fundamentally and basically inadequate or conclusory in nature," recirculation is required in order to permit meaningful public review.[16]

The FEIR does not meet CEQA's basic legal standards. As discussed below, the FEIR still fails to accurately describe the Project's environmental setting. As with the DEIR, the FEIR lacks analysis of critical impacts, relies on unsupported studies to conclude that impacts would be less than significant, and fails to adopt all feasible mitigation to reduce the Project's impacts to the greatest extent feasible. The FEIR must be revised and recirculated to comply with CEQA.

III. THE FEIR'S DESCRIPTION OF THE ENVIRONMENTAL SETTING REMAINS INADEQUATE

The FEIR fails to adequately describe the environmental setting against which the Project's environmental impacts are to be measured. This contravenes the fundamental purpose of the environmental review process, which is to determine whether there is a potentially substantial, adverse change compared to the existing setting.[17] CEQA requires that a lead agency include a description of the physical environmental conditions, or "baseline," in the vicinity of the project as they exist at the time environmental review commences.[18] As the courts have repeatedly held, the impacts of a project must be measured against the "real conditions on the ground."[19] The description of the environmental setting constitutes the "baseline" physical conditions against which the lead agency assesses the significance of a

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[15] *Laurel Heights Impr. Assn. v. Reg. of Univ. of Cal.* (1993) 6 Cal. 4th 1112, 1130 ("*Laurel Heights II*").
[16] *Id.*
[17] CEQA Guidelines § 15063(d).
[18] CEQA Guidelines § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.
[19] *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.; *Save Our Peninsula Com. V. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the-Sea v. Bd. Of Supervisors of Monterey County* (986) 183 Cal.App.3d 229, 246.

project's impacts.[20] An environmental setting is required "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.[21]

C-1 Cont.

A. The FEIR Still Fails to Accurately Describe the Existing Noise Environment

CARE CA's previous comments explained that the DEIR failed to accurately describe the existing noise environment by leaving out the closest sensitive receptor residence next to the Project site. The FEIR fails to resolve this deficiency.

Mr. Meighan explains that the County still fails to consider the Project's potentially significant operational noise impacts on the closest residence to the Project site, which is located at 62101 Tyler Street.[22] Instead, the County reasserts that it adequately analyzed 62800 Tyler Street as the "nearest existing noise sensitive residential land use immediately east of the Project site."[23] This conclusion is not supported by substantial evidence.[24]

Mr. Meighan provides substantial evidence in his comments that 62101 Tyler Street is the closest residence by referring to aerial photographs of the two residences.[25] These photos demonstrate that 62101 Tyler Street is closer to the Project site.[26] Mr. Meighan goes on to explain that although 62101 Tyler Street is approximately 50 feet west of the 62800 Tyler Street residence and farther from the clustered operational noise sources near the southern edge of the Project site, it may still experience greater noise impacts due to its closer proximity to noise sources located along the western portion of the site.[27] Therefore, the FEIR's continued failure to include 62101 Tyler Street in its analysis, renders the subsequent operational noise analysis unsupported and potentially underestimated.

C-2

The County must revise and recirculate the EIR to provide an accurate analysis of the Project site's existing noise environment against which to measure the Project's true construction noise impacts as required by CEQA.

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[20] CEQA Guidelines § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th at 321.
[21] CEQA Guidelines § 15125(a).
[22] Meighan Comments, p. 1.
[23] FEIR, p. 81.
[24] Meighan Comments, pp. 1-2.
[25] *Id.*
[26] *Id.*
[27] *Id.*

IV. THE PROJECT MAY HAVE SIGNIFICANT, UNMITIGATED PUBLIC HEALTH IMPACTS

A. The FEIR Lacks Substantial Evidence to Conclude that the Project Will Not Result in Significant Health Risks from Exposure to Toxic Air Contaminants

CARE CA's previous comments demonstrated that the DEIR's analysis of the Project's potential health risks was inadequate because it relied on LSTs. CARE CA's air quality expert explained that compliance with LSTs does not support a less than significant conclusion because LSTs only assesses criteria air pollutants, not TACs, which have a carcinogenic effect when inhaled. Additionally, LSTs assess 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 standards ("AAQS"). LSTs do not assess health risk from human exposure to toxic emissions.

In response, the County continues to claim that its reliance on LSTs was appropriate and adequately supports the FEIR's conclusion that the Project's construction activities will not create any significant health risks.[28] The County argues that because its analysis determined that PM2.5 emissions will not exceed the LST for PM2.5, that DPM emissions will also not cause health impacts.[29] However, this conclusion is misleading, unsupported, and contrary to CEQA because PM2.5 is not a TAC, and LSTs do not measure cancer risk. C-3

In *Sierra Club v. County of Fresno*, the California Supreme Court affirmed CEQA's mandate to protect public health and safety by holding that a CEQA document fails as an informational document when it fails to disclose the public health impacts from air pollutants that would be generated by a development project.[30] As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact."[31] The Court concluded that the County's EIR was inadequate for failing to disclose the nature and extent of public health impacts caused by the project's air pollution.[32] As the Court

[28] FEIR, p. 41.
[29] FEIR, p. 41.
[30] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[31] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[32] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.

explained, the EIR failed to comply with CEQA because after reading the EIR, "'the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin.'"[33]

Similar to *Sierra Club,* the FEIR fails to provide an adequate analysis and discussion of the Project's potential health risks. While it is true that DPM is a subset of PM2.5, they are not the same.[34] Health risk from DPM is assessed based on inhalation exposure and unit risk factors (such as cancer potency), not based on total PM2.5 mass.[35] A recent study found that even when diesel exhaust is filtered to remove particles like DPM, the remaining gases can still harm health—especially the lungs, immune system, and during pregnancy.[36] This demonstrates that measuring total PM2.5 levels for exceedance of LST may not accurately capture the full health risks from diesel exhaust, and that a separate analysis of DPM needs to be conducted.

C-3 Cont.

The County also argues that a health risk analysis ("HRA") is not necessary because it is only required for facilities that are designated as "high priority." The County claims that the proposed Project does not qualify as a "high-priority" facility, since it is not one of eight specific categories of existing sources of TACs identified by the California Air Resources Board ("CARB"), nor is it located near such sources (i.e., high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations).[37] The FEIR also cites the South Coast Air Quality Management District ("SCAQMD") Risk Assessment Procedures for Rules 1401, 1401.1, and 212 as evidence that an HRA is not required.[38]

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[33] *Id.*
[34] CARB, Overview: Diesel Exhaust & Health, available at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.
[35] Arlene Rosenbaum et al., *Analysis of Diesel Particulate Matter Health Risk Disparities in Selected US Harbor Areas*, available at: https://pmc.ncbi.nlm.nih.gov/articles/PMC3222501/?utm_source=chatgpt.com ("A higher intake fraction means the given level of emission creates more health risk because a larger fraction of the emitted mass is delivered to human lungs"); Lui S. Azam et al., *Assessing Hazard of Diesel Particulate Matter (DPM) in the Mining Industry: A Review of the Current State of Knowledge,* available at: https://link.springer.com/article/10.1007/s40789-024-00707-8 ("DPM being ultrafine, can penetrate deep into the lungs, translocate to other generally unreachable parts of the body, and show higher biological activity than its larger counterparts. However, their mass is negligible.").
[36] C. Weitekamp et al., *A Systemic Review of the Health Effects Associated with The Inhalation of Particle-Filtered and Whole Diesel Exhaust*, available at: https://assessments.epa.gov/risk/document/%26deid%3D349022?utm_source=chatgpt.com.
[37] FEIR, p. 100.
[38] SCAQMD. *Risk Assessment Procedures for Rules 1401, 1401.1, and 212.* (2024, October 31).

This argument is misplaced and inconsistent with guidance from both the Office of Environmental Health Hazard Assessment ("OEHHA") and SCAQMD. First, the County conflates "health risk assessments", which are required for certain industrial facilities pursuant to the Health and Safety Code and other air quality laws, with the analysis of health risk from human exposure to Project emissions which is required by CEQA for all projects. In *Sierra Club,* the Supreme Court clarified that CEQA does not require a "Health Risk Assessment," but that CEQA does require a detailed analysis of health risk which correlates a project's air emissions with the corresponding health risk from exposure to those emissions.[39] The FEIR ignores this distinction.

Second, even if a "health risk assessment" were at issue, which it is not, the list of eight facilities referenced in the FEIR is not an exclusive list of high-priority facilities. Rather, they represent facility types from which CARB recommends minimum separation distances for new sensitive land uses, not criteria for determining whether a project qualifies as high-priority under air toxics regulations. Moreover, the FEIR incorrectly relies on SCAQMD Risk Assessment Procedures for Rules 1401, 1401.1, and 212, which explicitly state that these procedures "should not be used for AB2588/Rule 1402," as those rules have their own separate risk assessment procedures.[40] These rules are inapplicable to the County's duty under CEQA to analyze the cancer risk posed to nearby sensitive receptors from exposure to the Project's emissions. SCAQMD CEQA thresholds for health risk are contained in SCAQMD's CEQA Handbook, which provides the following thresholds for measuring the significance of exposure to TAC emissions under CEQA:[41]

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> Maximum Incremental Cancer Risk ≥ 10 in 1 million
> Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)
> Chronic & Acute Hazard Index ≥ 1.0 (project increment)

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http://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=8

[39] *Sierra Club,* 6 Cal.5th at 523.

[40] *Id.* at p. 2.

[41] See South Coast AQMD Air Quality Significance Thresholds, available at https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf%3Fsfvrsn%3D25&ved=2ahUKEwjNmdaY4LaQAxXeFTQIHRCuIC0QFnoECAsQAQ&usg=AOvVaw07n1OZu8NvvtfqOAnstLMG (last visited 10/21/25).

The FEIR fails to apply these thresholds and does not provide any evidence demonstrating that the Project would not result in a cancer risk that exceeds the SCAQMD significance thresholds for health risk. Therefore, the County lacks substantial evidence to conclude that the Project will not result in significant health risk impacts from TAC emissions during construction. The EIR must be revised and recirculated to include this analysis.

C-4 Cont.

B. The FEIR Lacks Substantial Evidence to Conclude That The Project Would Not Result in Significant Cumulative Health Risk Impacts

The FEIR omits an analysis of the Project's cumulative TAC emissions by failing to consider the Project's emissions together with emissions from existing and proposed development near the Project site. This violates CEQA, Attorney General warehouse guidance, and updated SCAQMD guidance.

Under CEQA, an environmental review document must evaluate a cumulative impact if the project's incremental effect combined with the effects of other projects is "cumulatively considerable."[42] This determination is based on an assessment of the project's incremental impacts "viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[43] Proper cumulative impact analysis is vital because "the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact."[44]

C-5

The recent Attorney General guidance document setting forth best practices for evaluating the environmental impacts of warehouse projects also mandates this analysis.[45] The County characterized the Equestrian Center as an "unrefrigerated

[42] CEQA Guidelines § 15130(a).
[43] CEQA Guidelines §§ 15065(a)(3), 15355(b).
[44] *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 114.
[45] CEQA Guidelines § 15130; *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*, p. 7 (Updated September 2022) ("[w]hen analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even *if the project's individual impacts alone do not exceed the applicable significance threshold*."), available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

warehouse" in its CalEEMod calculations, thus acknowledging that warehouse guidance is applicable to the Project.[46] With respect to cumulative air quality and GHG emissions analysis, the Attorney General's guidance states that best practices include "[w]hen analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, *even if the project's individual impacts alone do not exceed the applicable significance threshold*."[47]

Lastly, the City of Fontana was recently sued by the State Attorney General for failing to consider project emissions combined with emissions from other projects to evaluate cumulative impacts, in reliance on SCAQMD's outdated 2003 White Paper which advocated this "drop in the bucket" approach to cumulative impacts.[48] The Attorney General's petition explained: "[t]o the extent that the 2003 SCAQMD White Paper asserts that any project with less than significant individual air quality impacts also necessarily has less than significant cumulative air quality impacts, it is inconsistent with CEQA."[49] The Attorney General's litigation resulted in a settlement which requires compliance with an ordinance adopted on April 12, 2022 that establishes sustainability standards for warehouses in Fontana, including standards intended to address cumulative air quality impacts. For example, the standards include requirements that rooftop solar panels supply 100% of power for non-refrigerated portions of facilities with buildings over 400,000 square feet, trees in automobile parking areas, zero emission motorized operational equipment, other equipment electrification requirements, and solar-ready building roofs.[50]

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[46] DEIR, p. 3.10-2.
[47] *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (updated September 2022) (, available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.
[48] *People of the State of California v. City of Fontana,* Case No. CIVSB2121829, Petition for Writ of Mandate, available at https://climatecasechart.com/wp-content/uploads/case-documents/2021/20210723_docket-CIVSB2121829_petition-for-writ-of-mandate.pdf.
[49] *Id.*
[50] *Id.*, Stipulation For Entry Of Final Judgment On Consent, available at https://climatecasechart.com/wp-content/uploads/case-documents/2022/20220414_docket-CIVSB2121605-CIVSB2121829_stipulation.pdf.

SCAQMD is in the process of updating its guidance to reflect modern science and CEQA's requirements, specifically referencing the City of Fontana case.[51] Although new protocols have not yet been formally adopted, SCAQMD comments on similar warehouse projects recommend that the draft protocols be applied.[52] This demonstrates that the new thresholds are supported by substantial evidence, unlike the outdated 2003 guidance. SCAQMD's November 6, 2024, Working Group's draft cumulative impacts guidance recommends that agencies lower the cancer risk significance threshold to better reflect cumulative impacts.[53] The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met, and require a multi-step approach to assess health risk factors caused by the proposed project as well as cumulative health risk factors from the surrounding environment.[54] C-6

The Project does meet the requirements under Step 1 of the flowchart, which is to determine the background cancer risk affecting the Project area via the SCAQMD Multiple Air Toxics Exposure Study ("MATES"). Per the MATES V Data Visualization Tool, the location of the Project site is within the 63rd percentile of cancer risk. Thus, because the Project is within the 90th to 50th percentile of excess cancer risk, the threshold would be reduced from 10 in one million to 7 in one million.[55]

Step 2 of the WG 6 flow diagram, which is to determine if there are 951 daily heavy-duty truck trips.[56] The FEIR does not quantify the number of heavy duty trucks that will be used. If this criteria is met, the threshold would be reduced even further.

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[51] SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13, pg. 4; *see* SCAQMD, Analyzing Cumulative Impacts from Air Toxics in CEQA Documents, https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).

[52] *Id.*

[53] SCAQMD, Analyzing Cumulative Impacts from Air Toxics in CEQA Documents, available at: https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new); SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.

[54] *Id.*

[55] SCAQMD MATES V Data Visualization Tool, Thermal, CA, available at: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page?views=Gridded-Cancer-Risk%2CNavigate-the-map#data_s=id%3AdataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A330%2Cid%3AdataSource_112-7c8f2a4db79b4a918d46b4e8985a112b%3A14101.

[56] *Id.*

The Project does meet the requirements under Step 3, which is to determine if the Project is located in an SB535 disadvantaged community or an AB617 community. If the project is within such an area, then the threshold would be reduced from 7 in one million to 5 in one million.[57] The proposed Project is located in Thermal, CA, which is designated as an AB617 community.[58] Therefore, the Project's cumulative air quality impacts need to at least be assessed against a 5 in one million significance threshold. If it is later determined that the Project will involve more than 951 heavy duty truck trips, then the significance threshold would be reduced further to 3 in one million.

C-6 Cont.

The County's failure to quantify the Project's cumulative health risk impacts is inconsistent with CEQA, AG guidance, and SCAQMD recommendations. The County must revise and recirculate a new EIR to include a cumulative health risk analysis.

V. THE FEIR LACKS SUBSTANTIAL EVIDENCE TO SUPPORT A STATEMENT OF OVERRIDING CONSIDERATION FOR THE PROJECT'S SIGNIFICANT AGRICULTURE IMPACTS

A. The FEIR Fails to Include Any Mitigation for the Project's Significant Impacts Related to Conversion of Agriculture Land

CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project's impacts from the conversion of agricultural land is significant and unavoidable because the DEIR did not propose any mitigation as required by CEQA. Instead of resolving this issue by incorporating agricultural mitigation, the County merely asserts that an ACE would not be effective at reducing or avoiding impacts to less than significant levels and is infeasible for economic and policy reasons.[59] This conclusion is speculative and not supported by substantial evidence. Moreover, the County has rejected feasible mitigation to further reduce the Project's significant agricultural impacts, in violation of CEQA.

C-7

[57] Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.
[58] CARB, Eastern Coachella Valley, available at: https://ww2.arb.ca.gov/capp/com/cip/eastern-coachella-valley.
[59] FEIR, pp. 56-57.

When an EIR identifies significant environmental impacts that may result from a project, the County must certify the EIR and make mandatory CEQA findings. Those findings include that the EIR complies with CEQA, that the County has mitigated all significant environmental impacts to the greatest extent feasible, and that any remaining significant environmental impacts are acceptable due to overriding considerations.[60] Accordingly, before an impact can be declared significant and unavoidable, the County must first adopt all feasible mitigation to reduce the impact to the greatest extent feasible, and must consider feasible mitigation recommended by commenters, when such measures would substantially lessen a significant environmental effect.[61] Mitigation is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors."[62] Additionally, findings of economic infeasibility must be supported by relevant economic data.[63]

C-7
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Here, the County concludes that there is no effective mitigation available to reduce the Project's agricultural resources impacts. Specifically, the County claims that an ACE is infeasible because it conflicts with broader policy goals of reducing reliance on Colorado River water and allowing limited agricultural land conversion to support housing and economic development.[64] This conclusion is incorrect for several reasons.

First, while it may be true that drought conditions are placing a strain on the County's water supply, the County does not provide any evidence that a conservation easement would exacerbate this problem. In fact, Mr. House explains that conserving remaining agricultural land in Coachella Valley would not exacerbate any existing water shortage or even effect it because the conserved land would already be in existing agricultural use. Furthermore, Mr. Meighan highlights

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[60] PRC § 21081(a)(3), (b); CEQA Guidelines §§ 15090, 15091.
[61] *Covington v Great Basin Unif. Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879-883.
[62] CEQA Guidelines § 15364.
[63] *County of San Diego v. Grossmont Cuyamaca Community College Dist.* (2006) 141 CA4th 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); *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 CA3d 1167 (record that included no analysis of comparative costs, profits, or economic benefits of scaled-down project alternative was insufficient to support finding of economic infeasibility*); Burger v. County of* Mendocino (1975) 45 CA3d 322 (infeasibility finding based on economic factors cannot be made without estimate of income or expenditures to support conclusion that reduction of motel project or relocation of some units would make project unprofitable).
[64] FEIR, pp. 56-57.

the fact that drought in California has a long-term history of alternating drought and non-drought conditions, and that those facts do not support a conclusion that the loss of important farmland should not be mitigated.[65]

Second, contrary to the County's claim, conservation of remaining agricultural land would not make mitigating the Project's agricultural impacts infeasible due to policy reasons.[66] The General Plan expressly endorses the use of conservation easements to conserve the County's agricultural land. Open Space Policy 7.2 states "[t]he County of Riverside shall seek out available funding for farmland conservation. Examples of programs which may be employed include: land trusts; *conservation easements*… Land Conservation Contracts…to encourage conservation of productive agricultural land in Riverside County's Incentive Program…."[67]

Third, while the County does allow the conversion of up to 7% of land designated as agricultural to facilitate additional housing and economic development, this does not render an ACE infeasible as a mitigation measure under CEQA. Mitigation is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors."[68] ACE's clearly meet this definition. They are commonly used in CEQA mitigation for farmland conversion and have been repeatedly upheld by courts as a valid tool to offset impacts to agricultural resources.[69] Additionally, several policies in the County's own General Plan encourage conservation of agricultural land. This includes Open Space Policy 7.2, which, as discussed above, explicitly supports the use of conservation easements as a way to conserve agricultural land in the County. Thus, an ACE remains a feasible and effective mitigation measure. The County also has not provided any evidence that other mitigation measures are infeasible or would not effectively reduce impacts from the Project's conversion of agricultural land. Nor could it, because there is substantial evidence in the record demonstrating that ACE's are feasible and effective mitigation.

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[65] House Comments, p. 2.
[66] House Comments, p. 2.
[67] Open Space Element, p. OS-20.
[68] CEQA Guidelines § 15364.
[69] *V Lions Farmg, LLC v. County of Kern* (2020) 45 Cal.App.5th 814; *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412.

Therefore, the FEIR lacks substantial evidence to conclude that impacts from the conversion of agricultural land will be significant and unavoidable. The County must revise the EIR to include the necessary analysis of mitigation measures recirculate it for public review. C-7 Cont.

B. The Project's Conversion of Farmland is Inconsistent with the Imperial County General Plan

The Project's proposed conversion of 568.3 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, conflicts with the County's general plan.[70] CEQA requires an agency to determine whether a Project would "[c]ause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."[71] Inconsistency with a general plan is both a land use impact and a significant impact under CEQA.[72]

The FEIR fails to adequately disclose that the Project's conversion of agriculture land for non-agriculture purposes contravenes the goals and objectives listed in the General Plans Vision Statement, Open Space Element, and Land Use Element. This includes:

Vision Statement	Agricultural land that remains economically viable either as a permanent or temporary economic resource, is well protected by policies, ordinances and design regulations applicable to new development that may be planned nearby.[73]
Vision Statement	Agriculture remains a strong component of the County's economy. Even though some agricultural land has been urbanized, there has also been expansion in other locations. The place of agriculture in the community remains strong and conflicts between

C-8

[70] DEIR, p. 2.4-20.
[71] 14 CCR § 15000 Appendix G.
[72] *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4, 32 Cal.Rptr.3d 177; see also, *County of El Dorado v. Dept. of Transp*. (2005) 133 Cal.App.4th 1376.
[73] Vision Statement, p. V-20.

	agricultural operations and nearby development are rare. The Riverside County agricultural industry is a strong competitor in the global agricultural market.[74]
Land Use Policy 20.1	Encourage agriculturally designated lands where agricultural activity can be sustained at an operational scale, where it accommodates lifestyle choice, and in locations where impacts to and from potentially incompatible uses, such as residential uses, are minimized through incentives such as tax credits.[75]
Land Use Policy 20.2	Protect agricultural uses, including those with industrial characteristics (dairies, poultry, hog farms, etc.) by discouraging inappropriate land division in the immediate proximity and allowing only uses and intensities that are compatible with agricultural uses.[76]
Land Use Policy 20.4	Encourage conservation of productive agricultural lands. Preserve prime agricultural lands for high-value crop production.[77]
Land Use Policy 20.6	Require consideration of state agricultural land classification specifications when a 2.5-year Agriculture Foundation amendment to the General Plan is reviewed that would result in a shift from an agricultural to a non-agricultural use.[78]

C-8
Cont.

[74] Vision Statement, p. V-20.
[75] Land Use Element, p. LU-45.
[76] Land Use Element, p. LU-45.
[77] Land Use Element, p. LU-46.
[78] Land Use Element, p. LU-46.

Open Space Policy 7.3	Encourage conservation of productive agricultural lands and preservation of prime agricultural lands.[79]
Open Space Policy 7.2	In cooperation with individual farmers, farming organizations, and farmland conservation organizations, the County of Riverside shall employ a variety of agricultural land conservation programs to improve the viability of farms and ranches and thereby ensure the long-term conservation of viable agricultural operations within Riverside County. The County of Riverside shall seek out available funding for farmland conservation. Examples of programs which may be employed include: land trusts; conservation easements (under certain circumstances, these may also provide federal and state tax benefits to farmers); dedication incentives; Land Conservation Contracts; Farmland Security Act contracts; the Agricultural Land Stewardship Program Fund; agricultural education programs; transfer and purchase of development rights; providing adequate incentives (e.g. clustering and density bonuses) to encourage conservation of productive agricultural land in Riverside County's Incentive Program; and providing various resource incentives to landowners.[80]

C-8
Cont.

The General Plan emphasizes the historic and economic importance of agriculture land in Riverside County, stating "it is agriculture that defines the unique character of many communities in Riverside County, and helps to define the edges of and provide separation between developed areas…there is a solid

[79] Open Space Element, p. OS-21.
[80] Open Space Element, p. OS-20.

commitment to ensuring that these uses remain an integral part of Riverside County's future."[81] Consistent with this statement, the goals and policies above support the preservation of agricultural lands in Riverside County, especially for Prime Farmland.

The Project conflicts with these goals and policies for several reasons. First, as discussed in detail in CARE CA's previous comments and above, the proposed Project would convert 568.3 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, which is in active agricultural cultivation, into non-agricultural uses.[82] These are two of the highest soil classifications of important farmland, meaning they are the most ideal for agriculture production.[83] Land Use Policies 20.4 and 20.6, as well as Open Space Policy 7.3 discourage conversion of productive agricultural lands, especially lands that have high land use classifications. C-8 Cont.

Second, the Project not only considers conversion of these valuable agricultural lands, but it does not propose any mitigation to reduce impacts or demonstrate consistency with the General Plans policies. Open Space Policy 7.2 highlights the importance of conserving agricultural lands and provides several examples of ways to ensure this conservation occurs. The FEIR's failure to adequately disclose and analyze these inconsistencies constitutes a significant impact under CEQA.

VI. THE FEIR FAILS TO RESOLVE THE PROJECT'S SIGNIFICANT, UNMITIGATED OPERATIONAL NOISE IMPACTS

CARE CA's previous comments demonstrated that the Project would result in potentially significant operational noise impacts when more realistic HVAC run times are utilized. Instead of correcting this deficiency, the County continues to underestimate HVAC run times and asserts that "continuous operation of Project HVAC systems is unreasonable" because HVAC systems are designed to cycle on and off for optimal performance and energy efficiency.[84] C-9

While it is true that the HVAC systems would not run 100 percent of the time—Mr. Meighan clarifies that the system could run for a full hour or on hot days, instead of the maximum 39 minutes every hour that the FEIR analyzes.[85] Mr.

[81] Land Use Element, p. LU-44.
[82] DEIR, p. 2.5-10.
[83] Open Space Element, p. OS-16.
[84] FEIR, p. 53.
[85] Meighan Comments, p. 4; FEIR, p. 82.

Meighan's explains that Thermal, CA has a desert climate which regularly experiences high heat.[86] For example, climate data shows that Thermal has average summer highs above 110 °F on average 28 days per year, and exceed 120 °F every other year.[87] Additionally, during almost four months out of the year, the average daily high temperature is above 99 degrees Fahrenheit.[88] UCLA and the Public Health Alliance of Southern California project that portions of the Coachella Valley will have more than 200 days a year above 90 degrees by mid-century.[89] Therefore, these high temperatures and the need for HVAC systems to run for a full hour are reasonably foreseeable. CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are "substantial."[90] Therefore, because the FEIR still relies on a low HVAC run time, the County underestimates the Project's potentially significant operational noise impacts.

The County also claims that even though Mr. Meighan's previous comments demonstrated that the Project would exceed the absolute noise threshold of 45dBA, there is no significant impact because the noise levels would not exceed the ambient noise threshold.[91] This conclusion is contrary to CEQA. In applying significance thresholds, the lead agency must consider both the "absolute noise level" associated with a project as well as the increase in the level of noise that will result from a project.[92] A significant impact occurs when either one of these thresholds is exceeded.

C-9
Cont.

The County further tries to discredit Mr. Meighan's analysis by pointing to Public Resources Code Section 21085, which states "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment." However, this law is not applicable to Mr. Meighan's analysis. Mr. Meighan's calculations evaluated the Project's operational noise, with a particular focus on rooftop HVAC equipment. HVAC noise is not noise generated by project occupants or their guests.

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[86] Meighan Comments, p. 4.
[87] Meighan Comments, p. 4.
[88] WeatherSpark, Climate and Average Weather Year Round in Coachella, available at: https://weatherspark.com/y/2104/Average-Weather-in-Coachella-California-United-States-Year-Round.
[89] Public Health Institute, *Hotter Weather Coming to Coachella Valley: Desert Sun Cites PHI's Healthy Places Index: Extreme Heat Edition*, available at: https://www.phi.org/press/public-health-alliance-of-southern-california-and-ucla-project-hotter-weather-for-200-days-in-coachella-valley/.
[90] CEQA Appendix G, Section 13 (Noise Impacts).
[91] FEIR, p. 83.
[92] *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 CA5th 814, 884; *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 CA4th 714, 733.

Lastly, the County claims, without providing any evidence, that the noise from HVAC units will be mitigated to less than significant levels. CEQA requires an agency to support its conclusion with substantial evidence.[93] Substantial evidence does not include argument, speculation, or unsubstantiated opinion. Therefore, without more, the County lacks substantial evidence to supports its conclusion. C-9 Cont.

In sum, the FEIR fails to analyze and mitigate the significant HVAC related noise impacts during Project operations. The County also lacks substantial evidence to conclude that these impacts would be mitigated to less than significant levels. The County must correct this deficiency in a revised and recirculated EIR.

VII. THE FEIR LACKS SUBSTANTIAL EVIDENCE TO CONCLUDE THAT THE PROJECT'S ENERGY IMPACTS WILL BE LESS THAN SIGNIFICANT

The FEIR concludes that the Project will have less than significant energy impacts.[94] However, the FEIR fails to provide substantial evidence to support this conclusion by not quantifying the Project's construction-related energy consumption or analyzing energy conservation measures that might be available or appropriate for the Project, in violation of CEQA.

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."[95] The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide the following examples in Appendix F: C-10

- Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
- The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- The potential for reducing peak energy demand.
- Alternate fuels (particularly renewable ones) or energy systems.

[93] PRC § 21082.2.
[94] DEIR, p. 2.8-13.
[95] PRC § 21100(b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 930.

- Energy conservation which could result from recycling efforts.[96]

Courts have rejected CEQA documents that fail to include adequate analysis investigation into energy conservation measures that might be available or appropriate for a project.[97] In *California Clean Energy Commission v. City of Woodland* ("*CCEC*"), the Court of Appeal reviewed an EIR for a shopping center on undeveloped agricultural land.[98] Similar to the FEIR here, the EIR in *CCEC* concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations, the project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy.[99] But, the lead agency's EIR did not include a discussion regarding the different renewable energy options that might be available or appropriate for the project.[100] The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."[101] The lead agency argued that compliance with the Building Code sufficed to address energy impact concerns for the project.[102] But the Court explained:

C-10
Cont.

Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines. These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.[103]

The Supreme Court of California agreed with the *CCEC* court's decision in *League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer* ("*Save Lake Tahoe*"), holding that even projects that find a less-than-significant energy impact must "discuss whether any renewable energy features could be incorporated

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[96] CEQA Guidelines § 15126.4(a)(1)(C) (stating "'Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").
[97] *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256; *Spring Valley Lake Ass'n v. City of Victorville* (2016) 248 CA4th 91.
[98] *CCEC* (2014) 225 Cal.App.4th 173.
[99] *Id.* at 184.
[100] *Id.* at 213.
[101] *Id.* at 213.
[102] *Id.* at 210, 211.
[103] *Id.* at 211.

into the project."[104] In *Save Lake Tahoe*, the Court considered an EIR for a land use specific plan and rezoning to permit residential and commercial development and preserve forest land near Truckee and Lake Tahoe.[105] The EIR did not consider whether it was feasible to power the project on 100 percent renewable electrical energy or some lesser percentage, nor evaluate strategies for reducing reliance on fossil fuels, increasing reliance on renewable resources, reducing peak loads, and reducing the impacts of relying on remote generation facilities.[106] The lead agency reasoned that this analysis was not required because energy impacts would be less than significant.[107] Citing CEQA Guidelines Section 15126.2, subdivision (b) and the decision in *CCEC*, the Court held that when an EIR analyzes the project's energy use to determine if it creates significant effects, it should discuss whether any renewable energy features could be incorporated into the project.[108] The Court found that the EIR violated CEQA for not discussing whether the project could increase its reliance on renewable energy sources to meet its energy demand.[109] As discussed below, the FEIR here suffers from the same flaws.

The FEIR concludes that the Project's construction-related energy use would be less than significant without quantifying them.[110] The FEIR instead reasons that because the electricity demand would be temporary and the building is required to comply with IID guidelines and requirements as well as the County's General Plan and CAP Update that use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.[111] However, this reasoning is flaws for several reasons. C-10 Cont.

First, without quantification, the FEIR's statement that electricity use during construction will be "temporary" and "nominal" is not supported. Energy that is temporary may still be wasteful, inefficient, and unnecessary. There is also no way to determine what "nominal" means and if that also constitutes a level that is not wasteful, inefficient, and unnecessary.

Second, similar to *League to Save Lake Tahoe*, the County did not discuss whether any renewable energy features could be incorporated into the Project's construction phase. For example, the County did not discuss the use of Tier 4 final

[104] *Save Lake Tahoe* (2022) 75 CA5th 63, 167–68.
[105] *Id.* at 70.
[106] *Id.* at 165-166.
[107] *Id.* at 166.
[108] *Id.* at 167-168.
[109] *Id.* at 168.
[110] DEIR, p. 2.8-9.
[111] DEIR, p. 2.8-9.

diesel engines, electric-powered machinery, or use of alternative fuels like renewable diesel or biodiesel. This lack of analysis violates CEQA and does not constitute substantial evidence that justifies the FEIR's significance determination.

Third, compliance with the County's General Plan, CAP Update, and IID Guidelines do not ensure energy efficient measures that go beyond Title 24 standards will be implemented. The General Plan and CAP update merely require compliance with Title 24 standards.[112] There is no requirement that these standards be exceeded. Additionally, IID does not have guidelines specifically governing the efficiency of energy use during construction or in building design. The IID offers energy efficiency incentive programs, but these are voluntary and thus are not binding.

C-10
Cont.

In sum, the FEIR's energy analysis fails to adequately analyze measures that would ensure the Project's consumption of energy during construction is not wasteful, inefficient, and unnecessary. It also fails to meaningfully address Appendix F's considerations of whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope.[113] This analysis must be provided in an EIR.

VIII. THE COUNTY LACKS SUBSTANTIAL EVIDENCE TO APPROVE THE PROJECT'S ENTITLEMENTS

The Project requires the County to make a recommendation to the Board of Supervisors regarding whether to certify the FEIR and approve the Specific Plan, General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.[114] However, as discussed above, the County failed to adequately address CARE CA's previous comments and thus the FEIR still fails to adequately disclose or mitigate several significant environmental and public health impacts. As discussed in more detail below, this failure to address all of the Project's potentially significant environmental impacts prevents the County from making the requisite findings to recommend approval of the Project's entitlements.

[112] General Plan Multipurpose Open Space Element, Policy OS 16.1, p.OS-39; CAP Update, p. 35.
[113] *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256, 264.
[114] FEIR, p. 4.

General Plan Amendment

The Project site currently has a General Plan Foundation of Agriculture and Land Use Designation of Agriculture.[115] The General Plan Amendment ("GPA") would propose to change the Foundation to Community Development and the land use designations to match those of the proposed Specific Plan, which include Commercial Tourist, Very Low Density Residential, Medium High Density Residential, Highest Density Residential, and Commercial Retail.[116] The GPA is defined as an Entitlement/Policy General Plan Amendment and an Agricultural Foundation Component Amendment.

Ordinance No. 348 sets forth different procedures based on the type of GPA being proposed. Accordingly, a GPA that would change the General Plan land use designation from "Agriculture" to a set of five different land use categories is governed by Section 2.4, while the GPA that would change the General Plan Foundation Element designation for the Project site from "Agriculture" to "Community Development" is governed by Section 2.7. Because the GPA includes two types of amendments, the County must make all of the findings required in both Section 2.4 and Section 2.7.

C-11

1. Entitlement/Policy General Plan Amendment

A planning commission resolution recommending approval of an entitlement/policy amendment must include 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;

[115] Staff Report, p. 16.
[116] Staff Report, pp. 16-17.

- 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.[117]

The County cannot make the required findings to approve this amendment for several reasons. First, the GPA conflicts with the County's General Plan Vision Statement and thus is detrimental to the purposes of the General Plan. As discussed above, the County's Vision Statement reflects the important historic and economic role agricultural uses have in Riverside County.[118] The County's Vision Statement also acknowledges the mounting growth pressures agricultural areas face and expresses the desire to preserve these agricultural areas.[119] By proposing the permanent conversion of over 619 acres of important farmland without offering any mitigation, the GPA directly contradicts the County's stated goals. Rather than supporting agricultural preservation, it accelerates the very pressures the Vision Statement seeks to resist. C-11 Cont.

Second, the GPA conflicts with general planning 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.[120] 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 foundation component designation—shifting land from the Agricultural Foundation Component to the Community Development designation. Therefore, the County cannot make the first required finding to recommend approval of the GPA.

[117] Ordinance No. 348 § 2.4
[118] Vision Statement, p. V-21; see also Land Use Element, p. LU-44.
[119] Vision Statement, p. V-20, ; see also, Land Use Element, p. LU-44.
[120] General Plan Appendix B: Planning Principles, pp. 12-13.

Therefore, the County cannot approve the GPA because it cannot make the requisite findings under Section 2.4 of Ordinance No. 348. The GPA directly conflicts with the core goals of the County Vision Statement and General Planning Principles. Thus, the Staff Report's conclusion that the GPA does not conflict with these documents is unsupported and contradicted by the Project's unmitigated conversion of over 619 acres of important farmland. The GPA also involves a Foundation change, which disqualifies it from approval under the County's required findings.

2. Agricultural Foundation Component General Plan Amendments

For an Agricultural Foundation Component General Plan Amendment to be made, the following findings are required to be made:

- 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.[121]
- 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.[122]

For the same reasons discussed above, the GPA's permanent conversion of over 619 acres of important farmland without offering any mitigation directly contradicts the General Plan's stated goals of preserving agricultural land.

C-11 Cont.

Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[123] The Staff Report concludes that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[124] However, as discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land.

C-12

[121] Ordinance No. 348 § 2.7.B.3.
[122] Administration Element, p. A-16.
[123] Riverside County Ordinance No. 348, §§ 2.8, 2.1.
[124] Staff Report, p. 22.

Additionally, the Specific Plan conflicts with policies in the General Plan's Noise Element Specifically, Policy N1.5 states that "excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County" should be prevented and mitigated.[125] Similarly, Policy N1.6 states "noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses" shall be minimized.[126] Our noise expert demonstrated that the FEIR failed to disclose and mitigate potentially significant operational noise impacts related to the Project's HVAC systems. Therefore, the Specific Plan would allow a land use that conflicts with the County's General Plan and cannot be approved as currently proposed. C-12 Cont.

Plot Plan

The Project includes three plot plans.[127] Section 18.30 of Ordinance No. 348 governs the processing of Plot Plans. Pursuant to this Section, no Plot Plan shall be approved unless it complies with the following standards:

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; C-13
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.[128]

[125] Noise Element, p. 10.
[126] Noise Element, p. 10.
[127] DEIR, p. ES-2.
[128] Ordinance No. 348 § 18.30(C).

The County cannot make the first two of these required findings. First, as discussed above, the Project does not conform with all of the requirements of the General Plan because it conflicts with the General Plan's agriculture and noise policies by converting 619 acres of important farmland without proposing any mitigation and by failing to disclose and mitigate the Project's operational noise impacts. Second, the development of the land would not be designed for the protection of the public health, safety, and general welfare. Contrary to the Staff Report's conclusion, the County lacks substantial evidence to conclude that the Project will not have significant public health and noise impacts.[129] Specifically, the FEIR failed to conduct a health risk analysis of the Project's TAC emissions. The FEIR also underestimated the Project's significant operational noise impacts related to HVAC units. Therefore, the Commission cannot make the requisite findings to recommend approval of the Plot Plans.

C-13 Cont.

Zone Change

The Project site has a split zoning classification of Controlled Development Areas (W-2) and Heavy Agriculture, ten-acre minimum (A-2-10).[130] The Change of Zone proposes to change the zoning of the site to entirely Specific Plan with the associated proposed Specific Plan zoning ordinance that would specify the permitted uses and development standards for each of the Specific Plan Planning Areas and the map that would define the Specific Plan Planning Area boundaries.[131]

A planning commission resolution recommending approval of a Zone Change requires compliance with Section 20.3 of Ordinance No. 348. This Section requires the Commission 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. It would also allow significant operational noise impacts that violates the Noise Element policies. Therefore, the Commission cannot recommend approval of the Zone Change.

C-14

Tentative Tract Map

The Tentative Tract Map is a proposal for a Schedule A subdivision to subdivide the entire 619.1 gross acre site into 330 lots.[132]

C-15

[129] Staff Report, p. 26.
[130] Staff Report, p. 17.
[131] Staff Report, p. 17.
[132] Staff Report, p. 23.

A planning commission resolution recommending approval of a Tentative Tract Map requires compliance with Section 20.3 of Ordinance No. 348, as well as the Subdivision Map Act. Accordingly, the County 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.[133]

C-15 Cont.

The Commission 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. The Project also conflicts with the General Plans Noise Element policies related to prevention and mitigation of excessive noise levels. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments above demonstrate, the Project will have significant public health and noise impacts that were not adequately disclosed, analyzed or mitigated.[134] Specifically, the FEIR failed to conduct a health risk analysis of the Project's TAC emissions. The FEIR also underestimated the Project's significant operational noise impacts related to HVAC units. Therefore, the Commission cannot make the requisite findings to recommend approval of the Tentative Tract Map.

[133] Subdivision Map Act §§ 66474, 66473.5; Ordinance No. 348 § 20.3.
[134] Staff Report, p. 26.

IX. CONCLUSION

For the reasons discussed above, the FEIR for the Project is inadequate under CEQA. The Commission may not approve the Project or adopt the FEIR in its current form. 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 Commission remand the Project 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

ARM:ljl

EXHIBIT A

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.43

October 21, 2025

Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: Thermal Ranch FEIR
Riverside County, California
Review and Comment on Noise Analysis

Dear Ms. McGuire,

Per your request, we have reviewed the Final Environmental Impact Report (FEIR) for the Thermal Ranch Specific Plan, state clearinghouse number 2023050624. The responses to our comments are contained in comments C-2, C-8, C-9, C-24, C-25, C-26, C-27, and C-28. These comments are a response to a letter regarding our concerns with the project, dated January 10th, 2025.

Response to Comments C-2 and C-25

These comments respond to my previous comment that not all worst-case sensitive recievers were analyzed, notably 62101 Tyler Street. The FEIR reaffirms that the City omitted this residence from its impact analysis, stating "the Project noise analyst identified the closest residence on the east side of Tyler Street, which is identified in the DEIR as R2" (FEIR, page 38). And that receiver location "R2 at 62800 Tyler Street was intended to describe the nearest existing noise sensitive residential land use immediately east of the Project site" (FEIR, page 81).

There is no evidence provided that shows 62800 Tyler Street is the closest or worst-case reciever, especially when compared to 62101 Tyler Street. ***Figure 1*** below compares the footprint of the Project to both single-family resdnces. 62101 Tyler Street is on the top, with a red line drawn at the closest façade to the Project. The line travels south, and is roughly 50 feet west of the closest façade of 62800 Tyler Street. ***Figure 3*** and ***Figure 2*** show each of the two sites, resepctivley, where it can be seen that both are single family residences that need to be considered.

C-16

The FEIR states that when "considering the location of the actual operational noise source activities in relation to the noise sensitive residential land uses east of the Project site, Receiver Location R2 at 62800 Tyler Street represents the worst-case sensitive receiver location" (FEIR, page 82). The operational noise sources are clustered more to the southern edge of the site. However, with the large distances from the operational noise sources, it is likely that 62101 Tyler Street will experience louder noise levels due to being closer to the noise sources to the west, resulting in a potenitally significant noise impact that the County has not addressed. Since the FEIR did not consider noise impacts to 62101 Tyler Street, the conclusion that noise impacts on local residents would be either less than significant, or fully mitigated, lacks support. The EIR should be amended to include this site as a reciever to verify that there are no unreported significant operational noise impacts.

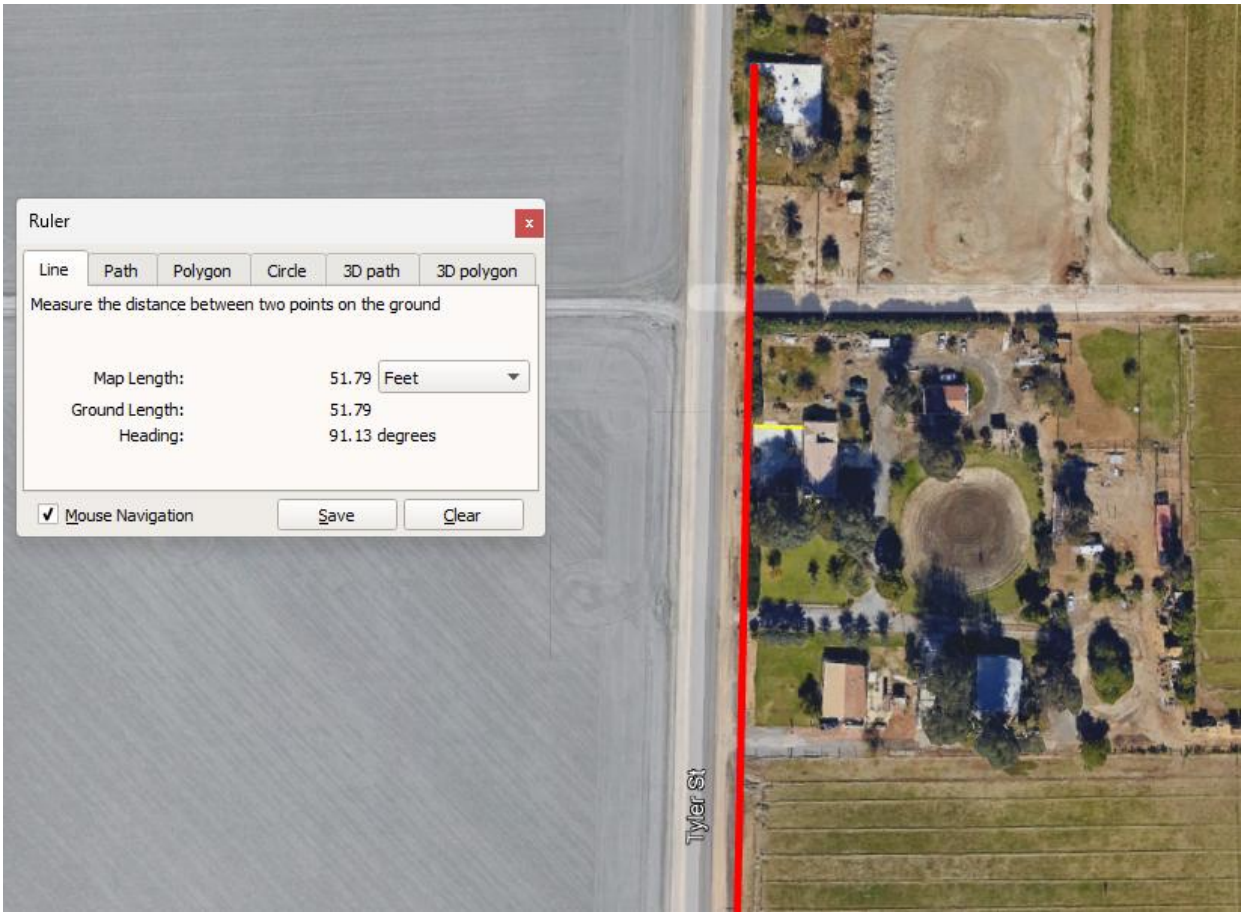


Figure 1: Comparison of both 62800 and 62101 Tyler Street to Project Footprint

Figure 2: Street View of 62800 Tyler Street

C-16
Cont.

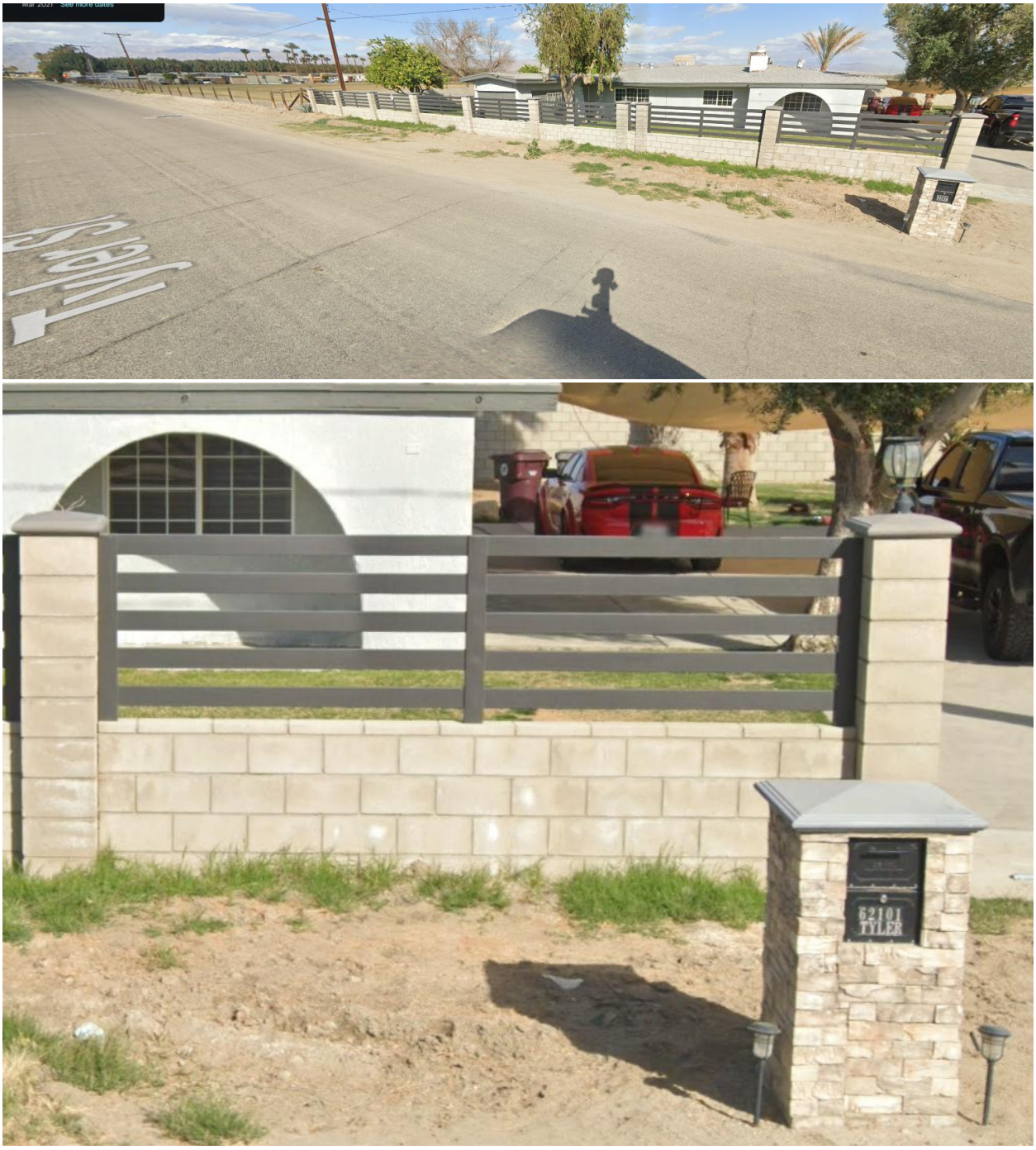


Figure 3: Street View of 62101 Tyler Street

C-16
Cont.

Response to Comments C-9, C-26, and C-27

This comment is in response to my previous comment that the EIR's noise analysis underestimated the time HVAC systems would run under worst-case conditions in the notoriously hot Coachella Valley region. The FEIR asserts that "continuous operation of Project HVAC systems is unreasonable. HVAC systems are designed to cycle on and off for optimal performance and energy efficiency and current California Building Codes are designed for maximum building insulation" (FEIR, page 53).

This statement underestimates the reasonably foreseeable extent of HVAC use at the Project site given regional climate conditions.

While an HVAC system may not run 100 percent of the time, it may run for a full hour or more on hot days. On days that are exceptionally hot, which is common in Thermal CA, as documented in our previous letter, it is reasonable to presume a full hour of continuous air conditioning operation at a time. Under CEQA, project applicants are required to evaluate noise impacts under reasonably foreseeable operating conditions to ensure that potential environmental effects are fully disclosed and mitigated. For HVAC systems, this means estimating noise assuming continuous operation for a foreseeable amount of time, even though such systems would not typically run nonstop. This approach is necessary because CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are "substantial".[1] Evaluating only average or intermittent operation could underestimate actual impacts during peak conditions—such as extreme heat, which is not uncommon at the project site—when the system may run continuously. Thermal, CA has a desert climate which regularly experiences high heat. For example, climate data shows that Thermal has average summer highs above 110 °F (43 °C) on average 28 days per year, and exceed 120 °F (49 °C) every other year.[2] By failing to analyze HVAC use during reasonably foreseeable high temperature scenarios, the FEIR understates impacts associated with extended HVAC use, and fails to ensure that appropriate mitigation measures are incorporated into the Project to protect local residents and surrounding land uses.

The FEIR also states that the "comment suggesting that an increase 0.1 dBA (45.0 to 45.1 dBA) is significant completely fails to recognize that the existing nighttime ambient noise levels at the nearest noise sensitive receiver locations currently range from 61.1 to 67.4 dBA" (FEIR, page 54). The threshold of significance chosen within the noise analysis was 45 dBA. Our comment was following the County's own threshold. An impact may be significant if an absolute noise threshold is exceeded, even if the ambient threshold is not exceeded.

C-16
Cont.

The FEIR continues, saying that "CEQA states that for residential projects, the effect of noise generated by project occupants and their guests is not a significant effect on the environment" (FEIR, page 54). This is immaterial to the HVAC analysis because HVAC's are mechanical equipment installed as Project components. The FEIR's assertion does not affect the finding within our letter. The FEIR also argues that the "HVAC units for residences planned in PA-3 are expected to be pad-mounted, while any roof-top HVAC units would be screened with an acoustical barrier. Furthermore, the east boundary of the project will be bounded by six-foot masonry walls," (FEIR, page 83). The County has not included any analysis to prove that these project features would reduce noise levels below significance thresholds and has not made them mandatory Project components.

As it stands, reasonable usage of an HVAC system at the Project site under regional heat conditions would increase noise levels over the FEIR's chosen significance threshold, as documented in our previous letter. We believe that this is an unreported significant impact and should be corrected with analysis of mitigation. The analysis must detail noise levels before and after implementation of

[1] CEQA Appendix G, Section 13 (Noise Impacts).
[2] See NOAA Climate data for Thermal, California, 1950-present, available at https://en.wikipedia.org/wiki/Thermal,_California (10/21/25).

mitigation. And any proposed mitigation must demonstrate that noise levels would be reduced to below the applicable thresholds. C-16 Cont.

Very truly yours,
WILSON IHRIG

Jack Meighan
Associate

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

JACK MEIGHAN

Associate

Jack joined Wilson Ihrig in 2021 and is an experienced acoustics engineer with expertise in projects involving rail transit systems, highways, CEQA analysis, environmental noise reduction, mechanical drawing reviews, and construction noise and vibration mitigation. He has hands-on experience with project management, including client coordination and presentations, as well as in designing, developing, and testing MATLAB code used in acoustics applications. Additionally, his expertise includes taking field measurements, developing test plans and specifying, purchasing, setting up and repairing acoustic measurement equipment. He has experience in using Traffic Noise Model (TNM), CadnaA, EASE, Visual Basic, LabView, and CAD software.

Education

- B.S. in Mechanical Engineering, University of Southern California, Los Angeles, CA

Project Experience

Metro Regional Connector, Los Angeles CA
Planned, took, and processed measurements as part of a team to determine the effectiveness of floating slab trackwork for a new subway in downtown Los Angeles that travels below the Walt Disney Concert Hall and the Colburn School of Music.

Rodeo Credit Enterprise CEQA Analysis for New Construction, Palmdale, CA
Wrote an accepted proposal and executed it for a noise study project to determine noise mitigation requirements on a new housing development. Led all aspects of the project and managed the budget during all phases of project completion. Completed 5 separate projects of this type for this developer.

Blackhall Studios, Santa Clarita, CA
Led the vibration measurement effort for a new soundstage directly adjacent to an existing freight and commuter rail line. Tested equipment, processed data, and analyzed results to determine the vibration propagation through the soil to the proposed soundstage locations, and was part of the team that developed mitigation techniques for the office spaces directly next to the rail line.

Octavia Residential Condos CEQA Study, San Francisco, CA
Calculated the STC ratings for the proposed windows to meet Title 24 requirements, modeled the acoustic performance of floor and ceiling structures, researched noise codes, helped with a mechanical design review, and wrote a report summarizing the results for a new Condominium project being developed in San Francisco.

San Diego International Airport Terminal I Replacement, CA
Conducted interior noise and vibration measurements, analyzed measurement data to help determine project criteria, modeled the existing and future terminals in CadnaA, and was part of a team that did a complete HVAC analysis of the entire terminal, as part of a CEQA analysis where a new terminal for the airport is being designed.

Five Points Apartments Noise Study, Whittier, CA
Took measurements, researched sound data and solutions, and recommended mitigation for a new apartment complex that was located next to an existing car wash, as part of a CEQA review.

USC Ellison Vibration Survey, Los Angeles, CA
Conducted vibration measurements as part of a survey to determine the effectiveness of vibration isolation platforms that are used to insulate cell growth in a cancer research facility. Determined the effectiveness and presented this information to the client. Researched and recommended a permanent monitoring system so the client could view data in real time.

TEN50 Condos 'Popping' Noise Investigation, Los Angeles, CA
Was part of a team that investigated the noise source of an unwanted popping noise in luxury condos in Downtown Los Angeles. Helped isolate the noise source location with accelerometers to determine where vibrations were occurring first and used an acoustic camera to determine where in the condo the noise was coming from.

2000 University Project, Berkely, CA
Wrote a construction noise monitoring plan based on environmental noise calculations, wrote a report summarizing the results, and attending a meeting with the client to discuss options.

Bay Area Rapid Transit (BART) On-Track, CA, San Francisco Bay Area, CA*
Day to day project manager, responsible for meetings, presentations, and coordination with the client for an ongoing noise study on the BART system. Developed MATLAB code to process measurements and determine areas where high corrugation was present, contributing to excessively high in-car noise levels. Performed noise measurements inside both the right of way and the vehicle cabin, in addition to rail corrugation measurements.

California I-605/SR-60 Interchange Improvement, Los Angeles, CA*
Developed a noise model of the area that predicted sound levels for abatement design, in addition to conducting noise measurements and analysis. Led the Team in use of the FHWA Traffic Noise Model Software for the project, involving three major highways and two busy interchanges extending over 17 miles in southern California.

Sound Transit On-Track, Seattle, WA*
Took measurements, fixed equipment, and developed software in MATLAB to process Corrugation Analysis Trolley measurements as part of an ongoing noise study on the Sound Transit Link system. Tested vibration data to determine the best measurement and processing techniques to store the data in an online database for in-car measurements.

LA Metro CRRC Railcar Testing, Los Angeles, CA*
Led the effort to plan the measurements, determine measurement locations and finalize the test plan. Formulated a method to capture speed data directly from legacy train vehicles. Executed noise and vibration specification measurements for new rail cars delivered by CRRC.

City of Los Angeles, Pershing Square Station Rehabilitation Noise Monitoring, CA*
Built noise models, wrote a construction noise plan, and assisted in on-site construction noise issues as they arose for a renovation of the Pershing Square metro station in downtown Los

Angeles. Trained construction personnel in techniques for noise reduction and how to conduct noise monitoring measurements to meet project specifications.

City of Orange Metrolink Parking Garage Construction Monitoring, CA*
Wrote an adaptive management vibration monitoring plan, set up equipment to monitor live vibration levels, and generated weekly reports as part of an effort to build a new parking garage. Designed, planned, and completed measurements to predict and mitigate pile driving construction impacts at three historic building locations adjacent to the construction site. Coordinated with the client whenever an on-site problem arose.

LA Metro Westside Subway Construction, Los Angeles, CA*
Planned, organized, and processed noise measurements for the Purple Line extension construction. Implemented both long term microphones to measure noise levels and accelerometers to measure vibration levels in existing subway tunnels. Oversaw noise monitoring at sensitive construction sites for the project and worked with the contractor to find ways to reduce construction noise levels by approximately 10dB.

Montreal Réseau Express Métropolitain, Canada*
Conducted vibration propagation measurements used to create models to predict operational vibration levels for an under-construction transit line. Managed equipment, solved problems in the field, and wrote parts of the report summarizing the findings of the acoustic study.

NHCRP Barrier*
Took on-highway measurements and wrote, designed, developed, and tested MATLAB code to identify specific spectrograms to use for analyses for a project evaluating barrier reflected highway traffic noise differences in the presence of a single absorptive or reflective noise barrier.

Siemens Railcar Testing for Sound Transit, Seattle, WA*
Measured in-car noise and vibration for new rail cars delivered by Siemens. Developed new internal techniques for measurements based on the written specifications. Contributed to the team that helped identify issues that new cars had in meeting the Sound Transit specifications for noise and vibration. Participated in developing the test plan and specified then acquired new equipment for the measurement.

Toronto/Ontario Eglinton Crosstown Light Rail, Final Design, Canada*
Assisted in vibration propagation measurements, analysis, and recommendations for mitigation for a 12-mile light-rail line both on and under Eglinton Avenue. Set up and ran equipment for at-grade measurements with an impact hammer for underground measurements with an impact load cell that was used during pre-construction borehole drilling.

EXHIBIT B

HOUSE AGRICULTURAL CONSULTANTS

Providing expertise in agricultural science, management, & appraisal since 1977.

1105 Kennedy Place
Suite 1
Davis, California 95616
telephone +1 530 753-3361

October 21, 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 EIR of Thermal Ranch Project, Riverside County, with respect to agricultural matters

Dear Ms. McGuire:

At your request, we have reviewed the final 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 first 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.

1 The FEIR and reply to Comment C-10 fail to comply with CEQA and Riverside County's General Plan

To achieve its agenda of converting 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, without mitigation, the FEIR reply comment C-10 deliberately confuses ongoing and predicted irrigation water shortages with an alleged inability, or uselessness, of mitigation through an agricultural conservation easement (*ACE*). This is contradictory: on the one hand the comment states,

> The Coachella Valley does not support dry dirt farming, and all crops are reliant upon limited and precious groundwater and primarily imported Colorado River water.

C-17

Then the comment develops its water-shortage argument:

> The DEIR and consultations with CVWD warn of increasing water scarcity facing regions dependent on Colorado River water. As climate change and other factors have put an increasing strain on water supplies, agriculture remains the largest consumer use of water in California. The question facing farmers served by Colorado River water is when the subject long-term drought may cease, and whether adequate and stable water supplies will return in the future.

It is significant here that the reply comment wonders when the long-term drought will end so that stable water supplies will return in the future because such qualitative reasoning is speculation, not a logical argument about the instant issue. The only supported conclusion that can be made about drought is that California (and the West as a whole) has a long-term history of periodic droughts alternating with non-drought conditions.

Then the reply to comment C-10 takes a contradictory turn to argue for the viability of agriculture in the Coachella Valley:

> Moreover, it is arguable that, in the long-term, reduced demand for agricultural irrigation water may benefit other existing farm operations by improving the availability of Colorado River water and reducing pressure on increased costs of irrigation water. In this respect, the subject conversion may serve to make agricultural use elsewhere in the Coachella Valley more financially viable, as recognized by Riverside County numerous General Plan policies.

This is a statement about land elsewhere in the Coachella Valley. The FEIR implicitly argues that the project's converwion of agricultural land, if not mitigated, would somehow benefit long-term agricultural production in the Coachella Valley. This argument is non-sensical. The argument for conserving remaining agricultural land in Coachella Valley, far from the subject, does not in any logical way lead to a conclusion of the infeasibility or nonutility of mitigating for agricultural land lost to the subject project, because it is an orthogonal issue. Moreover, conserving other land elsewhere in the Coachella Valley would not in any way exacerbate any existing water shortage or even affect it, as the conserved land would be in existing agricultural use—but the FEIR presents it as such:

C-17
Cont.

> These facts would support a conclusion by the County Board of Supervisors that requiring agricultural conservation easements as mitigation is infeasible for policy reasons (not just economic reasons), as well as being insufficient to substantially reduce the project's impacts to a level of less than significant.

In actuality, per CEQA, Riverside County is obliged to mitigate this significant impact to the greatest extent feasible. The FEIR has not only failed to demonstrate it is infeasible to do so, but has actually admitted very clearly in its reply to comment C-10 that its general plan has as an objective that requires "the preservation of the physical and economic integrity of agricultural lands".[1] It is inarguable that losing 619 acres of important farmland would be inconsistent with this objective, and that preserving 619 acres of agricultural land in the Coachella Valley with an ACE would both meet this general-plan objective and effectively reduce impacts, as required by CEQA. The fact that an ACE may not fully mitigate the loss of farmland does not diminish its ability to mitigate agricultural impacts to the greatest extent feasible.

Throughout California, for decades, cities and counties have obtained ACEs to mitigate the loss of important farmland. To wit, it is the industry-standard means of mitigating the loss of important farmland. To remain consistent with its general plan and to comply with CEQA, Riverside County must obtain an ACE and include it as mitigation for this significant environmental impact of converting 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance.

2 Conclusion

In closing, our review of this project has led us to conclude that the FEIR does not support its conclusion that mitigation by ACE is infeasible. Available evidence supports the opposite conclusion: mitigation of agricultural-land loss is feasible. Mitigation is an offset to impacts, not a cancellation of impact, as the FEIR incorrectly asserts. The County's conclusion also contradicts

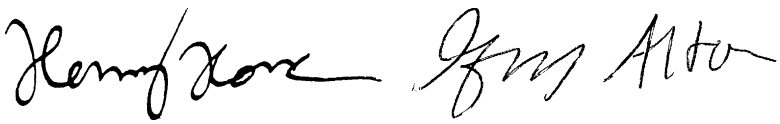
[1] ⟨*https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i*⟩, section 4.2.

our understanding of CEQA requirements as established by California court precedent (see *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412.). This project's conversion of agricultural land must be mitigated. C-17 Cont.

3 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

4 Appendix: Qualifications of House Agricultural Consultants

4.1 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 lost profits.

– Value of lost crops, emblements, and foodstuff inventory.

– Farm management: good farming practices in orchards, such as almonds and walnuts, row crops.

– 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.

– 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-residential 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 Yellowstone, State of Montana, September 2025.—Topic: standard of care for crop farming · fire safety · wheat. *Colin Funk v. Stephen Becker and Becker Farming* (case no. DV-56-2024-0001290-NE in Montana's Thirteenth Judicial District). A matter of fire damage to rural-residentian land near Billings, Montana. The plaintiff retained and designated Mr. House to analyze the defendants' standard of care in performing harvest operations on a wheat field where a fire originated. To our understanding, Mr. House's opinions, which were submitted to the court in a written report, were of evidentiary relevance to cousel's legal theory of negligence by the defendants.

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 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 list 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, 2015–2021.

– *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.

4.2 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.

Gregory A. House

Agricultural Consultant
Agronomist
Professional Farm Manager
Rural Appraiser
Farmer

Experience

Agricultural Consultant, House Agricultural Consultants, providing agricultural science, economics, management, and appraisal services, 1983–present

Farmer, 1987–present. Organic apples, peaches, cherries, apricots, field and seed crops

Corporation Secretary & Consulting Agronomist, Hannesson, Riddle & Associates, Inc., 1977–1983.

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 #501
- Certified Professional Agronomist (CPAg), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd. Certificate # 2319
- Certified Crop Advisor CCA), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd.
- Accredited Rural Appraiser (ARA), American Society of Farm Managers & Rural Appraisers, Certificate #749
- Certified General Appraiser, State of California License # AG 001999

  These credentials have continuing education requirements with which I am in compliance.

Qualifications of Gregory A. House, continued

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
- Courses of the American Society of Farm Managers and 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

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, Yolo
- United States Tax Court Qualified Expert Witness
- United States Bankruptcy Court Qualified Expert Witness

A list of depositions and trial appearances is available upon request

Qualifications of Gregory A. House, continued

Awards

- CCOF Presidential Award, California Certified Organic Farmers, February, 2001
- Meritorious Service in Communications, American Society of Farm Managers and Rural Appraisers, November 2004
- H.E. Buck Stalcup Excellence in Education Award, American Society of Farm Managers and Rural Appraisers, October, 2011

Appointments & Activities

- Adjunct Lecturer, Farm Management Courses ARE 140 & ARE 198, University of California, Davis, Department of Agricultural & Resource Economics, current
- Instructor, "Principles of Farm Management", an Internet course of the American Society of Farm Managers and Rural Appraisers, 1996 to 2007
- President, California Chapter American Society of Farm Managers & Rural Appraisers 1994–1995; Secretary-Treasurer, 1984 to 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 and 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; Chairman of Certification Committee, Yolo Chapter, 1993-2005; Member of the Finance Committee, 1998-current
- CCOF Foundation Going Organic Program, Management Team member and Chapter Leader, 2006-current
- USDA Organic Grant Panel member, 2002
- City of Davis Open Space and Habitat Commission, 2006–current, 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

Qualifications of Gregory A. House, continued

Speaking Engagements

- Guest Lecturer, University of California at Davis, Agricultural Economics 145, Farm and Rural Resources Appraisal, on professional farm appraisal (1985–1997)
- Guest Lecturer, University of California at Davis, Agricultural Economics Department, Course 140, "Farm Management", on adoption of new technologies, farm budgeting, cash flow management, cost accounting, etc. (1985–present)
- Guest Lecturer, University of Florida at Gainesville, Vegetable Crops Department, seminar on transition to organic agriculture, (November, 1994)
- Featured Program Speaker, 1995 Eco-Farm Conference, Asilomar, California , on economics of organic apple production
- Guest Speaker, Community Alliance with Family Farmers, on farm management and agricultural economics, 1996 and 1997
- Instructor, American Society of Farm Managers and Rural Appraisers, Course M-12, "Standards and Ethics for Professional Farm Managers", March, 1997
- Guest Speaker, American Horticultural Society, "Challenges of Organic Stone Fruit Production", Sacramento, California, July 2001
- Organizer and Presenter, Going Organic Kickoff Meetings, November 2005 and December 2006
- Master of Ceremonies, California Certified Organic Farmers, Annual Meeting, February, 2006, Sacramento, California
- Featured Program Speaker, 2012 Eco-Farm Conference, Asilomar, California, "Imitating Natural Systems: Towards an Indigenous Agro-forestry"
- Seminar presentation: "What Makes for Comparable Sales in Condemnation Appraisal" , Rpid Fire Seminar, American Society of Farm Managers and Rural Appraisers, Reno , NV, October 2013.

Publications

- "Principles of Farm Management", Course M-10, a 40-hour professional credit Internet educational offering of the American Society of Farm Managers & Rural Appraisers
- "Conservation Issues in Agriculture", a unit of Course M-25, a 15-hour professional credit Internet 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

House Agricultural Consultants
Partial Listing of Clients Served

Allied Insurance Group

American Farmland Trust

Balverne Winery & Vineyards
Sonoma County, California

Bank of America

Best, Best & Kreiger, LLP
Riverside, California

California Giant Berry Farms

California Department of Fish & Game
Wildlife Conservation Board

California Department of Justice

City of Davis

City of Fairfield

City of Morgan Hill

City of Sacramento, City Attorney

Continental Casualty Company
Chicago, Illinois

County of Solano

County of Yolo

Downey, Brand, Seymour & Rohwer
Sacramento, California

Glenn-Colusa Irrigation District

Hamel Ranch Partnership
Davis, California

Harris Farms, Inc.

Farmers' Home Administration (U.S.D.A.)
Sacramento, California

Internal Revenue Service, District Counsel
San Francisco, California

McMahon-Graf Partners
Winters, California

Morrison & Foerster
San Francisco, California

Oakdale Irrigation District

Pajaro Valley Water Management Agency
Watsonville, California

Phillips 66 Company

Republic Indemnity Company of America
San Francisco, California

Royal & Sun Alliance

Sacramento Valley Conservancy

Sacramento Valley Farm Credit Banks

San Andreas Farms
Fresno County, California

San Joaquin Council of Governments

San Luis Delta Mendota Water Authority

Sanwa Bank, N.A.
Sacramento, California

Solano Land Trust

Stanford Management Company
Stanford University

The Nature Conservancy

The Prudential Agricultural Group
Sacramento, California

The Travelers Insurance Company

The Trust for Public Land

U. S. Fish & Wildlife Service

U. S. Departments of Justice & Treasury

University of California, Davis

Yolo Land Trust

Wells Fargo Bank, N.A.

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October 21, 2025

Via Email

Romelio Ruiz, Chair
Marissa Gruytch, Vice Chair
Ariel Savage
Shellie Clack
Bill Sanchez
Planning Commission
County of Riverside
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Russell Brady, Senior Planner
Planning Department
County of Riverside
4080 Lemon Street, 9th Floor
Riverside, CA 92502
rbrady@rivco.org

Re: SAFER Comment
Thermal Ranch Specific Plan
Environmental Impact Report - SCH No. 2023050624
Planning Commission Agenda Item 3.3 (Oct. 22, 2025)

To the Riverside County Planning Commission and Senior Planner Brady:

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 as Agenda Item 3.3 at the Planning Commission's October 22, 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 and (2) failing to demonstrate that additional mitigation for the Project's significant and unavoidable impacts to agricultural resources is infeasible. 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 Planning Commission refrain from recommending approval of the Project and EIR at this time and, instead, direct 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 is required 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: D-1

(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

D-1
Cont.

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.

D-1 Cont.

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].)

D-2

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.)

D-2
Cont.

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 Planning Commission refrain from recommending approval of the Project and EIR at this time and, instead, direct 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

E

From: **Brady, Russell** rbrady@RIVCO.ORG
Subject: FW: Request for the Immediate Rejection of the Thermal Ranch Project
Date: October 15, 2025 at 2:36 PM
To: JEREMY SMITH jeremy@thermalranchca.com, Vaughn, James james.vaughn@procopio.com, John Criste jcriste@terranovaplanning.com, Kimberly Cuza kcuza@terranovaplanning.com, DePalatis, Paul pdepalatis@msaconsultinginc.com, Brizuela, Christopher cbrizuela@msaconsultinginc.com

RB

See below comments received today.

Any further substantial ones I'll forward over to you for your awareness at least.

For any CEQA heavy comments, be ready at Planning Commission to address those as best as possible and if the Commission does move it on to Board for consideration then for any such CEQA heavy comments it would be appropriate to prepare response to comments to make part of the record.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025

How are we doing? Click the Link and tell us

From: Mayra Zamora Cruz <zamoramayra8@gmail.com>
Sent: Wednesday, October 15, 2025 1:35 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
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.

E-1

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.

E-2

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

Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure.
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County of Riverside California

F

From: **Hildebrand, John** JHildebr@RIVCO.ORG
Subject: Fw: NO to Thermal Ranch
Date: October 22, 2025 at 6:59 AM
To: Brady, Russell rbrady@RIVCO.ORG

JH

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Athens Marron <aemarron@ucdavis.edu>
Sent: Tuesday, October 21, 2025 9:45:45 PM
To: TLMA Planning Hearings <planninghearings@rivco.org>; pbrady@rivco.org <pbrady@rivco.org>
Subject: NO to Thermal Ranch

Dear Planning Commission,

My name is Athens Marrón and I am writing to you today as both as a former student who grew up in the Coachella Valley and as a current PhD candidate at the University of California, Davis, where my research focuses on youth development, sense of belonging, and holistic well-being.

Through my academic work, I have studied how environmental conditions directly impact students' ability to learn, their sense of identity, and their connection to their communities. The research is clear: students do not leave their lived experiences at the classroom door. They bring with them the full weight of their circumstances, including the air they breathe and the water they drink.

When you approve projects that worsen existing environmental conditions near schools, you send a powerful message to young people and their families: that their health and futures are negotiable. This directly undermines students' sense of belonging and their ability to focus on learning. Educational spaces must be sanctuaries where students feel safe, valued, and heard.

I urge you to reject this proposal of the Thermal Beach Club. Our children deserve better. You have the power to protect them. Their health, education, and future depend on you. This vote will define whether you prioritized profit or protected our most vulnerable. Community will remember.

Thank you for your time and consideration.

From: **Cornejo-Henish, Monique** MCHenish@Rivco.org
Subject: FW: Public Comment for Thermal Ranch Project Hearing on 10/22/25
Date: October 21, 2025 at 3:18 PM
To: Brady, Russell rbrady@RIVCO.ORG

MC

Hi Russell,

This was received and forwarded to the commissioners.

Thank you!

Monique Cornejo-Henish

Administrative Services Analyst II
Riverside County TLMA-Planning Department
4080 Lemon Street, 12th Floor, Riverside, CA 92501
Ph: 951-955-7436
mchenish@rivco.org

RIVERSIDE COUNTY
PLANNING DEPARTMENT

From: Allyson Jeffredo <a.jeffredo2@gmail.com>
Sent: Monday, October 20, 2025 10:03 PM
To: TLMA Planning Hearings <planninghearings@rivco.org>
Subject: Public Comment for Thermal Ranch Project Hearing on 10/22/25

Dear Planning Commission,

As a lifelong resident of the Eastern Coachella Valley currently residing in Indio, I am writing to express my concerns and opposition to the Thermal Ranch project. The project has faced widespread opposition from residents of Thermal and neighboring communities, who have repeatedly raised serious concerns. Based on the project's Environmental Impact Report, the project poses substantial threats to the Thermal and larger communities where the full risks and consequences cannot be fully evaluated or understood until the project is developed. Because of this, the cumulative impacts of this project are not and cannot be fully realized without putting the Thermal community at great risk. Noteworthy impacts include but are not limited to:

G-1

- Threats to the environment with increased traffic and incredible amounts of expected animal waste
- Strains on public utilities infrastructure, such as water, waste management

- Strains on public utilities infrastructure, such as water, waste management, 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 is going to drastically change the landscape of the primarily agricultural and rural Eastern Coachella Valley, which is in direct opposition to the County's own General Plan especially those elements in the Chapter 10: Healthy Communities Element, includes Environmental Justice that states, "The policies in the Healthy Communities Element are intended to address Riverside County's key health issues and challenges with the goal of fostering the overall health and well-being of Riverside County residents. In addition, particular attention is paid to those residents who are considered especially vulnerable to public health risks, including children, the elderly, the disabled, and those in poverty." Based on Census data, the Thermal community is likely to fall within the purview of a community the County has identified it will pay close attention to: G-1 Cont.

- 12% are children 0 – 19 years of age
- 12% are 65 years or older; 69% of that group is 85 years or older
- 21.5% are considered disabled
- 30% are those experiencing poverty

Additionally, this project will convert agricultural land to commercial use in an area that is in no way equipped or retrofitted for this type of development. Among many points in the General Plan this project does not align with, I would like to specifically outline the General Plan element Countywide Land Uses HC 2.1.b that outlines, "Directing new growth to existing, urbanized areas while reducing new growth in undeveloped areas of Riverside County." This project will draw from limited resources and rely on public infrastructure that is already underinvested that includes but is not limited to: G-2

- Significant burden on water resources with a 5-million-gallon water storage reservoir that will divest public water for private use
- Significant burden on the electrical grid that will require the investment and installation of a power grid
- Production of tons of animal waste byproduct with no comprehensive plan for waste maintenance and removal

Approval of this project will be in direct opposition of H.C. 1.2, "Promote an understanding of the connections between the built environment and the on-going health challenges in Riverside County." The Environmental Impact Report itself, along with numerous community members, has outlined many impacts this project will have on the Thermal and larger community that will no doubt impact ongoing health challenges and the overall communities' safety and wellbeing.

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 have expressed only tentative support for similar reasons.

In summary, approving the Thermal Ranch project would contradict the County's

In summary, approving the Thermal Ranch project would contradict the County's own commitments to environmental justice and sustainable growth. I urge the Planning Commission 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.

Sincerely,

Allyson Jeffredo

H

From: **Hildebrand, John** JHildebr@RIVCO.ORG
Subject: Fw: Opposition to Thermal Ranch
Date: October 22, 2025 at 6:58 AM
To: Brady, Russell rbrady@RIVCO.ORG

JH

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Francisco Carrillo <ciscooo.c@gmail.com>
Sent: Wednesday, October 22, 2025 1:44:57 AM
To: TLMA Planning Hearings <planninghearings@rivco.org>
Subject: Opposition to Thermal Ranch

Hello and good morning. My name is Francisco Carrillo and I am from Indio, California. Like other community members who may find themselves here today, I am taking time to publicly voice my opposition to the Thermal Ranch luxury development in the Eastern Coachella Valley. This development does not reflect the interest of the community, nor do the developers have the best interest of community members at heart. Much opposition has been voiced against not only this development, but previous ones as well. Any statement saying otherwise is a hideous lie. The people of Thermal have been told in the past that these types of developments will be beneficial, but it has been proven time and time again that this is not the case. The only people who benefit from this are the wealthy who can afford these said luxuries. How does one make sense of approving these developments in the same areas where some people who live there do not even have access to clean water? For years community members have reported arsenic in their water and poor quality infrastructure. Thermal Ranch would only perpetuate displacement, health issues, and environmental risks to the area. Do not make the mistake of listening to developers, listen to the people who live there, to the people who actually care about their community. Say no to this proposal.

Thank you

I

From: **Geena Vescial** geenaart@gmail.com
Subject: Planning Commission Hearing: A Comment Opposing Thermal Ranch Luxury Development
Date: October 21, 2025 at 11:47 PM
To: TLMA Planning Hearings planninghearings@rivco.org
Cc: Brady, Russell rbrady@RIVCO.ORG

Dear Riverside Planning Committee,

My name is Geena Vescial and I've been a resident of the Coachella Valley since 1999. **I am saying "NO" to Thermal Ranch!** Over the past decade, I've witnessed many changes in this beautiful place I call home, most notably, the unprecedented shifts in our weather. Coachella Valley residents bear much of the consequences of respiratory diseases like asthma and allergic symptoms that predominantly affect our children and the elderly due to the constant uproot in natural sediment when building irresponsible luxury developments like the Thermal Ranch. Moreover, the hundreds of thousands of people that draw each spring during festival season also stir up dust and add pollutants on the I-10. The other environmental hazard and elephant in the room is the Salton Sea. An ongoing issue that is impacting both the natural habitat of migrant birds and health to its residents. For this, I believe the Thermal Ranch will bring even more environmental and health concerns to what residents are currently facing today. This project plans to house up to 2,700 horses, bringing about 140,000 pounds of manure each day. YUCK! This will not only add harmful bacteria in the air but will continue to add pollutants. The smell from the manure alone can deter snowbirds and tourists from visiting the Coachella Valley. This can result in the loss of economic dollars that snowbirds and tourists bring into the region each year. So, Committee Members, please, please, reconsider this irresponsible project that stinks in so many ways. Thank you all for your time and attention to this matter.

Sincerely,
Geena

J

From: **Cecilia L** cecy.lemus1995@gmail.com
Subject: No to THERMAL RANCH
Date: October 21, 2025 at 2:52 PM
To: TLMA Planning Hearings planninghearings@rivco.org, Brady, Russell rbrady@RIVCO.ORG

CL

Hello,

I am in opposition of the Thermal Ranch Project proposed plan. Do not pass this plan as it will increase gentrification and worsen access to clean air and water. This project is ridiculous. Focus on the current needs of local residents without the false promises of infrastructure from luxury projects such as this one, Thermal Beach, Thermal Race Car Track and the airport. It's all for wealthy people. Do right by the ECV community RIVCO.

Cecilia Lemus

K

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

RIVERSIDE COUNTY
PLANNING DEPARTMENT

REPORT OF ACTIONS
RIVERSIDE COUNTY PLANNING COMMISSION – OCTOBER 22, 2025
COUNTY ADMINISTRATIVE CENTER
1st Floor, Board Chambers, 4080 Lemon Street, Riverside, CA 92501

1st District	2nd District	3rd District	4th District	5th District
Ariel Savage	Marissa Gruytch Vice-Chair	Shellie Clack	Bill Sanchez	Romelio Ruiz Chair

CALL TO ORDER: 9:00 a.m.
OATH OF OFFICE
ROLL CALL: Members Present: Savage, Gruytch, Clack, and Sanchez
Members Absent: Ruiz

1 CONSENT CALENDAR

1.1 ADOPTION OF THE REVISED 2025 PLANNING COMMISSION CALENDAR – VACATING THE DECEMBER 31, 2025, HEARING DATE.

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Gruytch, 2nd by Commissioner Sanchez

By a vote of 4-0 (Commissioner Ruiz absent), the Planning Commission took the following action:

APPROVED the Revised 2025 Planning Commission Calendar.

2 PUBLIC HEARINGS CONTINUED

2.1 28852 CONDITIONAL USE PERMIT NO. 240025 (CUP240025) - CEQA Exempt per Section 15301 (Existing Facilities) and 15061(b)(3) (Common Sense) - Applicant: Salim Daher, c/o DB Oil – Engineer/Representative: Western States Engineering c/o Joseph Karaki – Second Supervisorial District – Meadowbrook Zoning Area – Elsinore Area Plan: Community Development: Commercial Retail (CD:CR) – Location: Northwest of Highway 74, south of El Toro Cutoff – 1.44 Gross Acres - Zoning: Manufacturing-Service Commercial (M-SC). REQUEST: The request is a proposal for a Type 21 (Off-Sale Beer, Wine & Spirits) Alcoholic Beverage Control (ABC) License for Off-Site Consumption of Beer, Wine and Spirits at a proposed Gas Station and Convenience Store approved under PPT210016 - APN(s): 347-130-028, 347-130-029 – Continued from September 17, 2025 – Project Planner: Suhaim Bawany at 951-955-3103, or email at sbawany@rivco.org.

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Gruytch, 2nd by Commissioner Sanchez

By a vote of 4-0 (Commissioner Ruiz absent), the Planning Commission took the following action:

FOUND that the project is Exempt from the California Environmental Quality Act (CEQA); and,

APPROVED Conditional Use Permit No. 240025, subject to the Advisory Notification Document and Conditions of Approval.

3 PUBLIC HEARINGS – NEW

3.1 29115 CONDITIONAL USE PERMIT NO. 240012 (CUP240012) – CEQA Exempt (Section §15303) – Applicant: Ron Meraz – Engineer/Representative: CJ Hortsman, HAB Design Group – Fourth Supervisorial District – Lower Coachella Valley Zoning District – Eastern Coachella Valley Area Plan: Community

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Gruytch, 2nd by Commissioner Sanchez

Development: Mixed Use Area (MUA) – Location: The project site is in the community of Vista Santa Rosa, currently with an assigned address of 56400 Monroe Street. The property is east of the Palms Golf Club – 3.28 gross acres – Zoning: Community Development: Mixed Use (MU) – REQUEST: Conditional Use Permit No. 240012 proposes the conversion of an existing 3,752 square-foot (SF) grocery store with attached two-story residence to a grocery market and delicatessen, with administrative office space on second floor. A detached, 1,674 SF one-story residence at the rear of the site will be converted into commercial kitchens to prepare food for onsite consumption as well as local catering. The Project scope includes approximately 282 SF of additions to both buildings, 1,290 SF of new outdoor covered dining areas, attached trellis structures, fencing and landscape improvements. Related cases PAR230092 – APN: 760-080-003, -004 – Project Planner: Jose Merlan at 951-955-0314, or email at jmerlan@rivco.org. STAFF RECOMMENDS CONTINUANCE TO NOVEMBER 5, 2025.

By a vote of 4-0 (Commissioner Ruiz absent), the Planning Commission took the following actions:

CONTINUED item to November 5, 2025.

3.2 29007 CONDITIONAL USE PERMIT NO. 190012 – Adopt a Mitigated Negative Declaration (CEQ190075 / EA190075) - Applicant: J. Craig Mann – Third Supervisorial District – Rancho California Zoning Area – Southwest Area Plan: Community Development: Commercial Retail (0.20- 0.35 FAR) – Location: Southwest corner of Keller Drive and SH-79/ Winchester Road – 6.98 Gross Acres – Zoning: General Commercial (C-1/C-P) - REQUEST: CUP190012 is a request to construct a 125,781 square foot self-storage facility on a 6.98 gross acre lot. The Project will include a total of eight buildings: one 1,172 square foot office building and seven storage buildings ranging in size from 1,525 square feet to 76,744 square feet. Three of these buildings will provide 20 parking spaces for RV storage. In addition to these interior spaces, there will be 32 available outdoor RV and boat parking spaces. The Project will be open 7 days a week between the hours of 8:00 a.m. to 6:00 p.m., and there will be 4 employees overseeing the site operations per a shift. There are 7 standard parking spaces, including 1 ADA space and 1 EV space, and 3 additional spaces dedicated to loading and unloading – Project Planner: Blanca Bernardino at 951-955-6503, or email at bbernardino@rivco.org.

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Clack, 2nd by Commissioner Sanchez

By a vote of 4-0 (Commissioner Ruiz absent), the Planning Commission took the following action:

ADOPTED a Mitigated Negative Declaration for Environmental Assessment No. 190075; and,

APPROVED Conditional Use Permit No. 190012, subject to the Advisory Notification Document and Conditions of Approval as modified at hearing.

3.3 27623 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–

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Sanchez, 2nd by Commissioner Gruytch

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 .

By a vote of 3-1 (Commissioner Ruiz absent), the Planning Commission took the following actions:

ADOPTED Planning Commission Resolution No. 2025-006; and

Recommended that the Board of Supervisors take the following action:

ADOPT a Resolution Certifying the Environmental Impact Report (EIR); and,

TENTATIVELY APPROVE General Plan Amendment No. 23001; and,

TENTATIVELY APPROVE Specific Plan No. 401; and,

TENTATIVELY APPROVE Change of Zone No. 2300003; and,

TENTATIVELY APPROVE Tentative Tract Map No. 38578; and,

TENTATIVELY APPROVE Plot Plan No. 240016; and,

TENTATIVELY APPROVE Plot Plan No. 230005; and,

TENTATIVELY APPROVE Plot Plan No. 230006, subject to the Advisory Notification Document and Conditions of Approval.

4 GENERAL PLAN AMENDMENT INITIATION PROCEEDINGS

4.1 29016 INITIATION OF FOUNDATION COMPONENT GENERAL PLAN AMENDMENT NO. 240019 (GPA240019) – REQUEST: The applicant requests that the County of Riverside consider whether to recommend the initiation of GPA240019 to change the General Plan Foundation Component of one (1) parcel from Open Space: Rural (OS: RUR) to Community Development: Low Density Residential (CD: LDR), Rural: Rural Desert (R: RD) and Open Space: Rural (OS: RUR) to allow for the submittal of an application for development of plus/minus 70 single-family homes and an eco-tourist glamping resort, while maintaining the northern portion of the project site as open space. Additional development applications and review by the County to confirm that the overall project complies with applicable standards, policies, findings, and other requirements will be required if the proposed GPA240019 is initiated by the

Planning Commission Action:
Public Hearing: Closed

District 1 – Support
District 2 – Support
District 3 – Support
District 4 – Support
District 5 – Absent

RECOMMENDED the Initiation of Foundation Component General Plan Amendment No. 240019 move forward to the Board of Supervisors.

Board of Supervisors. – Fourth Supervisorial District – Pass & Desert District – Western Coachella Valley Area Plan – Applicant: Scott Taschner – Engineer / Representative: SRK Architects c/o Brian Kite – Existing Zoning: W-2 (Controlled Development Areas) – Existing Land Use: Open Space: Rural (OS: RUR) – Location: 0.5 miles north of Mission Lakes Boulevard and 0.9 miles east of Annandale Avenue – APN(s): 638-070-001 – 161.76 Gross Acres – Project Planner: Elizabeth Mora-Rodriguez at (951) 955-3024, or email at emorarodriguez@rivco.org.

5 WORKSHOPS

NONE

6 PUBLIC COMMENTS

Public Comments Received

7 DIRECTOR'S REPORT

NONE

8 COMMISSIONER'S COMMENTS

NONE

ADJOURNMENT: 12:37 p.m.

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

Memorandum

DATE: **October 22, 2025**

TO: **Planning Commission**

FROM: **Russell Brady, Project Planner**

RE: **Item 3.3 – Public Comments**

Since the preparation of the staff report, additional public comments in opposition have been received that are attached for consideration by the Planning Commission. No written responses have been prepared to these comments yet.

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

Desert Office · 77588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7040

Brady, Russell

From: Hildebrand, John
Sent: Wednesday, October 22, 2025 6:59 AM
To: Brady, Russell
Subject: Fw: NO to Thermal Ranch

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Athens Marron <aemarron@ucdavis.edu>
Sent: Tuesday, October 21, 2025 9:45:45 PM
To: TLMA Planning Hearings <planninghearings@rivco.org>; pbrady@rivco.org <pbrady@rivco.org>
Subject: NO to Thermal Ranch

Dear Planning Commission,

My name is Athens Marrón and I am writing to you today as both as a former student who grew up in the Coachella Valley and as a current PhD candidate at the University of California, Davis, where my research focuses on youth development, sense of belonging, and holistic well-being.

Through my academic work, I have studied how environmental conditions directly impact students' ability to learn, their sense of identity, and their connection to their communities. The research is clear: students do not leave their lived experiences at the classroom door. They bring with them the full weight of their circumstances, including the air they breathe and the water they drink.

When you approve projects that worsen existing environmental conditions near schools, you send a powerful message to young people and their families: that their health and futures are negotiable. This directly undermines students' sense of belonging and their ability to focus on learning. Educational spaces must be sanctuaries where students feel safe, valued, and heard.

I urge you to reject this proposal of the Thermal Beach Club. Our children deserve better. You have the power to protect them. Their health, education, and future depend on you. This vote will define whether you prioritized profit or protected our most vulnerable. Community will remember.

Thank you for your time and consideration.

Brady, Russell

From: Cecilia L <cecy.lemus1995@gmail.com>
Sent: Tuesday, October 21, 2025 2:52 PM
To: TLMA Planning Hearings; Brady, Russell
Subject: No to THERMAL RANCH

Hello,

I am in opposition of the Thermal Ranch Project proposed plan. Do not pass this plan as it will increase gentrification and worsen access to clean air and water. This project is ridiculous. Focus on the current needs of local residents without the false promises of infrastructure from luxury projects such as this one, Thermal Beach, Thermal Race Car Track and the airport. It's all for wealthy people. Do right by the ECV community RIVCO.

Cecilia Lemus

Brady, Russell

From: Cornejo-Henish, Monique
Sent: Tuesday, October 21, 2025 3:18 PM
To: Brady, Russell
Subject: FW: Public Comment for Thermal Ranch Project Hearing on 10/22/25

Hi Russell,

This was received and forwarded to the commissioners.

Thank you!

Monique Cornejo-Henish
Administrative Services Analyst II
Riverside County TLMA-Planning Department
4080 Lemon Street, 12th Floor, Riverside, CA 92501
Ph: 951-955-7436
mchenish@rivco.org

RIVERSIDE COUNTY
PLANNING DEPARTMENT

From: Allyson Jeffredo <a.jeffredo2@gmail.com>
Sent: Monday, October 20, 2025 10:03 PM
To: TLMA Planning Hearings <planninghearings@rivco.org>
Subject: Public Comment for Thermal Ranch Project Hearing on 10/22/25

Dear Planning Commission,

As a lifelong resident of the Eastern Coachella Valley currently residing in Indio, I am writing to express my concerns and opposition to the Thermal Ranch project. The project has faced widespread opposition from residents of Thermal and neighboring communities, who have repeatedly raised serious concerns. Based on the project's Environmental Impact Report, the project poses substantial threats to the Thermal and larger communities where the full risks and consequences cannot be fully evaluated or understood until the project is developed. Because of this, the cumulative impacts of this project are not and cannot be fully realized without putting the Thermal community at great risk. Noteworthy impacts include but are not limited to:

- Threats to the environment with increased traffic and incredible amounts of expected animal waste

- Strains on public utilities infrastructure, such as water, waste management, 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 is going to drastically change the landscape of the primarily agricultural and rural Eastern Coachella Valley, which is in direct opposition to the County's own General Plan especially those elements in the Chapter 10: Healthy Communities Element, includes Environmental Justice that states, "The policies in the Healthy Communities Element are intended to address Riverside County's key health issues and challenges with the goal of fostering the overall health and well-being of Riverside County residents. In addition, particular attention is paid to those residents who are considered especially vulnerable to public health risks, including children, the elderly, the disabled, and those in poverty." Based on Census data, the Thermal community is likely to fall within the purview of a community the County has identified it will pay close attention to:

- 12% are children 0 – 19 years of age
- 12% are 65 years or older; 69% of that group is 85 years or older
- 21.5% are considered disabled
- 30% are those experiencing poverty

Additionally, this project will convert agricultural land to commercial use in an area that is in no way equipped or retrofitted for this type of development. Among many points in the General Plan this project does not align with, I would like to specifically outline the General Plan element Countywide Land Uses HC 2.1.b that outlines, "Directing new growth to existing, urbanized areas while reducing new growth in undeveloped areas of Riverside County." This project will draw from limited resources and rely on public infrastructure that is already underinvested that includes but is not limited to:

- Significant burden on water resources with a 5-million-gallon water storage reservoir that will divest public water for private use
- Significant burden on the electrical grid that will require the investment and installation of a power grid
- Production of tons of animal waste byproduct with no comprehensive plan for waste maintenance and removal

Approval of this project will be in direct opposition of H.C. 1.2, "Promote an understanding of the connections between the built environment and the on-going health challenges in Riverside County." The Environmental Impact Report itself, along with numerous community members, has outlined many impacts this project will have on the Thermal and larger community that will no doubt impact ongoing health challenges and the overall communities' safety and wellbeing.

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 have expressed only tentative support for similar reasons.

In summary, approving the Thermal Ranch project would contradict the County's own commitments to environmental justice and sustainable growth. I urge the Planning Commission 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.

Sincerely,

Allyson Jeffredo

Brady, Russell

From: Geena Vescial <geenaart@gmail.com>
Sent: Tuesday, October 21, 2025 11:47 PM
To: TLMA Planning Hearings
Cc: Brady, Russell
Subject: Planning Commission Hearing: A Comment Opposing Thermal Ranch Luxury Development

Dear Riverside Planning Committee,

My name is Geena Vescial and I've been a resident of the Coachella Valley since 1999. **I am saying "NO" to Thermal Ranch!** Over the past decade, I've witnessed many changes in this beautiful place I call home, most notably, the unprecedented shifts in our weather. Coachella Valley residents bear much of the consequences of respiratory diseases like asthma and allergic symptoms that predominantly affect our children and the elderly due to the constant uproot in natural sediment when building irresponsible luxury developments like the Thermal Ranch. Moreover, the hundreds of thousands of people that draw each spring during festival season also stir up dust and add pollutants on the I-10. The other environmental hazard and elephant in the room is the Salton Sea. An ongoing issue that is impacting both the natural habitat of migrant birds and health to its residents. For this, I believe the Thermal Ranch will bring even more environmental and health concerns to what residents are currently facing today. This project plans to house up to 2,700 horses, bringing about 140,000 pounds of manure each day. YUCK! This will not only add harmful bacteria in the air but will continue to add pollutants. The smell from the manure alone can deter snowbirds and tourists from visiting the Coachella Valley. This can result in the loss of economic dollars that snowbirds and tourists bring into the region each year. So, Committee Members, please, please, reconsider this irresponsible project that stinks in so many ways. Thank you all for your time and attention to this matter.

Sincerely,
Geena

Brady, Russell

From: Hildebrand, John
Sent: Wednesday, October 22, 2025 6:58 AM
To: Brady, Russell
Subject: Fw: Opposition to Thermal Ranch

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Francisco Carrillo <ciscooo.c@gmail.com>
Sent: Wednesday, October 22, 2025 1:44:57 AM
To: TLMA Planning Hearings <planninghearings@rivco.org>
Subject: Opposition to Thermal Ranch

Hello and good morning. My name is Francisco Carrillo and I am from Indio, California. Like other community members who may find themselves here today, I am taking time to publicly voice my opposition to the Thermal Ranch luxury development in the Eastern Coachella Valley. This development does not reflect the interest of the community, nor do the developers have the best interest of community members at heart. Much opposition has been voiced against not only this development, but previous ones as well. Any statement saying otherwise is a hideous lie. The people of Thermal have been told in the past that these types of developments will be beneficial, but it has been proven time and time again that this is not the case. The only people who benefit from this are the wealthy who can afford these said luxuries. How does one make sense of approving these developments in the same areas where some people who live there do not even have access to clean water? For years community members have reported arsenic in their water and poor quality infrastructure. Thermal Ranch would only perpetuate displacement, health issues, and environmental risks to the area. Do not make the mistake of listening to developers, listen to the people who live there, to the people who actually care about their community. Say no to this proposal.

Thank you

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October 21, 2025

Via Email

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Marissa Gruytch, Vice Chair
Ariel Savage
Shellie Clack
Bill Sanchez
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Russell Brady, Senior Planner
Planning Department
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Riverside, CA 92502
rbrady@rivco.org

Re: SAFER Comment
Thermal Ranch Specific Plan
Environmental Impact Report - SCH No. 2023050624
Planning Commission Agenda Item 3.3 (Oct. 22, 2025)

To the Riverside County Planning Commission and Senior Planner Brady:

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 as Agenda Item 3.3 at the Planning Commission's October 22, 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 and (2) failing to demonstrate that additional mitigation for the Project's significant and unavoidable impacts to agricultural resources is infeasible. 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 Planning Commission refrain from recommending approval of the Project and EIR at this time and, instead, direct 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 is required 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.)

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 Planning Commission refrain from recommending approval of the Project and EIR at this time and, instead, direct 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

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October 21, 2025

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Re: Agenda Item No.: 3.3: Specific Plan No. 401, General Plan Amendment No. 2300001, Change of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, Plot Plan No. 230006 (Thermal Ranch Specific Plan) (SCH 2023050624)

Dear Chair Ruiz, Commissioners, Director Hildebrand, and Mr. Brady:

On behalf of Californians Allied for a Responsible Economy ("CARE CA"), we submit these comments on Agenda Item No. 3.3: Specific Plan No. 401, General Plan Amendment No. 2300001, Change of Zone No. 2300003, Tentative Tract Map No. 38578, Plot Plan No. 240016, Plot Plan No. 230005, Plot Plan No. 230005, Plot Plan No. 230005 for the Thermal Ranch Specific Plan Project (SCH 2023050624) ("Project") proposed by Thermal Ranch, LLC ("Applicant"). The Staff Report asks the Commission to recommend that the Board of Supervisors certify the Project's

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Final Environmental Impact Report ("FEIR") and approve the Specific Plan, General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plans.[1]

CARE CA's review of the FEIR and Staff Report, in conjunction with its experts, demonstrates that the County has not complied with CEQA or applicable land use requirements. Accordingly, the Planning Commission should continue the hearing on the Project until after County Staff has prepared and circulated a revised EIR for public review.

In addition to the FEIR, 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.[2] 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 lots, single-family attached and detached homes and resort condominiums.[3] 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.[4] 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.[5] 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.[6] The proposed Project site is located in the southeastern portion of the Coachella Valley in the central unincorporated area of Riverside County.[7]

On January 10, 2025, **CARE CA submitted comments on the Project's Draft** Environmental Impact Report ("DEIR"). The comments were supported by expert evidence and demonstrated that the Project will result in potentially significant

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[1] County of Riverside Planning Department, Staff Report on Agenda Item No. 3.3, available at: https://riversidecountyca.iqm2.com/Citizens/FileOpen.aspx?Type=30&ID=193487&MeetingID=3235.
[2] DEIR, p. ES-2.
[3] DEIR, p. ES-2.
[4] DEIR, p. ES-2.
[5] DEIR, p. ES-2.
[6] DEIR, p. ES-2.
[7] DEIR, p. 1-3.

impacts related to public health, noise, and agricultural resources that were not adequately disclosed, analyzed or mitigated in the DEIR. CARE CA's air quality expert demonstrated that the County improperly relied on Localized Significance Thresholds ("LSTs") to assess health risk, which failed to identify potentially significant impacts from 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 FEIR and Staff Report fail to resolve the majority of these issues. There is substantial evidence in the record before the Planning Commission demonstrating that the Project will result in significant public health, noise, agriculture, and energy impacts that are not adequately disclosed, analyzed, or mitigated in the FEIR.

For example, CARE CA's noise expert, Jack Meighan[8] of Wilson Ihrig demonstrates that the County failed to address his previous comments by continuing to underestimate operational noise impacts due to inaccurate baseline noise measurements and underestimated HVAC usage.

CARE CA's agricultural resources consultant, Henry House[9] provides substantial evidence demonstrating that an agricultural conservation easement ("ACE") would be feasible and effective mitigation that would substantially reduce the Project's significant impacts from converting important farmland.

Furthermore, there is substantial evidence demonstrating that the Project may have significant project-specific and cumulative health risk impacts that the County failed to disclose because of continued reliance on inapplicable LSTs to assess health risks. The County also failed to quantify the Project's expected energy consumption during construction or consider available energy conservation measures in violation of CEQA. Finally, the Project is inconsistent with the County's General Plan.

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[8] See **Exhibit A,** Jack Meighan Comments on the Final Environmental Impact Report for Thermal Ranch Specific Plan ("Meighan Comments").
[9] See **Exhibit B,** Henry House Comments on the Final Environmental Impact Report for Thermal Ranch Specific Plan ("House Comments").

The Planning Commission cannot recommend approval of the Project until the errors and omissions in the FEIR are remedied, and until the County demonstrates compliance with the General Plan. Accordingly, the Planning Commission should continue the hearing on the Project until after County Staff has prepared a revised EIR and recirculated it for public review and comment.

I. 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.

II. THE COUNTY HAS NOT COMPLIED WITH CEQA

CEQA requires public agencies to analyze the potential environmental impacts of their proposed actions in an EIR.[10] "The foremost principle under CEQA is that the Legislature intended the act to be interpreted in such manner as to

[10] Public Resources Code ("PRC") § 21100.

afford the fullest possible protection to the environment within the reasonable scope of the statutory language."[11]

While 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."[12] As the courts have explained, a prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process."[13] "The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail 'to enable who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'"[14]

Recirculation of an EIR prior to certification is addressed in CEQA Section 21092.1, and CEQA Guidelines Section 15088.5. "When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 ... ***but prior to certification***, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report." PRC § 21092.1.

"Significant new information" includes:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project.

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[11] *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal ("Laurel Heights I")* (1988) 47 Cal.3d 376, 390 (internal quotations omitted).

[12] *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (emphasis added) (quoting *Laurel Heights I*, 47 Cal.3d at 391, 409, fn. 12).

[13] *Berkeley Jets*, 91 Cal.App.4th at p. 1355; *see also San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722 (error is prejudicial if the failure to include relevant information precludes informed decision making and informed public participation, thereby thwarting the statutory goals of the EIR process); *Galante Vineyards*, 60 Cal.App.4th at p. 1117 (decision to approve a project is a nullity if based upon an EIR that does not provide decision-makers and the public with information about the project as required by CEQA); *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946 (prejudicial abuse of discretion results where agency fails to comply with information disclosure provisions of CEQA).

[14] *Sierra Club*, 6 Cal.5th at p. 516 (quoting *Laurel Heights I*, 47 Cal.3d at 405).

> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
> 14 CCR §15088.5; *Mountain Lion Coal. v. Fish and Game Comm'n* (1989) 214 Cal.App.3d 1043.

The courts have held that "Section 21092.1 was intended to encourage meaningful public comment."[15] Therefore, where, as here, the draft EIR was "fundamentally and basically inadequate or conclusory in nature," recirculation is required in order to permit meaningful public review.[16]

The FEIR does not meet CEQA's basic legal standards. As discussed below, the FEIR still fails to accurately describe the Project's environmental setting. As with the DEIR, the FEIR lacks analysis of critical impacts, relies on unsupported studies to conclude that impacts would be less than significant, and fails to adopt all feasible mitigation to reduce the Project's impacts to the greatest extent feasible. The FEIR must be revised and recirculated to comply with CEQA.

III. THE FEIR'S DESCRIPTION OF THE ENVIRONMENTAL SETTING REMAINS INADEQUATE

The FEIR fails to adequately describe the environmental setting against which the Project's environmental impacts are to be measured. This contravenes the fundamental purpose of the environmental review process, which is to determine whether there is a potentially substantial, adverse change compared to the existing setting.[17] CEQA requires that a lead agency include a description of the physical environmental conditions, or "baseline," in the vicinity of the project as they exist at the time environmental review commences.[18] As the courts have repeatedly held, the impacts of a project must be measured against the "real conditions on the ground."[19] The description of the environmental setting constitutes the "baseline" physical conditions against which the lead agency assesses the significance of a

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[15] *Laurel Heights Impr. Assn. v. Reg. of Univ. of Cal.* (1993) 6 Cal. 4th 1112, 1130 ("*Laurel Heights II*").
[16] *Id.*
[17] CEQA Guidelines § 15063(d).
[18] CEQA Guidelines § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.
[19] *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.; *Save Our Peninsula Com. V. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the-Sea v. Bd. Of Supervisors of Monterey County* (986) 183 Cal.App.3d 229, 246.

project's impacts.[20] An environmental setting is required "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.[21]

A. The FEIR Still Fails to Accurately Describe the Existing Noise Environment

CARE CA's previous comments explained that the DEIR failed to accurately describe the existing noise environment by leaving out the closest sensitive receptor residence next to the Project site. The FEIR fails to resolve this deficiency.

Mr. Meighan explains that the County still fails to consider the Project's potentially significant operational noise impacts on the closest residence to the Project site, which is located at 62101 Tyler Street.[22] Instead, the County reasserts that it adequately analyzed 62800 Tyler Street as the "nearest existing noise sensitive residential land use immediately east of the Project site."[23] This conclusion is not supported by substantial evidence.[24]

Mr. Meighan provides substantial evidence in his comments that 62101 Tyler Street is the closest residence by referring to aerial photographs of the two residences.[25] These photos demonstrate that 62101 Tyler Street is closer to the Project site.[26] Mr. Meighan goes on to explain that although 62101 Tyler Street is approximately 50 feet west of the 62800 Tyler Street residence and farther from the clustered operational noise sources near the southern edge of the Project site, it may still experience greater noise impacts due to its closer proximity to noise sources located along the western portion of the site.[27] Therefore, the FEIR's continued failure to include 62101 Tyler Street in its analysis, renders the subsequent operational noise analysis unsupported and potentially underestimated.

The County must revise and recirculate the EIR to provide an accurate analysis of the Project site's existing noise environment against which to measure the Project's true construction noise impacts as required by CEQA.

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[20] CEQA Guidelines § 15125(a); *Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th at 321.
[21] CEQA Guidelines § 15125(a).
[22] Meighan Comments, p. 1.
[23] FEIR, p. 81.
[24] Meighan Comments, pp. 1-2.
[25] *Id.*
[26] *Id.*
[27] *Id.*

IV. THE PROJECT MAY HAVE SIGNIFICANT, UNMITIGATED PUBLIC HEALTH IMPACTS

A. The FEIR Lacks Substantial Evidence to Conclude that the Project Will Not Result in Significant Health Risks from Exposure to Toxic Air Contaminants

CARE CA's previous comments demonstrated that the DEIR's analysis of the Project's potential health risks was inadequate because it relied on LSTs. CARE CA's air quality expert explained that compliance with LSTs does not support a less than significant conclusion because LSTs only assesses criteria air pollutants, not TACs, which have a carcinogenic effect when inhaled. Additionally, LSTs assess 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 standards ("AAQS"). LSTs do not assess health risk from human exposure to toxic emissions.

In response, the County continues to claim that its reliance on LSTs was appropriate and adequately supports the FEIR's conclusion that the Project's construction activities will not create any significant health risks.[28] The County argues that because its analysis determined that PM2.5 emissions will not exceed the LST for PM2.5, that DPM emissions will also not cause health impacts.[29] However, this conclusion is misleading, unsupported, and contrary to CEQA because PM2.5 is not a TAC, and LSTs do not measure cancer risk.

In *Sierra Club v. County of Fresno*, the California Supreme Court affirmed CEQA's mandate to protect public health and safety by holding that a CEQA document fails as an informational document when it fails to disclose the public health impacts from air pollutants that would be generated by a development project.[30] As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact."[31] The Court concluded that the County's EIR was inadequate for failing to disclose the nature and extent of public health impacts caused by the project's air pollution.[32] As the Court

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[28] FEIR, p. 41.
[29] FEIR, p. 41.
[30] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[31] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[32] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.

explained, the EIR failed to comply with CEQA because after reading the EIR, "'the public would have no idea of the health consequences that result when more **pollutants are added to a nonattainment basin.'"**[33]

Similar to *Sierra Club*, the FEIR fails to provide an adequate analysis and **discussion of the Project's potential health risks.** While it is true that DPM is a subset of PM2.5, they are not the same.[34] Health risk from DPM is assessed based on inhalation exposure and unit risk factors (such as cancer potency), not based on total PM2.5 mass.[35] A recent study found that even when diesel exhaust is filtered to remove particles like DPM, the remaining gases can still harm health—especially the lungs, immune system, and during pregnancy.[36] This demonstrates that measuring total PM2.5 levels for exceedance of LST may not accurately capture the full health risks from diesel exhaust, and that a separate analysis of DPM needs to be conducted.

The County also argues that a **health risk analysis** ("HRA") is not necessary **because it is only required for facilities that are designated as "high priority."** The **County claims that the proposed Project does not qualify as a "high-priority"** facility, since it is not one of eight specific categories of existing sources of TACs **identified by the California Air Resources Board ("CARB"), nor is it located near** such sources (i.e., high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gas stations).[37] The FEIR also cites the South Coast Air Quality Management **District ("SCAQMD") Risk Assessment Procedures for Rules 1401, 1401.1, and 212** as evidence that an HRA is not required.[38]

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[33] *Id.*
[34] CARB, Overview: Diesel Exhaust & Health, available at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.
[35] Arlene Rosenbaum et al., *Analysis of Diesel Particulate Matter Health Risk Disparities in Selected US Harbor Areas*, available at: https://pmc.ncbi.nlm.nih.gov/articles/PMC3222501/?utm_source=chatgpt.com ("A higher intake fraction means the given level of emission creates more health risk because a larger fraction of the emitted mass is delivered to human lungs"); Lui S. Azam et al., *Assessing Hazard of Diesel Particulate Matter (DPM) in the Mining Industry: A Review of the Current State of Knowledge,* available at: https://link.springer.com/article/10.1007/s40789-024-00707-8 ("DPM being ultrafine, can penetrate deep into the lungs, translocate to other generally unreachable parts of the body, and show higher biological activity than its larger counterparts. However, their mass is negligible.").
[36] C. Weitekamp et al., *A Systemic Review of the Health Effects Associated with The Inhalation of Particle-Filtered and Whole Diesel Exhaust*, available at: https://assessments.epa.gov/risk/document/%26deid%3D349022?utm_source=chatgpt.com.
[37] FEIR, p. 100.
[38] SCAQMD. *Risk Assessment Procedures for Rules 1401, 1401.1, and 212.* (2024, October 31).

This argument is misplaced and inconsistent with guidance from both the **Office of Environmental Health Hazard Assessment ("OEHHA") and SCAQMD.** First, **the County conflates "health risk assessments", which are required for certain** industrial facilities pursuant to the Health and Safety Code and other air quality laws, with the analysis of health risk from human exposure to Project emissions which is required by CEQA for all projects. In *Sierra Club,* the Supreme Court clarified that CEQA does not **require a "Health Risk Assessment," but that CEQA** does require **a detailed analysis of health risk which correlates a project's air** emissions with the corresponding health risk from exposure to those emissions.[39] The FEIR ignores this distinction.

Second, even if a "health risk assessment" were at issue, which it is not, the list of eight facilities referenced in the FEIR is not an exclusive list of high-priority facilities. Rather, they represent facility types from which CARB recommends minimum separation distances for new sensitive land uses, not criteria for determining whether a project qualifies as high-priority under air toxics regulations. Moreover, the FEIR incorrectly relies on SCAQMD Risk Assessment Procedures for Rules 1401, 1401.1, and 212, which explicitly state that these **procedures** "should not be used for AB2588/Rule 1402," **as those rules have their** own separate risk assessment procedures.[40] These rules are inapplicable to the **County's duty under CEQA to analyze the cancer risk posed to nearby sensitive receptors from exposure to the Project's emissions. SCAQMD CEQA thresholds for health risk are contained in SCAQMD's** CEQA Handbook, which provides the following thresholds for measuring the significance of exposure to TAC emissions under CEQA:[41]

> **Maximum Incremental Cancer Risk ≥ 10 in 1 million**
> **Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)**
> **Chronic & Acute Hazard Index ≥ 1.0 (project increment)**

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http://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=8

[39] *Sierra Club,* 6 Cal.5th at 523.

[40] *Id.* at p. 2.

[41] See South Coast AQMD Air Quality Significance Thresholds, available at https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf%3Fsfvrsn%3D25&ved=2ahUKEwjNmdaY4LaQAxXeFTQIHRCuIC0QFnoECAsQAQ&usg=AOvVaw07n1OZu8NvvtfqOAnstLMG (last visited 10/21/25).

The FEIR fails to apply these thresholds and does not provide any evidence demonstrating that the Project would not result in a cancer risk that exceeds the SCAQMD significance thresholds for health risk. Therefore, the County lacks substantial evidence to conclude that the Project will not result in significant health risk impacts from TAC emissions during construction. The EIR must be revised and recirculated to include this analysis.

B. The FEIR Lacks Substantial Evidence to Conclude That The Project Would Not Result in Significant Cumulative Health Risk Impacts

The FEIR omits **an analysis of the Project's cumulative TAC emissions** by **failing to consider the Project's emissions** together with emissions from existing and proposed development near the Project site. This violates CEQA, Attorney General warehouse guidance, and updated SCAQMD guidance.

Under CEQA, an environmental review document must evaluate a **cumulative impact if the project's incremental effect combined with the effects of other projects is "cumulatively considerable."**[42] This determination is based on an **assessment of the project's incremental impacts "viewed in connection with the** effects of past projects, the effects of other current projects, and the effects of **probable future projects."**[43] **Proper cumulative impact analysis is vital because "the** full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which **they interact."**[44]

The recent Attorney General guidance document setting forth best practices for evaluating the environmental impacts of warehouse projects also mandates this analysis.[45] **The County characterized the Equestrian Center as an "unrefrigerated**

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[42] CEQA Guidelines § 15130(a).
[43] CEQA Guidelines §§ 15065(a)(3), 15355(b).
[44] *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 114.
[45] CEQA Guidelines § 15130; *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*, p. 7 **(Updated September 2022) ("[w]hen analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with** past, present, and reasonably foreseeable future projects, even *if the project's individual impacts alone do not exceed the applicable significance threshold.*"), available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

warehouse" in its CalEEMod calculations, thus acknowledging that warehouse guidance is applicable to the Project.[46] With respect to cumulative air quality and **GHG emissions analysis, the Attorney General's guidance states that best practices include "[w]hen analyzing cumulative impacts, thoroughly considering the project's** incremental impact in combination with past, present, and reasonably foreseeable future projects, ***even if the project's individual impacts alone do not exceed the*** *applicable significance threshold.*"[47]

Lastly, the City of Fontana was recently sued by the State Attorney General for failing to consider project emissions combined with emissions from other projects **to evaluate cumulative impacts, in reliance on SCAQMD's outdated 2003 White Paper which advocated this "drop in the bucket" approach to cumulative impacts.**[48] **The Attorney General's petition explained: "[t]o the extent that the 2003 SCAQMD** White Paper asserts that any project with less than significant individual air quality impacts also necessarily has less than significant cumulative air quality impacts, it **is inconsistent with CEQA."**[49] **The Attorney General's litigation resulted** in a settlement which requires compliance with an ordinance adopted on April 12, 2022 that establishes sustainability standards for warehouses in Fontana, including standards intended to address cumulative air quality impacts. For example, the standards include requirements that rooftop solar panels supply 100% of power for non-refrigerated portions of facilities with buildings over 400,000 square feet, trees in automobile parking areas, zero emission motorized operational equipment, other equipment electrification requirements, and solar-ready building roofs.[50]

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[46] DEIR, p. 3.10-2.
[47] *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (updated September 2022) (, available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.
[48] *People of the State of California v. City of Fontana,* Case No. CIVSB2121829, Petition for Writ of Mandate, available at https://climatecasechart.com/wp-content/uploads/case-documents/2021/20210723_docket-CIVSB2121829_petition-for-writ-of-mandate.pdf.
[49] *Id.*
[50] *Id.*, Stipulation For Entry Of Final Judgment On Consent, available at https://climatecasechart.com/wp-content/uploads/case-documents/2022/20220414_docket-CIVSB2121605-CIVSB2121829_stipulation.pdf.

SCAQMD is in the process of updating its guidance to reflect modern science and CEQA's requirements, specifically referencing the City of Fontana case.[51] Although new protocols have not yet been formally adopted, SCAQMD comments on similar warehouse projects recommend that the draft protocols be applied.[52] This demonstrates that the new thresholds are supported by substantial evidence, unlike the outdated 2003 guidance. SCAQMD's November 6, 2024, Working Group's draft cumulative impacts guidance recommends that agencies lower the cancer risk significance threshold to better reflect cumulative impacts.[53] The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met, and require a multi-step approach to assess health risk factors caused by the proposed project as well as cumulative health risk factors from the surrounding environment.[54]

The Project does meet the requirements under Step 1 of the flowchart, which is to determine the background cancer risk affecting the Project area via the SCAQMD Multiple Air Toxics Exposure Study ("MATES"). Per the MATES V Data Visualization Tool, the location of the Project site is within the 63rd percentile of cancer risk. Thus, because the Project is within the 90th to 50th percentile of excess cancer risk, the threshold would be reduced from 10 in one million to 7 in one million.[55]

Step 2 of the WG 6 flow diagram, which is to determine if there are 951 daily heavy-duty truck trips.[56] The FEIR does not quantify the number of heavy duty trucks that will be used. If this criteria is met, the threshold would be reduced even further.

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[51] SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13, pg. 4; *see* SCAQMD, Analyzing Cumulative Impacts from Air Toxics in CEQA Documents, https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).

[52] *Id.*

[53] SCAQMD, Analyzing Cumulative Impacts from Air Toxics in CEQA Documents, available at: https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new); SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.

[54] *Id.*

[55] SCAQMD MATES V Data Visualization Tool, Thermal, CA, available at: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page?views=Gridded-Cancer-Risk%2CNavigate-the-map#data_s=id%3AdataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A330%2Cid%3AdataSource_112-7c8f2a4db79b4a918d46b4e8985a112b%3A14101.

[56] *Id.*

The Project does meet the requirements under Step 3, which is to determine if the Project is located in an SB535 disadvantaged community or an AB617 community. If the project is within such an area, then the threshold would be reduced from 7 in one million to 5 in one million.[57] The proposed Project is located in Thermal, CA, which is designated as an AB617 community.[58] Therefore, the Project's cumulative air quality impacts need to at least be assessed against a 5 in one million significance threshold. If it is later determined that the Project will involve more than 951 heavy duty truck trips, then the significance threshold would be reduced further to 3 in one million.

The County's failure to quantify the Project's cumulative health risk impacts is inconsistent with CEQA, AG guidance, and SCAQMD recommendations. The County must revise and recirculate a new EIR to include a cumulative health risk analysis.

V. THE FEIR LACKS SUBSTANTIAL EVIDENCE TO SUPPORT A STATEMENT OF OVERRIDING CONSIDERATION FOR THE PROJECT'S SIGNIFICANT AGRICULTURE IMPACTS

A. The FEIR Fails to Include Any Mitigation for the Project's Significant Impacts Related to Conversion of Agriculture Land

CARE CA's previous comments demonstrated that the County lacks substantial evidence to conclude that the Project's impacts from the conversion of agricultural land is significant and unavoidable because the DEIR did not propose any mitigation as required by CEQA. Instead of resolving this issue by incorporating agricultural mitigation, the County merely asserts that an ACE would not be effective at reducing or avoiding impacts to less than significant levels and is infeasible for economic and policy reasons.[59] This conclusion is speculative and not supported by substantial evidence. Moreover, the County has rejected feasible mitigation to further reduce the Project's significant agricultural impacts, in violation of CEQA.

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

[58] CARB, Eastern Coachella Valley, available at: https://ww2.arb.ca.gov/capp/com/cip/eastern-coachella-valley.

[59] FEIR, pp. 56-57.

When an EIR identifies significant environmental impacts that may result from a project, the County must certify the EIR and make mandatory CEQA findings. Those findings include that the EIR complies with CEQA, that the County has mitigated all significant environmental impacts to the greatest extent feasible, and that any remaining significant environmental impacts are acceptable due to overriding considerations.[60] Accordingly, before an impact can be declared significant and unavoidable, the County must first adopt all feasible mitigation to reduce the impact to the greatest extent feasible, and must consider feasible mitigation recommended by commenters, when such measures would substantially lessen a significant environmental effect.[61] Mitigation is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors."[62] Additionally, findings of economic infeasibility must be supported by relevant economic data.[63]

Here, the County concludes that there is no effective mitigation available to reduce the Project's agricultural resources impacts. Specifically, the County claims that an ACE is infeasible because it conflicts with broader policy goals of reducing reliance on Colorado River water and allowing limited agricultural land conversion to support housing and economic development.[64] This conclusion is incorrect for several reasons.

First, while it may be true that drought conditions are placing a strain on the County's water supply, the County does not provide any evidence that a conservation easement would exacerbate this problem. In fact, Mr. House explains that conserving remaining agricultural land in Coachella Valley would not exacerbate any existing water shortage or even effect it because the conserved land would already be in existing agricultural use. Furthermore, Mr. Meighan highlights

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[60] PRC § 21081(a)(3), (b); CEQA Guidelines §§ 15090, 15091.
[61] *Covington v Great Basin Unif. Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879-883.
[62] CEQA Guidelines § 15364.
[63] *County of San Diego v. Grossmont Cuyamaca Community College Dist.* (2006) 141 CA4th 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); *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 CA3d 1167 (record that included no analysis of comparative costs, profits, or economic benefits of scaled-down project alternative was insufficient to support finding of economic infeasibility*); Burger v. County of* Mendocino (1975) 45 CA3d 322 (infeasibility finding based on economic factors cannot be made without estimate of income or expenditures to support conclusion that reduction of motel project or relocation of some units would make project unprofitable).
[64] FEIR, pp. 56-57.

the fact that drought in California has a long-term history of alternating drought and non-drought conditions, and that those facts do not support a conclusion that the loss of important farmland should not be mitigated.[65]

Second, contrary to the County's claim, conservation of remaining agricultural land would not make mitigating the Project's agricultural impacts infeasible due to policy reasons.[66] The General Plan expressly endorses the use of conservation easements to conserve the County's agricultural land. Open Space Policy 7.2 states "[t]he County of Riverside shall seek out available funding for farmland conservation. Examples of programs which may be employed include: land trusts; *conservation easements*... Land Conservation Contracts...to encourage conservation of productive agricultural land in Riverside County's Incentive Program...."[67]

Third, while the County does allow the conversion of up to 7% of land designated as agricultural to facilitate additional housing and economic development, this does not render an ACE infeasible as a mitigation measure under CEQA. Mitigation is "feasible" if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors."[68] ACE's clearly meet this definition. They are commonly used in CEQA mitigation for farmland conversion and have been repeatedly upheld by courts as a valid tool to offset impacts to agricultural resources.[69] Additionally, several policies in the County's own General Plan encourage conservation of agricultural land. This includes Open Space Policy 7.2, which, as discussed above, explicitly supports the use of conservation easements as a way to conserve agricultural land in the County. Thus, an ACE remains a feasible and effective mitigation measure. The County also has not provided any evidence that other mitigation measures are infeasible or would not effectively reduce impacts from the Project's conversion of agricultural land. Nor could it, because there is substantial evidence in the record demonstrating that ACE's are feasible and effective mitigation.

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[65] House Comments, p. 2.
[66] House Comments, p. 2.
[67] Open Space Element, p. OS-20.
[68] CEQA Guidelines § 15364.
[69] *V Lions Farmg, LLC v. County of Kern* (2020) 45 Cal.App.5th 814; *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412.

Therefore, the FEIR lacks substantial evidence to conclude that impacts from the conversion of agricultural land will be significant and unavoidable. The County must revise the EIR to include the necessary analysis of mitigation measures recirculate it for public review.

B. The Project's Conversion of Farmland is Inconsistent with the Imperial County General Plan

The Project's proposed conversion of 568.3 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, conflicts with the County's general plan.[70] CEQA requires an agency to determine whether a Project would "[c]ause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."[71] Inconsistency with a general plan is both a land use impact and a significant impact under CEQA.[72]

The FEIR fails to adequately disclose that the Project's conversion of agriculture land for non-agriculture purposes contravenes the goals and objectives listed in the General Plans Vision Statement, Open Space Element, and Land Use Element. This includes:

Vision Statement	Agricultural land that remains economically viable either as a permanent or temporary economic resource, is well protected by policies, ordinances and design regulations applicable to new development that may be planned nearby.[73]
Vision Statement	Agriculture remains a strong component of the County's economy. Even though some agricultural land has been urbanized, there has also been expansion in other locations. The place of agriculture in the community remains strong and conflicts between

[70] DEIR, p. 2.4-20.
[71] 14 CCR § 15000 Appendix G.
[72] *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 783-4, 32 Cal.Rptr.3d 177; see also, *County of El Dorado v. Dept. of Transp.* (2005) 133 Cal.App.4th 1376.
[73] Vision Statement, p. V-20.

	agricultural operations and nearby development are rare. The Riverside County agricultural industry is a strong competitor in the global agricultural market.[74]
Land Use Policy 20.1	Encourage agriculturally designated lands where agricultural activity can be sustained at an operational scale, where it accommodates lifestyle choice, and in locations where impacts to and from potentially incompatible uses, such as residential uses, are minimized through incentives such as tax credits.[75]
Land Use Policy 20.2	Protect agricultural uses, including those with industrial characteristics (dairies, poultry, hog farms, etc.) by discouraging inappropriate land division in the immediate proximity and allowing only uses and intensities that are compatible with agricultural uses.[76]
Land Use Policy 20.4	Encourage conservation of productive agricultural lands. Preserve prime agricultural lands for high-value crop production.[77]
Land Use Policy 20.6	Require consideration of state agricultural land classification specifications when a 2.5-year Agriculture Foundation amendment to the General Plan is reviewed that would result in a shift from an agricultural to a non-agricultural use.[78]

[74] Vision Statement, p. V-20.
[75] Land Use Element, p. LU-45.
[76] Land Use Element, p. LU-45.
[77] Land Use Element, p. LU-46.
[78] Land Use Element, p. LU-46.

Open Space Policy 7.3	Encourage conservation of productive agricultural lands and preservation of prime agricultural lands.[79]
Open Space Policy 7.2	In cooperation with individual farmers, farming organizations, and farmland conservation organizations, the County of Riverside shall employ a variety of agricultural land conservation programs to improve the viability of farms and ranches and thereby ensure the long-term conservation of viable agricultural operations within Riverside County. The County of Riverside shall seek out available funding for farmland conservation. Examples of programs which may be employed include: land trusts; conservation easements (under certain circumstances, these may also provide federal and state tax benefits to farmers); dedication incentives; Land Conservation Contracts; Farmland Security Act contracts; the Agricultural Land Stewardship Program Fund; agricultural education programs; transfer and purchase of development rights; providing adequate incentives (e.g. clustering and density bonuses) to encourage conservation of productive agricultural land in Riverside County's Incentive Program; and providing various resource incentives to landowners.[80]

The General Plan emphasizes the historic and economic importance of agriculture land in Riverside County, stating "it is agriculture that defines the unique character of many communities in Riverside County, and helps to define the edges of and provide separation between developed areas…there is a solid

[79] Open Space Element, p. OS-21.
[80] Open Space Element, p. OS-20.

commitment to ensuring that these uses remain an integral part of Riverside County's future."[81] Consistent with this statement, the goals and policies above support the preservation of agricultural lands in Riverside County, especially for Prime Farmland.

The Project conflicts with these goals and policies for several reasons. First, as discussed in detail in CARE CA's previous comments and above, the proposed Project would convert 568.3 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, which is in active agricultural cultivation, into non-agricultural uses.[82] These are two of the highest soil classifications of important farmland, meaning they are the most ideal for agriculture production.[83] Land Use Policies 20.4 and 20.6, as well as Open Space Policy 7.3 discourage conversion of productive agricultural lands, especially lands that have high land use classifications.

Second, the Project not only considers conversion of these valuable agricultural lands, but it does not propose any mitigation to reduce impacts or demonstrate consistency with the General Plans policies. Open Space Policy 7.2 highlights the importance of conserving agricultural lands and provides several examples of ways to ensure this conservation occurs. The FEIR's failure to adequately disclose and analyze these inconsistencies constitutes a significant impact under CEQA.

VI. THE FEIR FAILS TO RESOLVE THE PROJECT'S SIGNIFICANT, UNMITIGATED OPERATIONAL NOISE IMPACTS

CARE CA's previous comments demonstrated that the Project would result in potentially significant operational noise impacts when more realistic HVAC run times are utilized. Instead of correcting this deficiency, the County continues to underestimate HVAC run times and asserts that "continuous operation of Project HVAC systems is unreasonable" because HVAC systems are designed to cycle on and off for optimal performance and energy efficiency.[84]

While it is true that the HVAC systems would not run 100 percent of the time—Mr. Meighan clarifies that the system could run for a full hour or on hot days, instead of the maximum 39 minutes every hour that the FEIR analyzes.[85] Mr.

[81] Land Use Element, p. LU-44.
[82] DEIR, p. 2.5-10.
[83] Open Space Element, p. OS-16.
[84] FEIR, p. 53.
[85] Meighan Comments, p. 4; FEIR, p. 82.

Meighan's explains that Thermal, CA has a desert climate which regularly experiences high heat.[86] For example, climate data shows that Thermal has average summer highs above 110 °F on average 28 days per year, and exceed 120 °F every other year.[87] Additionally, during almost four months out of the year, the average daily high temperature is above 99 degrees Fahrenheit.[88] UCLA and the Public Health Alliance of Southern California project that portions of the Coachella Valley will have more than 200 days a year above 90 degrees by mid-century.[89] Therefore, these high temperatures and the need for HVAC systems to run for a full hour are reasonably foreseeable. CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are "substantial."[90] Therefore, because the FEIR still relies on a low HVAC run time, the County underestimates the Project's potentially significant operational noise impacts.

The County also claims that even though Mr. Meighan's previous comments demonstrated that the Project would exceed the absolute noise threshold of 45dBA, there is no significant impact because the noise levels would not exceed the ambient noise threshold.[91] This conclusion is contrary to CEQA. In applying significance thresholds, the lead agency must consider both the "absolute noise level" associated with a project as well as the increase in the level of noise that will result from a project.[92] A significant impact occurs when either one of these thresholds is exceeded.

The County further tries to discredit Mr. Meighan's analysis by pointing to Public Resources Code Section 21085, which states "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment." However, this law is not applicable to Mr. Meighan's analysis. Mr. Meighan's calculations evaluated the Project's operational noise, with a particular focus on rooftop HVAC equipment. HVAC noise is not noise generated by project occupants or their guests.

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[86] Meighan Comments, p. 4.
[87] Meighan Comments, p. 4.
[88] WeatherSpark, Climate and Average Weather Year Round in Coachella, available at: https://weatherspark.com/y/2104/Average-Weather-in-Coachella-California-United-States-Year-Round.
[89] Public Health Institute, *Hotter Weather Coming to Coachella Valley: Desert Sun Cites PHI's Healthy Places Index: Extreme Heat Edition*, available at: https://www.phi.org/press/public-health-alliance-of-southern-california-and-ucla-project-hotter-weather-for-200-days-in-coachella-valley/.
[90] CEQA Appendix G, Section 13 (Noise Impacts).
[91] FEIR, p. 83.
[92] *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 CA5th 814, 884; *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 CA4th 714, 733.

Lastly, the County claims, without providing any evidence, that the noise from HVAC units will be mitigated to less than significant levels. CEQA requires an agency to support its conclusion with substantial evidence.[93] Substantial evidence does not include argument, speculation, or unsubstantiated opinion. Therefore, without more, the County lacks substantial evidence to supports its conclusion.

In sum, the FEIR fails to analyze and mitigate the significant HVAC related noise impacts during Project operations. The County also lacks substantial evidence to conclude that these impacts would be mitigated to less than significant levels. The County must correct this deficiency in a revised and recirculated EIR.

VII. THE FEIR LACKS SUBSTANTIAL EVIDENCE TO CONCLUDE THAT THE PROJECT'S ENERGY IMPACTS WILL BE LESS THAN SIGNIFICANT

The FEIR concludes that the Project will have less than significant energy impacts.[94] However, the FEIR fails to provide substantial evidence to support this conclusion by not quantifying the Project's construction-related energy consumption or analyzing energy conservation measures that might be available or appropriate for the Project, in violation of CEQA.

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."[95] The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide the following examples in Appendix F:

- Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
- The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- The potential for reducing peak energy demand.
- Alternate fuels (particularly renewable ones) or energy systems.

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[93] PRC § 21082.2.
[94] DEIR, p. 2.8-13.
[95] PRC § 21100(b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 930.

- Energy conservation which could result from recycling efforts.[96]

Courts have rejected CEQA documents that fail to include adequate analysis investigation into energy conservation measures that might be available or appropriate for a project.[97] In *California Clean Energy Commission v. City of Woodland* ("*CCEC*"), the Court of Appeal reviewed an EIR for a shopping center on undeveloped agricultural land.[98] Similar to the FEIR here, the EIR in *CCEC* concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations, the project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy.[99] But, the lead agency's EIR did not include a discussion regarding the different renewable energy options that might be available or appropriate for the project.[100] The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."[101] The lead agency argued that compliance with the Building Code sufficed to address energy impact concerns for the project.[102] But the Court explained:

Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines. These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.[103]

The Supreme Court of California agreed with the *CCEC* court's decision in *League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer* ("*Save Lake Tahoe*"), holding that even projects that find a less-than-significant energy impact must "discuss whether any renewable energy features could be incorporated

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[96] CEQA Guidelines § 15126.4(a)(1)(C) (stating "'Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").
[97] *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256; *Spring Valley Lake Ass'n v. City of Victorville* (2016) 248 CA4th 91.
[98] *CCEC* (2014) 225 Cal.App.4th 173.
[99] *Id.* at 184.
[100] *Id.* at 213.
[101] *Id.* at 213.
[102] *Id.* at 210, 211.
[103] *Id.* at 211.

into the project."[104] In *Save Lake Tahoe*, the Court considered an EIR for a land use specific plan and rezoning to permit residential and commercial development and preserve forest land near Truckee and Lake Tahoe.[105] The EIR did not consider whether it was feasible to power the project on 100 percent renewable electrical energy or some lesser percentage, nor evaluate strategies for reducing reliance on fossil fuels, increasing reliance on renewable resources, reducing peak loads, and reducing the impacts of relying on remote generation facilities.[106] The lead agency reasoned that this analysis was not required because energy impacts would be less than significant.[107] Citing CEQA Guidelines Section 15126.2, subdivision (b) and the decision in *CCEC*, the Court held that when an EIR analyzes the project's energy use to determine if it creates significant effects, it should discuss whether any renewable energy features could be incorporated into the project.[108] The Court found that the EIR violated CEQA for not discussing whether the project could increase its reliance on renewable energy sources to meet its energy demand.[109] As discussed below, the FEIR here suffers from the same flaws.

The FEIR concludes that the Project's construction-related energy use would be less than significant without quantifying them.[110] The FEIR instead reasons that because the electricity demand would be temporary and the building is required to comply with IID guidelines and requirements as well as the County's General Plan and CAP Update that use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.[111] However, this reasoning is flaws for several reasons.

First, without quantification, the FEIR's statement that electricity use during construction will be "temporary" and "nominal" is not supported. Energy that is temporary may still be wasteful, inefficient, and unnecessary. There is also no way to determine what "nominal" means and if that also constitutes a level that is not wasteful, inefficient, and unnecessary.

Second, similar to *League to Save Lake Tahoe*, the County did not discuss whether any renewable energy features could be incorporated into the Project's construction phase. For example, the County did not discuss the use of Tier 4 final

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[104] *Save Lake Tahoe* (2022) 75 CA5th 63, 167–68.
[105] *Id.* at 70.
[106] *Id.* at 165-166.
[107] *Id.* at 166.
[108] *Id.* at 167-168.
[109] *Id.* at 168.
[110] DEIR, p. 2.8-9.
[111] DEIR, p. 2.8-9.

diesel engines, electric-powered machinery, or use of alternative fuels like renewable diesel or biodiesel. This lack of analysis violates CEQA and does not constitute substantial evidence that justifies the FEIR's significance determination.

Third, compliance with the County's General Plan, CAP Update, and IID Guidelines do not ensure energy efficient measures that go beyond Title 24 standards will be implemented. The General Plan and CAP update merely require compliance with Title 24 standards.[112] There is no requirement that these standards be exceeded. Additionally, IID does not have guidelines specifically governing the efficiency of energy use during construction or in building design. The IID offers energy efficiency incentive programs, but these are voluntary and thus are not binding.

In sum, the FEIR's energy analysis fails to adequately analyze measures that would ensure the Project's consumption of energy during construction is not wasteful, inefficient, and unnecessary. It also fails to meaningfully address Appendix F's considerations of whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope.[113] This analysis must be provided in an EIR.

VIII. THE COUNTY LACKS SUBSTANTIAL EVIDENCE TO APPROVE THE PROJECT'S ENTITLEMENTS

The Project requires the County to make a recommendation to the Board of Supervisors regarding whether to certify the FEIR and approve the Specific Plan, General Plan Amendment, Change of Zone, Tentative Tract Map, and three Plot Plan applications.[114] However, as discussed above, the County failed to adequately address CARE CA's previous comments and thus the FEIR still fails to adequately disclose or mitigate several significant environmental and public health impacts. As discussed in more detail below, this failure to address all of the Project's potentially significant environmental impacts prevents the County from making the requisite findings to recommend approval of the Project's entitlements.

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[112] General Plan Multipurpose Open Space Element, Policy OS 16.1, p.OS-39; CAP Update, p. 35.
[113] *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256, 264.
[114] FEIR, p. 4.

General Plan Amendment

The Project site currently has a General Plan Foundation of Agriculture and Land Use Designation of Agriculture.[115] The General Plan Amendment ("GPA") would propose to change the Foundation to Community Development and the land use designations to match those of the proposed Specific Plan, which include Commercial Tourist, Very Low Density Residential, Medium High Density Residential, Highest Density Residential, and Commercial Retail.[116] The GPA is defined as an Entitlement/Policy General Plan Amendment and an Agricultural Foundation Component Amendment.

Ordinance No. 348 sets forth different procedures based on the type of GPA being proposed. Accordingly, a GPA that would change the General Plan land use designation from "Agriculture" to a set of five different land use categories is governed by Section 2.4, while the GPA that would change the General Plan Foundation Element designation for the Project site from "Agriculture" to "Community Development" is governed by Section 2.7. Because the GPA includes two types of amendments, the County must make all of the findings required in both Section 2.4 and Section 2.7.

1. Entitlement/Policy General Plan Amendment

A planning commission resolution recommending approval of an entitlement/policy amendment must include 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;

[115] Staff Report, p. 16.
[116] Staff Report, pp. 16-17.

- 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.[117]

The County cannot make the required findings to approve this amendment for several reasons. First, the GPA conflicts with the County's General Plan Vision Statement and thus is detrimental to the purposes of the General Plan. As discussed above, the County's Vision Statement reflects the important historic and economic role agricultural uses have in Riverside County.[118] The County's Vision Statement also acknowledges the mounting growth pressures agricultural areas face and expresses the desire to preserve these agricultural areas.[119] By proposing the permanent conversion of over 619 acres of important farmland without offering any mitigation, the GPA directly contradicts the County's stated goals. Rather than supporting agricultural preservation, it accelerates the very pressures the Vision Statement seeks to resist.

Second, the GPA conflicts with general planning 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.[120] 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 foundation component designation—shifting land from the Agricultural Foundation Component to the Community Development designation. Therefore, the County cannot make the first required finding to recommend approval of the GPA.

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[117] Ordinance No. 348 § 2.4
[118] Vision Statement, p. V-21; see also Land Use Element, p. LU-44.
[119] Vision Statement, p. V-20, ; see also, Land Use Element, p. LU-44.
[120] General Plan Appendix B: Planning Principles, pp. 12-13.

Therefore, the County cannot approve the GPA because it cannot make the requisite findings under Section 2.4 of Ordinance No. 348. The GPA directly conflicts with the core goals of the County Vision Statement and General Planning Principles. Thus, the Staff Report's conclusion that the GPA does not conflict with these documents is unsupported and contradicted by the Project's unmitigated conversion of over 619 acres of important farmland. The GPA also involves a Foundation change, which disqualifies it from approval under the County's required findings.

2. Agricultural Foundation Component General Plan Amendments

For an Agricultural Foundation Component General Plan Amendment to be made, the following findings are required to be made:

- 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.[121]
- 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.[122]

For the same reasons discussed above, the GPA's permanent conversion of over 619 acres of important farmland without offering any mitigation directly contradicts the General Plan's stated goals of preserving agricultural land.

Specific Plan

Specific Plans are adopted in accordance with Section 2.9 of Riverside County Ordinance No. 348.[123] The Staff Report concludes that the Specific Plan is consistent with the Riverside County General Plan and thus can be approved.[124] However, as discussed above, the Specific Plan is not consistent with the General Plan's goals and policies pertaining to preservation of agricultural land.

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[121] Ordinance No. 348 § 2.7.B.3.
[122] Administration Element, p. A-16.
[123] Riverside County Ordinance No. 348, §§ 2.8, 2.1.
[124] Staff Report, p. 22.

Additionally, the Specific Plan conflicts with policies in the General Plan's Noise Element Specifically, Policy N1.5 states that "excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County" should be prevented and mitigated.[125] Similarly, Policy N1.6 states "noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses" shall be minimized.[126] Our noise expert demonstrated that the FEIR failed to disclose and mitigate potentially significant operational noise impacts related to the Project's HVAC systems. Therefore, the Specific Plan would allow a land use that conflicts with the County's General Plan and cannot be approved as currently proposed.

Plot Plan

The Project includes three plot plans.[127] Section 18.30 of Ordinance No. 348 governs the processing of Plot Plans. Pursuant to this Section, no Plot Plan shall be approved unless it complies with the following standards:

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.[128]

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[125] Noise Element, p. 10.
[126] Noise Element, p. 10.
[127] DEIR, p. ES-2.
[128] Ordinance No. 348 § 18.30(C).

The County cannot make the first two of these required findings. First, as discussed above, the Project does not conform with all of the requirements of the General Plan because it conflicts with the General Plan's agriculture and noise policies by converting 619 acres of important farmland without proposing any mitigation and by failing to disclose and mitigate the Project's operational noise impacts. Second, the development of the land would not be designed for the protection of the public health, safety, and general welfare. Contrary to the Staff Report's conclusion, the County lacks substantial evidence to conclude that the Project will not have significant public health and noise impacts.[129] Specifically, the FEIR failed to conduct a health risk analysis of the Project's TAC emissions. The FEIR also underestimated the Project's significant operational noise impacts related to HVAC units. Therefore, the Commission cannot make the requisite findings to recommend approval of the Plot Plans.

Zone Change

The Project site has a split zoning classification of Controlled Development Areas (W-2) and Heavy Agriculture, ten-acre minimum (A-2-10).[130] The Change of Zone proposes to change the zoning of the site to entirely Specific Plan with the associated proposed Specific Plan zoning ordinance that would specify the permitted uses and development standards for each of the Specific Plan Planning Areas and the map that would define the Specific Plan Planning Area boundaries.[131]

A planning commission resolution recommending approval of a Zone Change requires compliance with Section 20.3 of Ordinance No. 348. This Section requires the Commission 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. It would also allow significant operational noise impacts that violates the Noise Element policies. Therefore, the Commission cannot recommend approval of the Zone Change.

Tentative Tract Map

The Tentative Tract Map is a proposal for a Schedule A subdivision to subdivide the entire 619.1 gross acre site into 330 lots.[132]

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[129] Staff Report, p. 26.
[130] Staff Report, p. 17.
[131] Staff Report, p. 17.
[132] Staff Report, p. 23.

A planning commission resolution recommending approval of a Tentative Tract Map requires compliance with Section 20.3 of Ordinance No. 348, as well as the Subdivision Map Act. Accordingly, the County 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.[133]

The Commission 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. The Project also conflicts with the General Plans Noise Element policies related to prevention and mitigation of excessive noise levels. Second, the proposed improvements are likely to cause substantial environmental damage and serious public health problems. As our comments above demonstrate, the Project will have significant public health and noise impacts that were not adequately disclosed, analyzed or mitigated.[134] Specifically, the FEIR failed to conduct a health risk analysis of the Project's TAC emissions. The FEIR also underestimated the Project's significant operational noise impacts related to HVAC units. Therefore, the Commission cannot make the requisite findings to recommend approval of the Tentative Tract Map.

[133] Subdivision Map Act §§ 66474, 66473.5; Ordinance No. 348 § 20.3.
[134] Staff Report, p. 26.

IX. CONCLUSION

For the reasons discussed above, the FEIR for the Project is inadequate under CEQA. The Commission may not approve the Project or adopt the FEIR in its current form. 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 Commission remand the Project 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:ljl

EXHIBIT A

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.43

October 21, 2025

Alaura R. McGuire
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: Thermal Ranch FEIR
Riverside County, California
Review and Comment on Noise Analysis

Dear Ms. McGuire,

Per your request, we have reviewed the Final Environmental Impact Report (FEIR) for the Thermal Ranch Specific Plan, state clearinghouse number 2023050624. The responses to our comments are contained in comments C-2, C-8, C-9, C-24, C-25, C-26, C-27, and C-28. These comments are a response to a letter regarding our concerns with the project, dated January 10th, 2025.

Response to Comments C-2 and C-25

These comments respond to my previous comment that not all worst-case sensitive recievers were analyzed, notably 62101 Tyler Street. The FEIR reaffirms that the City omitted this residence from its impact analysis, stating **"the Project noise analyst identified the closest residence on the east side of Tyler Street, which is identified in the DEIR as R2" (FEIR, page 38).** And that receiver location "R2 at 62800 Tyler Street was intended to describe the nearest existing noise sensitive residential land use **immediately east of the Project site" (FEIR, page 81).**

There is no evidence provided that shows 62800 Tyler Street is the closest or worst-case reciever, especially when compared to 62101 Tyler Street. ***Figure 1*** below compares the footprint of the Project to both single-family residnces. 62101 Tyler Street is on the top, with a red line drawn at the closest façade to the Project. The line travels south, and is roughly 50 feet west of the closest façade of 62800 Tyler Street. ***Figure 3*** and ***Figure 2*** show each of the two sites, resepctivley, where it can be seen that both are single family residences that need to be considered.

The FEIR states that when "considering the location of the actual operational noise source activities in relation to the noise sensitive residential land uses east of the Project site, Receiver Location R2 at 62800 Tyler Street represents the worst-case **sensitive receiver location**" (FEIR, page 82). The operational noise sources are clustered more to the southern edge of the site. However, with the large distances from the operational noise sources, it is likely that 62101 Tyler Street will experience louder noise levels due to being closer to the noise sources to the west, resulting in a potenitally significant noise impact that the County has not addressed. Since the FEIR did not consider noise impacts to 62101 Tyler Street, the conclusion that noise impacts on local residents would be either less than significant, or fully mitigated, lacks support. The EIR should be amended to include this site as a reciever to verify that there are no unreported significant operational noise impacts.

Figure 1: Comparison of both 62800 and 62101 Tyler Street to Project Footprint

Figure 2: Street View of 62800 Tyler Street

Figure 3: Street View of 62101 Tyler Street

Response to Comments C-9, C-26, and C-27

This comment is in response to my previous comment that the **EIR's** noise analysis underestimated the time HVAC systems would run under worst-case conditions in the notoriously hot Coachella Valley region. The FEIR asserts that "continuous operation of Project HVAC systems is unreasonable. HVAC systems are designed to cycle on and off for optimal performance and energy efficiency and current California Building Codes are designed for maximum building insulation" (FEIR, page 53).

This statement underestimates the reasonably foreseeable extent of HVAC use at the Project site given regional climate conditions.

While an HVAC system may not run 100 percent of the time, it may run for a full hour or more on hot days. On days that are exceptionally hot, which is common in Thermal CA, as documented in our previous letter, it is reasonable to presume a full hour of continuous air conditioning operation at a time. Under CEQA, project applicants are required to evaluate noise impacts under reasonably foreseeable operating conditions to ensure that potential environmental effects are fully disclosed and mitigated. For HVAC systems, this means estimating noise assuming continuous operation for a foreseeable amount of time, even though such systems would not typically run nonstop. This approach is necessary because CEQA mandates accurate analysis that captures the maximum potential for noise exposure to nearby sensitive receptors in order to evaluate whether noise increases are "substantial".[1] Evaluating only average or intermittent operation could underestimate actual impacts during peak conditions—such as extreme heat, which is not uncommon at the project site—when the system may run continuously. Thermal, CA has a desert climate which regularly experiences high heat. For example, climate data shows that Thermal has average summer highs above 110 °F (43 °C) on average 28 days per year, and exceed 120 °F (49 °C) every other year.[2] By failing to analyze HVAC use during reasonably foreseeable high temperature scenarios, the FEIR understates impacts associated with extended HVAC use, and fails to ensure that appropriate mitigation measures are incorporated into the Project to protect local residents and surrounding land uses.

The FEIR also states that the "comment suggesting that an increase 0.1 dBA (45.0 to 45.1 dBA) is significant completely fails to recognize that the existing nighttime ambient noise levels at the nearest noise sensitive receiver locations currently range from 61.1 to 67.4 dBA" (FEIR, page 54). The threshold of significance chosen within the noise analysis was 45 dBA. Our comment was following the County's own threshold. An impact may be significant if an absolute noise threshold is exceeded, even if the ambient threshold is not exceeded.

The FEIR continues, saying that "CEQA states that for residential projects, the effect of noise generated by project occupants and their guests is not a significant effect on the environment" (FEIR, page 54). This is immaterial to the HVAC analysis because HVAC's are mechanical equipment installed as Project components. The FEIR's assertion does not affect the finding within our letter. The FEIR also argues that the "HVAC units for residences planned in PA-3 are expected to be pad-mounted, while any roof-top HVAC units would be screened with an acoustical barrier. Furthermore, the east boundary of the project will be bounded by six-foot masonry walls," (FEIR, page 83). The County has not included any analysis to prove that these project features would reduce noise levels below significance thresholds and has not made them mandatory Project components.

As it stands, reasonable usage of an HVAC system at the Project site under regional heat conditions would increase noise levels over the FEIR's chosen significance threshold, as documented in our previous letter. We believe that this is an unreported significant impact and should be corrected with analysis of mitigation. The analysis must detail noise levels before and after implementation of

[1] CEQA Appendix G, Section 13 (Noise Impacts).
[2] See NOAA Climate data for Thermal, California, 1950-present, available at https://en.wikipedia.org/wiki/Thermal,_California (10/21/25).

mitigation. And any proposed mitigation must demonstrate that noise levels would be reduced to below the applicable thresholds.

Very truly yours,
WILSON IHRIG

Jack Meighan
Associate

WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

JACK MEIGHAN

Associate

Jack joined Wilson Ihrig in 2021 and is an experienced acoustics engineer with expertise in projects involving rail transit systems, highways, CEQA analysis, environmental noise reduction, mechanical drawing reviews, and construction noise and vibration mitigation. He has hands-on experience with project management, including client coordination and presentations, as well as in designing, developing, and testing MATLAB code used in acoustics applications. Additionally, his expertise includes taking field measurements, developing test plans and specifying, purchasing, setting up and repairing acoustic measurement equipment. He has experience in using Traffic Noise Model (TNM), CadnaA, EASE, Visual Basic, LabView, and CAD software.

Education

- B.S. in Mechanical Engineering, University of Southern California, Los Angeles, CA

Project Experience

Metro Regional Connector, Los Angeles CA
Planned, took, and processed measurements as part of a team to determine the effectiveness of floating slab trackwork for a new subway in downtown Los Angeles that travels below the Walt Disney Concert Hall and the Colburn School of Music.

Rodeo Credit Enterprise CEQA Analysis for New Construction, Palmdale, CA
Wrote an accepted proposal and executed it for a noise study project to determine noise mitigation requirements on a new housing development. Led all aspects of the project and managed the budget during all phases of project completion. Completed 5 separate projects of this type for this developer.

Blackhall Studios, Santa Clarita, CA
Led the vibration measurement effort for a new soundstage directly adjacent to an existing freight and commuter rail line. Tested equipment, processed data, and analyzed results to determine the vibration propagation through the soil to the proposed soundstage locations, and was part of the team that developed mitigation techniques for the office spaces directly next to the rail line.

Octavia Residential Condos CEQA Study, San Francisco, CA
Calculated the STC ratings for the proposed windows to meet Title 24 requirements, modeled the acoustic performance of floor and ceiling structures, researched noise codes, helped with a mechanical design review, and wrote a report summarizing the results for a new Condominium project being developed in San Francisco.

San Diego International Airport Terminal I Replacement, CA
Conducted interior noise and vibration measurements, analyzed measurement data to help determine project criteria, modeled the existing and future terminals in CadnaA, and was part of a team that did a complete HVAC analysis of the entire terminal, as part of a CEQA analysis where a new terminal for the airport is being designed.

Five Points Apartments Noise Study, Whittier, CA
Took measurements, researched sound data and solutions, and recommended mitigation for a new apartment complex that was located next to an existing car wash, as part of a CEQA review.

USC Ellison Vibration Survey, Los Angeles, CA
Conducted vibration measurements as part of a survey to determine the effectiveness of vibration isolation platforms that are used to insulate cell growth in a cancer research facility. Determined the effectiveness and presented this information to the client. Researched and recommended a permanent monitoring system so the client could view data in real time.

TEN50 Condos 'Popping' Noise Investigation, Los Angeles, CA
Was part of a team that investigated the noise source of an unwanted popping noise in luxury condos in Downtown Los Angeles. Helped isolate the noise source location with accelerometers to determine where vibrations were occurring first and used an acoustic camera to determine where in the condo the noise was coming from.

2000 University Project, Berkely, CA
Wrote a construction noise monitoring plan based on environmental noise calculations, wrote a report summarizing the results, and attending a meeting with the client to discuss options.

Bay Area Rapid Transit (BART) On-Track, CA, San Francisco Bay Area, CA*
Day to day project manager, responsible for meetings, presentations, and coordination with the client for an ongoing noise study on the BART system. Developed MATLAB code to process measurements and determine areas where high corrugation was present, contributing to excessively high in-car noise levels. Performed noise measurements inside both the right of way and the vehicle cabin, in addition to rail corrugation measurements.

California I-605/SR-60 Interchange Improvement, Los Angeles, CA*
Developed a noise model of the area that predicted sound levels for abatement design, in addition to conducting noise measurements and analysis. Led the Team in use of the FHWA Traffic Noise Model Software for the project, involving three major highways and two busy interchanges extending over 17 miles in southern California.

Sound Transit On-Track, Seattle, WA*
Took measurements, fixed equipment, and developed software in MATLAB to process Corrugation Analysis Trolley measurements as part of an ongoing noise study on the Sound Transit Link system. Tested vibration data to determine the best measurement and processing techniques to store the data in an online database for in-car measurements.

LA Metro CRRC Railcar Testing, Los Angeles, CA*
Led the effort to plan the measurements, determine measurement locations and finalize the test plan. Formulated a method to capture speed data directly from legacy train vehicles. Executed noise and vibration specification measurements for new rail cars delivered by CRRC.

City of Los Angeles, Pershing Square Station Rehabilitation Noise Monitoring, CA*
Built noise models, wrote a construction noise plan, and assisted in on-site construction noise issues as they arose for a renovation of the Pershing Square metro station in downtown Los

Angeles. Trained construction personnel in techniques for noise reduction and how to conduct noise monitoring measurements to meet project specifications.

City of Orange Metrolink Parking Garage Construction Monitoring, CA*
Wrote an adaptive management vibration monitoring plan, set up equipment to monitor live vibration levels, and generated weekly reports as part of an effort to build a new parking garage. Designed, planned, and completed measurements to predict and mitigate pile driving construction impacts at three historic building locations adjacent to the construction site. Coordinated with the client whenever an on-site problem arose.

LA Metro Westside Subway Construction, Los Angeles, CA*
Planned, organized, and processed noise measurements for the Purple Line extension construction. Implemented both long term microphones to measure noise levels and accelerometers to measure vibration levels in existing subway tunnels. Oversaw noise monitoring at sensitive construction sites for the project and worked with the contractor to find ways to reduce construction noise levels by approximately 10dB.

Montreal Réseau Express Métropolitain, Canada*
Conducted vibration propagation measurements used to create models to predict operational vibration levels for an under-construction transit line. Managed equipment, solved problems in the field, and wrote parts of the report summarizing the findings of the acoustic study.

NHCRP Barrier*
Took on-highway measurements and wrote, designed, developed, and tested MATLAB code to identify specific spectrograms to use for analyses for a project evaluating barrier reflected highway traffic noise differences in the presence of a single absorptive or reflective noise barrier.

Siemens Railcar Testing for Sound Transit, Seattle, WA*
Measured in-car noise and vibration for new rail cars delivered by Siemens. Developed new internal techniques for measurements based on the written specifications. Contributed to the team that helped identify issues that new cars had in meeting the Sound Transit specifications for noise and vibration. Participated in developing the test plan and specified then acquired new equipment for the measurement.

Toronto/Ontario Eglinton Crosstown Light Rail, Final Design, Canada*
Assisted in vibration propagation measurements, analysis, and recommendations for mitigation for a 12-mile light-rail line both on and under Eglinton Avenue. Set up and ran equipment for at-grade measurements with an impact hammer for underground measurements with an impact load cell that was used during pre-construction borehole drilling.

EXHIBIT B

HOUSE AGRICULTURAL CONSULTANTS

Providing expertise in agricultural science, management, & appraisal since 1977.

1105 Kennedy Place
Suite 1
Davis, California 95616
telephone +1 530 753-3361

October 21, 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 EIR of Thermal Ranch Project, Riverside County, with respect to agricultural matters

Dear Ms. McGuire:

At your request, we have reviewed the final 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 first 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.

1 The FEIR and reply to Comment C-10 fail to comply with CEQA and Riverside County's General Plan

To achieve its agenda of converting 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance, without mitigation, the FEIR reply comment C-10 deliberately confuses ongoing and predicted irrigation water shortages with an alleged inability, or uselessness, of mitigation through an agricultural conservation easement (*ACE*). This is contradictory: on the one hand the comment states,

> The Coachella Valley does not support dry dirt farming, and all crops are reliant upon limited and precious groundwater and primarily imported Colorado River water.

Then the comment develops its water-shortage argument:

> The DEIR and consultations with CVWD warn of increasing water scarcity facing regions dependent on Colorado River water. As climate change and other factors have put an increasing strain on water supplies, agriculture remains the largest consumer use of water in California. The question facing farmers served by Colorado River water is when the subject long-term drought may cease, and whether adequate and stable water supplies will return in the future.

It is significant here that the reply comment wonders when the long-term drought will end so that stable water supplies will return in the future because such qualitative reasoning is speculation, not a logical argument about the instant issue. The only supported conclusion that can be made about drought is that California (and the West as a whole) has a long-term history of periodic droughts alternating with non-drought conditions.

Then the reply to comment C-10 takes a contradictory turn to argue for the viability of agriculture in the Coachella Valley:

> Moreover, it is arguable that, in the long-term, reduced demand for agricultural irrigation water may benefit other existing farm operations by improving the availability of Colorado River water and reducing pressure on increased costs of irrigation water. In this respect, the subject conversion may serve to make agricultural use elsewhere in the Coachella Valley more financially viable, as recognized by Riverside County numerous General Plan policies.

This is a statement about land elsewhere in the Coachella Valley. The FEIR implicitly argues that the project's converwion of agricultural land, if not mitigated, would somehow benefit long-term agricultural production in the Coachella Valley. This argument is non-sensical. The argument for conserving remaining agricultural land in Coachella Valley, far from the subject, does not in any logical way lead to a conclusion of the infeasibility or nonutility of mitigating for agricultural land lost to the subject project, because it is an orthogonal issue. Moreover, conserving other land elsewhere in the Coachella Valley would not in any way exacerbate any existing water shortage or even affect it, as the conserved land would be in existing agricultural use—but the FEIR presents it as such:

> These facts would support a conclusion by the County Board of Supervisors that requiring agricultural conservation easements as mitigation is infeasible for policy reasons (not just economic reasons), as well as being insufficient to substantially reduce the project's impacts to a level of less than significant.

In actuality, per CEQA, Riverside County is obliged to mitigate this significant impact to the greatest extent feasible. The FEIR has not only failed to demonstrate it is infeasible to do so, but has actually admitted very clearly in its reply to comment C-10 that its general plan has as an objective that requires "the preservation of the physical and economic integrity of agricultural lands".[1] It is inarguable that losing 619 acres of important farmland would be inconsistent with this objective, and that preserving 619 acres of agricultural land in the Coachella Valley with an ACE would both meet this general-plan objective and effectively reduce impacts, as required by CEQA. The fact that an ACE may not fully mitigate the loss of farmland does not diminish its ability to mitigate agricultural impacts to the greatest extent feasible.

Throughout California, for decades, cities and counties have obtained ACEs to mitigate the loss of important farmland. To wit, it is the industry-standard means of mitigating the loss of important farmland. To remain consistent with its general plan and to comply with CEQA, Riverside County must obtain an ACE and include it as mitigation for this significant environmental impact of converting 568.30 acres of Prime Farmland and 52.59 acres of Farmland of Statewide Importance.

2 Conclusion

In closing, our review of this project has led us to conclude that the FEIR does not support its conclusion that mitigation by ACE is infeasible. Available evidence supports the opposite conclusion: mitigation of agricultural-land loss is feasible. Mitigation is an offset to impacts, not a cancellation of impact, as the FEIR incorrectly asserts. The County's conclusion also contradicts

[1] ⟨*https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i*⟩, section 4.2.

our understanding of CEQA requirements as established by California court precedent (see *V Lions Farming, LLC v. County of Kern* (2024) 100 Cal.App.5th 412.). This project's conversion of agricultural land must be mitigated.

3 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

4 Appendix: Qualifications of House Agricultural Consultants

4.1 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 lost profits.

– Value of lost crops, emblements, and foodstuff inventory.

– Farm management: good farming practices in orchards, such as almonds and walnuts, row crops.

– 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.

– 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-residential 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 Yellowstone, State of Montana, September 2025.—Topic: standard of care for crop farming · fire safety · wheat. *Colin Funk v. Stephen Becker and Becker Farming* (case no. DV-56-2024-0001290-NE in Montana's Thirteenth Judicial District). A matter of fire damage to rural-residentian land near Billings, Montana. The plaintiff retained and designated Mr. House to analyze the defendants' standard of care in performing harvest operations on a wheat field where a fire originated. To our understanding, Mr. House's opinions, which were submitted to the court in a written report, were of evidentiary relevance to cousel's legal theory of negligence by the defendants.

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 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 list 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, 2015–2021.

– *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.

4.2 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.

Gregory A. House

Agricultural Consultant
Agronomist
Professional Farm Manager
Rural Appraiser
Farmer

Experience

Agricultural Consultant, House Agricultural Consultants, providing agricultural science, economics, management, and appraisal services, 1983–present

Farmer, 1987–present. Organic apples, peaches, cherries, apricots, field and seed crops

Corporation Secretary & Consulting Agronomist, Hannesson, Riddle & Associates, Inc., 1977–1983.

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 #501
- Certified Professional Agronomist (CPAg), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd. Certificate # 2319
- Certified Crop Advisor CCA), American Registry of Certified Professionals in Agronomy, Crops. & Soils, Ltd.
- Accredited Rural Appraiser (ARA), American Society of Farm Managers & Rural Appraisers, Certificate #749
- Certified General Appraiser, State of California License # AG 001999

  These credentials have continuing education requirements with which I am in compliance.

Qualifications of Gregory A. House, continued

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
- Courses of the American Society of Farm Managers and 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

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, Yolo
- United States Tax Court Qualified Expert Witness
- United States Bankruptcy Court Qualified Expert Witness

A list of depositions and trial appearances is available upon request

Qualifications of Gregory A. House, continued

Awards

- CCOF Presidential Award, California Certified Organic Farmers, February, 2001
- Meritorious Service in Communications, American Society of Farm Managers and Rural Appraisers, November 2004
- H.E. Buck Stalcup Excellence in Education Award, American Society of Farm Managers and Rural Appraisers, October, 2011

Appointments & Activities

- Adjunct Lecturer, Farm Management Courses ARE 140 & ARE 198, University of California, Davis, Department of Agricultural & Resource Economics, current
- Instructor, "Principles of Farm Management", an Internet course of the American Society of Farm Managers and Rural Appraisers, 1996 to 2007
- President, California Chapter American Society of Farm Managers & Rural Appraisers 1994–1995; Secretary-Treasurer, 1984 to 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 and 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; Chairman of Certification Committee, Yolo Chapter, 1993-2005; Member of the Finance Committee, 1998-current
- CCOF Foundation Going Organic Program, Management Team member and Chapter Leader, 2006-current
- USDA Organic Grant Panel member, 2002
- City of Davis Open Space and Habitat Commission, 2006–current, 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

Qualifications of Gregory A. House, continued

Speaking Engagements

- Guest Lecturer, University of California at Davis, Agricultural Economics 145, Farm and Rural Resources Appraisal, on professional farm appraisal (1985–1997)
- Guest Lecturer, University of California at Davis, Agricultural Economics Department, Course 140, "Farm Management", on adoption of new technologies, farm budgeting, cash flow management, cost accounting, etc. (1985–present)
- Guest Lecturer, University of Florida at Gainesville, Vegetable Crops Department, seminar on transition to organic agriculture, (November, 1994)
- Featured Program Speaker, 1995 Eco-Farm Conference, Asilomar, California , on economics of organic apple production
- Guest Speaker, Community Alliance with Family Farmers, on farm management and agricultural economics, 1996 and 1997
- Instructor, American Society of Farm Managers and Rural Appraisers, Course M-12, "Standards and Ethics for Professional Farm Managers", March, 1997
- Guest Speaker, American Horticultural Society, "Challenges of Organic Stone Fruit Production", Sacramento, California, July 2001
- Organizer and Presenter, Going Organic Kickoff Meetings, November 2005 and December 2006
- Master of Ceremonies, California Certified Organic Farmers, Annual Meeting, February, 2006, Sacramento, California
- Featured Program Speaker, 2012 Eco-Farm Conference, Asilomar, California, "Imitating Natural Systems: Towards an Indigenous Agro-forestry"
- Seminar presentation: "What Makes for Comparable Sales in Condemnation Appraisal" ; Rpid Fire Seminar, American Society of Farm Managers and Rural Appraisers, Reno , NV, October 2013.

Publications

- "Principles of Farm Management", Course M-10, a 40-hour professional credit Internet educational offering of the American Society of Farm Managers & Rural Appraisers
- "Conservation Issues in Agriculture", a unit of Course M-25, a 15-hour professional credit Internet 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

House Agricultural Consultants
Partial Listing of Clients Served

Allied Insurance Group

American Farmland Trust

Balverne Winery & Vineyards
Sonoma County, California

Bank of America

Best, Best & Kreiger, LLP
Riverside, California

California Giant Berry Farms

California Department of Fish & Game
Wildlife Conservation Board

California Department of Justice

City of Davis

City of Fairfield

City of Morgan Hill

City of Sacramento, City Attorney

Continental Casualty Company
Chicago, Illinois

County of Solano

County of Yolo

Downey, Brand, Seymour & Rohwer
Sacramento, California

Glenn-Colusa Irrigation District

Hamel Ranch Partnership
Davis, California

Harris Farms, Inc.

Farmers' Home Administration (U.S.D.A.)
Sacramento, California

Internal Revenue Service, District Counsel
San Francisco, California

McMahon-Graf Partners
Winters, California

Morrison & Foerster
San Francisco, California

Oakdale Irrigation District

Pajaro Valley Water Management Agency
Watsonville, California

Phillips 66 Company

Republic Indemnity Company of America
San Francisco, California

Royal & Sun Alliance

Sacramento Valley Conservancy

Sacramento Valley Farm Credit Banks

San Andreas Farms
Fresno County, California

San Joaquin Council of Governments

San Luis Delta Mendota Water Authority

Sanwa Bank, N.A.
Sacramento, California

Solano Land Trust

Stanford Management Company
Stanford University

The Nature Conservancy

The Prudential Agricultural Group
Sacramento, California

The Travelers Insurance Company

The Trust for Public Land

U. S. Fish & Wildlife Service

U. S. Departments of Justice & Treasury

University of California, Davis

Yolo Land Trust

Wells Fargo Bank, N.A.

Planning Commission **County of Riverside**

RESOLUTION 2025-006

RECOMMENDING ADOPTION OF

GENERAL PLAN AMENDMENT NO. 230001

WHEREAS, pursuant to the provisions of Government Code Section(s) 65350/65450 et seq., a public hearing was held before the Riverside County Planning Commission in Riverside, California on October 22, 2025, to consider the above-referenced matter; and,

WHEREAS, all the procedures of the California Environmental Quality Act and the Riverside County Additional Procedures to Implement the California Environmental Quality Act have been satisfied and the recommendation to Certify an Environmental Impact Report has been evaluated in accordance with the above-referenced Act and Procedures; and,

WHEREAS, the matter was discussed fully with testimony and documentation presented by the public and affected government agencies; now, therefore,

BE IT RESOLVED, FOUND, DETERMINED, AND ORDERED by the Planning Commission of the County of Riverside, in regular session assembled on October 22, 2025, recommended Certification of an Environmental Impact Report and recommends the following based on the staff report and the findings and conclusions stated therein:

APPROVAL of GENERAL PLAN AMENDMENT NO. 230001.

COUNTY OF RIVERSIDE
PLANNING DEPARTMENT
STAFF REPORT

Agenda Item No.
3.3
(ID # 27623)
MEETING DATE:
Wednesday, October 22, 2025

SUBJECT: 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.

PROPOSED PROJECT	
Case Number(s):	SP00401, GPA230001, CZ2300003, TTM38578, PPT230005, PPT230006, PPT240016
Environmental Type:	Environmental Impact Report
Area Plan No.	Eastern Coachella Valley
Zoning Area/District:	Lower Coachella Valley District
Supervisorial District:	Fourth District
Project Planner:	Russell Brady
Project APN(s):	751-020-002, 751-020-003, 751-020-006, 751-020-007, 751-020-

010
Continued From:

PROJECT DESCRIPTION AND LOCATION

Specific Plan No. 401 is a proposal for a development program on a 619.1 acre area that consists of 223.1 acres for Equestrian Center, 194.3 acres of Very Low Density Residential, 69.5 acres of Medium High Density Residential, 18.3 acres of Highest Density Residential, 77.2 acres of Commercial Tourist, and 21.4 acres of Commercial Retail. Overall the Specific Plan proposes a total maximum of 1,362 dwelling units, 320 RV spaces, and 285,000 sq. ft. of commercial building area. The Specific Plan is oriented around an equestrian center with supporting and ancillary residential and commercial uses.

General Plan Amendment No. 230001 is a proposal to establish 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 (HHDR), and Commercial Retail (CR).

Change of Zone No. 2300003 is a proposal 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.

Tentative Tract Map No. 38578 is a proposal for a Schedule A subdivision to subdivide the entire 619.1 gross 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 with a minimum lot size of 20,000 square feet, 161 lots for detached single-family with a minimum lot size of 5,000 square feet, 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 proposal for the development plan for the 191 attached condominium units.

Plot Plan No. 230005 is a proposal 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 a proposal for the equestrian center on 223.2 acres that includes a total of 615,689 sq. ft. of building area that includes the Grand VIP Barn, 16 Private Barn buildings, 21 Large Barn buildings, 2 Retail buildings, 5 Retail Barn buildings, and 1 Office building. Non-building areas include grass field, riding, and holding areas for horses.

The description as included above and as further detailed in the EIR constitutes the “Project” or “project” as further referenced in this staff report.

The Project is located east of Harrison Street, south of 62nd Avenue, west of Tyler Street, north of 64th Avenue.

PROJECT RECOMMENDATION

STAFF RECOMMENDATIONS:

THAT THE PLANNING COMMISSION TAKE THE FOLLOWING ACTIONS:

ADOPT PLANNING COMMISSION RESOLUTION NO. 2025-006 recommending adoption of General Plan Amendment No. 230001 and Specific Plan No. 401 to the Board of Supervisors.

THAT THE PLANNING COMMISSION RECOMMENDS THAT THE BOARD OF SUPERVISORS TAKE THE FOLLOWING ACTIONS:

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

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

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,

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

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

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,

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,

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.

PROJECT DATA

Land Use and Zoning:

Specific Plan:	N/A
Specific Plan Land Use:	N/A
Existing General Plan Foundation Component:	Agriculture (AG)
Proposed General Plan Foundation Component:	Community Development (CD)
Existing General Plan Land Use Designation:	Agriculture (AG)
Proposed General Plan Land Use Designation:	Commercial Tourist (CT), Very Low Density Residential (VLDR), Medium High Density

	Residential (MHDR), Highest Density Residential (HDR), Commercial Retail (CR)
Policy / Overlay Area:	N/A
Surrounding General Plan Land Uses	
North:	Agriculture (AG), Medium Density Residential (MDR)
East:	Medium High Density Residential (MHDR), Very High Density Residential (VHDR), Open Space – Conservation (OS-C)
South:	Indian Lands (IND)
West:	Agriculture (AG), Medium Density Residential (MDR)
Existing Zoning Classification:	Heavy Agriculture, ten-acre minimum (A-2-10), Controlled Development Areas (W-2)
Proposed Zoning Classification:	Specific Plan (SP)
Surrounding Zoning Classifications	
North:	Specific Plan (SP 303), Controlled Development Areas (W-2)
East:	Specific Plan (SP 303), Heavy Agriculture, ten-acre minimum (A-2-10)
South:	Controlled Development Areas (W-2), Light Agriculture, ten-acre minimum (A-1-10)
West:	Controlled Development Areas (W-2), One-Family Dwellings, one-acre minimum (R-1-1), Open Area Combining Zone-Residential Developments (R-5), Planned Residential (R-4)
Existing Use:	Agricultural
Surrounding Uses	
North:	Agricultural
East:	Agricultural, Single-family residential
South:	Vacant land
West:	Agricultural, Vacant land

Project Details:

Item	***Value***	***Min./Max. Development Standard***

Item	*Value*	*Min./Max. Development Standard*
SP Project Site (Acres):	619.1	N/A
SP Proposed Non-Residential Building Area (SQFT):	285,000	N/A
Proposed Minimum Lot Size:	5,000 square feet (single-family lots), 2,000 square feet (multi-family)	5,000 square feet and 2,000 square feet per proposed Specific Plan zoning ordinance
SP Total Proposed Number of Dwelling Units:	1,362 (including 340 maximum RV Park spaces)	1,362 per proposed Specific Plan
Map Schedule:	A	

Equestrian Facility Parking:

Type of Parking	*Use Factor*	*Parking Ratio*	*Spaces Required*	*Spaces Provided*
Daily Visitor	8,100 daily visitor	0.18 per daily visitor	1,371	1,620
Trailer/RV Parking	2,700 horse stalls	0.14 per horse stall	378	378
TOTAL:				**1,998**

Located Within:

City's Sphere of Influence:	No
County Service Area ("CSA"):	Yes – Thermal 125
Special Flood Hazard Zone:	No
Agricultural Preserve:	No
Liquefaction Area:	Yes - High
Subsidence Area:	Yes – Active
Fault Zone:	No
Fire Zone:	No
Mount Palomar Observatory Lighting Zone:	Yes – Zone B
WRCMSHCP Criteria Cell:	No
CVMSHCP Conservation Boundary:	No

Stephens Kangaroo Rat ("SKR") Fee Area:	No
Airport Influence Area ("AIA"):	Yes – Jacqueline Cochran – Zones D and E

PROJECT LOCATION MAP

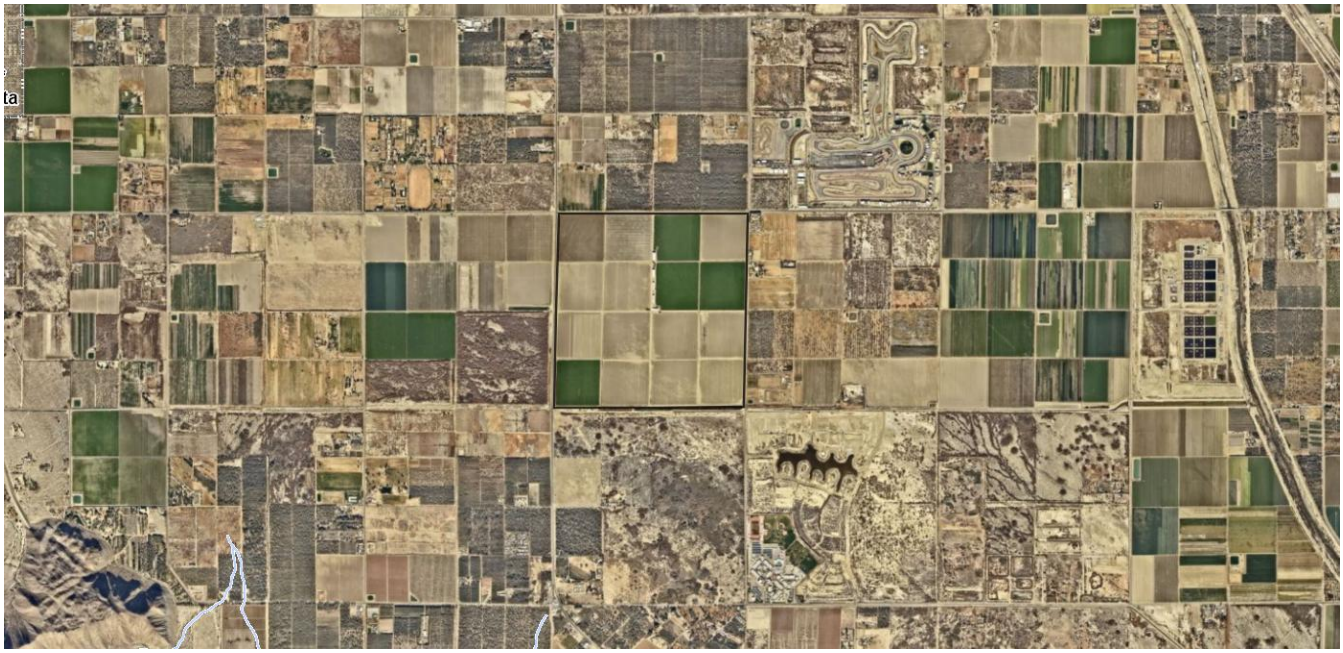


Figure 1: Project Vicinity

Figure 2: Project Location

PROJECT BACKGROUND AND ANALYSIS

Background:

Specific Plan No. 401 was submitted to the County of Riverside on September 30, 2022. Plot Plan Nos. 230005 and 230006 were submitted to the County of Riverside on March 6, 2023. General Plan Amendment No. 230001, Change of Zone No. 2300003, and Tentative Tract Map No. 38578 were submitted to the County of Riverside on March 8, 2023. Plot Plan No. 240016 was submitted to the County of Riverside on April 12, 2024.

The project site includes existing agricultural uses that also predominantly exist in the surrounding area. Equestrian uses and scattered residential uses exist in the surrounding area generally, with the Thermal Motorsports Club use to the northeast of the project site. Three schools (Mirage High School, Toro Canyon Middle School, Las Palmitas Elementary School) are all located nearby. Torres-Martinez Tribe land is located immediately to the south or the project site.

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.

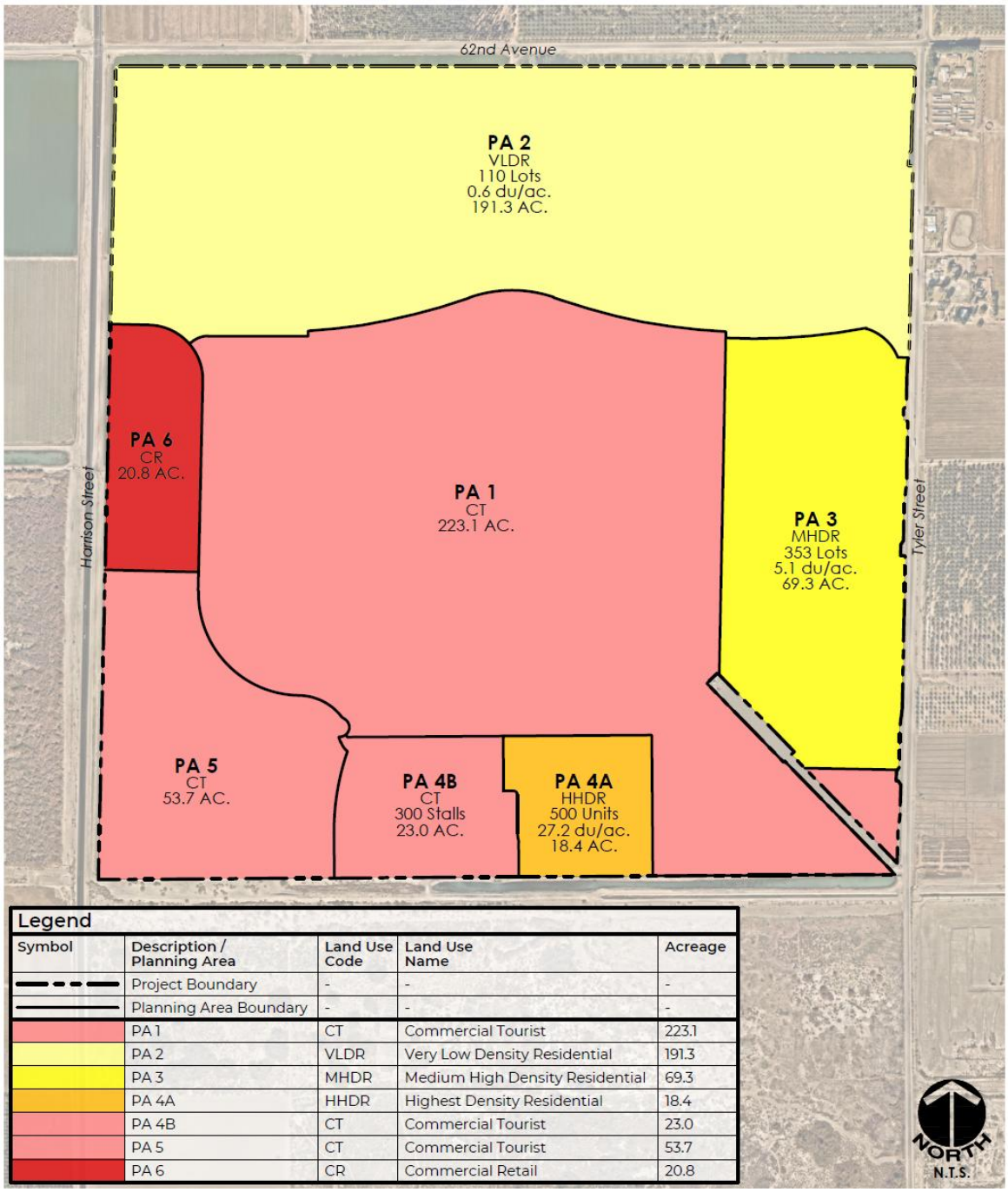
Figure 3: Proposed Specific Plan Land Use Table

Planning Area	Land Use	Acres	Residential DUs	RV Spaces	Commercial Sq. Ft.	Hotel Keys
PA1	Commercial Tourist	223.1			85,000	
PA2	Very Low Density Residential	191.3	132			
PA3	Medium High Density Residential	69.3	390 [2]			
PA4a	Highest Density Residential	18.4	500			
PA4b	Commercial Tourist	23.0		320		
PA5	Commercial Tourist	53.7	340		50,000	150
PA6	Commercial Retail	20.8			150,000	
	Perimeter ROW	16.8				
TOTALS		**619.1**	**1,162-1,362**	**320**	**285,000**	**150**

Notes:

1. *Unless otherwise noted, columns 4-7 represent development maximums. Each Planning Area may be developed at or below these numbers.*
2. *Residential development in PA 3 must be no less than 5 du/ac (356 units), consistent with ALUC density criteria for Zone D.*
3. *Up to 10% of development maximums may be transferred between Planning Areas, so long as Specific Plan totals are not exceeded.*

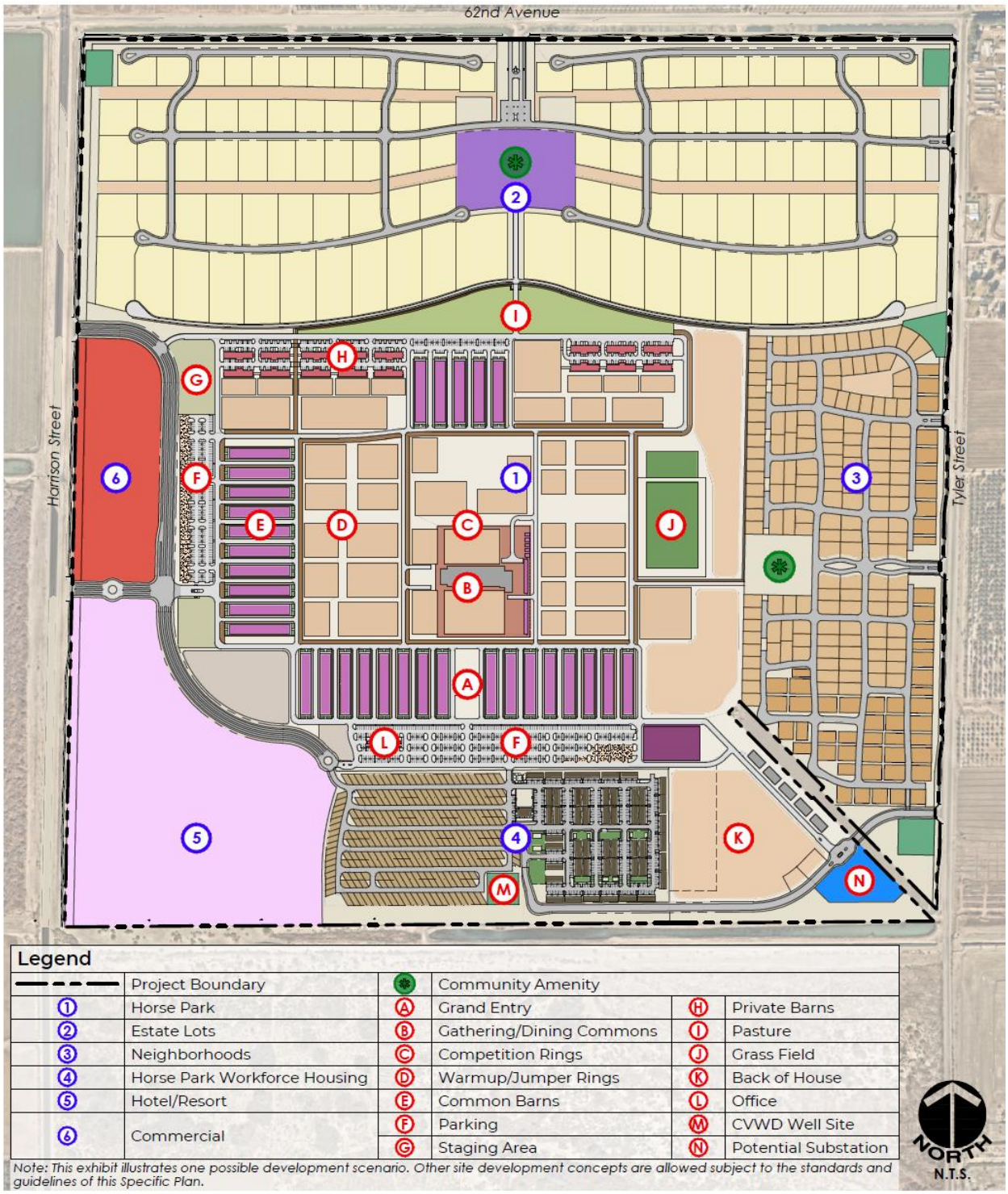
Figure 4: Proposed Specific Plan Land Use Plan



Legend

Symbol	Description / Planning Area	Land Use Code	Land Use Name	Acreage
	Project Boundary	-	-	-
	Planning Area Boundary	-	-	-
	PA 1	CT	Commercial Tourist	223.1
	PA 2	VLDR	Very Low Density Residential	191.3
	PA 3	MHDR	Medium High Density Residential	69.3
	PA 4A	HHDR	Highest Density Residential	18.4
	PA 4B	CT	Commercial Tourist	23.0
	PA 5	CT	Commercial Tourist	53.7
	PA 6	CR	Commercial Retail	20.8

Figure 5: Conceptual Development Plan



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.

Access/Road Improvements

Access would generally be provided for the Tentative Tract Map and overall development via Harrison Street, 62nd Avenue, and Tyler Street with improvements proposed for these roads and intersections based on the proposed phasing of the overall development that is incorporated into the conditions of approval for the Tentative Tract Map and Plot Plans. Road improvements would generally include project side half-width improvements to ultimate General Plan road design with improvements on the opposite side to maintain minimum required lanes to adequately serve traffic generated by the project along with transitions to connect to existing road improvements extending from the project site. Access and improvements are not proposed along the southern boundary due to an existing drainage channel along with overhead lines that constrain the ability to improve and access there. Improvements at the intersection of Harrison and 62nd would not be to ultimate due to constraints of existing CVWD infrastructure that impedes ultimate improvements. The project is required to pay cash in-lieu for ultimate intersection improvements due to this constraint. For the Tyler and 62nd intersection the improvements required for that intersection would require acquisition of right-of-way from the property owner on the east side of Tyler Street. The project has been designed and conditioned to complete the intersection as proposed; however, if the right-of-way is not able to be obtained

the project is conditioned that the project and intersection be redesigned, likely to bring more road improvements onto the project site.

Environmental Justice

The Project is located within a designated Environmental Justice Community. Evaluation of the project's compliance with the Environmental Justice policies were prepared and reviewed by County staff and was included as an appendix to the Draft EIR. The evaluation indicates that the proposed project is consistent with all applicable policies.

ENVIRONMENTAL REVIEW / ENVIRONMENTAL FINDINGS

An Environmental Impact Report (EIR) has been prepared for this project in accordance with the California Environmental Quality Act (CEQA). The EIR represents the independent judgement of Riverside County. The Draft Environmental Impact Report was circulated on November 18, 2024 with the comment period closed on January 10, 2025 (extended from the original January 2, 2025. Below is a summary of the significant and unavoidable impacts identified in the circulated Draft EIR:

Air Quality – Long Term Regional

The Project's long term operational emissions would exceed the SCAQMD regional thresholds for Carbon Monoxide (CO), Oxides of Nitrogen (NO_x) and Reactive Organic Gases (ROG).

Additionally, due to the proposed General Plan Amendment, the Project and its proposed land use designation is not consistent with the SCAQMD Air Quality Management Plan (AQMP) land use assumptions and resulting emission modeling that is based on current General Plan land use designations. Therefore, impacts related to AQMP consistency are determined to be potentially significant.

The EIR includes all feasible mitigation measures to reduce emissions and impacts from CO, NO_x, and ROG operation emissions, but emission levels remain above SCAQMD thresholds and are therefore significant.

Transportation - VMT

The Project would generate an increase in Vehicle Miles Traveled (VMT) of 31,389 compared to scenarios without the project based on a boundary method analysis.

Although the increase in VMT is primarily due to the lack of urban development in the nearby area, the analysis still results in an increase and therefore a potential significant impact. The project is designed with the intent of increasing efficiency in a mix of land uses that provides greater opportunities for employment within the project where a resident lives that assists in minimizing VMT as a means of mitigating VMT impacts as much as possible for a project of this type and scale. Other options oriented around transit are not as feasible due to the relative non-urbanized nature of the surrounding area that makes such service not currently a priority.

Six comments were received during the 45-day public review period. These comments were reviewed, and detailed responses to each comment were prepared and included in the Final EIR, which was posted on September 24, 2025 and with emailed notices to commenters sent on the same day.

For the reasons set forth above and in the Environmental Impact Report prepared for this Project, the proposed project will potentially have a significant effect on the environment related to Transportation. Mitigation Measures from the Environmental Impact Report have been incorporated as conditions of approval on the project.

Solar Energy:
Riverside County Climate Action Plan, as revised in 2019, includes Measure R2-CE1 which requires renewable energy generation by projects of a certain size. This measure requires the production of 20% of the energy demand for commercial, office, industrial of manufacturing uses totaling more than 100,000 square feet and production of 30% of the energy demand for residential development with 75 or more units. This measure has been applied to this Project and will be further implemented by the conditions of approval. This is anticipated to be accommodated via rooftop mounted solar panels.

FINDINGS AND CONCLUSIONS

In order for the County to approve the proposed project, the following findings are required to be made:

Land Use Findings:

1. The project site currently has a General Plan Foundation of Agriculture and Land Use Designation of Agriculture (AG). The General Plan Amendment would propose to change the Foundation to Community Development and the land use designations to match those of the proposed Specific Plan which include Commercial Tourist (CT), Very Low Density

Residential (VLDR), Medium High Density Residential (MHDR), Highest Density Residential (HHDR), and Commercial Retail (CR).

2. The Project site has a split zoning classifications of Controlled Development Areas (W-2) in the roughly western ¼ portion of the site and Heavy Agriculture, ten-acre minimum (A-2-10) in the eastern ¾ portion of the site. The Change of Zone proposes to change the zoning of the site to entirely Specific Plan with the associated proposed Specific Plan zoning ordinance that would specify the permitted uses and development standards for each of the Specific Plan Planning Areas and the map that would define the Specific Plan Planning Area boundaries.

Entitlement Findings:

General Plan Amendment No. 230001:

General Plan Amendment No. 230001 is defined as an Entitlement/Policy General Plan Amendment and an Agricultural Foundation Component Amendment.

For an Entitlement/Policy General Plan Amendment, the following findings are required to be made:

Pursuant to Ordinance No. 348, Section 2.4 C.2., the first two findings (C.2.a and C.2.b) are required and one additional finding (C.2.c through C.2.g) is also required. The additional findings selected as the additional finding (C.2.c) is that special circumstances or conditions have emerged that were unanticipated in preparing the General Plan and (C.2.f) that an amendment is required to expand basic employment job opportunities and that would improve the ratio of jobs-to-workers in the County.

1. The proposed changes do not involve a change in or conflict with:

    a. The Riverside County Vision.

        The General Plan Vision Statement, in its introductory discussion on Risk, provides, “We readily acknowledge that there is a certain degree of risk and uncertainty regarding future expectations, especially as they relate to land resources and how we manage them. At the same time, through the unique planning opportunities present here, we seek to make the risks known and avoid arbitrary and capricious decision making that aggravates the normal risks in human affairs.” The Project as proposed is not without its risks and potential impacts to the environment, but these have been documented in the

Environmental Impact Report and made available for the public and for decision makers on the Project to consider.

On the introductory discussion of Employment, the General Plan Vision Statement provides, “We acknowledge gainful employment as one of the most basic individual needs and value a growing and diversified job base within which our residents may find a wide range of income opportunities in the agricultural, commercial, industrial, office, tourism, and institutional sectors of our economy.” The Project would continue directly provide employment onsite through the operation of the equestrian facility and other anticipated commercial uses and is expected to have secondary employment and economic benefits for other businesses in the area.

On the topic of Sustainability and Global Environmental Stewardship, the General Plan Vision Statement provides, “Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County – new development, retrofitting of existing structures, as well as new and ongoing operations.” As is shown in the Climate Action Plan screening tables included with the Project EIR, the Project is providing certain design and operational measures to limit the Project’s contribution to greenhouse gas emissions to be consistent with state reduction goals and to be considered less than significant.

On the topic of Jobs and the Economy, the General Plan Vision Statement provides, “Implementation of the RCIP provides a clear picture of the fiscal implications of land use policies and documents the financial, as well as physical and social viability of communities in Riverside County.” The proposed Project would continue to support employment in the area. Additionally, the Project has been designed in consideration of the surrounding area to design and operate the Project to minimize impacts to the surrounding area, which is detailed in the Project’s EIR. As is required for Specific Plans, a Fiscal Impact Analysis was prepared to inform County decisionmakers on the project and its fiscal impacts to the County.

On the topic of Recreation, the General Plan Vision Statement provides, “We seek an environment where residents of Riverside County enjoy better access to parks, trails and open spaces than the previous generation. This means a county where most neighborhoods have parks, trails and community facilities that are safe, appealing, and that encourage people of all ages to remain physically and socially active.” The project through its primary equestrian facility as well as perimeter and internal trails and residential oriented recreation amenities assists in meeting this statement.

This is simply a sampling of the General Plan Vision Statement topics that the General Plan Amendment is consistent with and not an exhaustive list of Vision topics. There are no other provisions or statements within the Riverside County Vision that the General Plan Amendment are inherently inconsistent with. Therefore, the proposed General Plan Amendment would not conflict with the Riverside County Vision.

b. Any General Planning Principle Set forth in General Plan Appendix B:

General Plan Principle I.C.1 notes that "The General Plan Vision acknowledges that every community in the County is maturing in its own way, at its own pace and within its own context. Policies and programs should be tailored to local needs in order to accommodate the particular level of anticipated maturation in any given community." The project through its General Plan Amendment, Specific Plan, and Change of Zone represent a change to the current allowance on the property and through the specific proposal incorporates a unique combination of uses that are oriented around an equestrian use that exists and is common in the area. The project is an example of a unique way of that existing equestrian use maturing or evolving to accommodate and be supported through other types of development that are facilitated through the General Plan Amendment.

General Plan Principle IV.A.1 notes that "It is the intent of the General Plan to foster variety and choice in community development, particularly in the choice and opportunity for housing in various styles, of various densities, of a wide range of prices and accommodating a range of life styles in equally diverse community settings, emphasizing compact and higher density choices." The General Plan Amendment and Specific Plan propose a variety of residential densities and development types to provide housing options for a wide variety of households rather than a narrow spectrum of households.

General Plan Principle IV.A.4 notes that "Communities should range in location and type from urban to suburban to rural, and in intensity from dense urban centers to small cities and towns to rural country villages to ranches and farms. Low density residential development should not be the predominant use or standard by which residential desirability is determined." The General Plan Amendment and Specific Plan with its increase in residential density allowed is an implementation of this principle with its variety of residential densities and types within a single community.

General Plan Principle IV.A.5 notes "The creation of new cities/towns, villages and aggregated specific plan areas should be considered. The process of planning for new communities should be started so that when they are built they will have the infrastructure, the facilities, services, and economic sustainability to make them viable

into the next century." The General Plan Amendment with the Specific Plan component proposes a diverse community that has planned for the necessary infrastructure and provision of commercial and recreation services to future residents.

General Plan Principle IV.C. provides that "where appropriate, each community should be encouraged to develop a 'community center' as the focus and place of concentrated civic activity". The proposed Project with the inclusion of the core equestrian facility along with the residential area oriented recreation will represent a primary focal point for civic activity where daily and special activities would be accommodated within this proposed community.

General Plan Principle IV.F. notes "Land use policies should permit a fine grain mix of housing types, densities and prices. This means that neighborhoods and development projects may contain a mix of several housing types, densities and price ranges, subject to carefully crafted standards of design (e.g. regulating lot coverage, setbacks, and landscaping)." The General Plan Amendment and Specific Plan provide such variety of housing densities and types along with including specific development standards and guidelines for residential development.

General Plan Principle VII.B.1 and 2 provide, "provide employment-generating uses in Riverside County, with capacity for enough jobs to employ the workers who live in Riverside County to the maximum extent possible" and "stimulate the growth of businesses focused on national and international markets". These principles are highlighted in the Project through its direct and indirect employment impacts it is anticipated to have along with the equestrian events that will occur that could attract visitors and businesses to the area that would be accommodated within the Specific Plan designated commercial areas or surrounding areas.

This is simply a sampling of the Principles that the proposed General Plan Amendment is consistent with and not an exhaustive list of all consistent Principles. There are no Principles with which the General Plan Amendment inherently conflicts. Therefore, the proposed General Plan Amendment would not conflict with the Riverside County General Planning Principles set forth in General Plan Appendix B.

c. Any Foundation Component designation in the General Plan.

The proposed General Plan Amendment would include a Foundation change. The necessary findings for the Foundation change are made in the following section.

2. The proposed amendment would either contribute to the achievement of the purposes of the General Plan or, at a minimum, would not be detrimental to them.

   The purposes of General Plan are to set direction for land use and development in strategic locations, provide for the development of the economic base, establish a framework of the transportation system, and ensure the preservation of extremely valuable natural and cultural resources. The Project is strategically located to be located within the Thermal and Vista Santa Rosa area that has a strong equestrian background and continued presence to be consistent with. The area also provides the necessary infrastructure to serve the overall proposed project. Therefore, the proposed General Plan Amendment would help contribute to the achievement of the purposes of the General Plan by strategically planning for appropriate land uses in specific locations; the Project therefore is not detrimental to the purposes of the General Plan.

3. Special circumstances or conditions have emerged that were unanticipated in preparing the General Plan.

   The proposed project is unique in its mix of land uses to incorporate an equestrian facility that is typical for a rural area but also a mix of urban level residential and commercial uses that was not anticipated in the preparation of the General Plan and the current land use designation of Agriculture. While the site was previously used for agriculture purposes that made the land use designation appropriate to reflect that existing use, that use has since ceased and the General Plan being more forward looking and accommodating for unique types and mix of uses necessitates the change to the land use designation.

4. 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.

   Although the site with its current land use designation as Agriculture (AG) could accommodate for employment from agricultural uses, the proposed project's equestrian facility would provide for approximately 300 employees during competition season and 20 to 30 employees year round. This does not include the potential employment from the other commercial designated areas that would provide for more employment as well compared to the current agricultural use.

For an Agricultural Foundation Component General Plan Amendment, the following findings are required to be made:

1. Pursuant to Ordinance No. 348 Section 2.7.B.3, a maximum of 7% of the Agricultural Foundation acreage shall be generally authorized for conversion from the Agriculture Foundation Component to any other Foundation Component within a 2 ½ year period. The proposed amendment to the Agricultural Foundation Component would be within the January 1, 2024 and July 31, 2026 2 ½ year cycle. At the start of the current 2 ½ year cycle, the total acreage within Area B of Riverside County (consisting of Western Coachella Valley and Eastern Coachella Valley was 50,395 acres. Within this time period, no other changes to the Agricultural Foundation Component have already occurred. The current change to convert 619.1 acres from Agricultural Foundation to Community Development represent a 1.2% change to the total acreage of the Agricultural Foundation Component. Additionally, prior cycles have resulted in changes to the Agricultural Foundation Component that have been below the 7% maximum per cycle to convert to another Foundation Component, which is allowed to roll over to subsequent cycles as unutilized conversion. Therefore, the proposed change to the Agricultural Foundation Component Amendment would not result in a greater than 7% conversion of Agricultural Foundation Component designated area to another Foundation Component.

2. As provided above in the Entitlement/Policy Amendment findings, the General Plan Amendment would either contribute to the achievement of the purposes of the General Plan or, at a minimum, not be detrimental to them.

Specific Plan

In accordance with Government Code section 65454 and Section 2.9. of Ordinance No. 348, SP No. 401 is consistent with the Riverside County General Plan for the following reasons:

As is indicated in the preceding General Plan Amendment findings, the Project is consistent with the General Plan Vision and Principles. Furthermore, the project is consistent with all applicable General Plan policies, which is included as an appendix to the Project's EIR.

Change of Zone No. 2300003

The Project site is currently zoned Controlled Development Areas (W-2) and Heavy Agriculture, ten-acre minimum (A-2-10). Change of Zone No. 2000025 proposes to change the zoning to Specific Plan (SP) to reflect the proposed Specific Plan that includes a Specific Plan Zoning Ordinance specifying the permitted uses and development standards for each Specific Plan Planning Area as well as defining the boundaries for each Planning Area. These proposed changes to the zoning would provide direct consistency with the proposed Specific Plan and General Plan Amendment.

Tentative Tract Map No. 38578

Tentative Tract Map No. 38578 is a proposal for a Schedule A subdivision to subdivide the entire 619.1 gross acre site into 330 lots, including 1 lot for the Equestrian Center, 2 lots for Horse Park Workforce Housing (RV Park and 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. The findings required to approve the Tentative Tract Map No. 38605, pursuant to the provisions of the Riverside County Ordinance No. 460, are provided below:

1. The proposed map, subdivision design and improvements are consistent with the General Plan, specifically General Plan Principle IV.A.1 which provides that the intent of the General Plan is to foster variety and choice in community development, particularly in the choice and opportunity for housing in various styles, of various densities, of a wide range of prices and accommodating a range of life styles in equally diverse community settings, emphasizing compact and higher density choices. The General Plan Principle IV.4, states that communities should range in location and type from urban to suburban to rural, and in intensity from dense urban centers to small cities and towns to rural country villages to ranches and farms. Low density residential development should not be the predominant use or standard by which residential desirability is determined. The General Plan IV.B.1, also states the General Plan should promote development of a "unique community identity" in which each community exhibits a special sense of place by retaining distinct edges and sufficient open space between scattered urbanized areas. This will facilitate the buildout of existing communities, as well as the creation of new towns, each of which have distinct boundary and edge conditions. The proposed tentative tract map will comply with these General Plan principles by providing a variety of housing types in a single-family residential community, promoting community with the open space recreational areas. The Tentative Tract Map is located within the proposed Specific Plan and is consistent with the land use designation, maximum number of units, and development standards of the Specific Plan zoning ordinance. The Tentative Tract Map site is consistent with the Very Low Density Residential, Medium High Density Residential, and Highest Density Residential land use designations that are proposed by the Specific Plan and General Plan Amendment where strictly residential uses are proposed land use designations and all other requirements of the General Plan and the project is consistent with all applicable requirements of State law and the ordinances of Riverside County.

2. The site of the proposed map is physically suitable for the type of development and density because the site is relatively flat and would not require substantial grading or would not require impacts to hillside areas. Infrastructure to serve the residential development including water, sewer, and roads are proposed to be extended to the proposed site to

adequately serve it. Additionally, this development is consistent with the proposed Specific Plan land use designations as noted previously.

3. The design of the proposed map or proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat as detailed in the EIR prepared for the project, which determined the project would not have a significant impact for biological resources with the incorporation of required mitigation as detailed in the EIR.

4. The design of the proposed map or the type of improvements are not likely to cause serious public health problems, since as detailed in the EIR prepared for the project, the project would not have a significant impact to local air quality, hazardous materials, hydrology, wildfire, or noise. All other impacts to the environment related to public health would be less than significant.

5. As indicated in the included project Conditions of Approval, the proposed Tentative Tract Map includes the improvements as required by Riverside County Ordinance No. 460 for a Schedule "A" Map. Ordinance No. 460 requires all land divisions to conform to the County's General Plan, with applicable specific plans, Ordinance No. 348 and with the requirements of Ordinance No. 460. Tentative Tract Map No. 38605 complies with the Schedule "A" improvement requirements provided in Section 10.5 of Ordinance No. 460 as listed below.

    a. Streets. Streets are shown on the Tentative Map, which include all internal street improvements and perimeter frontage road improvements with transition improvements and Transportation Department conditions of approval.

    b. Domestic Water. Domestic water service will be supplied by Coachella Valley Water District via underground pipes consistent with the requirements set forth in California Administrative Code Title 22, Chapter 16.

    c. Fire Protection. Implementation of the project will provide for appropriate fire hydrant spacing and adequate water pressure and flow to meet Fire Department standards. The project is designed with two points of access and if development is phased each phase of the subdivision will be required to provide adequate access consistent with the provisions of Ordinance No. 460. Other fire protection measures shall be determined based on specific interior building designs, building code (Ordinance No. 457), and fire code (Ordinance No. 787) requirements.

    d. Sewage Disposal. Sewer service will be supplied by Coachella Valley Water District

e. Fences. At minimum the project is required to provide six-foot high chain link fencing along any canal, drain, expressway, or other feature deemed hazardous. The project does have a channel along the southern boundary. The project proposes a 6' wall along the southern boundary for areas proposed for development currently that excludes the commercial area in the southwest portion of the subdivision. The wall would generally inhibit access to these potentially hazardous areas. The basins proposed by the project would also be fenced with tubular steel fencing which is typical practice for deeper basins to prevent easy access to the basin that may be a potential hazard when the basin is full of water.

f. Electrical and Communication Facilities. The project will provide electrical, telephone, street lighting, cable television service with lines place underground.

6. The design of the proposed land division or the type of improvements will not conflict with street dedications, acquired by the public at large, for access through, or use of, property within the proposed land division. The project proposes to retain or relocate various easements for utility purposes that cross the site. These will be further documented through the Final Map process.

7. The Tentative Tract Map is consistent with the minimum size allowed by the project site's proposed zoning through the Specific Plan that includes 20,000 square feet for Planning Area 2, 5,000 square feet for single-family and 2,000 square feet for multi-family for Planning Area 3. The other Planning Areas have no minimum lot size. This is detailed further in the Development Standards findings below.

8. The Tentative Tract Map proposes access via off-site improvements at the southeast corner of the intersection of 62nd Avenue and Tyler Street. Although the Tentative Tract Map design as proposed would require it, the subdivision and related Plot Plans are conditioned that if such right-of-way is not able to be obtained that the intersection be redesigned. Thus, such initial authorization pursuant to Ordinance No. 460 Section 3.2.J for written assurances are not necessary at this time.

Plot Plan Nos. 230005, 230006, 240016

The following findings are required to approve the Plot Plans for Horse Park Workforce Housing, an equestrian facility, and development plan for 191 attached condominium units, pursuant to the provisions of Ordinance No. 348:

1. The proposed use conforms to all the requirements of the General Plan and with all applicable requirements of State law and the ordinances of Riverside County. The Plot

Plans encompass areas designated as Commercial Tourist (CT), Medium High Density Residential (MHDR), and Highest Density Residential (HHDR) by the proposed General Plan Amendment and Specific Plan. Each Plot Plan proposes uses that are consistent with the permitted uses for the respective Specific Plan Planning Areas since these uses are specifically listed as anticipated uses for each of these designations in the Specific Plan and Specific Plan Zoning Ordinance.

2. The proposed Specific Plan Zoning Ordinance includes the permitted uses and development standards for each of the Specific Plan Planning Areas. Within Planning Area 1 where the equestrian center or horse park is proposed, the Specific Plan Zoning Ordinance allows for an equestrian establishment with approval of a Plot Plan. Within Planning Area 4A where the workforce housing is allowed, the Specific Plan Zoning Ordinance allows for residential uses and specifically employee housing with approval of a Plot Plan. Within Planning Area 4B where the RV park is proposed, the Specific Plan Zoning Ordinance allows for an RV park with approval of a Plot Plan.

3. The overall development of the land shall be designed for the protection of the public health, safety and general welfare. As detailed in the Project's EIR, the project would not have a significant impact to local air quality, hazardous materials, hydrology, wildfire, or noise. All other impacts to the environment related to public health would be less than significant. Conditions of approval incorporated for the Plot Plans will further ensure that public health, safety and general welfare are protected.

4. The proposed use conforms to the logical development of the land and is compatible with the present and future logical development of the surrounding property, as areas surrounding the Plot Plan site are located within the Specific Plan and have been designed in coordination to be compatible and complementary land uses. Additionally, the proposed Project would not inhibit development of surrounding areas.

5. The plan for the proposed use 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. The project proposes to improve the three frontage roads, Harrison Street, 62nd Avenue, and Tyler Street. As previously noted, no improvements are proposed for 64th Avenue due to existing channel and other constraints for that frontage that are not necessary to serve the project. The overall Specific Plan area is located within a FEMA flood hazard area. The overall Specific Plan drainage plan and Tentative Tract Map drainage plan are designed to protect the development areas in the Specific Plan from the 100-year flood without increasing any flood hazards on neighboring properties.

6. The proposed uses are consistent with Ordinance No. 348 and the proposed Specific Plan, in particular with the permitted uses and development standards of the Specific Plan, as proposed by the Specific Plan and Change of Zone as detailed in the following Development Standards Findings section. The Plot Plans propose uses that are permitted in the proposed Specific Plan Zoning Ordinance for the respective Planning Areas with approval of a Plot Plan.

7. 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. Each Plot Plan proposes multiple buildings on proposed individual parcels. PPT230005 and PPT230006 are both proposed as facilities that would operate as single facilities with no anticipated purpose to sell individual buildings. PPT230005 and PPT230006 include a condition that clarifies the need for a further subdivision for individual ownership of the buildings. PPT240016 is associated with the TTM38578 that would subdivide for individual single family lots as well as multi-family condominium units that would allow for individual building ownership.

Development Standards Findings:

Planning Area 1 – TTM38578 and PPT230006

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 1 of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 1, the Specific Plan Zoning Ordinance utilizes Section 9.26 (C-T Zone) of Ordinance No. 348 to establish development standards for uses along with modifications and additions to those development standards and permitted uses from the C-T zone.

   With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 1:

   A. *There shall be no minimum lot size.* As there is no minimum lot size, this development standard is met.

   B. *The minimum interior setbacks shall be 10 feet. The minimum setback from Harrison St, Tyler St, and Ave 64 shall be 20 feet. The minimum distance between buildings shall be*

10 feet. Based on the site plan provided, all proposed buildings meet the required setbacks.

C. *All buildings and structures shall not exceed 75 feet.* The maximum proposed building height is 60 feet, which meets this development standard.

D. *0.18 parking spaces to be provided per daily guest. 0.14 RV parking stalls to be provided per each horse stall.* Based on the project proposal of up to 8,100 daily guests and 2,700 horse stalls, this requires a minimum of 1,458 parking spaces and 378 RV parking stalls. The project proposes 1,620 parking spaces include standard paved parking and decomposed granite overflow parking, which meets the required number of parking spaces. The project provides 378 trailer or RV parking spaces, which meets the required number of RV parking stalls.

E. *Trash areas shall be screened with an opaque six-foot high fence or wall and shall have an opaque gate.* All trash enclosures are proposed to be fully screened by fence or wall with a gate, which meets this development standard.

Planning Area 2 – TTM38578

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 2 of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 2, the Specific Plan Zoning Ordinance utilizes Section 6.2 (R-1 Zone) of Ordinance No. 348 to establish development standards for uses along with modifications and additions to those development standards and permitted uses from the R-1 zone.

   With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 2:

   A. *Building height shall not exceed three stories, with a maximum height of 40 feet.* No specific building plans are provided at this time, but subsequent building permits will be required to comply with this development standard.

   B. *The minimum lot size shall be 20,000 square feet.* The minimum lot size in this Planning Area is 26,753 square feet, which meets this development standard.

   C. *The minimum average width of that portion of a lot to be used as a building site shall be 60 feet with a minimum average depth of 100 feet. That portion of a lot used for access*

on flag lots shall have a minimum width of 20 feet. The Tentative Tract Map as designed for this Planning Area meets these applicable width and depth requirements.

D. *The minimum frontage of a lot shall be 60 feet, except that lots fronting on knuckles or cul-de-sac may have a minimum frontage of 35 feet. Lot frontage along curvilinear streets may be measured at the building setback in accordance with zone development standards.* The Tentative Tract Map as designed for this Planning Area meets these applicable lot frontage requirements.

E. *The minimum front yard setback shall be 20 feet. The minimum side yard setback shall be 10 feet. The minimum rear yard setback shall be 10 feet.* No specific building plans or plotting are provided at this time, but subsequent building permits will be required to comply with this development standard.

F. *Automobile storage space shall be provided as required by Section 18.12 of Ordinance No. 348.* For single-family lots like those proposed in this Planning Area it would require 2 parking spaces per dwelling unit. This will be provided through subsequent building permits to comply with this development standard.

G. *Lot Coverage: In no case shall more than 50% of any lot be covered by dwelling.* No specific building plans or plotting are provided at this time, but subsequent building permits will be required to comply with this development standard.

Planning Area 3 – TTM38578 and PPT240016

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 3 of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 3, the Specific Plan Zoning Ordinance utilizes Section 6.2 (R-1 Zone) of Ordinance No. 348 to establish development standards for uses along with modifications and additions to those development standards and permitted uses from the R-1 zone.

   With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 3:

   A. *Building height shall not exceed three stories, with a maximum height of 40 feet.* Although conceptual plans are provided for the multi-family component in this Planning Area, no specific building plans are provided at this time, but subsequent building permits will be required to comply with this development standard.

B. *Minimum lot size for detached single family shall be 5,000 square feet. Minimum lot size for multi-family shall be 2,000 square feet.* The minimum lot size in this Planning Area is 7,243 square feet for the single family lots and 8,932 for the multi-family area, which meet this development standard.

C. *The minimum average width of that portion of a lot to be used as a building site shall be 60 feet with a minimum average depth of 100 feet. That portion of a lot used for access on flag lots shall have a minimum width of 20 feet.* The Tentative Tract Map as designed for this Planning Area meets these applicable width and depth requirements.

D. *The minimum frontage of a lot shall be 60 feet, except that lots fronting on knuckles or cul-de-sac may have a minimum frontage of 35 feet. Lot frontage along curvilinear streets may be measured at the building setback in accordance with zone development standards.* The Tentative Tract Map as designed for this Planning Area meets these applicable lot frontage requirements.

E. *The front yard shall be not less than 10 feet. Minimum side yard setback for detached single family shall be 5 feet. There shall be no side yard setback for multi-family dwellings. The rear yard shall not be less than ten feet.* No specific building plans or plotting are provided at this time, but subsequent building permits will be required to comply with this development standard.

F. *Automobile storage space shall be provided as required by Section 18.12 of Ordinance No. 348.* For single-family lots and multi-family units like those proposed in this Planning Area it would require 2 parking spaces per dwelling unit. This will be provided through subsequent building permits to comply with this development standard.

G. *Maximum building coverage shall be 80% for detached residential dwellings. Maximum building coverage shall not be applicable to attached dwellings.* No specific building plans or plotting are provided at this time, but subsequent building permits will be required to comply with this development standard.

Planning Area 4A – TTM38578 and PPT230005

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 4A of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 4A, the Specific Plan Zoning Ordinance utilizes Section 8.2 (R-3 Zone) of Ordinance No. 348 to establish development standards for

uses along with modifications and additions to those development standards and permitted uses from the R-3 zone.

With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 4A:

A. *There shall be no minimum lot size.* As there is no minimum lot size, this development standard is met.

B. *The minimum setback from the southerly specific plan boundary shall be 20 feet. The minimum setback from Interior Property Line shall be 10 feet.* The Plot Plan design provide for the 20 foot southern boundary and 10 foot interior property line setback to meet this requirement.

C. *The minimum side yard shall be five feet for buildings that do not exceed 35 feet in height. Any portion of a building which exceeds 35 feet in height shall be set back from each side lot line five feet plus two feet for each foot by which the height exceeds 35 feet; if the side yard adjoins a street, the side setback requirement shall be the same as required for a front setback. No structural encroachments shall be permitted in the front, side, or rear yard except as provided in Section 18.19. of Ordinance No. 348.* No building within this Plot Plan exceeds 35 feet in height, therefore the minimum side yard setback is five feet. The Plot Plan design provides for the minimum 5 foot setback to meet this requirement.

D. *The maximum building lot coverage shall be 75%.* The Plot Plan indicates a total proposed building coverage of 158,530 square feet in this Planning Area, which across the 18.4 acre (800,176 square foot) Planning Area equates to approximately 20% lot coverage, which meets the requirement.

E. *The maximum ratio of floor area to lot area shall not be greater than two to one, not including basement floor area.* As all single-story structures and based on the 158,530 square feet of building area, this results in a floor area ratio of approximately 0.20 or approximately one to five, which does not exceed the maximum ratio of two to one.

F. *All buildings and structures shall not exceed 50 feet in height.* The maximum proposed building height in this Planning Area is 24 feet for the laundry building and 17 feet for the typical residential modular building, which meets this requirement.

G. *1 parking space per dwelling unit shall be provided.* The Plot Plan in this Planning Area proposes 1 parking space for each dwelling unit, which meets this requirement.

Planning Area 4B – TTM38578 and PPT230005

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 4B of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 4B, the Specific Plan Zoning Ordinance utilizes Section 9.26 (C-T Zone) of Ordinance No. 348 to establish development standards for uses along with modifications and additions to those development standards and permitted uses from the C-T zone.

   With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 4B:

   A. *There shall be no minimum lot size.* As there is no minimum lot size, this development standard is met.

   B. *The minimum setback from the southerly specific plan boundary shall be 20 feet. The minimum setback from Interior Property Lines shall be 10 feet.* The Plot Plan design provide for the 20 foot southern boundary and 10 foot interior property line setback to meet this requirement.

   C. *Max building height shall not be greater than 50 feet.* There are no proposed buildings by the Plot Plan within this Planning Area since the area is designated for RV and trailer space use.

   D. *1 automobile parking space to be provided for each RV space.* The typical plotting for each RV space accommodates space for 1 standard vehicle, which meets this requirement.

   E. *Trash areas shall be screened with an opaque six-foot high fence or wall and shall have an opaque gate.* All trash enclosures are proposed to be fully screened by fence or wall with a gate, which meets this development standard.

   AA. *The maximum building lot coverage shall be 75%.* As no buildings are proposed in this Planning Area, the lot coverage standard is met.

   BB. *All signage shall comply with the provisions of Article XIX of County Ordinance No. 348.* No specific signage is proposed by the Plot Plan at this time, but a minor plot

plan will be required to be submitted to determine compliance with Article XIX prior to any issuance of a building permit.

CC. *Removal of garbage and rubbish shall comply with the requirements of County Ordinance No. 513 and of the trash hauler.* The Plot Plan is designed appropriately for the location and type of enclosures to meet this. The project is conditioned to further meet this requirement through initial construction and operation.

DD. *Lighting shall be indirect, hooded and positioned so as to reflect onto the access roads and away from the recreational vehicle spaces and adjoining property unless otherwise approved by the approving body. Lighting standards for roads and recreational vehicle sites shall be a maximum of ten feet in height. The height of all light standards shall be measured from the elevation of the adjoining pavement of the access roads. Lighting standards in recreational areas may be taller than ten feet. All recreational vehicle parks in the Mt. Palomar Street Lighting Area shall comply with the lighting policies set forth in County Ordinance No. 655*. Lighting is not specifically proposed at this time with the Plot Plan. The project is conditioned to further meet this requirement through initial construction and operation.

EE. *The park shall be graded so that there will be no depressions in which surface water will accumulate or as approved by the County Flood Control District.* The Plot Plan grading design has been reviewed by Building & Safety Grading as well as County Flood Control District. Final grading and construction plans will be required to comply with this as well.

FF. *DISTANCE BETWEEN RECREATIONAL VEHICLES AND BUILDINGS*.

a. *Recreational vehicle spaces shall be designed so as to provide the maximum distance between recreational vehicles, taking into account minimum recreational vehicle space size requirements as established within this ordinance.* The RV spaces typically are 32 feet in width which would provide adequate width for typical RVs.

b. *In vacation recreational vehicle parks, recreational vehicle utility connections may be arranged so as to allow grouping of recreational vehicles, up to four vehicles per utility connection, if this is desired by the recreational vehicle owners. However, recreational vehicle owners shall not be required to group more than two to a utility connection unless they so request.* The Plot Plan is not anticipated to facilitate this grouping of utility connections, but would ultimately allow for it if feasible based on the layout of the park.

c. *Where recreational vehicle spaces are located near any permitted building, the minimum distance between the recreational vehicle and said building shall be 15 feet.* No permanent buildings are included within the RV park for this to be applicable.

GG. *All structures and recreational vehicle pads shall be set back from all side and rear property lines not less than three feet, except where a side or rear property line abuts a street, the setback shall be not less than 20 feet. Where the recreational vehicle park is adjacent to an existing single family development, a 100 foot setback shall be provided for structures exceeding one story*. No structures are proposed for this to apply to those and the no street or single family development is located near the RV Park for those standards to apply.

HH. *Maximum building heights shall be as permitted in the zoning classification in which the recreational vehicle park is located.* No buildings are proposed for this to be applicable.

II. *MANAGEMENT*.

a. *A caretaker responsible for the management of the park shall be present on the premises of the park at all times when the park is occupied.* A condition of approval is included in the Plot Plan to require this be complied with through the operation of the RV Park.

b. *Maintenance and Storage Yard. All storage of supplies, maintenance materials and equipment outside of buildings shall be provided within a storage area. Any storage shall be located outside any required yard and completely screened from adjoining properties with a decorative masonry wall or fencing six feet in height and further buffered with landscaping materials eight feet in height.* A condition of approval is included in the Plot Plan to require this be complied with through the operation of the RV Park.

JJ. *One washing machine and dryer shall be provided for every 50 recreational vehicle spaces or fraction thereof.* A condition of approval is included in the Plot Plan to require this be complied with through the operation of the RV Park.

KK. *Recreational vehicle parks which do not provide each recreational vehicle space with a connection to an approved sanitary sewer system shall provide sanitation stations designed to receive the discharge from the sewage holding tanks of*

recreational vehicles. The RV park proposes direct connection to a proposed sanitary sewer system. Therefore no sanitation stations are required to provide alternate disposal service for the RV park.

a. *The sanitary station shall be constructed in accordance with specifications set forth in Title 25 of the California Administrative Code.* Per above, not applicable.
b. *If a sanitation station is provided, it shall be located within the park in such a manner so as not to be obnoxious to the tenants of the park and shall be set back 100 feet from adjoining residential development, unless approved by the approving body.* Per above, not applicable.

LL. *Interior access roads within the recreational park shall not be less than 24 feet wide and be paved with a minimum thickness of three inches of asphalt concrete or six inches of Portland Cement Concrete, or with such alternate surfacing as recommended by a soils engineer. The approving body may reduce the minimum width of interior access roads to 20 feet where one way interior access roads are utilized.* The interior roads have a minimum width of 30 feet, which meets this minimum requirement.

MM. *Each recreational vehicle space shall front on or be served by an interior access road*. The Plot Plan is designed for each space to have direct access to the interior driveway or access road to meet this requirement.

NN. *In accordance with Title 25 of the California Administrative Code, the following standards shall be met*.

a. *Only one power supply connection shall be made to a recreational vehicle.* A condition of approval is included in the Plot Plan to require this be complied with through the construction and operation of the RV Park.

b. *Electric power supply equipment shall be located on the rear half of the recreational vehicle space within four feet of the location or proposed location of the recreational vehicle on the space.* A condition of approval is included in the Plot Plan to require this be complied with through the construction and operation of the RV Park.

OO. *Each recreational vehicle space shall have a minimum width of 32 feet and depth of 45 feet.* The Plot Plan has designed for each space to comply with this requirement.

PP. *INDIVIDUAL SPACE IMPROVEMENTS*:

a. *Each site shall contain a level, stabilized recreational vehicle parking pad of crushed stone, decomposed granite, paving or other suitable material.* A condition of approval is included in the Plot Plan to require this be complied with through the construction of the RV Park.

b. *Each recreational vehicle space may be provided with a ten foot by 25 foot parking area of asphalt concrete, Portland Cement Concrete, rock, decomposed granite/or similar material.* A condition of approval is included in the Plot Plan to require this be complied with through the construction of the RV Park.

c. *All areas not in hard surface shall be landscaped pursuant to Section 18.12. of this ordinance, unless otherwise approved by the approving body.* A condition of approval is included in the Plot Plan to require this be complied with through the construction of the RV Park.

QQ. *ELECTRICAL SERVICES*.

a. *Each recreational vehicle space shall be provided with an electrical service outlet.* A condition of approval is included in the Plot Plan to require this be complied with through the construction of the RV Park.

b. *Each recreational vehicle space may be provided with connection to telephone service.* A condition of approval is included in the Plot Plan to require this be complied with through the construction of the RV Park.

RR. *Each recreational vehicle space shall be provided with a fresh water service outlet delivering safe and potable water. Each recreational vehicle space shall be provided with a connection to an approved sanitary sewer system.* A condition of approval is included in the Plot Plan to require this be complied with through the construction of the RV Park.

SS. *Only one recreational vehicle connected to utilities shall be allowed per site. No other vehicle parked at the recreational vehicle site, except for the primary recreational vehicle, shall be used for human habitation on a temporary or permanent basis. In addition to the primary recreational vehicle, two cars, vans or trucks may be parked at the recreational vehicle space. One recreational vehicle may be substituted for these other vehicles provided it is the only available source of transportation to and from the recreational vehicle park.* A condition of approval is

included in the Plot Plan to require this be complied with through the construction of the RV Park.

TT. *Wheels shall not be removed from recreational vehicles.* A condition of approval is included in the Plot Plan to require this be complied with through the operation of the RV Park.

UU. *ACCESSORY STRUCTURE*. No such structures are currently included in the Plot Plan, but a condition of approval has been included to clarify the allowances for such structures in the future.

a. *Ramadas and patio covers are allowed.*

b. *Accessory storage structures may be allowed at individual vehicle spaces.*

c. *All structures shall comply with the requirements of Title 25 of the California Administrative Code, except where this ordinance is more restrictive, the more restrictive standards shall apply.*

d. *No more than 60 percent of the area of each individual recreational vehicle site may be covered by the recreational vehicle and accessory structures.*

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

f. *Awnings are permitted in accordance with the provisions of Title 25 of the California Administrative Code.*

VV. *Recreational vehicle park shall be screened or fenced as follows: For extended occupancy parks in Category III, IV, or open space land use areas a decorative masonry wall, earthen berm and block wall, fencing, or landscaping screen, or combination thereof shall be on all property lines as specified by the approving body. Where walls and fences are utilized an additional landscape buffer shall be provided as set forth in Section 18.12. of this ordinance. The exterior side of all block walls shall be coated with a protective coating that will facilitate the removal of graffiti.* The Plot Plan includes a 6 foot tall block wall along the southern and western sides that generally face outwards from the Project site as well as along its northern side that faces interior to the Project site to meet this requirement.

WW. *Only recreational vehicles which can connect to sewer and water service at the recreational vehicle space shall be allowed to stay for longer than 30 consecutive*

days or 120 days in any one year. All recreational vehicles which are sited within a recreational vehicle park on a long term or permanent basis shall be registered with the California Department of Motor Vehicles. A condition of approval is included in the Plot Plan to require this be complied with through the operation of the RV Park.

Planning Area 5 – TTM38578

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 5 of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 5, the Specific Plan Zoning Ordinance utilizes Section 9.26 (C-T Zone) of Ordinance No. 348 to establish development standards for uses along with modifications and additions to those development standards.

   With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 5:

   A. *There shall be no minimum lot size.* As there is no minimum lot size, this development standard is met.

   B. *Minimum interior setbacks between parcels within the Specific Plan shall be 10 feet. Minimum setback from Harrison St shall be 20 feet.* Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

   C. *Building height shall not exceed a maximum height of 75 feet.* Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

   D. *Automobile storage space shall be provided as required by Section 18.12. of Ordinance no. 348. Not less than five percent of the parking area shall be landscaped. No planting area shall be less than five feet wide at any point.* Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

   E. *Trash areas shall be screened with an opaque six-foot high fence or wall and shall have an opaque gate.* Aside from the subdivision proposal to create the parcel for the

Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

Planning Area 6 – TTM38578

1. The proposed Zoning Classification for the Project site is Specific Plan. Development standards for Planning Area 6 of Specific Plan No 401 are established in the proposed Specific Plan Zoning Ordinance. For Planning Area 6, the Specific Plan Zoning Ordinance utilizes Section 9.4 (C-1/C-P Zone) of Ordinance No. 348 to establish development standards for uses along with modifications and additions to those development standards.

   With the adoption of the proposed Specific Plan Zoning Ordinance, the following development standards shall apply to Planning Area 6:

   A. There is no minimum lot area requirement, unless specifically required by zone classification for a particular area. As there is no minimum lot size, this development standard is met.

   B. Minimum setback from Harrison St shall be 20 feet. Minimum interior setback shall be 10 feet. Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

   C. Building height shall not exceed a maximum height of 75 feet. Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

   D. Automobile storage space shall be provided as required by Section 18.12. of Ordinance No. 348. Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

   E. All roof mounted mechanical equipment shall be screened from the ground elevation view to a minimum sight distance of 1,320 feet. Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

AA. Maximum building lot coverage shall be 75%. Aside from the subdivision proposal to create the parcel for the Planning Area, no development is proposed at this time for this Planning Area. This development standard will be reviewed at the time of a specific development proposal.

Other Findings:

1. The Project site is not located within a Conservation Area of the Coachella Valley Multiple Species Habitat Conservation Plan. This Project fulfills the plan requirements.

2. The Project site is not located within a city Sphere of Influence.

3. The Project site is located within the Jacqueline Cochran Airport Influence Area ("AIA") boundary, primarily Zone D with some Zone E. The project was reviewed by the Riverside County Airport Land Use Commission (ALUC) and determined the project consistent with the Jaqueline Cochran Airport Land Use Compatibility Plan on July 13, 2023. The ALUC recommended conditions of approval have been incorporated into the applicable project cases conditions of approval.

4. The project site is located within Zone B of the Mount Palomar Observatory Lighting Zone boundary, as identified by Ordinance No. 655 (Mt. Palomar). The Project is required to comply with all lighting standards specified within Ordinance No. 655, pursuant to Zone B.

5. The Project site is not located within the Fee Assessment Area of the Stephen's Kangaroo Rat Habitat Conservation Plan ("SKRHCP").

6. In compliance with Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52), in March 2023 a Sacred Lands File Search and consultation list request was sent to the Native American Heritage Commission. NAHC responded with a list of 15 tribal representatives to contact and the results of the Sacred Lands File Search which was negative. Notices were sent to tribal representative contacts on March 29, 2023 for SB 18 and AB 52 purposes.

   Responses were received from five tribes. The Cahuilla Band of Indians and the Quechan Tribe of the Fort Yuma Reservation offered no comments regarding this project and deferred to tribes located in proximity to the Project site, with the Cahuilla Band deferring specifically to the Torres Martinez Desert Cahuilla Indians. The Augustine Band of Cahuilla Indians were unaware of any cultural resources that may be affected by the proposed project but requested notification if such resources are discovered during the project. The Agua Caliente Band of Cahuilla Indians requested copies of all cultural resource documentation

generated in connection with the project for tribal review as well as Native American monitoring during ground disturbing activities on the property. Consultation was concluded on December 27, 2023. The Torres Martinez Desert Cahuilla Indians, with Reservation lands adjacent to the subject site, requested further consultation and expressed concern regarding prehistoric settlement and land use patterns. The tribe provided a list of village sites and cultural landscapes in the Project vicinity, recommended archaeological testing and the development of a plan for recovered archaeological materials, and requested Native American monitoring during construction. A representative of the Torres Martinez Desert Cahuilla Indians also accompanied the archaeologist on the field reconnaissance conducted for the Project.

Fire Findings:

The Project site is not located within a designated Fire Hazard Severity Zone and is not located within a Cal Fire State Responsibility Area ("SRA")

Conclusion:

For the reasons discussed above, as well as the information provided in the Initial Study, the proposed Project conforms to all the requirements of the General Plan and with all applicable requirements of State law and the ordinances of Riverside County. Moreover, the proposed Project would not be detrimental to the health, safety or general welfare of the community.

PUBLIC HEARING NOTIFICATION AND COMMUNITY OUTREACH

This Project was advertised in the Press Enterprise Newspaper and Desert Sun. Additionally, public hearing notices were mailed to property owners within 1,500 feet of the Project site. Signs were also placed on the site notifying of the Project public hearing. As of the writing of this report, Planning Staff has not received any written communication or phone calls who indicated support or opposition to the proposed Project.

The Project was presented to and discussed at the Thermal Oasis Community Council on March 24, 2024, September 30, 2024, November 25, 2024, May 28, 2025, and June 16, 2025. Additionally, representatives performed a variety of public outreach, including to CVUSD staff, surrounding jurisdiction staff, Coachella Valley Housing Coalition, nearby tribal representatives, Thermal/Oasis Community Council members, and Leadership Counsel for Justice & Accountability members.

ATTACHMENTS

A. PC Resolution
B. GIS Exhibits
C. Specific Plan Document
D. Specific Plan Zoning Ordinance
E. TTM38578 Exhibits
F. PPT240016 Exhibits
G. PPT230005 Exhibits
H. PPT230006 Exhibits
I. PPT230006 Operations Manual
J. Fiscal Impact Analysis
K. Project Outreach Summary
L. Draft EIR
M. Final EIR
N. Specific Plan Conditions of Approval
O. TTM38578 Conditions of Approval
P. PPT240016 Conditions of Approval
Q. PPT230005 Conditions of Approval
R. PPT230006 Conditions of Approval
S. Environmental Justice Checklist
T. Recent Public Comments

RIVERSIDE COUNTY PLANNING DEPARTMENT

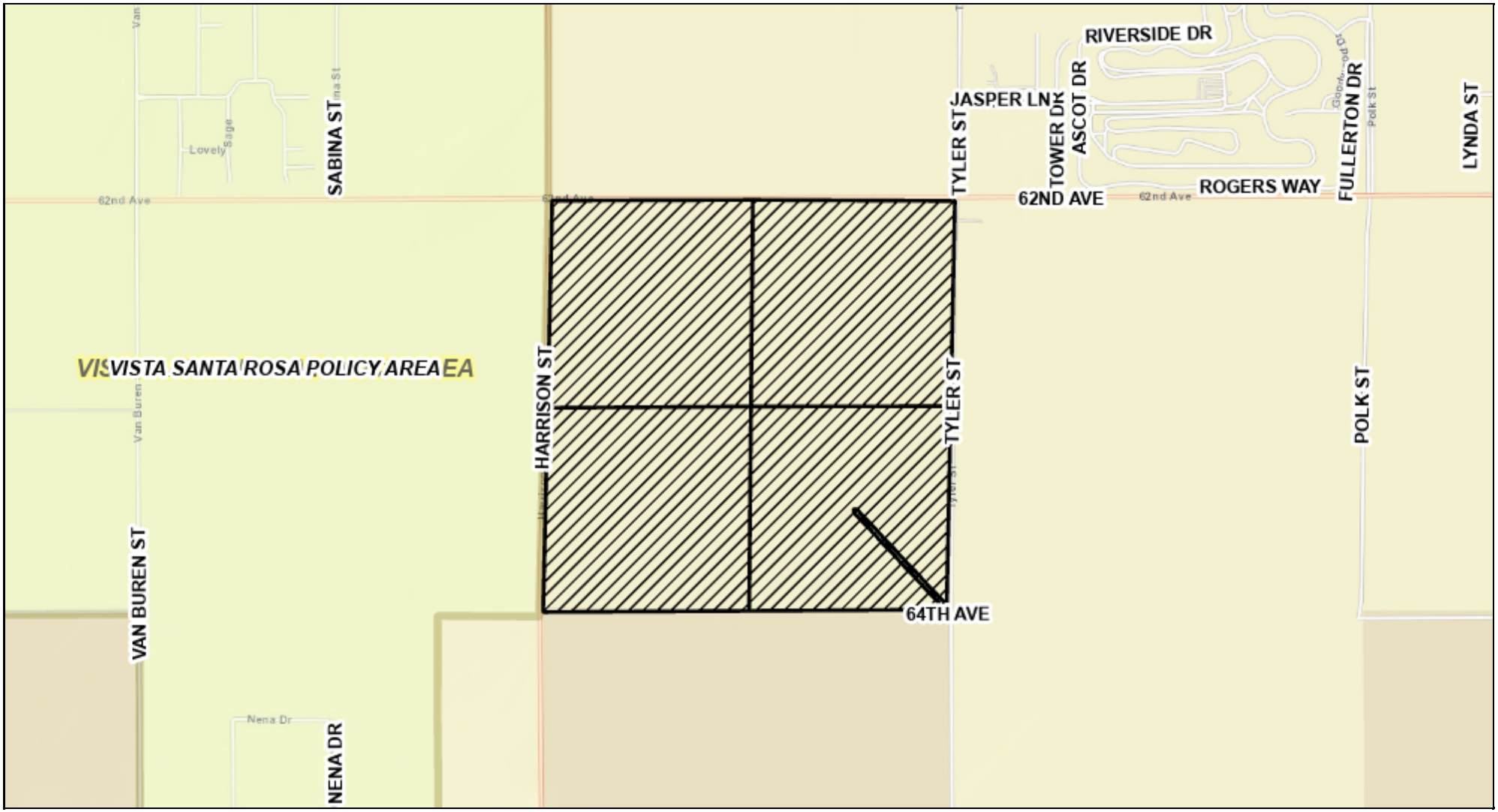
Supervisor: V MANUEL PEREZ

SP00401, GPA230001, CZ2300003, TTM38578, PPT230005, PPT230006, PPT240016

Date: 9-23-2025

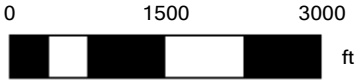
District: 4

VICINITY/POLICY AREAS



Zoning Area/District: LOWER COACHELLA VALLEY

DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different type of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951)955-3200 (Western County) or in Palm Desert at (760)863-8277 (Eastern County) or Website http://planning.rctlma.org



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RIVERSIDE COUNTY PLANNING DEPARTMENT

Supervisor: V MANUEL PEREZ

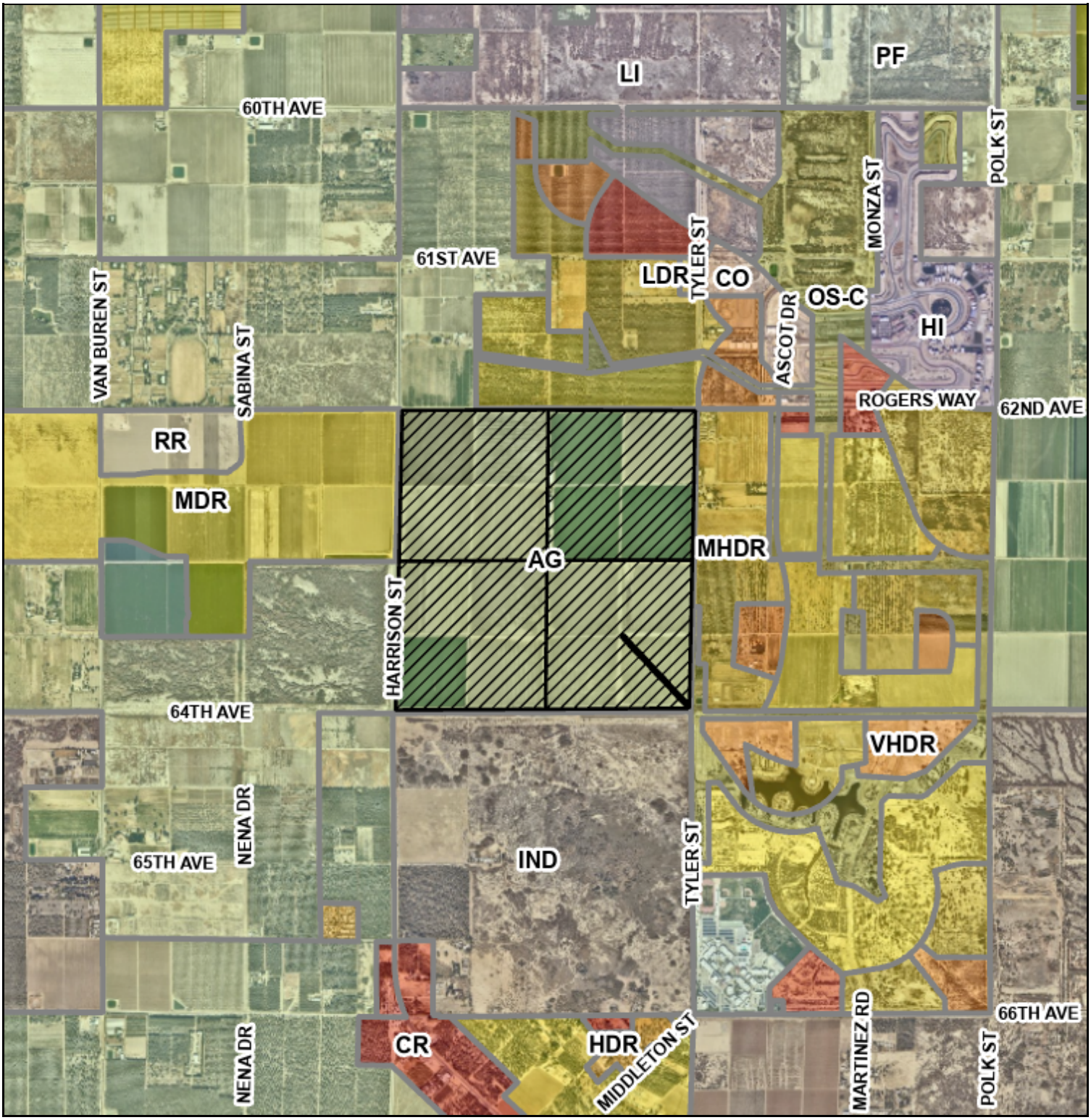
SP00401, GPA230001, CZ2300003, TTM38578, PPT230005, PPT230006, PPT240016

Date: 9-23-2025

District: 4

EXISTING GENERAL PLAN

Exhibit: 5



Zoning Area/District: LOWER COACHELLA VALLEY

Author:

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RIVERSIDE COUNTY PLANNING DEPARTMENT

Supervisor: V MANUEL PEREZ

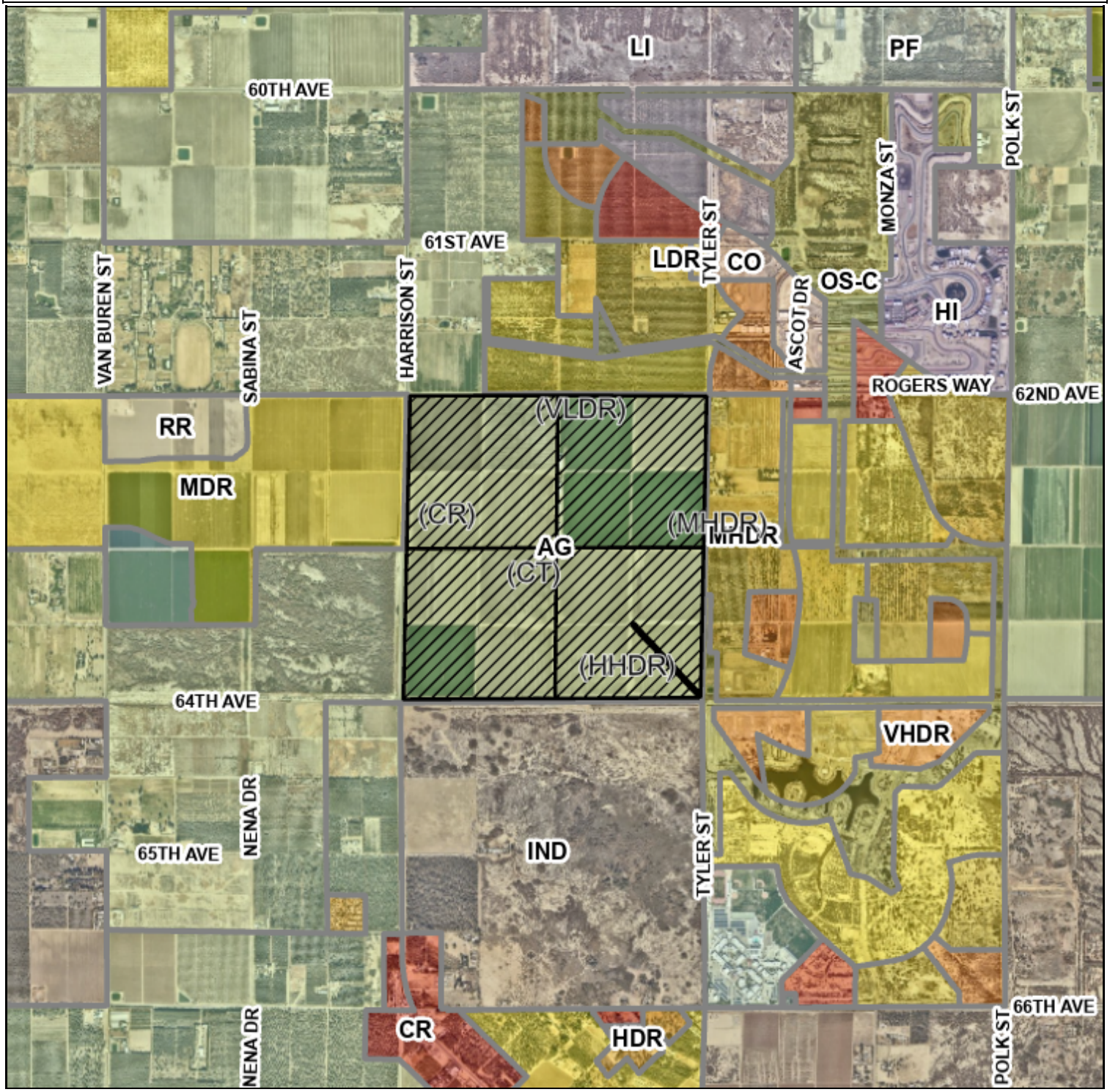
SP00401, GPA230001,
CZ2300003, TTM38578,
PPT230005, PPT230006,
PPT240016

Date: 9-23-2025

District: 4

PROPOSED GENERAL PLAN

Exhibit: 6



Zoning Area/District: LOWER COACHELLA VALLEY

Author:

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RIVERSIDE COUNTY PLANNING DEPARTMENT

Supervisor: V MANUEL PEREZ

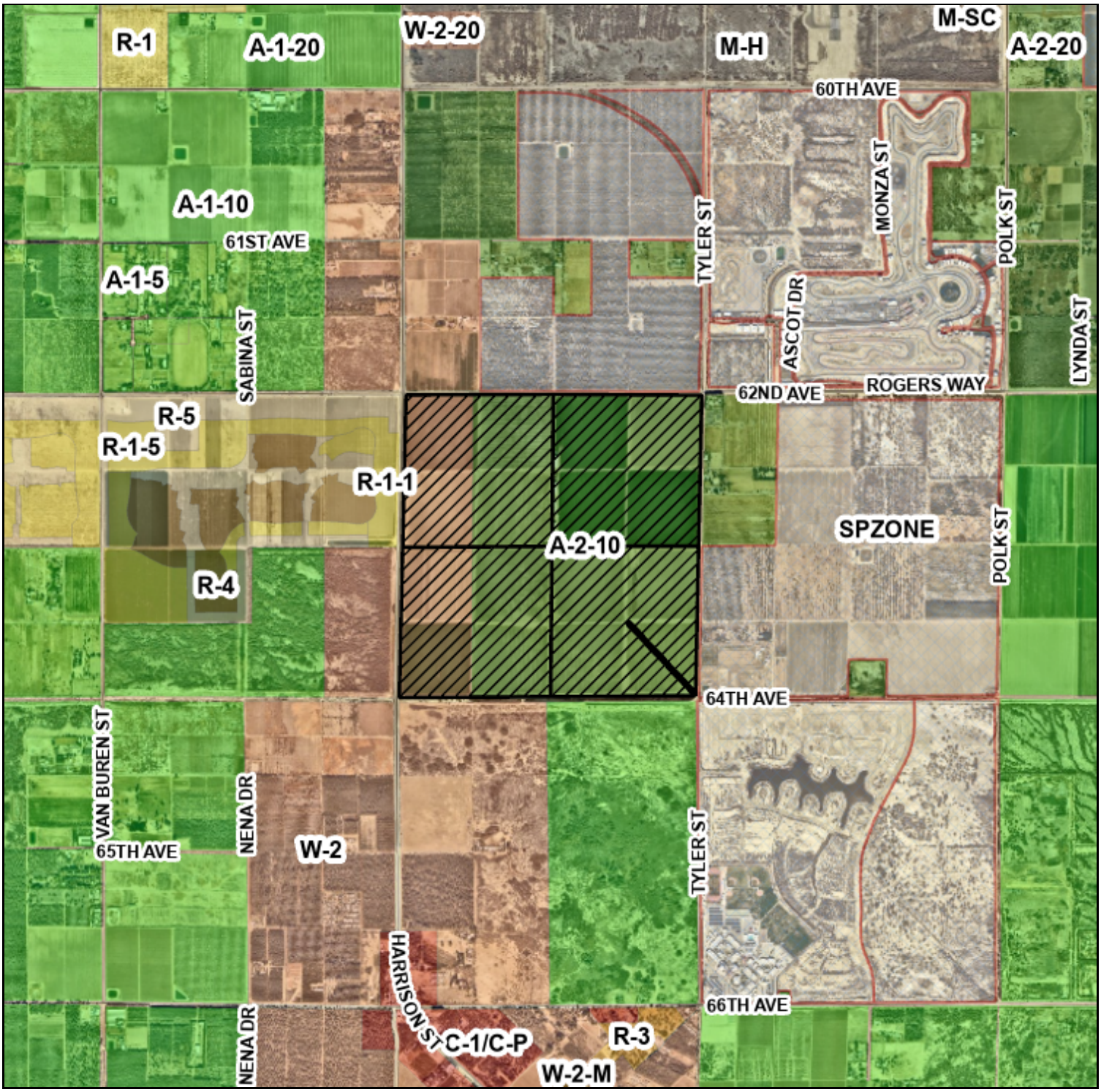
SP00401, GPA230001, CZ2300003, TTM38578, PPT230005, PPT230006, PPT240016

Date: 9-23-2025

District: 4

EXISTING ZONING

Exhibit: 2



Zoning Area/District: LOWER COACHELLA VALLEY

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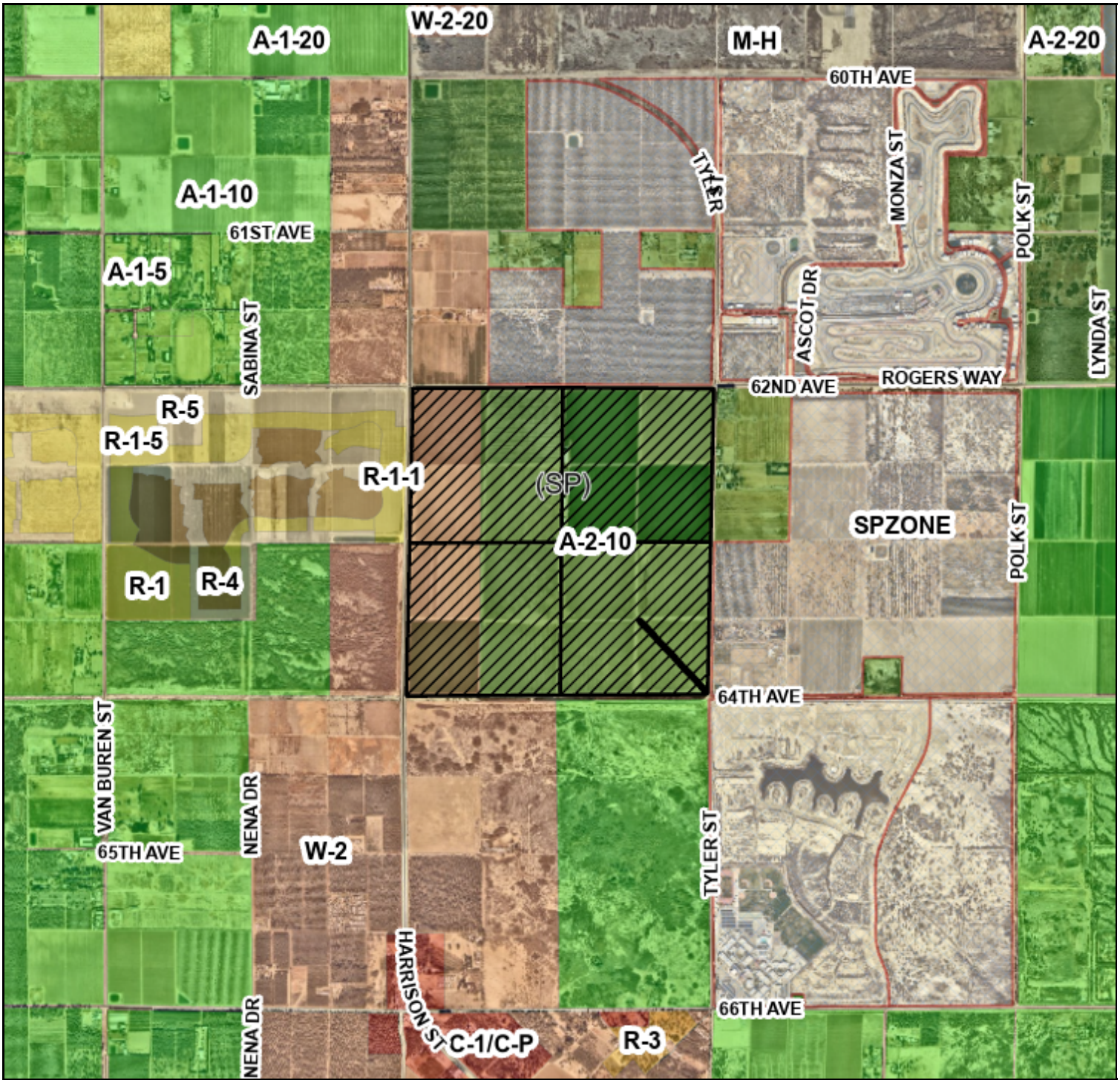
RIVERSIDE COUNTY PLANNING DEPARTMENT

SP00401, GPA230001, CZ2300003, TTM38578, PPT230005, PPT230006, PPT240016

PROPOSED ZONING

Supervisor: V MANUEL PEREZ
District: 4

Date: 9-23-2025
Exhibit: 3



Zoning Area/District: LOWER COACHELLA VALLEY

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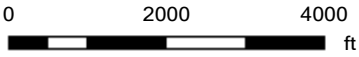

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RIVERSIDE COUNTY PLANNING DEPARTMENT

Supervisor:V MANUEL PEREZ

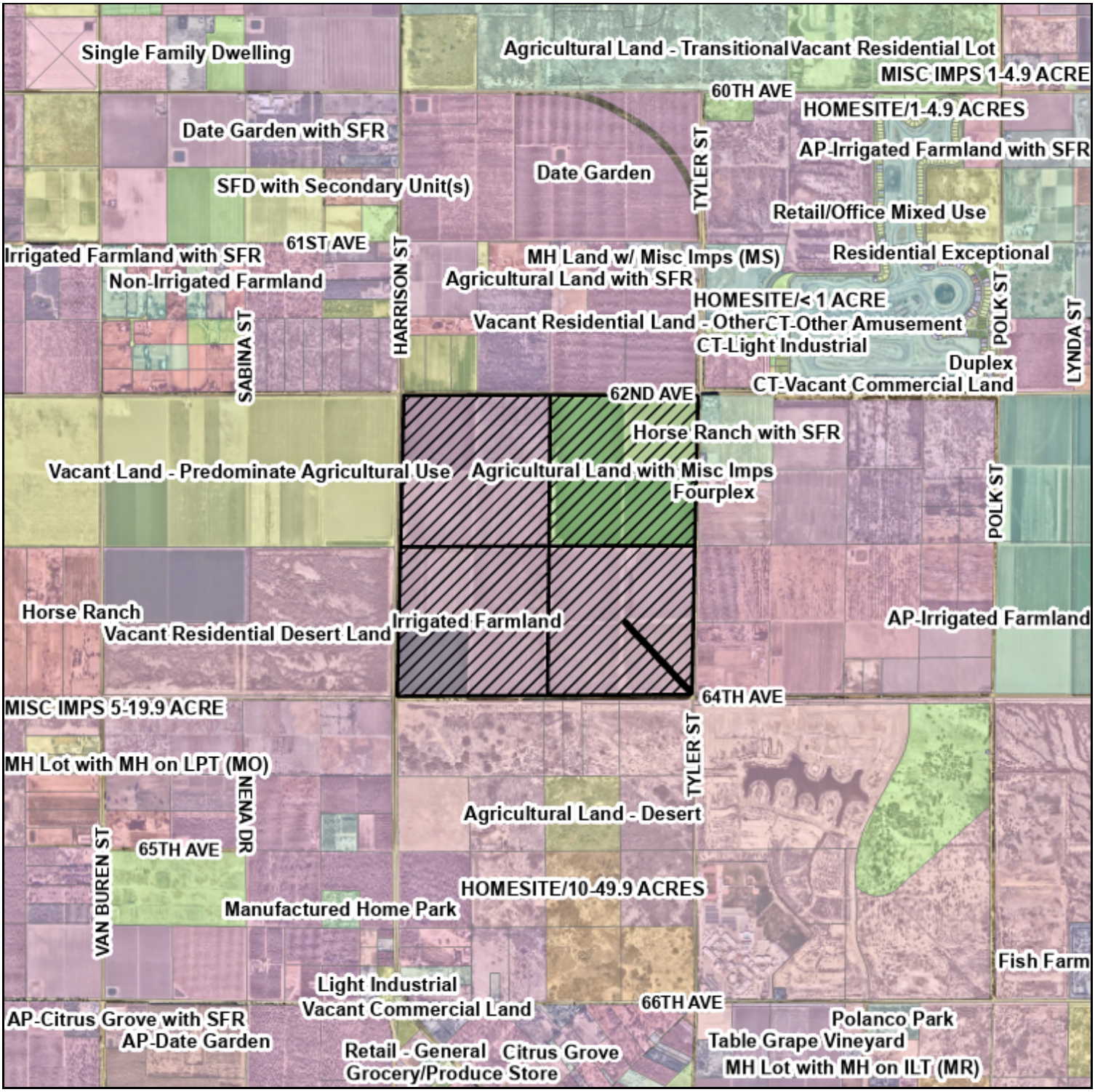
SP00401, GPA230001, CZ2300003, TTM38578, PPT230005, PPT230006, PPT240016

Date: 9-23-2025

District: 4

LAND USE

Exhibit: 1



Zoning District: LOWER COACHELLA VALLEY

DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different type of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951)955-3200 (Western County) or in Palm Desert at (760)863-8277 (Eastern County) or Website http://planning.rctlma.org

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THERMAL RANCH
SPECIFIC PLAN 401

August 2025

DRAFT

Prepared For:
County of Riverside
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Prepared By:
MSA Consulting, Inc.

ACKNOWLEDGEMENTS

Special acknowledgment and thanks is given to the following individuals:

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CHAPTER I: INTRODUCTION & SETTING

1.1 Executive Summary

The Thermal Ranch Specific Plan (Specific Plan) is an approximately 622-acre equestrian-oriented development located within the unincorporated community of Thermal, in Riverside County, California. This Specific Plan will provide for a mix of uses centered around a 231-acre equestrian center and related show facilities, including barns, stables, arenas, and related equestrian facilities and services. Surrounding this central facility are various supporting uses including areas for neighborhood commercial, resort and hospitality development along with a range of residential housing types such as large single-family estate lots, traditional detached and attached neighborhoods and horse park workforce housing. This Specific Plan will establish site-specific development standards, land use regulations, and programs to guide the development of the property in a manner that is consistent with the Riverside County General Plan while also maintaining flexibility to respond to changing conditions that factor in any long-term development. The Specific Plan implements all applicable elements of the General Plan and includes detailed information about the site's master plan and infrastructure improvements such as circulation, water, sewer, grading and drainage design. This Specific Plan is organized in six chapters, as described below:

Chapter 1, Introduction & Setting: This section provides an overview of the document, the project setting and history, legislative authority for the Specific Plan, entitlement process and other contextual information.

Chapter 2, Master Plans: This section describes the primary master plan components required for further development of the property. These include land use, circulation, open space and recreation, water and sewer, and grading and drainage.

Chapter 3, Planning Area Standards: This section provides development standards applicable within the Specific Plan area.

Chapter 4, Design Guidelines: This section establishes the design guidelines applicable within the Specific Plan area.

Chapter 5, Administration : This chapter describes the procedures for administration and implementation of the Thermal Ranch Specific Plan.

Chapter 6, Specific Plan Zoning This section establishes the allowable uses and development standards applicable within the Specific Plan area.

1.2 Purpose and Intent

This Specific Plan is intended to guide future development and use of land within the Thermal Ranch Specific Plan boundary, including the establishment of site-specific development standards and regulations. The Specific Plan is intended to ensure quality development consistent with the goals, objectives, and policies of the County of Riverside General Plan.

This document has been prepared pursuant to California Government Code Section 65450, which grants local governments the authority to prepare specific plans as a systematic means of implementing their General Plan. California Government Code Sections 65450 through 65454 establishes the authority to adopt a Specific Plan, identifies the required contents of a Specific Plan, and mandates consistency with the General Plan.

Per California Government Code Section 65451, a specific plan shall include a text and a diagram or diagrams which specify all of the following in detail:

- The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan.
- The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).
- The specific plan shall include a statement of the relationship of the specific plan to the general plan.

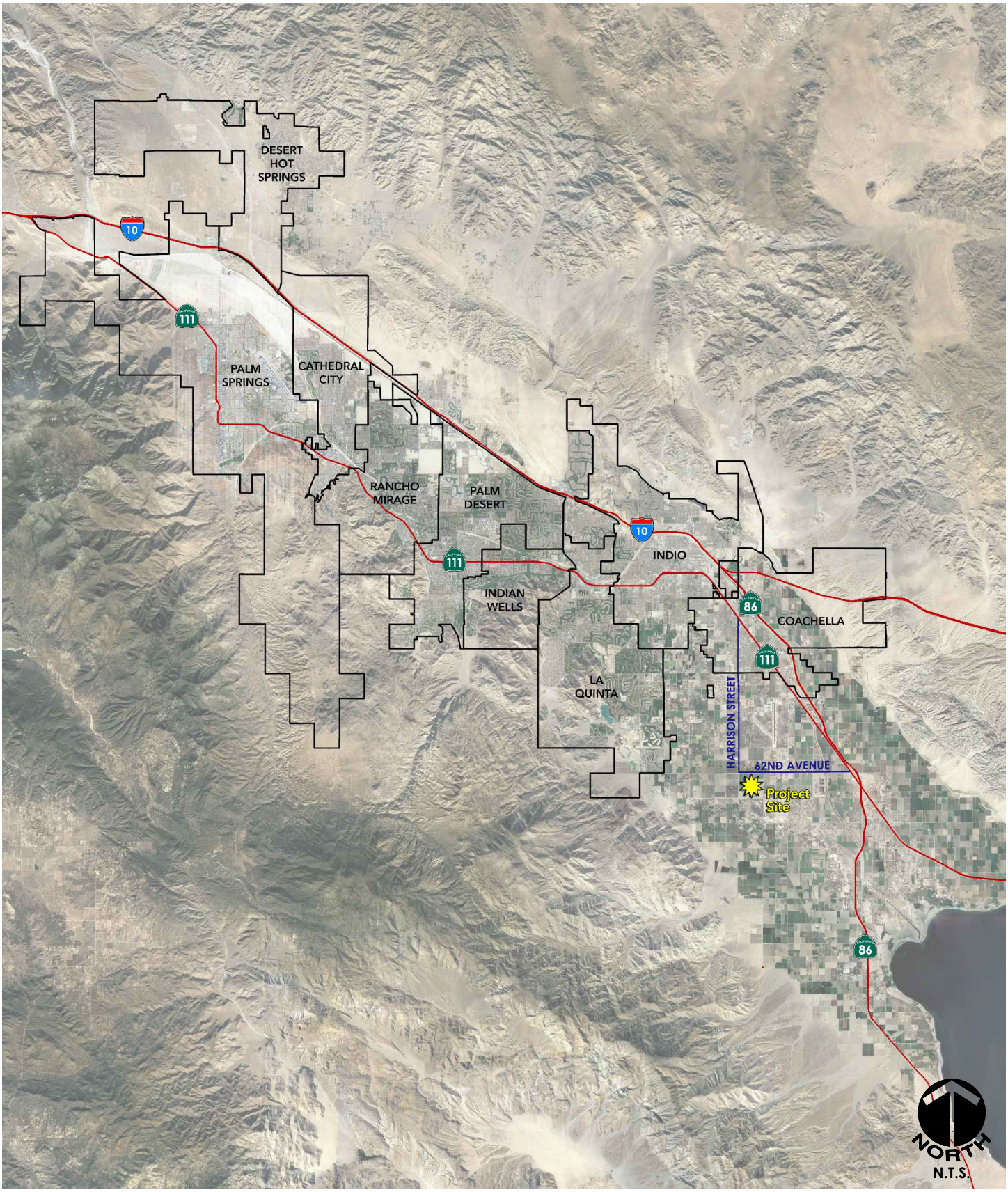
This Specific Plan defines the location, type and amount of development allowed within the Specific Plan area consistent with all requirements for Specific Plans identified in State Planning and Land Use Law as listed above and Sections 2.8-2.10 of the Riverside County Zoning Ordinance 348 (Ordinance 348).

1.3 Project Location & Site Characteristics

As shown on Figure 1.1, *Regional Location Map*, the Specific Plan is situated in the eastern portion of the Coachella Valley in Riverside County California within the unincorporated community of Thermal. The project is accessible from State Highways 86 and 111 via 62nd Avenue from the east and Harrison Street from the north (both two-lane paved public roads). The Specific Plan area totals approximately 620 acres (APNs 751-020-002,003, 006, & 007) Figure 1.2, *Vicinity Map*, depicts the physical setting of the property.

In its current condition the site consists entirely of undeveloped level land as shown on Figure 1.3, *Existing Conditions.* The site contains various agricultural buildings and structures along with well site infrastructure. Existing drain tiles and pipes are dispersed throughout the site from current agricultural use. Overhead pole lines run along the frontage of Ave 64 and a portion of Ave 62. A 25 ft drainage channel right-of-way owned by the Coachella Valley Water District adjoins the southerly boundary of the site on Ave 64.

Site topography slopes from the northwest to southeast with higher elevations ranging from 370 along the northwest corner of the property boundary to a low elevation of 350 along Ave 64 to the southeast. The project site borders Ave 62 to the north, Harrison Street to the west, Ave 64 to the south, and Tyler Street to the east. All permitter streets are currently paved 2-lane roads except for Ave 64 which is currently undeveloped along frontage of the southerly project boundary.

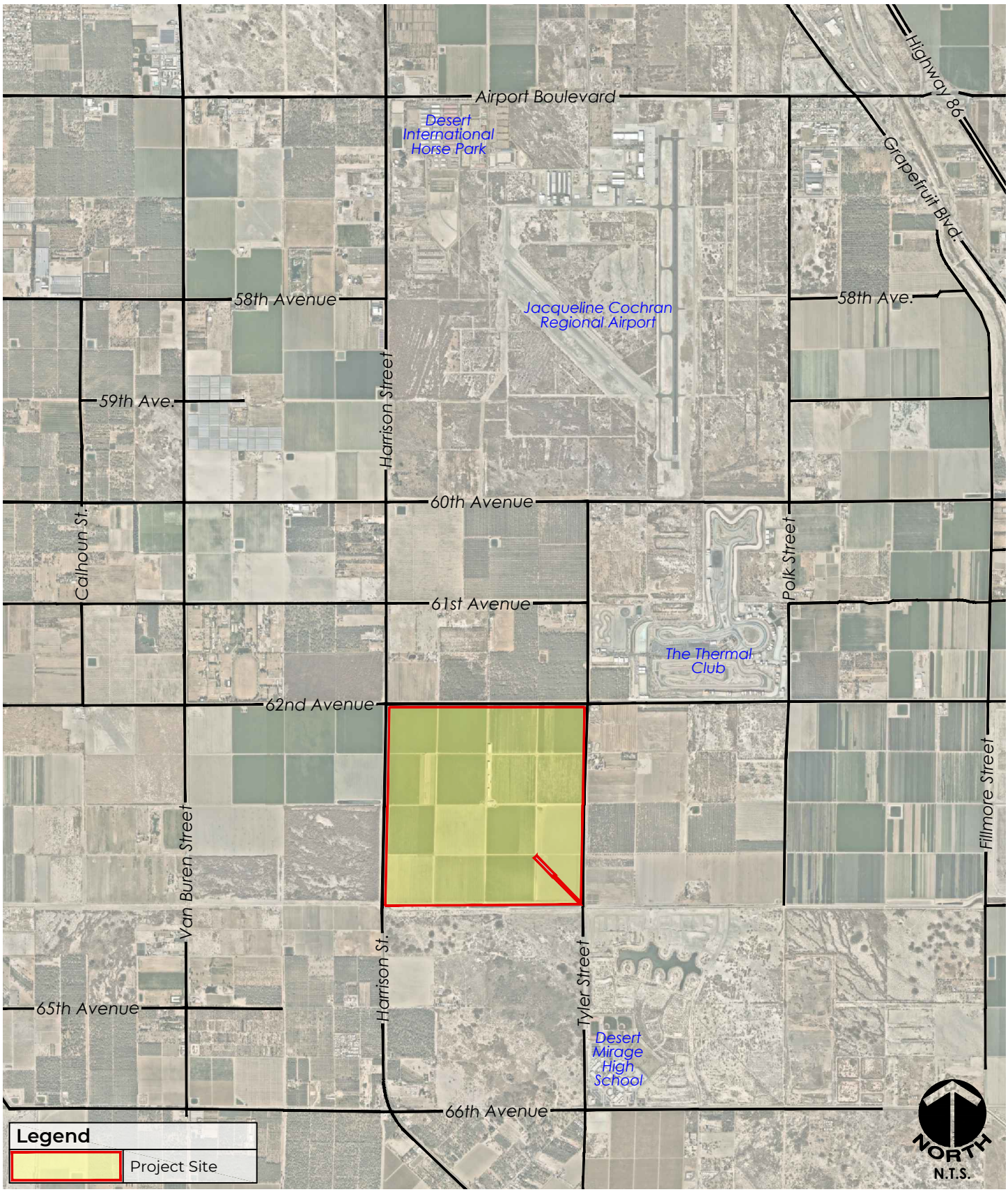


Source: Unincorporated Area of Riverside County

Exhibit Date: September 16, 2025

REGIONAL LOCATION MAP

FIGURE 1.1



Source: Unincorporated Area of Riverside County

Exhibit Date: September 16, 2025

VICINITY MAP

FIGURE 1.2

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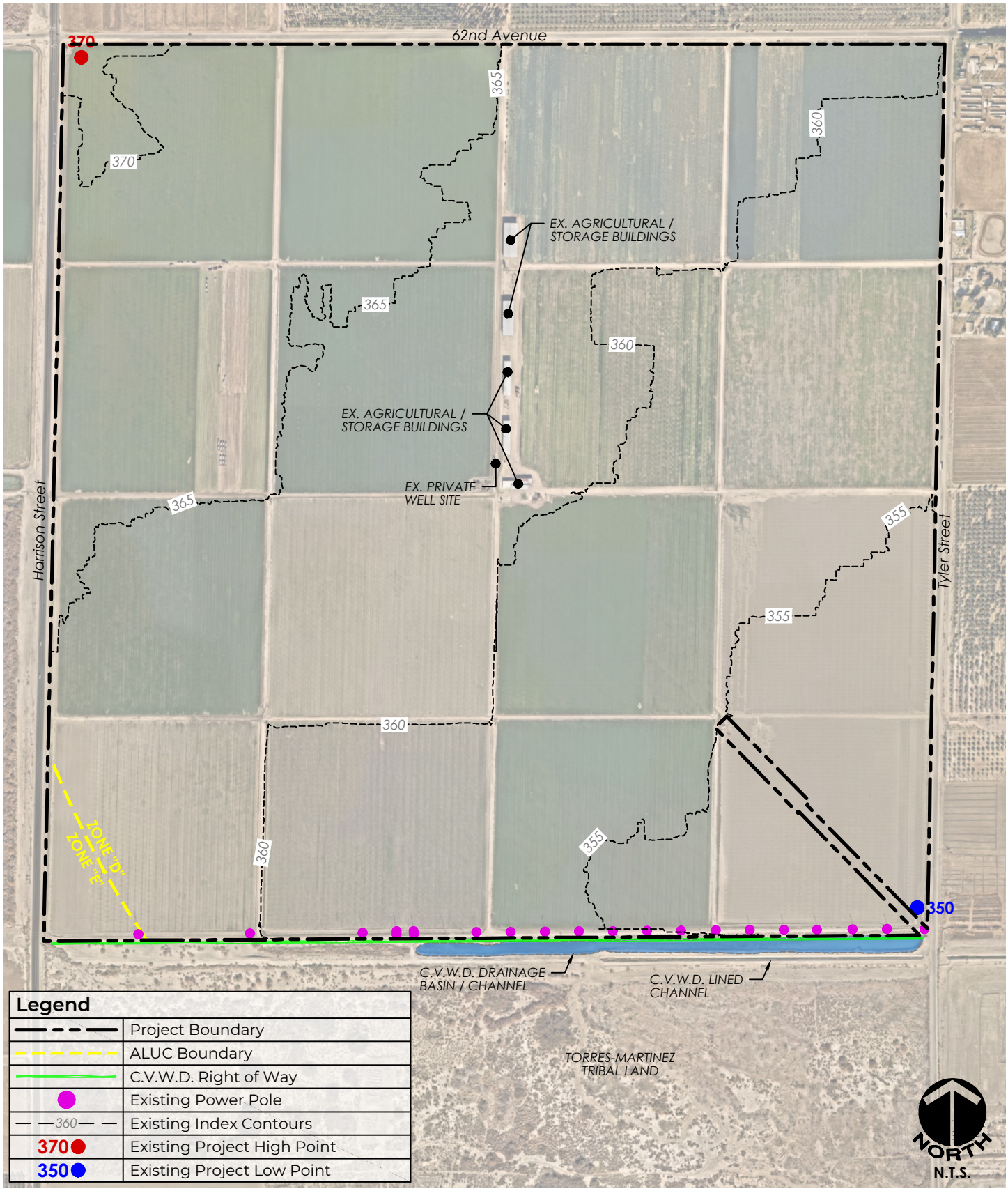


Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

EXISTING CONDITIONS

FIGURE 1.3

1.4 Regulatory Setting

Riverside County General Plan

The County of Riverside General Plan (General Plan) establishes the County's policy relative to the planned future pattern, intensity, density, and relationships of land uses in the County and the various infrastructure systems needed to effectively support those land uses. More focused policies that address specific regional and local issues are further refined through "area plans" and "community plans." This Specific Plan implements the General Plan by bringing detailed policies and regulations together into a focused development plan for the Specific Plan area. It serves as a link between the General Plan, the Eastern Coachella Valley Area Plan, the Vista Santa Rosa Community Plan, and subsequent development proposals within the Specific Plan area. This Specific Plan is a regulatory document which, when adopted by the County Board of Supervisors, will govern all facets of project development including the distribution of land uses, the location and sizing of supporting infrastructure, as well as the development standards and regulations that apply to the project.

Eastern Coachella Valley Area Plan (ECVAP)

The Thermal Ranch Specific Plan is located within Riverside County's Eastern Coachella Valley Area Plan. The Eastern Coachella Valley Area Plan serves as an extension to the County of Riverside General Plan and focuses on preserving the unique features of the valley while also setting forth standards and guidelines for future growth. The ECVAP is intended to help preserve the rural, agricultural, and open space character of the Eastern Coachella Valley, while also allowing for growth in desirable areas to bolster economic development and opportunities for the local communities.

Vista Santa Rosa Community Plan (VSRCP)

The Vista Santa Rosa Community Plan (VSRCP) is a community plan with an established set of design guidelines. The plan is intended to preserve the agricultural, rural, and equestrian focused character of the Eastern Coachella Valley, while also facilitating economic development and growth opportunities for the local communities. While the Thermal Ranch Specific Plan is not located within the VSRCP boundary, it is themed to reflect the rural/agricultural heritage of the Eastern Coachella Valley similar to the VSRCP.

Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)

The CVMSHCP is a regional conservation plan that will ultimately protect over 240,000 acres of open space and 27 species in the Coachella Valley. The CVMSHCP includes both incorporated and unincorporated County land and covers a diverse landscape. The plan's goals are to preserve the Valley's native desert wildlife and system of open space, trails and reserves, in addition to safeguarding habitat linkages and wildlife corridors. The MSHCP is based on a regional ideal for balanced growth that preserves the Coachella Valley's diverse desert landscape while supporting opportunities for recreation, tourism and job development. The Project is not located in a Conservation Area designated for preservation but is within the CVMSHCP Mitigation Fee area to fund acquisition of priority habitat.

Thermal Oasis Community Council

The Thermal Ranch Specific Plan falls within the boundary of the Thermal Oasis Community Council (Council). The Council serves as an advisory community to the Riverside County Board of Supervisors (BoS) on various community issues and new development proposals within the Council's boundaries. The County encourages new development projects to meet with the Council as part of community engagement process prior to a project being heard at the Riverside County Planning Commission or Board of Supervisors.

Airport Land Use Compatibility Plan (ALUCP)

The Thermal Ranch Specific Plan is located within the influence area of the Jackie Cochran Regional Airport and airport land use compatibility Zones "D" and "E" as shown on Figure 1.3, *Existing Conditions.* The Zone D and E designations are considered the least restrictive compatibility zones. Land use, density/intensity, building height and other restrictions associated with the zones are outlined in the 2004 Riverside County Airport Land Use Compatibility Plan (RCALUCP). Airport Land Use Commission (ALUC) consistency review is required when a project is located within an Airport Influence Area and a local jurisdiction processes a legislative action such as a General Plan Amendment, Plot Plan, or Specific Plan. Per the RCALUCP "the basic criteria for assessing whether a land use plan, ordinance, or development proposal is to be judged compatible with a nearby airport are set forth in the Basic Compatibility Criteria matrix, Table 2A." For reference, Table 2A has been attached to this Specific Plan as Appendix A. The ALUC will review the Specific Plan for compatibility with this table as part of the entitlement process.

County of Riverside Climate Action Plan (CAP)

The County of Riverside Climate Action Plan identifies programs and actions to reduce Greenhouse Gas Emissions (GHG). Mitigation of GHG emissions impacts during the development review process of projects provides one cost-effective way of implementing the GHG reduction strategies for reducing community-wide emissions associated with new development projects. CEQA requires the assessment of environmental impacts for proposed projects, including the assessment of GHG emissions. The County has Integrated the reduction measures identified in the CAP into the CEQA development review process as the first step in determining how a proposed project will implement the GHG reduction measures within the CAP. The CAP includes checklists (CAP Checklist) used to evaluate consistency of new development with the CAP. CAP checklists were prepared for this Specific Plan as part of the CEQA analysis and show that the project is consistent with the CAP. These checklists assign points for each design feature included in a development project, such as electric vehicle charging infrastructure and Title 24 requirements, that will reduce GHG emissions. The point values correspond to the minimum emissions reduction expected from each feature. The menu of features identified in these checklists allow maximum flexibility and options for how development projects can implement GHG reduction measures. Projects that achieve at least 100 points, such as the Thermal Ranch project, are consistent with the reduction quantities anticipated in the County's CAP. In addition, Policy R2-CE1 in the CAP requires onsite renewable energy generation to meet 20% of energy demand for commercial and multi-family uses and 30% for single-family homes. Individual projects proposed within the Specific Plan Area will meet this requirement through a combination of on-site solar panels, battery storage and/or other feasible renewable energy technologies.

1.5 Development Concept

The Thermal Ranch Specific Plan proposes to develop a high-quality, approximately 622-acre, master-planned, equestrian lifestyle community within seven (7) distinct Planning Areas centered around a world-class equestrian center.

The equestrian center contains approximately 231 acres and will serve as the focal point of the Thermal Ranch development providing a new home to the Desert International Horse Park. This catalyst facility will bring world-class competitions, Olympic-level facilities, boarding, training, commercial retail, and dining options to the property. Horse owners and others who want a unique equestrian lifestyle have the convenience of housing near the facility where they can train, exercise and compete with their animals. Equestrian services and amenities located onsite include, but not limited to, barns, stables, covered arenas, event areas, riding fields, farrier/veterinarian services, RV and trailer parking, and back of house uses.

The center will be designed with an extensive internal network of horse trails and golf cart/walking paths to limit and control vehicular/horse interactions. Other than golf carts, motor vehicles are prohibited inside the equestrian center except those needed for deliveries, maintenance and emergency purposes, Parking fields are provided at the periphery of the horse park so visitors can park and walk into the equestrian center to attend show events.

Surrounding the equestrian center will be a mix of residential neighborhoods, including single-family homes (attached and detached), large rural estate lots, employee workforce housing providing a variety of housing options and neighborhoods within the Thermal Ranch community. Each of these neighborhoods is planned with direct connections to the golf cart and walking paths within the equestrian center, allowing residents to fully access the center's amenities, services, and events without exiting the property.

Neighborhood commercial uses will provide convenient retail access, amenities, and services to the Thermal Ranch development and local community while resort condominiums and hotel uses are proposed to provide hospitality options for visitors at the equestrian center. These uses will allow for

convenient pedestrian and golf cart access, including controlled connection points into the equestrian center

As summarized above, this Specific Plan is intended to allow for a variety of uses to create a master-planned and integrated equestrian community. For a comprehensive list of allowable densities and maximum unit capacity, see Section 2.1, Land Use, for more information. For a comprehensive list of allowed uses and development standards, refer to Chapter 5 of this Specific Plan. Chapter 4 provides design guidelines and development standards to ensure quality project is built consistent with the Goals and Policies of the County of Riverside General Plan. This Specific Plan intends to provide a degree of flexibility of use and design so that implementing entitlements can respond to market demand factors. The Thermal Ranch Specific Plan will amend the development regulations of County Zoning Ordinance 348 to facilitate a unique and comprehensive master planned development strategy for the project.

1.6 Project Objectives

Various issues were considered and evaluated during the preparation of this Specific Plan. Engineering feasibility, water efficiency, General Plan goals, and compatibility with surrounding land uses were considered during the planning process. In order to ensure the functional integrity, economic viability, environmental sensitivity, and positive aesthetic contribution of this development, unique project objectives were established as follows:

- Develop a high-quality master planned equestrian community and world-class equestrian center that will ensure equestrian sports continue in the Thermal area.
- Develop an integrated community that allows equestrians, residents, and workers to live, work, and recreate within the project.
- Develop a thoughtfully planned and integrated project to allow for a variety of uses including but not limited to residential, neighborhood and tourist commercial uses that compliment and support the equestrian center

- Provide a variety of housing options including estate residences, traditional single family homes (attached and detached), modular homes, and RV parks to promote housing diversity and choices within the project and provide housing for people working or otherwise associated with the equestrian center.

- Provide a comprehensive land use plan that establishes development standards, land use regulations, and programs to guide the orderly transition/development of the property and enhances connectivity with the surrounding community.

- Provide commercial amenities for residents and visitors of the project and surrounding communities, including enhancing access to fresh food choices.

- Accommodate phasing that provides for multi-year project development in an orderly and environmentally efficient manner.

- Provide flexible development regulations that allow future projects to be entitled quickly and easily in response to market demand and evolving design needs.

- Establish design guidelines, development regulations, use standards and procedures that result in cohesive and attractive landscape and architectural treatments.

- Provide a safe and efficient circulation system.

- Provide a safe and efficient network of golf-cart and pedestrian paths.

  Provide water, sewer, drainage systems and other utilities to adequately service the project.

- Promote quality development consistent with the goals and policies of the County of Riverside General Plan.

- Promote development that integrates the principles of SB 1383 in a practical way to improve community health and support resilient local economies.

1.7 Utility & Service Providers

This Specific Plan is within the service area of the utility and service providers as listed in Table 1.2.

TABLE 1.2
UTILITY & SERVICE PROVIDERS

UTILITY/SERVICE	AGENCY	ADDRESS	PHONE
Sewer	CVWD	75-525 Hovley Lane, Desert, CA. 92211	760.398.2651
Water	CVWD	75-525 Hovley Lane Palm Desert, CA. 92211	760.398.2651
Natural Gas	SCG	P.O. Box 3150 San Dimas, CA. 91773	877.238.0092
Electric	IID	333 E. Barioni Blvd. Imperial, CA 92251	760.339.9379
CATV	Spectrum	44-425 Town Center Way Ste H Palm Desert CA 92211	760.340.2225
Police	Riverside County	73-705 Gerald Ford Dr. Palm Desert, CA 92211	760.863.8990
Fire	Riverside County	77-933 Las Montanas Rf., Ste 201 Palm Desert, Ca 92211	760.863.8886
Telephone	Frontier Comm.	401 Merritt 7 Norwalk CT, 06851	800.921.8101
Solid Waste	Burrtec	53600 Polk St. Coachella, Ca 92236	760.340.2113

1.8 CEQA

The project is subject to the requirements of the California Environmental Quality Act (CEQA) and an Environmental Impact Report (EIR) was prepared for the project in conformance with CEQA guidelines.

The EIR evaluated potential environmental impacts associated with the development as described in this Specific Plan and included mitigation measures to reduce those impacts wherever possible. The mitigation measures will be applied to all applicable components of the project as it is developed. The EIR will apply to all subsequent implementing entitlements proposed within the Specific Plan boundary. Future implementing projects that conform with the Specific Plan would be covered under the project EIR.

CHAPTER 2: MASTER PLANS

2.1 Land Use

The Thermal Ranch Specific Plan will create a master-planned community centered around a world-class equestrian center. The project would allow up to 285,000 square feet of commercial building space, 1,362 dwelling units, 150 hotel keys, and 320 recreational vehicle spaces on approximately 622 gross acres.

Land Use Plan

The project is divided into six (6) Planning Areas, each with a distinct land use, as depicted in Figure 2.1, *Land Use Map*, the exhibit is accompanied by Table 2.1, *Land Use Summary,* a statistical tabulation of uses and square footages allowed within the project.

TABLE 2.1
LAND USE SUMMARY [1]

Planning Area	Land Use	Acres	Residential DUs	RV Spaces	Commercial Sq. Ft.	Hotel Keys
PA1	Commercial Tourist	223.1			85,000	
PA2	Very Low Density Residential	191.3	132			
PA3	Medium High Density Residential	69.3	390 [2]			
PA4a	Highest Density Residential	18.4	500			
PA4b	Commercial Tourist	23.0		320		
PA5	Commercial Tourist	53.7	340		50,000	150
PA6	Commercial Retail	20.8			150,000	
	Perimeter ROW	16.8				
TOTALS		**619.1**	**1,162-1,362**	**320**	**285,000**	**150**

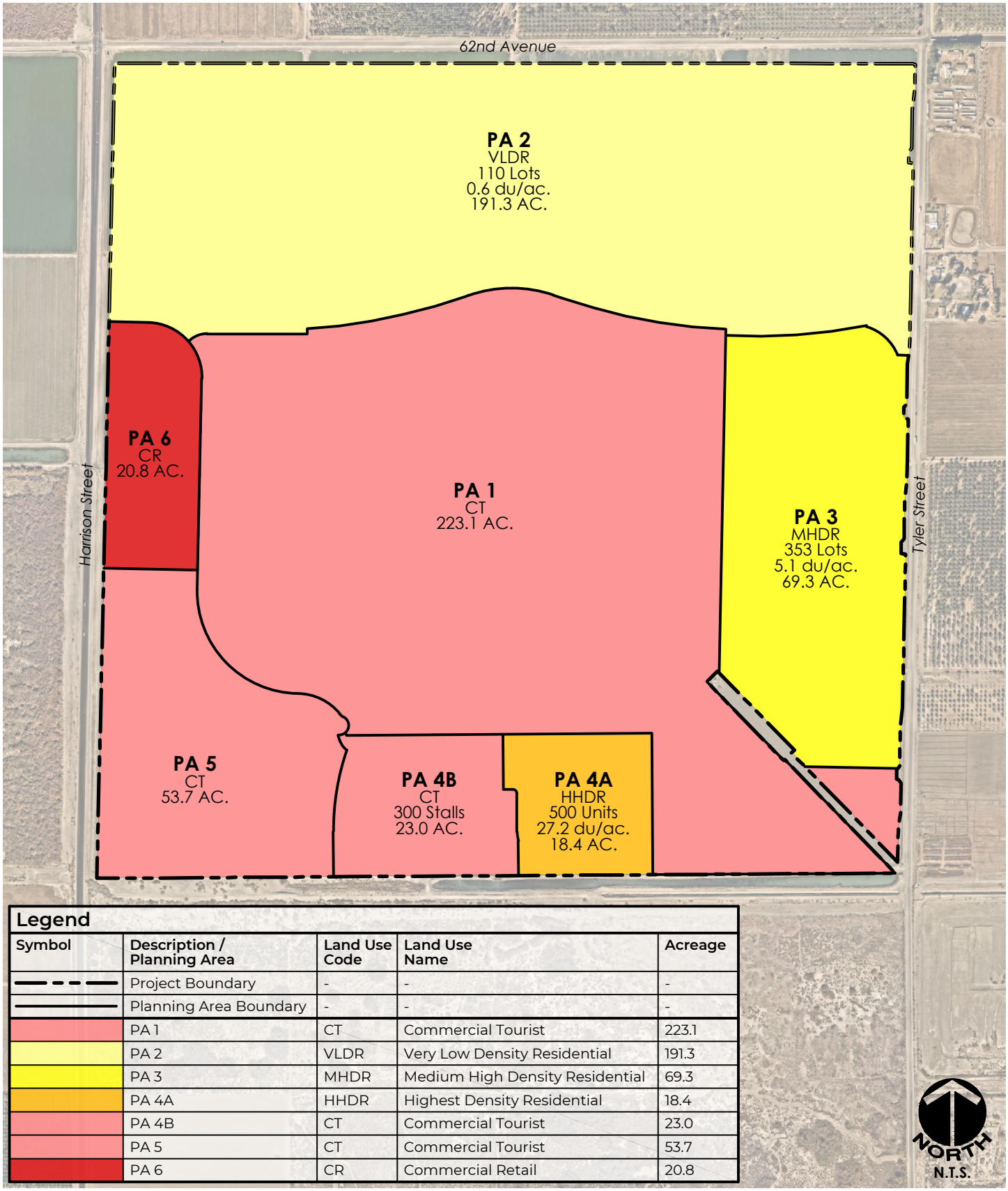
Notes:

1. *Unless otherwise noted, columns 4-7 represent development maximums. Each Planning Area may be developed at or below these numbers.*
2. *Residential development in PA 3 must be no less than 5 du/ac (356 units), consistent with ALUC density criteria for Zone D.*
3. *Up to 10% of development maximums may be transferred between Planning Areas, so long as Specific Plan totals are not exceeded.*

The ultimate site design and layout of these uses within each Planning Area will be refined with future entitlement approvals. Figure 2.2, *Illustrative Development Concept,* shows one possible development scenario illustrating how the Thermal Ranch Specific Plan might be implemented. Other development concepts are allowed subject to the guidelines and standards contained herein. Site specific land plans for Planning Areas 5 and 6 will be brought forward once retail and hospitality developers have been engaged.

As shown in the illustration, expected uses include:

- Equestrian Center and Event Area:
  - Barns, Covered Arena, Grand Prix Area
  - Warm up, jumper, hunter, FEI rings,
  - Farrier and Veterinarian,
  - Commercial retail and dining,
  - Open fields and riding areas,
  - Circulation infrastructure such as parking lots, driveways, golf cart paths, horse trails and bridal paths
  - Administrative office and back of house areas, etc.
  - Utility infrastructure facilities well sites and substations.
- Neighborhood Commercial:
  - Up to 150,000 sf of neighborhood commercial space and commercial amenities (Retail, Markets, Restaurants, Golf Facility, etc.)
  - Resort Condominiums (Up to 340 units) and Hospitality Uses (Up to 50,000 Sf and 150 Hotel Keys)
- A mix of residential neighborhoods:
  - Seasonal and year-round workforce housing
  - RV park facilities,
  - Single Family Homes (attached and detached), Multi-Family Condominiums.
  - Custom rural estate lots.
  - (See Section 2.1 for max residential densities and units allowed).
- Open space, amenity areas, and retention.



Legend

Symbol	Description / Planning Area	Land Use Code	Land Use Name	Acreage
	Project Boundary	-	-	-
	Planning Area Boundary	-	-	-
	PA 1	CT	Commercial Tourist	223.1
	PA 2	VLDR	Very Low Density Residential	191.3
	PA 3	MHDR	Medium High Density Residential	69.3
	PA 4A	HHDR	Highest Density Residential	18.4
	PA 4B	CT	Commercial Tourist	23.0
	PA 5	CT	Commercial Tourist	53.7
	PA 6	CR	Commercial Retail	20.8

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL LAND USE MAP

FIGURE 2.1

Legend					
	Project Boundary		Community Amenity		
1	Horse Park	A	Grand Entry	H	Private Barns
2	Estate Lots	B	Gathering/Dining Commons	I	Pasture
3	Neighborhoods	C	Competition Rings	J	Grass Field
4	Horse Park Workforce Housing	D	Warmup/Jumper Rings	K	Back of House
5	Hotel/Resort	E	Common Barns	L	Office
6	Commercial	F	Parking	M	CVWD Well Site
		G	Staging Area	N	Potential Substation

Note: This exhibit illustrates one possible development scenario. Other site development concepts are allowed subject to the standards and guidelines of this Specific Plan.

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ILLUSTRATIVE DEVELOPMENT CONCEPT

FIGURE 2.2

Each land use is described below. A full list of allowable uses for each Planning Area is found in Chapter 6, Specific Plan Zoning Ordinance.

Tourist Commercial (Planning Area 1, Equestrian Center) Create a full-service, state of the art, equestrian center as the new home for the Desert International Horse Park. Located in the center of the site, the horse park would serve as the defining, anchor facility for all other land use components of the Specific Plan. Featuring world-class equine showgrounds and supporting amenties, the equestrian center will feature over 2.5 million square feet of riding space including 19 competition rings, extensive on-site riding paths, pastures and a professional quality grass showfield to make this the perfect home for horses and their riders as well as an attractive destination for visitors and guests. Key facilities include a central VIP dining commons, an olympic-level grand prix riding ring, barns, competition arenas, q highly manicured grassed showring, equestrian themed retail shops, maintenance/feed storae buildings and equine service facilities. The equestrian center will have the capacity to stable 3,300 horses and provide onsite veterinary services, farrier and feed stores.

Very Low Density Residential (Planning Area 2, Estate Neighborhood) Provide high end housing on large-lots for residents who want to board horses at the equestrian center and live nearby with immediate access to their animals during the show season. This would consist of a gated community with up to 132 custom, estate homes featuring custom homesites ranging from half-acre to two acres. Larger lots bordering the equestrian center would allow for the boarding of horses on property. These larger lots would be bordered by a private access driveway for horse trailer deliveries and a bridal trail so residents could ride their horses directly into the equestrian center. The estates will also feature a central community center with a range of residential amenities such as a clubhouse, swimming pool, pickle ball court, gym, locker rooms, meeting areas and dining. All access to the horse park would be through electric golf carts, walking or equestrian travel without dependence on automobiles.

Medium High Density Residential (Planning Area 3, Traditional Neighborhood) Provide traditional single family detached and attached housing for residents who want to board horses at the equestrian center and live nearby with immediate access to the equestrian showgrounds, riding trails and services. This Planning Area will feature a variety of housing types including single-family detached homes and attached townhomes. Residents will enjoy access to a community center with a range of residential amenties such as tennis and pickle ball courts, gym, pool, meeting areas and dining. This residential community will have convenient golf cart access to the equestrian center to provide for an unparalled equestrian lifestyle experenice. All access to the horse park would be through electric golf carts, walking or equestrian travel without dependence on automobiles.

Highest Density Residential (Planning Area 4a, Horse Park Workforce Housing) Provide convenient, affordably priced, housing for employees of the horse park during the competition season. This may take the form of functional and attractive modular housing.. This Planning Area will feature an onsite laundromat and recreation areas, providing a convenient and affordable way for workers to stay near their place of employment. From October to March, workforce housing would be used exclusively by workers at Thermal Ranch and The Desert International Horse Park. From April to September (the offseason) workforce housing would be made available for rent to farmers and farmworkers in the eastern Coachella Valley. Similar to the other residential planning areas, the workforce

housing area will have direct and convenient pedestrian and golf cart access to the equestrian center without the need of a car.

Commercial Tourist (Planning Area 4b, Workforce RV Housing) This planning area is intended to supplment access to workforce housing by providing recreational vehicle parking spaces for those who travel from show to show and live out of an RV. From October to March, workforce housing would be used exclusively by workers at Thermal Ranch and The Desert International Horse Park. Similar to the other residential planning areas, the workforce housing area will have direct and convenient pedestrian and golf cart access to the equestrian center without the need of a car.

Commercial Tourist (Planning Area 5, Resort/Hotel) Develop hospitality uses such as hotel and hotel condominiums in a high-quality resort environment with immediate access to equestrian competitions and show events. This would be organized around a focal amenity, such as a central water or recreation amenity essential for establishing the necessary resort guest experience. Once at their accommmodations, guests would not need a car to access competitions at the equestrian center. PA-5 will provide a full range or hospitality/resort dining, spa, entertainment and retail activities.

Commercial Retail (Planning Area 6, Retail Village) Establish a retail village at Thermal Ranch offering a variety of conveniently accessible entertainment, food and beverage, service, retail, and commercial recreation amenties that cater to the residents and guests of Thermal Ranch and the local Thermal Community, who currently have limited access to retail services in the immediate area.

Land Use Goals and Guidelines

1. Uses and development standards shall be in accordance with the County of Riverside Zoning Ordinance No. 348 for this Specific Plan as described in Section 3.0 – Specific Plan Zoning Ordinance, and shall be defined by Specific Plan objectives, future detailed tentative maps and plot plans.
2. Standards relating to signage, landscaping, parking and other related design elements shall conform to the County of Riverside Zoning Ordinance No. 348 as amended for this Specific Plan in Section 5.0, and Coachella Valley Water District Ordinance 1302.3.
3. All project lighting shall be in accordance with County of Riverside standards.
4. The development of property shall be in accordance with the mandatory requirements of all Riverside County ordinances including Ordinance No. 348 as amended for this Specific Plan in Section 3.0, Ordinance No. 460, and state laws; and shall conform substantially with the adopted Specific Plan as filed in the office of the Riverside County Planning Department, unless otherwise amended.
5. All development on the site will be consistent with this Specific Plan No. 401 and subsequent amendments, as on file with the Riverside County Planning Department, and with all applicable laws of the State of California.
6. Prior to issuance of a building permit for construction of any use contemplated by this approval, the applicant shall first obtain clearance from the County of Riverside Planning Department verifying that all pertinent conditions of the Specific Plan approval have been satisfied for the phase of development in question.
7. Lots created pursuant to this Specific Plan and any subsequent tentative map shall be in

substantial conformance with the development standards of the Specific Plan.

8. Agriculture shall continue as an allowable use in accordance with Specific Plan Zoning Ordinance, until such time as permanent development under the Thermal Ranch occurs.
9. Utility service to this Specific Plan shall be provided by individual authorized service providers or through the creation of a Public Utilities District (PUD).
10. A maximum number of 1,362 dwelling units is allowed in the Thermal Ranch Specific Plan. Each residential planning area also has a target maximum based on the applicable density range and planning area acreage. Up to ten percent (10%) of density may be transferred between Planning Areas without a Specific Plan Amendment, provided that the total number of dwelling units within the Specific Plan is not exceeded.
11. A total of 5 acres of public parkland shall be provided for each one-thousand (1,000) in population within the Specific Plan or payment of an in-lieu fee, or combination of both . Fees shall be paid in accordance with Riverside County Ordinance 460.
12. All development should be compatible with the Riverside County Airport Land Use Compatibility Plan (RCALUCP) and the Basic Compatibility Criteria matrix (Table 2A) as found in Appendix A of this document.

2.2 Circulation

The Thermal Ranch Specific Plan is designed to provide safe and efficient access to all land uses within the project, including primary and secondary access points. Each Planning Area is designed to have direct access to one or more of the public, perimeter streets.

Circulation Plan

Key aspects of the circulation system include:

Frontage Improvements

Harrison Street, Tyler Street, and 62nd Avenue are all existing 2-lane paved roads along the project's north, east and west frontages. Per the County's General Plan Circulation Element, each of these roads will require additional right-of-way (ROW) dedication to accommodate the ultimate part-width street design improvements required by this project.

64th Avenue is currently undeveloped along the project's southern boundary. Various physical conditions constrain the 64th Avenue corridor including powerlines, drainage channels, retention basins and their attendant easements and rights-of-way, which reserve prior rights to various agencies. Due to these complicating factors, the project is designed to avoid direct access to 64th Avenue and to limit project site improvements so as not obstruct the ultimate ROW width to construct 64th Avenue if/when it might be needed in the future.

Project Entries

Each of the six Planning Areas includes primary and secondary entries directly to the public frontage streets, so each can be accessed independent of the others. Conceptual locations of these are illustrated in Figure 2.3A *Master Circulation Plan.*

Vehicular Circulation

Figure 2.3A, *Master Circulation Plan,* illustrates the backbone vehicular circulation system for the overall Specific Plan. As shown, each Planning area has its own internal circulating street system that provides internal connection with the primary and secondary access points.

Figure 2.3B *Equestrian Park Circulation* Plan depicts the circulation structure within the horse park in greater detail. Gated entries provide secure access points into the horse park. These occur along the project's Primary Collector Street that intersects Harrison Street. A system of 24' and 30' roads are proposed within the horse park, all of which are available for emergency use by fire and emergency vehicles. Once inside the gates, the outer zone allows for parking and operation of service, maintenance and delivery vehicles. The inner zone occurs behind a second tier of minor gates and restricts access within the showgrounds to golf carts, pedestrians and horses only.

A service access road connecting to Harrison Street is provided along the southerly portion of the site to serve the workforce housing and horse park back of house areas.

Typical Street sections for these roads are shown in *Figure 2.4A Typical Street Sections – Public* and *Figure 2.4B Typical Street Sections – Private and Figure 2.4C Typical Street Sections – Private.*

Pedestrian and Non-motorized Circulation

The Thermal Ranch project is designed to eliminate the need for an automobile once on property. After a resident or guest arrives and parks, all equestrian, dining and shopping needs will be provided on-site. Automobiles are restricted from entering the horse park where transportation will occur entirely by means of walking, horseback riding or golf carts. Residential uses ring the equestrian center with access gates that allow direct pedestrian and golf cart access into the horse park as well as the ability to cross connect via golf cart to retail commercial facilities on the west side of the project, all without resorting to an automobile. Primary pedestrian circulation is illustrated in Figure *2.3C Pedestrian Circulation plan*. It illustrates the primary pedestrian connectivity elements within the project as well as connections to Tyler St., Harrison ST., and Ave 62.

Parking

Sufficient off-street parking will be provided to serve each use, including festival parking at the equestrian center, surface parking lots in commercial/resort areas and uncovered, carport and garage parking for residential neighborhoods and workforce housing areas. Parking at the equestrian center will only be used seasonally during show season. During the rest of the year, the parking lots will be largely vacant. Horse owners and workers that reside within Thermal Ranch will have parking met at their residence and need only golf cart transportation from their home to access their animals and the horse park facilities.

Circulation Standards

1. Street patterns, hierarchy, and entry access points contained in this Specific Plan are conceptual and may be adjusted and refined subject to approval of a tentative tract map, plot plan, or other entitlement approval that complies with County engineering standards.

2. Application for any subdivision within the specific plan boundary shall comply with the standards of Ordinance 460.

3. Planning Areas 2, 3, and 4 shall have direct golf cart connections into the equestrian center in Planning Area 1.

4. Each subdivision shall comply with applicable on-site and frontage street improvement recommendations outlined in any traffic study prepared for the project.

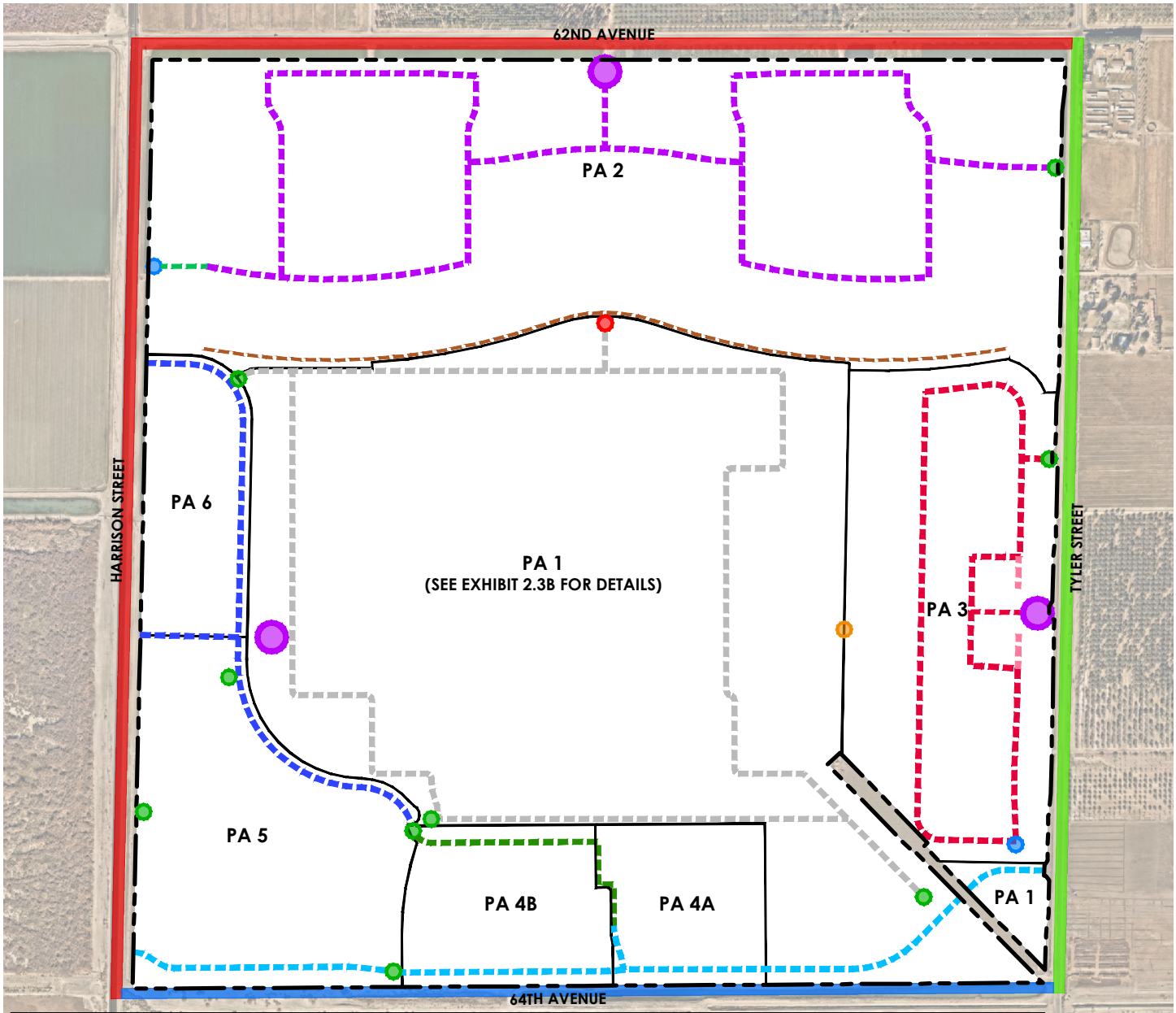
5. Parking standards for the Specific Plan are subject to County Review and to be consistent with the County of Riverside Zoning Ordinance 348 (Ordinance 348).

6. All typical street sections shall be per Ordinance 461.11, or as contained in this Specific Plan with approval by the County Transportation Department.

7. All intersection spacing and/or access openings shall be per Standard 114, Ordinance 461.11, or as approved by the Transportation Department.

8. Retention facilities will be maintained by an owner's association, county service area, or by the Coachella Valley Water District.

9. For street sections that use a mow strip, Q100yr flowrates shall not exceed the proposed right-of-way-line.



Legend					
Project Boundary		Private Streets		Access Points	
Planning Area Boundary		Primary Collector with Public Access (96'-100' ROW Varies)		Primary Entry	
Public Streets		Local Street with Public Access (60' ROW)		Secondary Entry	
Expressway (220' ROW)		Local Street (60' ROW)		EVA Only Access	
Major Highway (118' ROW)		Local Street (50' ROW)		Cart Entry	
Secondary Highway (100' ROW)		Local Street (37' ROW)			
Note: All other streets are local roads and may use any of the typical sections shown in Figure 2.4B-C. Street patterns shown are illustrative only and may be adjusted subject to approval of a tentative tract map or plat plan that complies with County engineering standards.		Local Street (33' ROW)			
		Local Street (30' ROW)		Cart / Trailer Entry	
		Emergency Access (24' Easement)			
		Service Driveway (15' Driveway)			
		Horse Park Circulating Road			

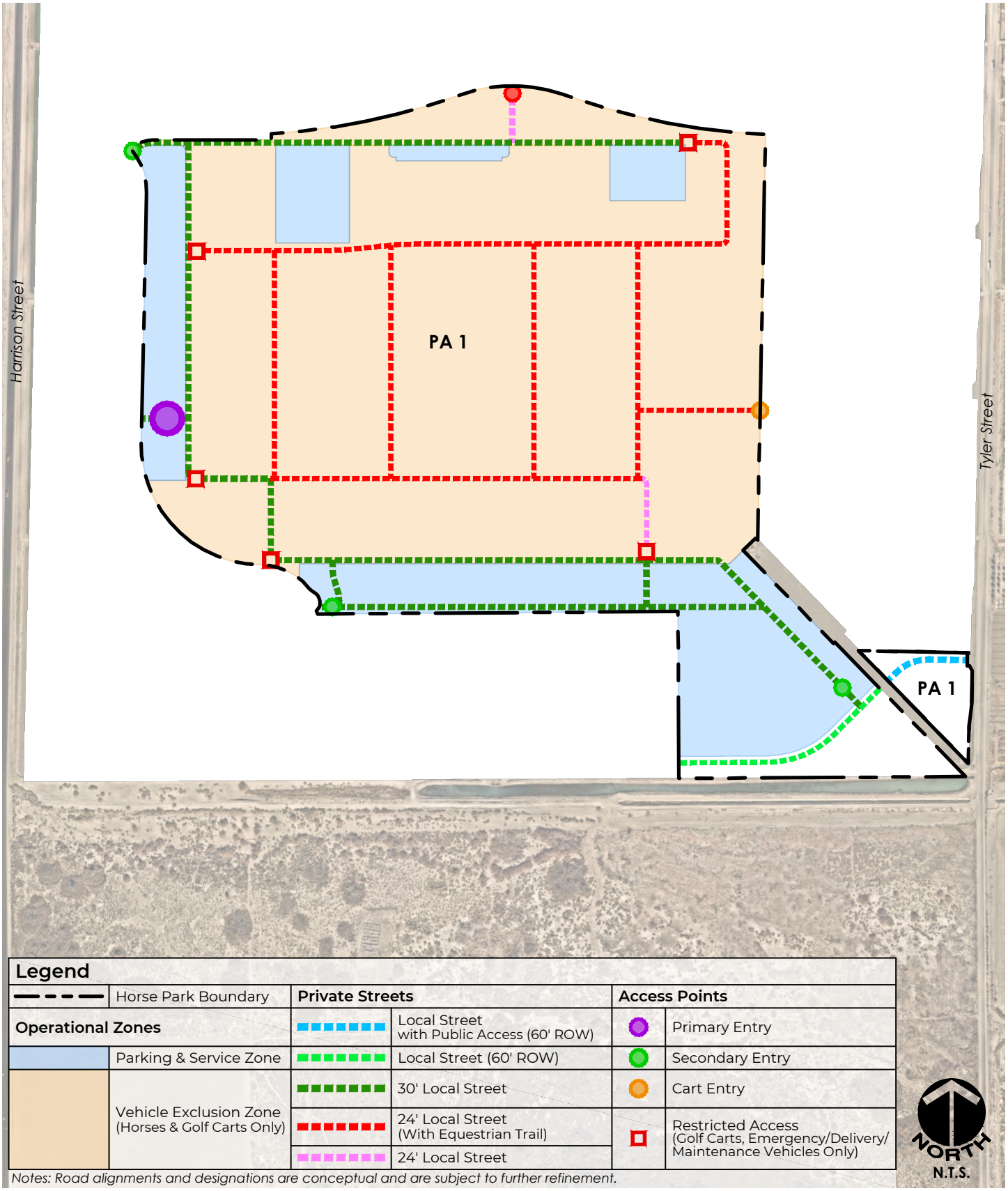
NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

MASTER CIRCULATION PLAN

FIGURE 2.3A



Legend					
Horse Park Boundary		Private Streets		Access Points	
Operational Zones		Local Street with Public Access (60' ROW)		Primary Entry	
Parking & Service Zone		Local Street (60' ROW)		Secondary Entry	
Vehicle Exclusion Zone (Horses & Golf Carts Only)		30' Local Street		Cart Entry	
		24' Local Street (With Equestrian Trail)		Restricted Access (Golf Carts, Emergency/Delivery/ Maintenance Vehicles Only)	
		24' Local Street			

Notes: Road alignments and designations are conceptual and are subject to further refinement.

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

HORSE PARK CIRCULATION PLAN

FIGURE 2.3B

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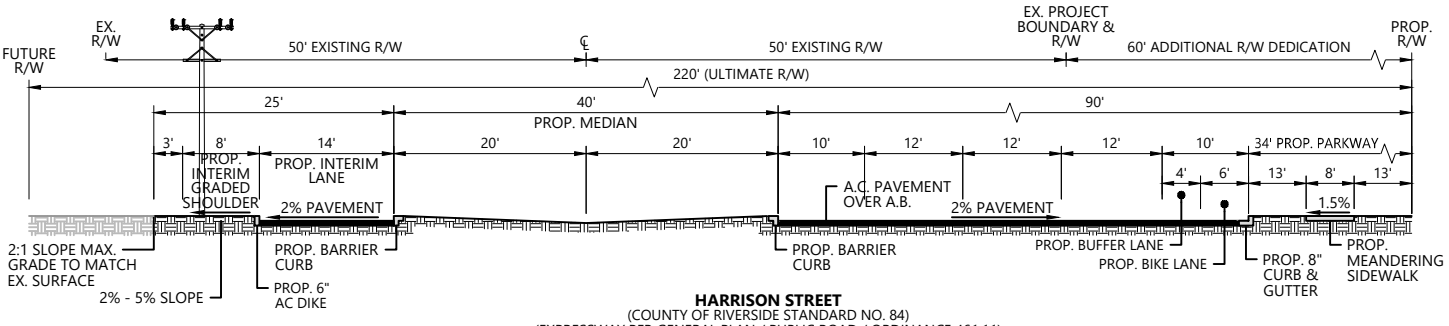
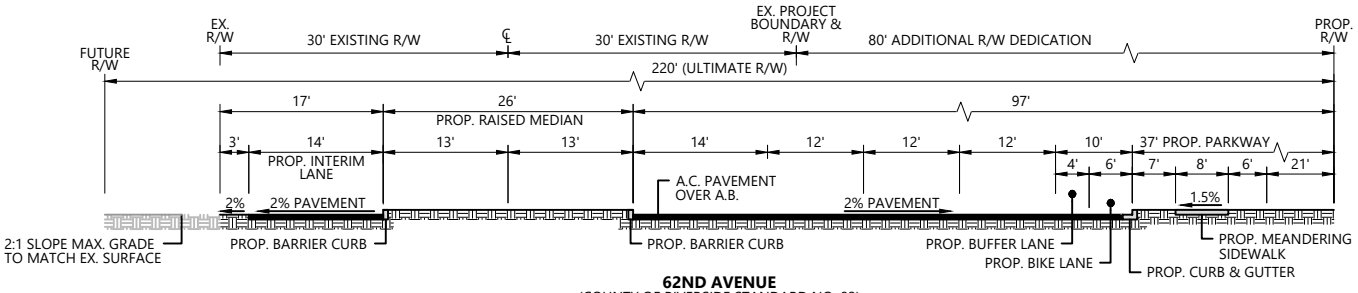
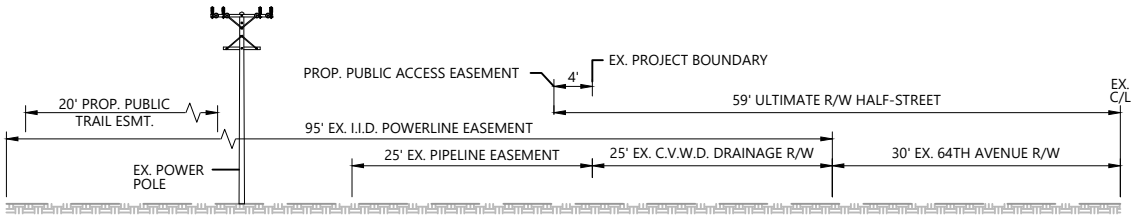


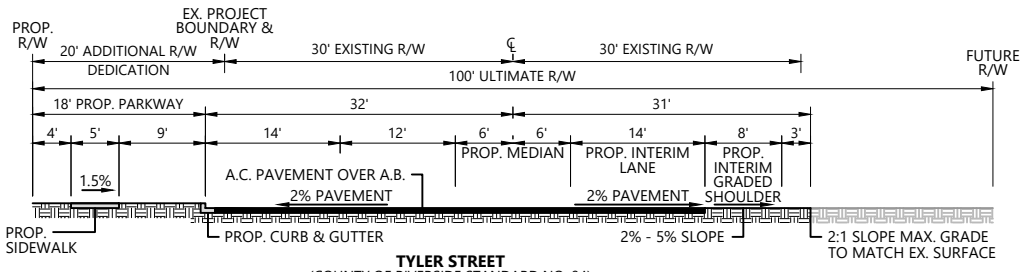
HARRISON STREET
(COUNTY OF RIVERSIDE STANDARD NO. 84)
(EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
N.T.S.



62ND AVENUE
(COUNTY OF RIVERSIDE STANDARD NO. 82)
(8-LANE EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
N.T.S.



64TH AVENUE
(COUNTY OF RIVERSIDE STANDARD NO. 93)
(MAJOR HIGHWAY PER GENERAL PLAN / PUBLIC ROAD)
N.T.S.



TYLER STREET
(COUNTY OF RIVERSIDE STANDARD NO. 94)
(SECONDARY HIGHWAY PER GENERAL PLAN)
(PUBLIC ROAD / ORDINANCE 461.11)
N.T.S.

Source: Unincorporated Area of Riverside County

Exhibit Date: September 16, 2025

TYPICAL STREET SECTIONS: PUBLIC

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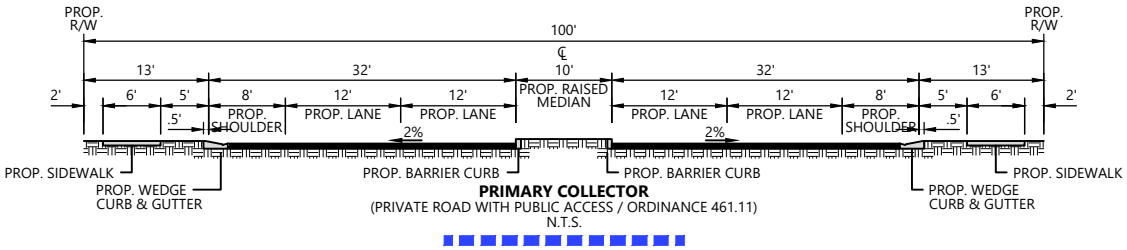
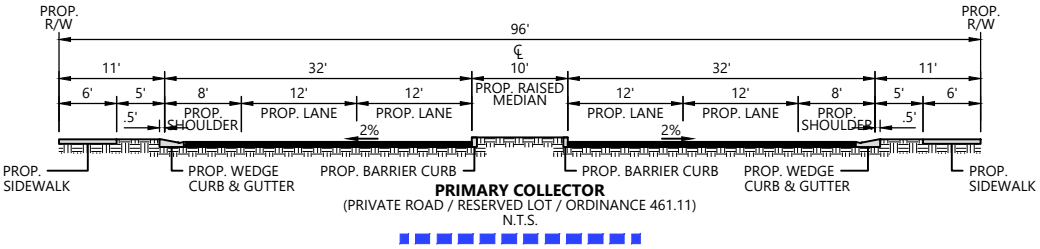
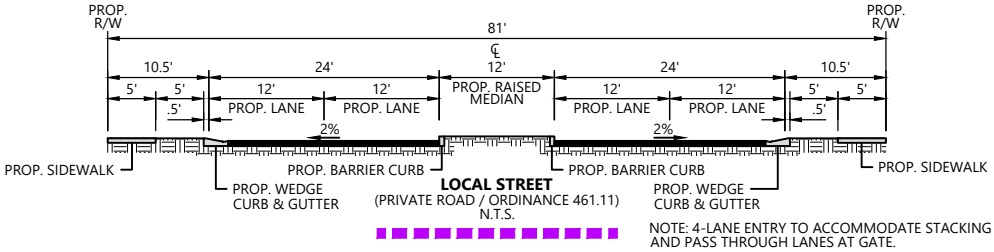
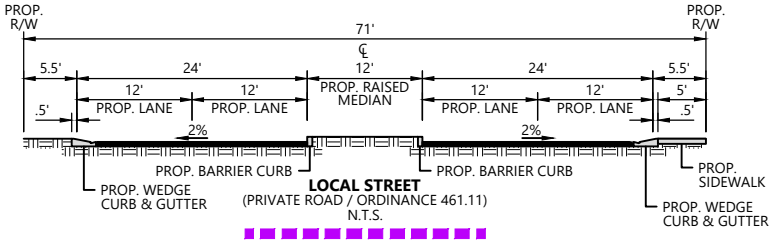
>PLANNING >CIVIL ENGINEERING >LAND SURVEYING
MSACONSULTINGINC.COM

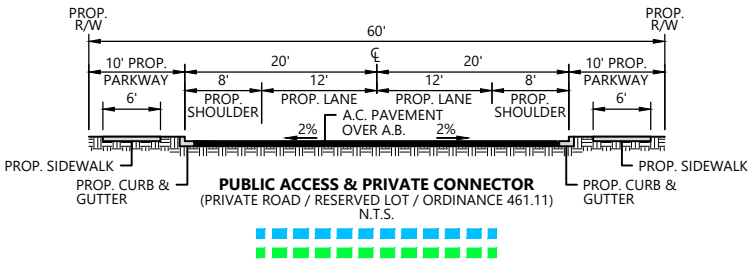
FIGURE 2.4A

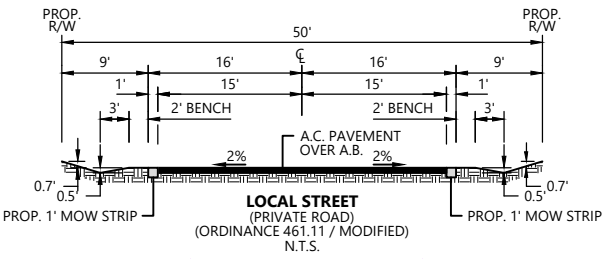


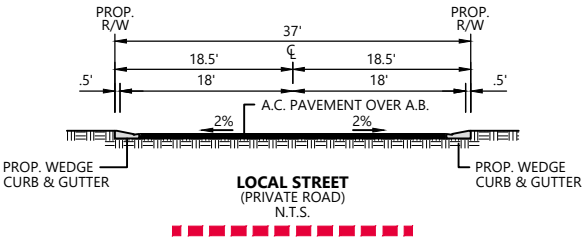


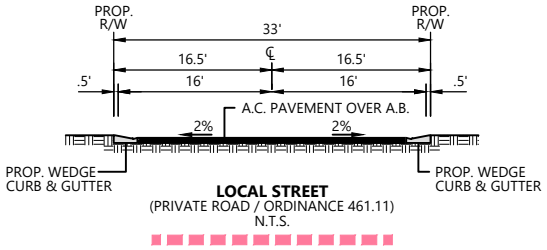










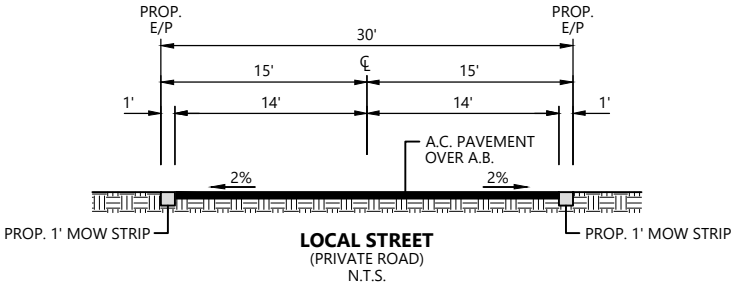


Source: MSA Consulting, Inc.

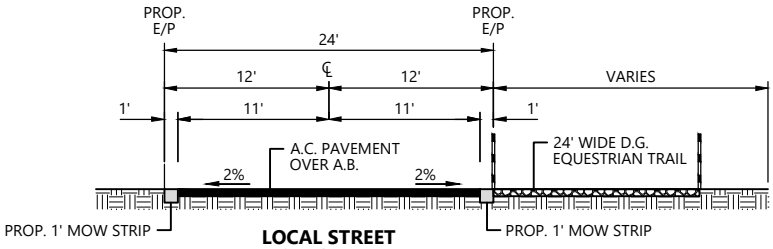
Exhibit Date: September 16, 2025

TYPICAL STREET SECTIONS: PRIVATE

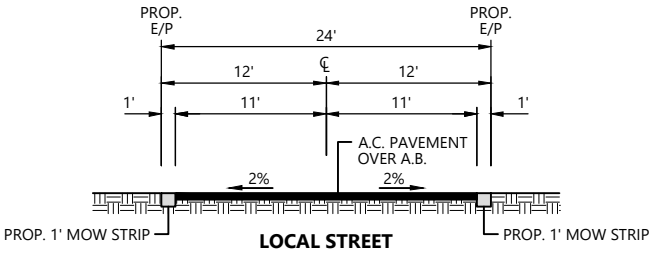
FIGURE 2.4B



LOCAL STREET
(PRIVATE ROAD)
N.T.S.



LOCAL STREET
WITH EQUESTRIAN TRAIL
(PRIVATE ROAD)
N.T.S.



LOCAL STREET
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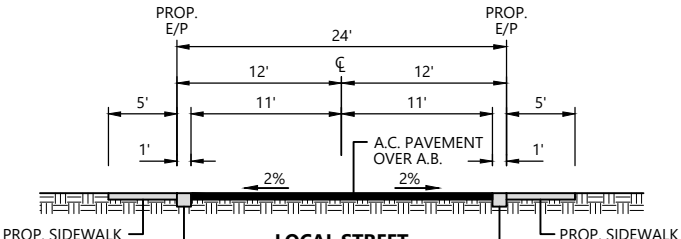
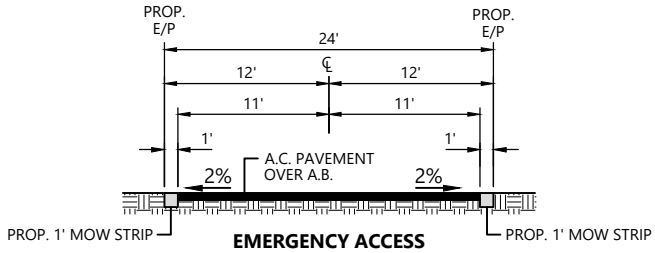


LOCAL STREET
(PRIVATE ROAD)
N.T.S.



EMERGENCY ACCESS
(PRIVATE ROAD)
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

TYPICAL STREET SECTIONS: PRIVATE

FIGURE 2.4C

2.3 Open Space

The Thermal Ranch Specific Plan will create a world-class equestrian and lifestyle community with a strong emphasis on outdoor recreation, open space, and its integration within the project. It will introduce a large permanent open space at the center of the project including such elements as triding trails golf-cart paths, event areas, equestrian competition and training rings, pastures, and open fields. These will be available to residents of the community and their families/guests, competitors, horse park workers and the general public as spectators at the events. Public Trails are provided along the project perimeter.

Open Space Plan

Residential areas (PA-2, PA-3, and PA-4) will each have appropriate community recreation amenities as well as convenient physical access to equestrian riding facilities and open spaces at the horse park, resulting in an integrated and connected outdoor / recreation experience.

As shown on Figure 2.5, *Public Open Space and Trails Plan*, public open space and recreation 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.

Open Space Standards

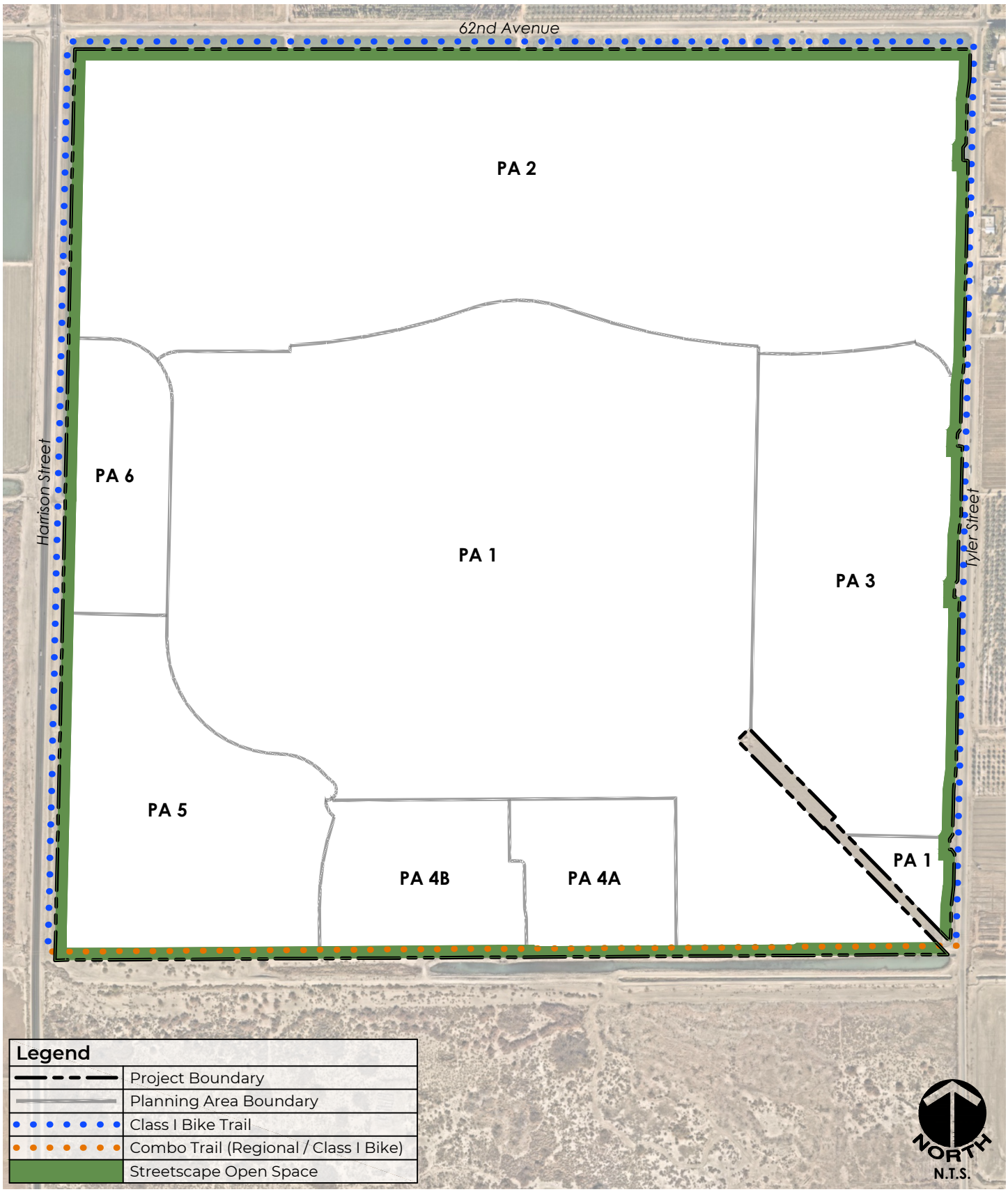
1. Provide direct golf cart access from each residential planning area to the equestrian center (PA-1)so that residents and workers can have direct access to horse park open space.

2. Residential planning areas should incorporate neighborhood scale open space and recreational amenities such as neighborhood parks, clubhouses, trails and golf-cart paths.

3. PA-5 should integrate outdoor open space and commercial recreational features to complement resort hotel and condominium uses.

4. PA-6 allows for the approval of commercial recreational facilities if supported by market conditions.

5. Implementing entitlements will specify the locations and amount of open space areas in each planning area.



Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PUBLIC OPEN SPACE & TRAILS PLAN

FIGURE 2.5

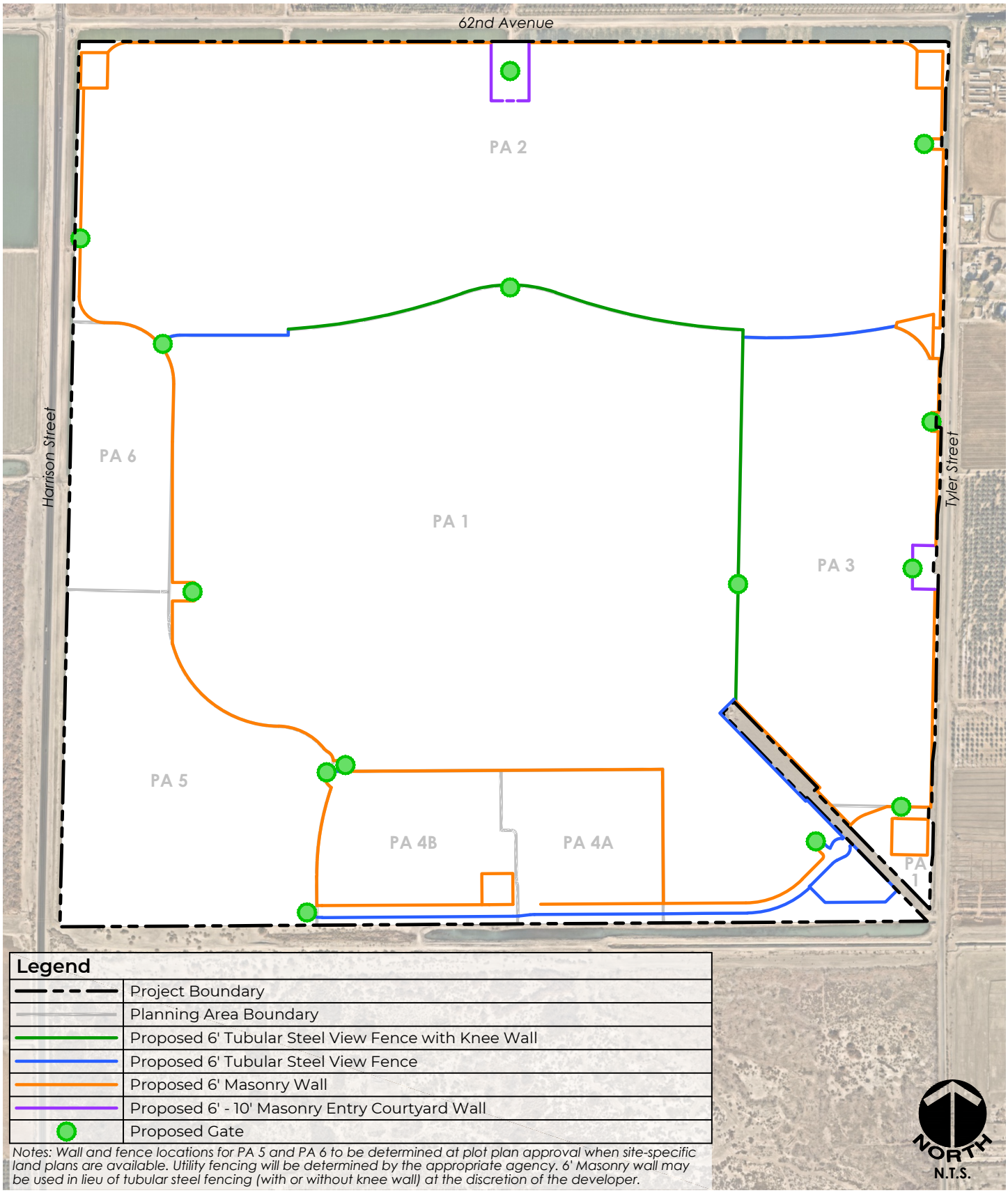
2.4 Walls and Fences

Wall/Fence Plan

As shown on Figure 2.6, *Conceptual Wall and Gating Plan*, public open space and recreation 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.

Wall/Fence Standards

1. Provide perimeter walls throughout the project as needed to secure each individual land use component.
2. Walls and fencing shall not obstruct visibility and sight distance for vehicular traffic.
3. Design guidelines for walls and fences are found in Chapter 4.



Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL WALL & GATING PLAN

FIGURE 2.6

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>PLANNING >CIVIL ENGINEERING >LAND SURVEYING
MSACONSULTINGINC.COM

2.5 Grading & Drainage

Site topography is extremely flat across the site with very little natural slope. The high elevation of 370 occurs in the northwest corner of the property at 62nd Avenue and Harrison Street. The low elevation of 350 occurs in the southeast corner or the site at 64th Avenue and Tyler Street. This equates to a vertical elevation change of only 20 feet over a distance of approximately 1 ¼ mile resulting in a natural gradient of 0.3%. The site contains an extensive system of agricultural tile drains. These will either be retained in place, relocated, or abandoned as determined during the final engineering design phase. Because grading and drainage are closely interrelated, they are addressed jointly in this section.

Grading/Drainage Plan

Site grading will create building pads and parking areas while keeping the earthwork cut and fill amounts balanced on site, so no soil export or import is expected. Because the site is relatively level, grading design will not deviate greatly from existing conditions and will be defined in greater detail as subsequent entitlement projects and plot plans are proposed. Grading will achieve positive surface flows and protect all structures and physical improvements from the 100-year storm through surface runoff into retention basins either above or below the finished surfaces. Soil erosion and water quality will be protected both during and after construction is completed. The incremental increase in storm water runoff from an existing condition to the new developed condition created by impervious surfaces (roofs, pavement) will be retained on site.

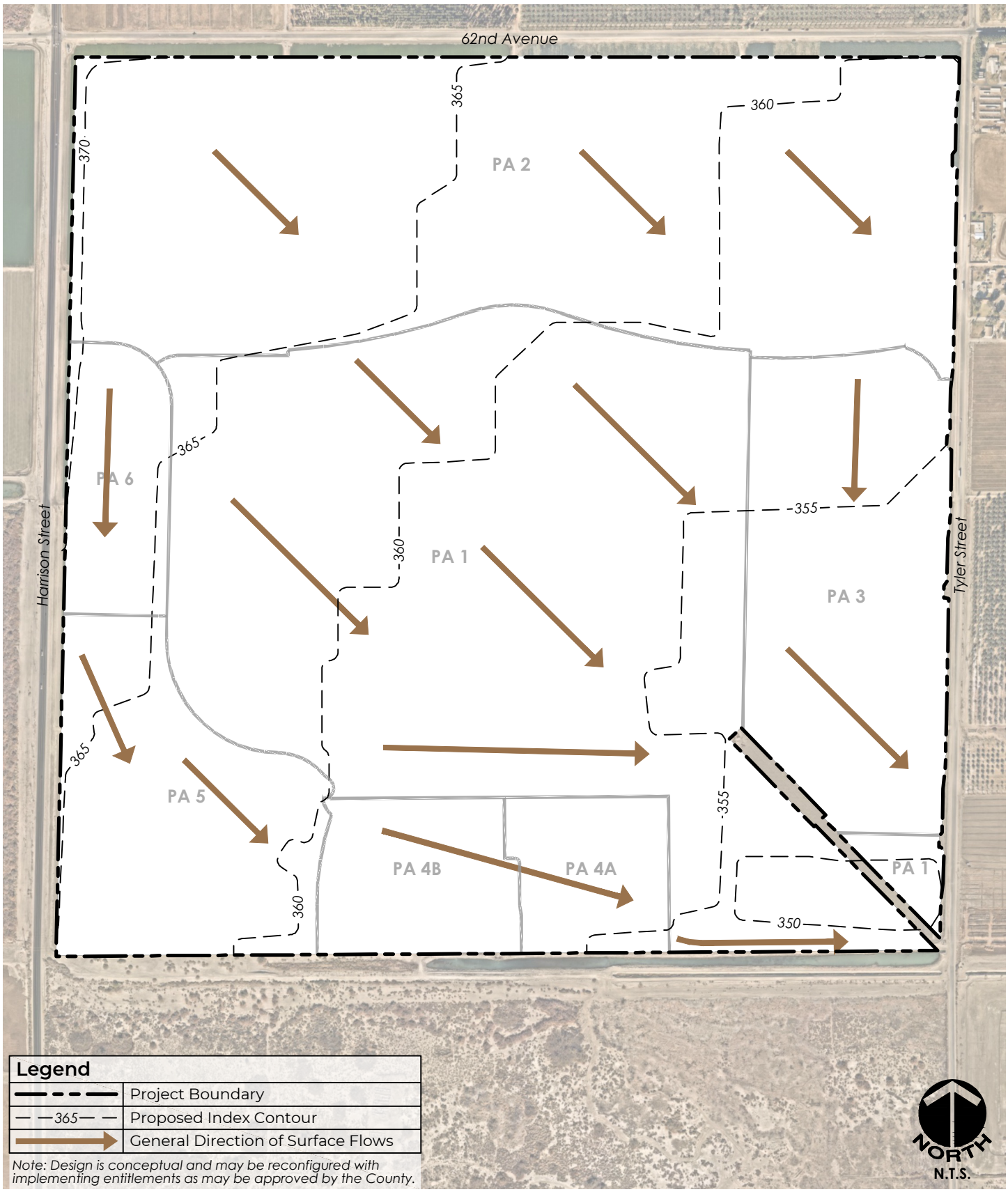
As shown in Figure 2.7, *Conceptual Grading Plan & Figure 2.8 Conceptual Drainage Plan* depicts the general routing of "developed condition" surface drainage through the site. Flows will be conveyed using future surface parking, drive aisles and limited piping where they will be delivered to a series of on-site retention facilities. The stormwater drainage system will be further refined and detailed as site-specific development proposals are submitted and approved by the County. Adjustments may include the number, location, configuration and depth of drainage pipes and basins as well as the specific flow path through the site. However, the retention basins and storm drainpipes will be sized appropriately for each phase of the project using standard engineering modelling methods as approved by the County of Riverside Engineering Department.

Grading/Drainage Standards

1. All grading activities shall be in substantial conformance with the Conceptual Grading and Drainage Plan, the California Building Code and Riverside County Ordinance No. 457.
2. Prior to development within any area of the Specific Plan, an overall Conceptual Grading Plan for the portion in process shall be submitted for Planning Department approval. The Grading Plan for each such area shall be used as a guideline for subsequent detailed grading plans for individual stages of development within that area and shall include preliminary pad and roadway elevations.
3. Unless otherwise approved by the County of Riverside, Building and Safety Department, all cut and fill slopes shall be constructed at inclinations of no steeper than two (2) horizontal feet to one (1) vertical foot.
4. A grading permit shall be obtained from the County of Riverside, as required by the County Grading Ordinance, prior to grading.

5. Soil stabilizers should be used to control dust as required by SCAQMD Rule 403.
6. Erosion control practices shall be implemented during grading activities.
7. All projects proposing construction activities including: clearing, grading, or excavation that results in the disturbance of at least five acres total land area, or activity which is part of a larger common plan of development of five acres or greater shall obtain the appropriate NPDES construction permit and pay the appropriate fees. All development within the specific plan boundaries shall be subject to future requirements adopted by the County to implement the NPDES program.

   Existing onsite drain tiles to be used to allow dewatering of proposed retention basins into regional facilities to be consistent with the Airport Land Use Commission (ALUC) 48-hour dewatering provision.



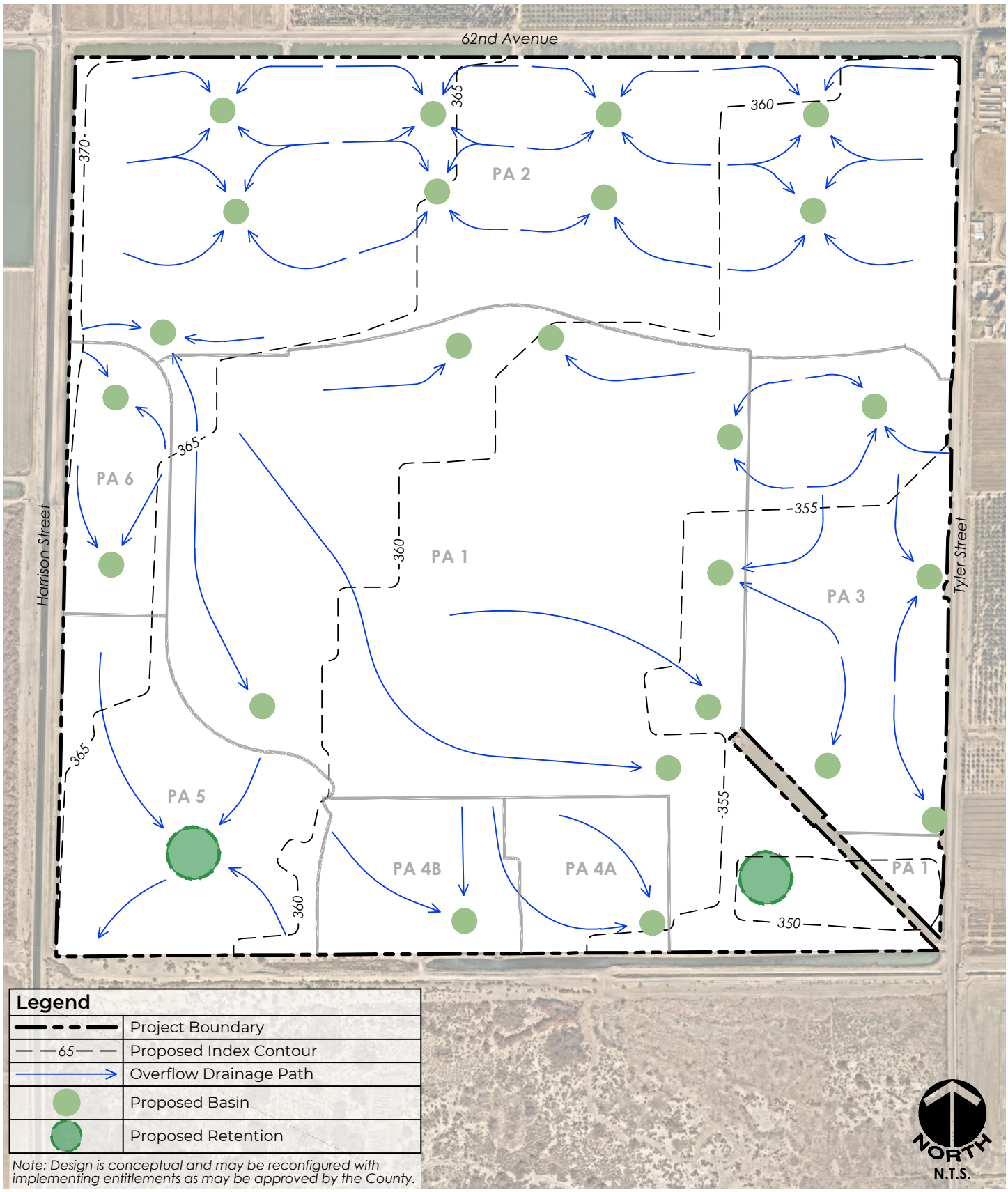
Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL GRADING PLAN

FIGURE 2.7

MSA CONSULTING, INC.
>PLANNING >CIVIL ENGINEERING >LAND SURVEYING
MSACONSULTINGINC.COM



Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL DRAINAGE PLAN

FIGURE 2.8

2.6 Water & Sewer

Water & Sewer Plan

As shown in Figure 2.9, *Conceptual Water Plan and* Figure 2.10, *Conceptual Sewer Plan,* the Specific Plan area is provided with domestic water and sanitary sewer service by the Coachella Valley Water District (CVWD). Development within the project will be served by a private network of lines that will connect to existing public CVWD water and sewer lines located in Harrison Street and 62nd Ave respectively.

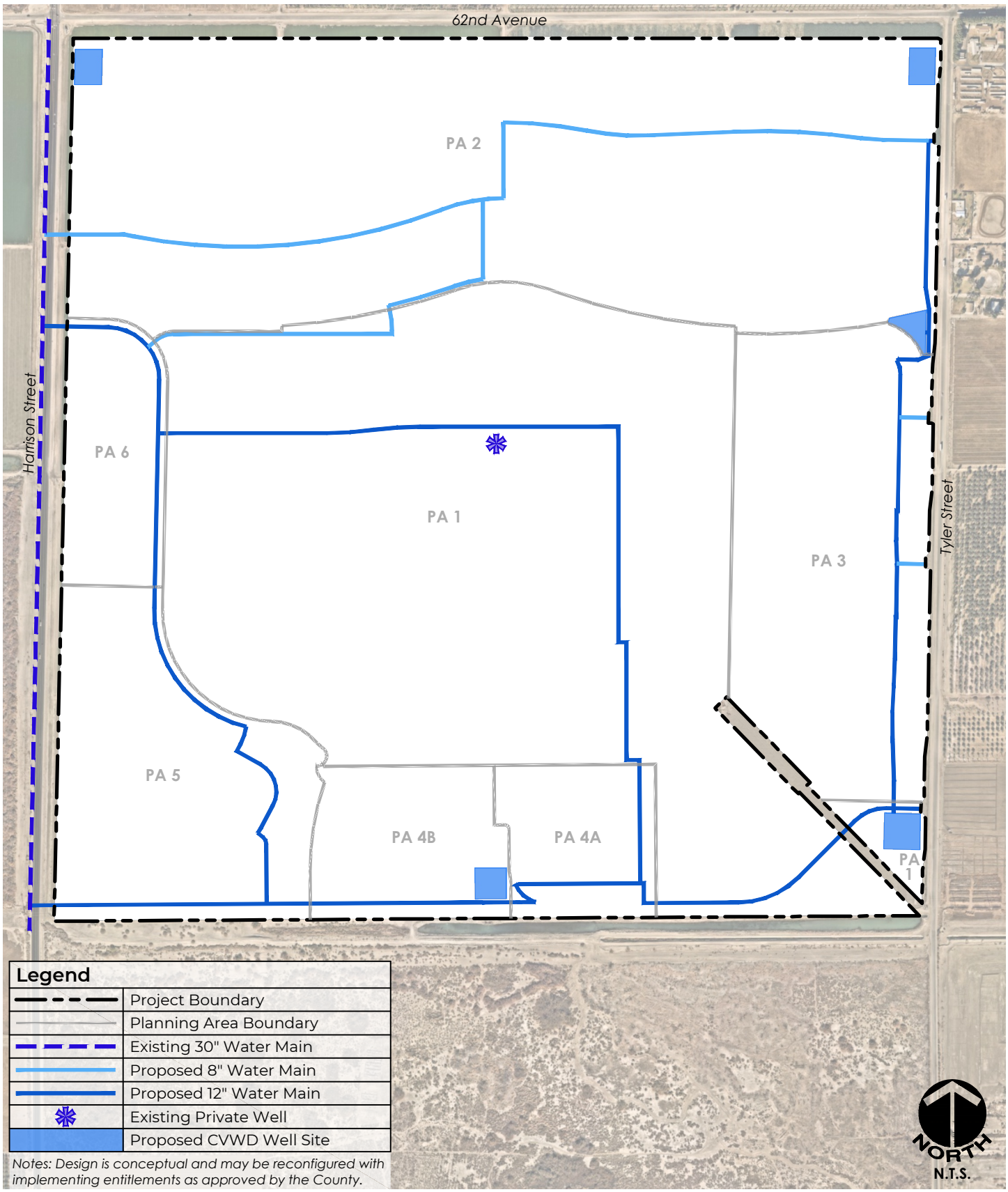
An Existing CVWD water main is located west of the site in Harrison Street. The project proposes connection points as illustrated on the Conceptual Water Plan. Water mains are proposed to be extended into the project site to provide an internal network of private lines to serve on-site development. In addition to serve the project's water needs, five (5) on-site wells are proposed and to be connected for CVWD use as illustrated in Figure 2.8.

An existing CVWD 42" sewer main exists north of the project site in 62nd Ave. The project proposes to connect to the existing CVWD sewer infrastructure and will provide a private network of sewer mains within the project to serve on-site uses. Two lift stations are proposed in the southerly portion of the project as illustrated in Figure 2.10 Their exact location and specifications will be determined as part of the final design process.

Figure 2.9, *and Figure 2.10* are conceptual and subject to refinement / modification as necessary in response to future specific development proposals.

Water/Sewer Standards

- All water and sewer facilities will be designed and constructed in accordance with the Coachella Valley Water District (CVWD) standards and specifications
- The capital cost of on-site and off-site facilities necessary to serve the project site will be the responsibility of the applicant. Relevant facilities will be dedicated to CVWD, after construction, for the District to maintain and operate. Fee credits may be available for transmission, storage, and wells.
- All development is required to landscape in accordance with Table 4.13 Plant Palette found in Section 4.7, and CVAG Ordinance 1302.1, Landscape and Irrigation System Design Criteria. This will ensure additional water conservation through the use of desert-appropriate landscape material.
- All projects, including subdivisions within the specific plan boundary, shall be subject to a Mitigation Monitoring Program, included as part of the EIR for SP 401 and any updated environmental assessments associated therewith.
- The grading contractor shall be required to obtain an encroachment permit from CVWD prior to entering any rights-of-way belonging to the Coachella Valley Water District of US Bureau of Reclamation.



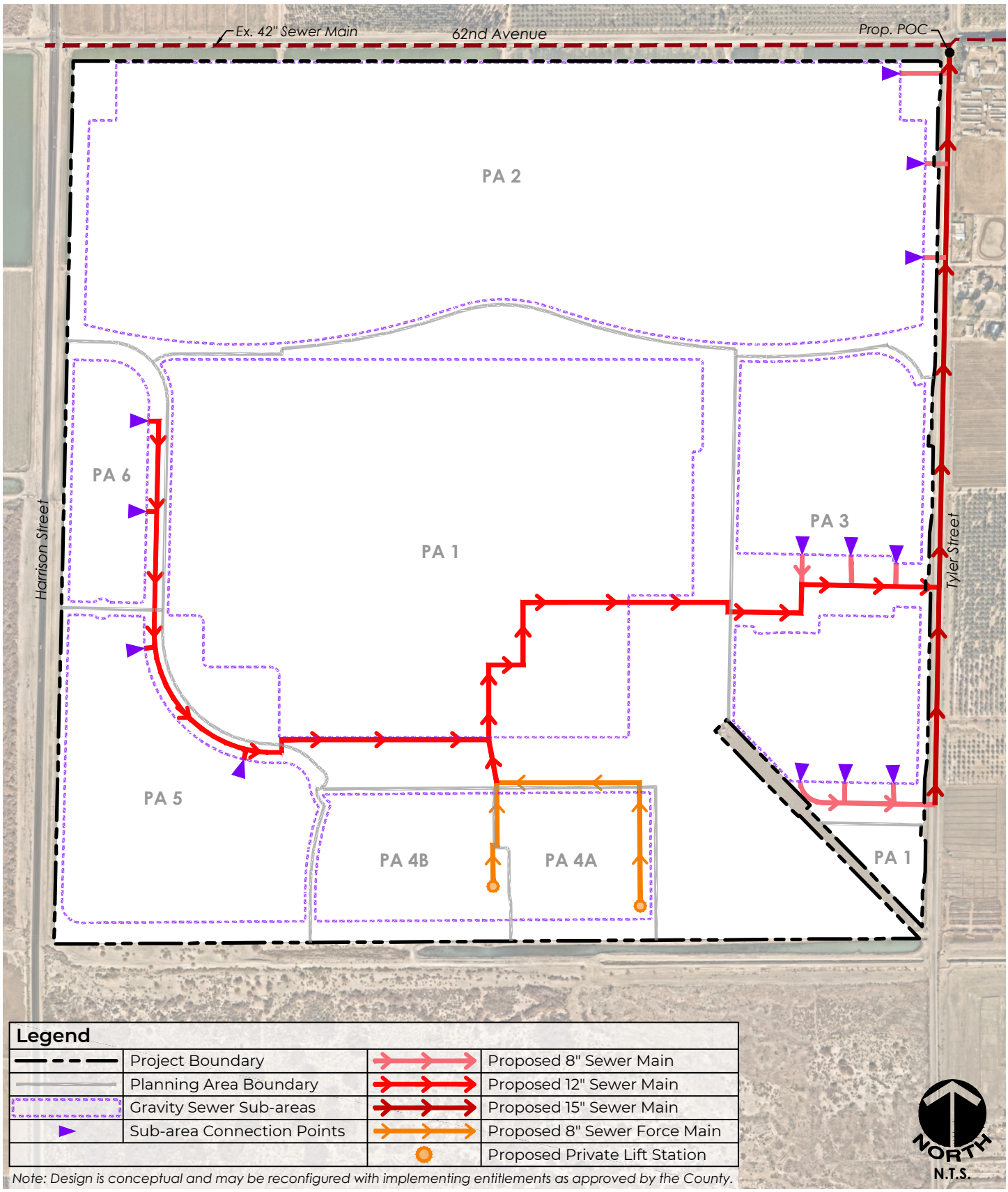
Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL WATER PLAN

FIGURE 2.9

MSA CONSULTING, INC.
>PLANNING >CIVIL ENGINEERING >LAND SURVEYING
MSACONSULTINGINC.COM



Note: Design is conceptual and may be reconfigured with implementing entitlements as approved by the County.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL SEWER PLAN

FIGURE 2.10

2.7 Solid Waste

The Riverside County Waste Management Department (RCWMD) is responsible for the efficient and effective landfill disposal of non-hazardous county waste. To accomplish this, the RCWMD operates six active landfills and administers a contract agreement for waste disposal at the private El Sobrante Landfill. The Department also oversees several transfer station leases, as well as a number of recycling and other special waste diversion programs. Solid waste not hauled directly to a landfill is deposited temporarily in several transfer stations throughout Riverside County. Solid waste is transported to one of three landfills and/or the Edom Hills Transfer Station which are: El Sobrante, Lamb Canyon and Badlands.

Manure and waste from the equestrian park will be collected and stored within the back of house area in PA-1. Once within the back of house area, it is planned for the manure to be loaded and transported to Burtecc landfill facilities or equivalent service for disposal.

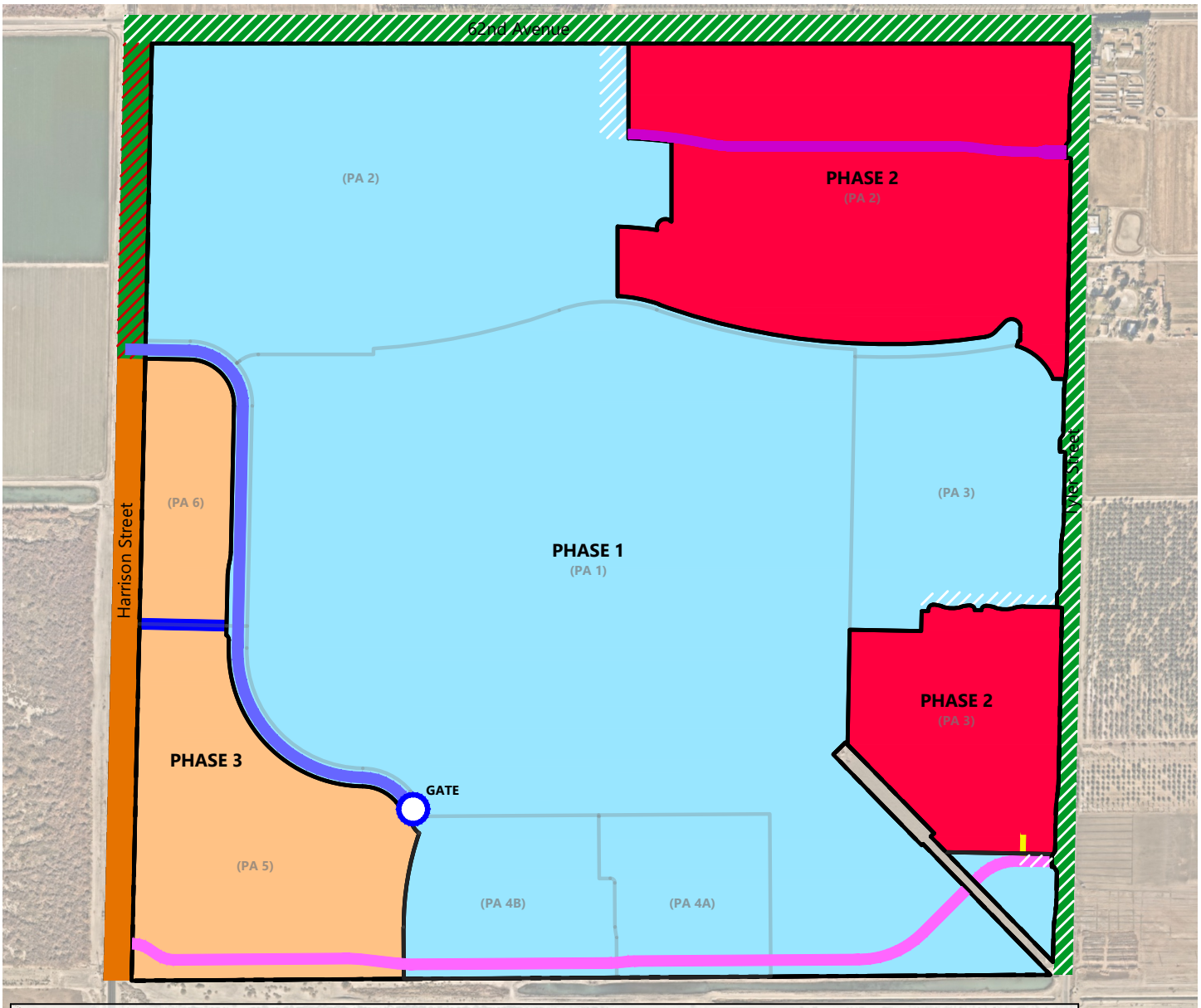
2.8 Phasing

Phasing Plan

Development of the Thermal Ranch Specific Plan may occur as a single project or over multiple phases. *Figure 2.11, Perimeter Improvement Phasing* illustrates the expected sequence of development in three (3) development phases and *Figure 2.12 Perimeter Improvement Phasing (Street Sections) provides street sections associated with each phase of development.* Planning Areas 1, 3, 4a, 4b, and a portion of PA 2 are intended as the first phase. Other project components and phases would follow as shown on the plan, but the order may be adjusted in response to market demand. Adjustments are allowed so long as each phase accommodates future phases with the orderly extension of circulation, parking, utilities, and infrastructure in accordance with the final conditions of approval for each project and the County's Engineering Department.

Phasing Standards

1. Construction of the development, including recordation of final subdivision maps, may be done progressively in stages, provided adequate vehicular access is constructed for all dwelling units in each stage of development and further provided that such phase of development conforms substantially with the Specific Plan Phasing Program.
2. The Primary Collector Road will be constructed with PA-1, PA-5, or PA-6, whichever occurs first.
3. Perimeter walls shall be constructed with the adjoining phase of development.
4. Prior to recordation of any final subdivision map, improvement plans that phase of development shall be submitted to the County Planning Department for approval.
5. Each phase shall provide primary and secondary access. If a subdivision is proposed within a phase a secondary access point shall be provided per Section 3.2.1 of Ordinance 460.



Legend

Symbol	Description
	Project Boundary
	Phase Boundary

Phase 1	
	Phase 1 Final Map
	Street "B": On-Site Street Improvement (Private with Public Access)
	Street "AF" & "AG": On-Site Street Improvement (Private with Public Access)
	On-Site Street Improvement (Secondary Access)
	Off-Site Street Improvement (Public)
	Private Gate
Phase 2	
	Phase 2 Final Map (No Off-Site Improvements)
	On-Site Street Improvement (Emergency Access)
	Additional Off-Site Improvements if Built as Phase 1

Phase 3	
	Phase 3 Final Map
	Street "A": On-Site Street Improvement (Private with Public Access)
	Off-Site Street Improvement (Public)
	Additional Off-Site Improvements if Built as Phase 1

Note: Exhibit shows expected sequence of development, but may change in response to market conditions.

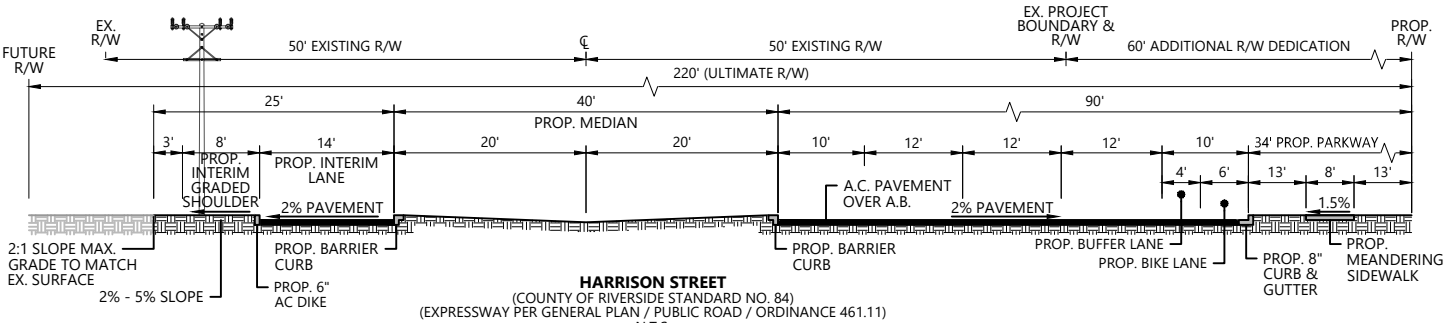
NORTH
N.T.S.

Source: MSA Consulting, Inc.

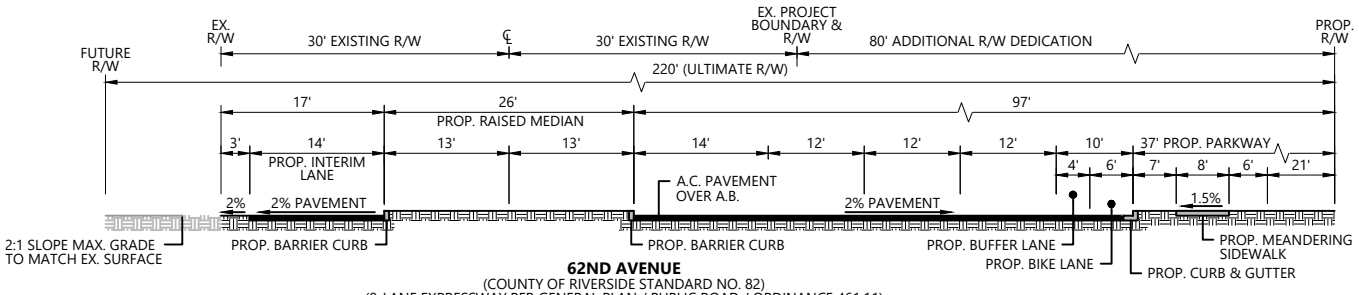
Exhibit Date: September 16, 2025

PERIMETER IMPROVEMENT PHASING

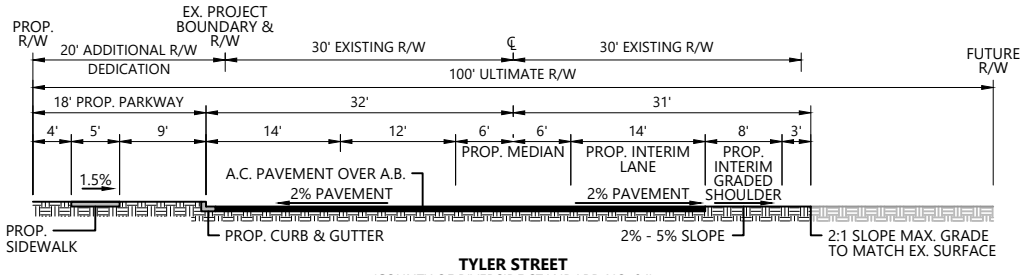
FIGURE 2.11



HARRISON STREET
(COUNTY OF RIVERSIDE STANDARD NO. 84)
(EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
N.T.S.



62ND AVENUE
(COUNTY OF RIVERSIDE STANDARD NO. 82)
(8-LANE EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
N.T.S.



TYLER STREET
(COUNTY OF RIVERSIDE STANDARD NO. 94)
(SECONDARY HIGHWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
N.T.S.

Source: Unincorporated Area of Riverside County

Exhibit Date: September 16, 2025

PUBLIC PERIMETER IMPROVEMENT (STREET SECTIONS)

FIGURE 2.12

CHAPTER 3: PLANNING AREA STANDARDS

Development standards for the Thermal Ranch have been established at four levels: Chapter 2 – Project-Wide Planning Standards, Section 3.3 – Design Guidelines, Section 3.4 – Landscape Design Guidelines, and, Planning Area Standards, which are provided in this section.

3.1 Planning Area 1 – Equestrian Center

Planning Area Description

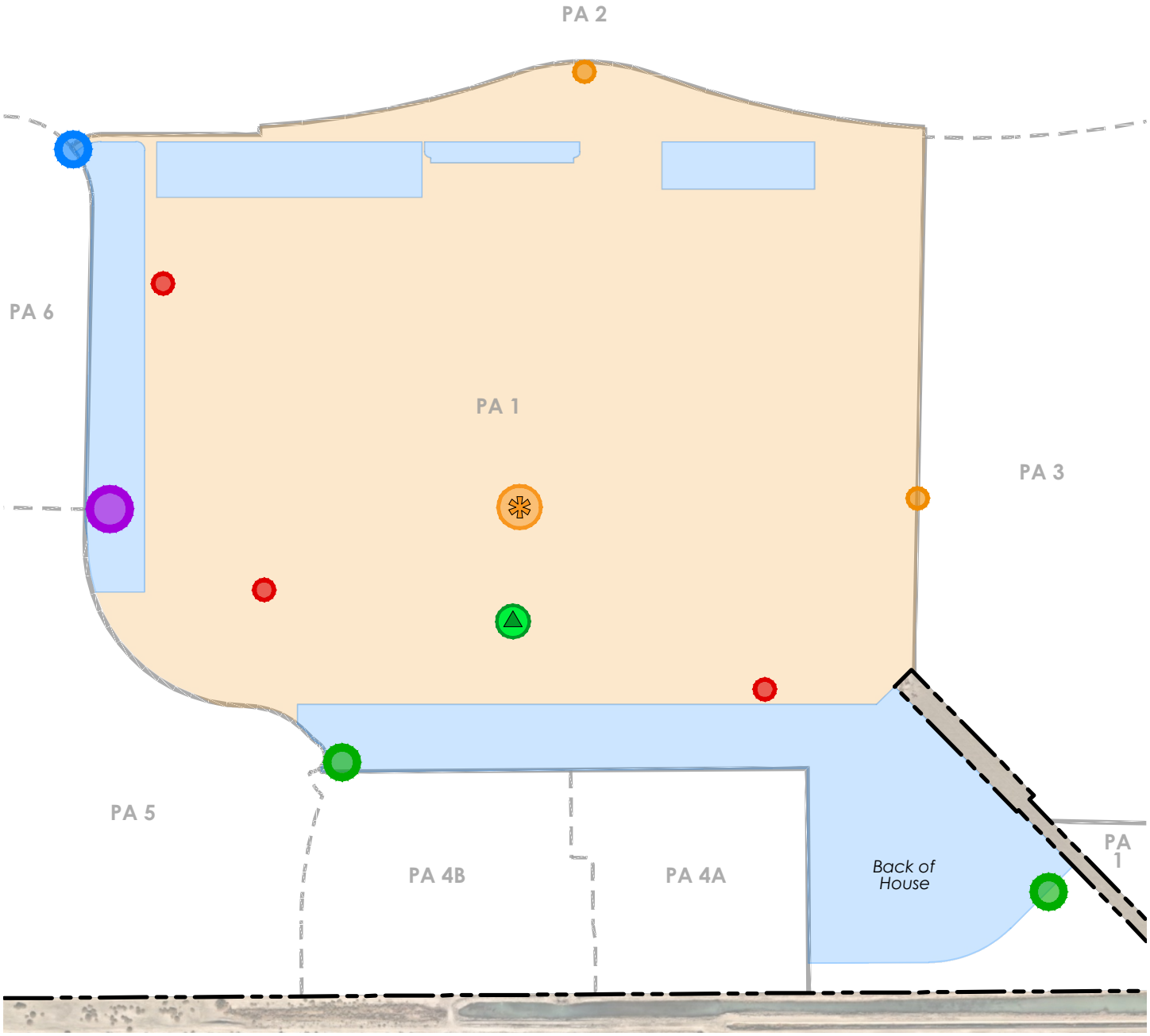
Planning Area 1 consists of approximately 231 acres for tourist commercial development located in the center of the Specific Plan. It will allow development of a full service equestrian center. Representative uses include barns, stables, arenas, horse trails, event areas, riding fields, farrier/veterinary services, equestrian themed retail, dining, parking, and back of house maintenance/service uses.

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards

Planning Area Development Standards

1. The primary entry to Planning Area 1 is from Harrison Street via the Primary Collector Road with secondary access on Harrison Street.
2. Refer to Chapter 2 for project-wide planning standards.
3. Refer to Chapter 4 for landscape and architectural design guidelines.
4. Planning Area 1 is located within Land Use Compatibility Zone D for the Jacqueline Cochran Regional Airport. Development will incorporate the necessary Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan).
5. Refer to Figure 3.1 Planning Area 1 Overview for more access, entry, and Planning Area specific detials.



Legend			
	Project Boundary		Primary Entry (Manned Year Around)
	Planning Area Boundary		Secondary Entry (Season Only)
	Parking & Service Zone		Secondary Entry
	Vehicle Exclusion Zone (Horses & Golf Carts Only)		Cart Entry Gate
	VIP Gathering/ Dining Commons		Cart Restriction
	Primary Entry Gateway		

Note: All other streets are local roads and are allowed as described in Figure XX. Street patterns shown are illustrative only and may be adjusted subject to approval of a tentative tract map or plot plan that complies with County engineering standards.

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 1 OVERVIEW

FIGURE 3.1

3.2 Planning Area 2 – Estate Residential

Planning Area Description

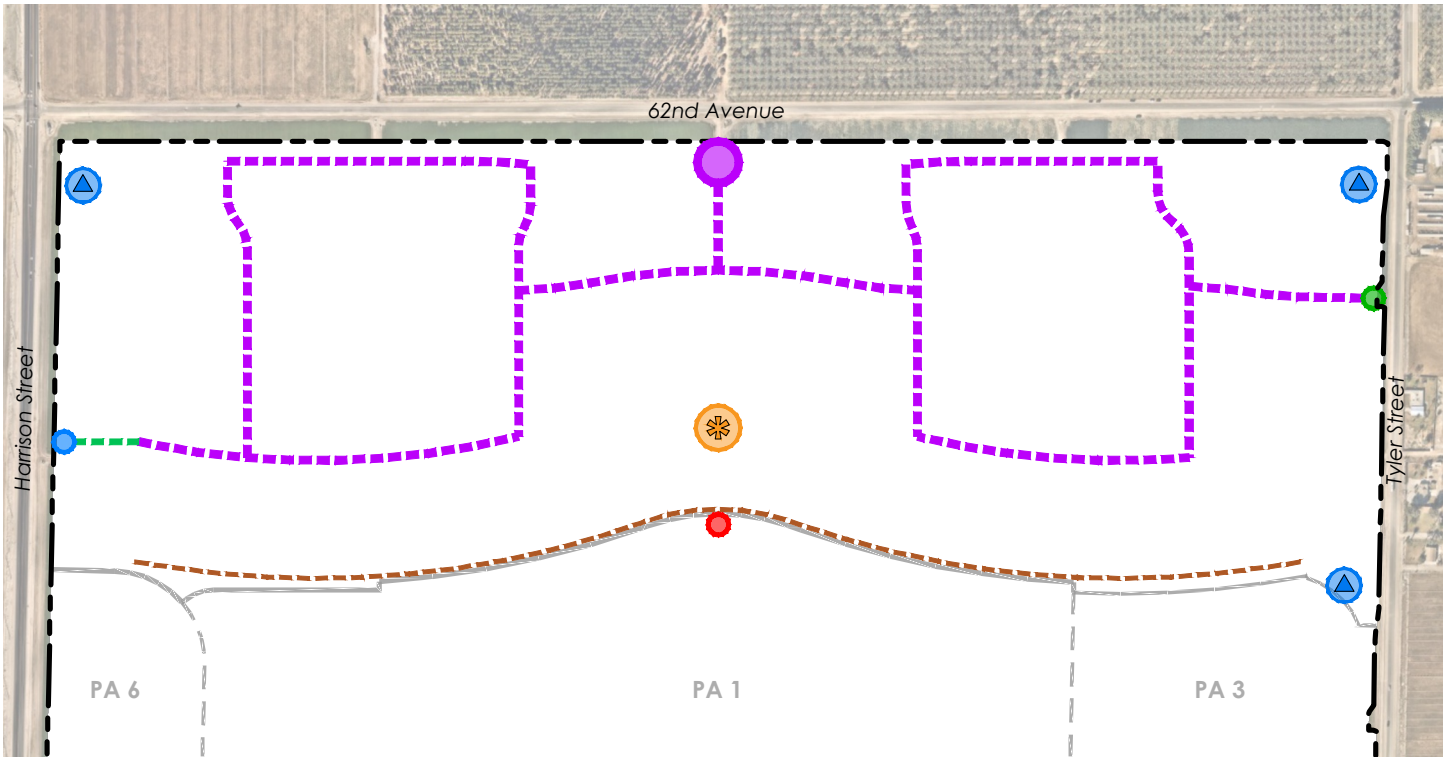
Planning Area 2 contains approximately 187 acres for low density residential developement located in the northern portion of the Specific plan. It allows for the development of equestrian lifestyle estate residences on lot sizes rangining from half-acre to two acres. Representative uses within this planning area include single-family homes, clubhouse, equestrian trails, and open space/retention areas.

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards

Planning Area Standards

1. The primary entry to Planning Area 2 is on 62nd Avenue with secondary access from Tyler Street and Harrison Street.
2. This planning area will be developed with a community recreation center to serve neighborhood residents. The community center will, at a minimum, include a community clubhouse and swimming pool. Other complimentary amenities, such as sports courts (pickleball, tennis, bocce ball, etc.), multi-use turf gathering and recreation areas, dog parks, community gardens, shaded barbecue & picnic facilities, bathrooms, trails, tot lots and par courses may also be included subject to market demand and demographic characteristics.
3. Refer to Chapter 2 for project-wide planning standards.
4. Refer to Chapter 4 for landscape and architectural design guidelines.
5. Planning Area 2 is located within Land Use Compatibility Zone D for the Jacqueline Cochran Regional Airport. Implementing development plans will incorporate the relevant Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan) except the average parcel size requirement The estate lot size essential for this equestrian lifestyle community will fall in between the high and low ranges.
6. Refer to Figure 3.2 Planning Area 2 Overview for more access, entry, and Planning Area specific detials.



Legend	
	Project Boundary
	Planning Area Boundary
	Local Street (32' ROW)
	Emergency Access (24' Easement)
	Service Driveway (15' Road)
	Community Amenity
	Potential CVWD Well Site
	Primary Entry
	Secondary Entry
	EVA Only Access
	Horse Park Entry

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 2 OVERVIEW

FIGURE 3.2

3.3 Planning Area 3 – Neighborhood Residential

Planning Area Description

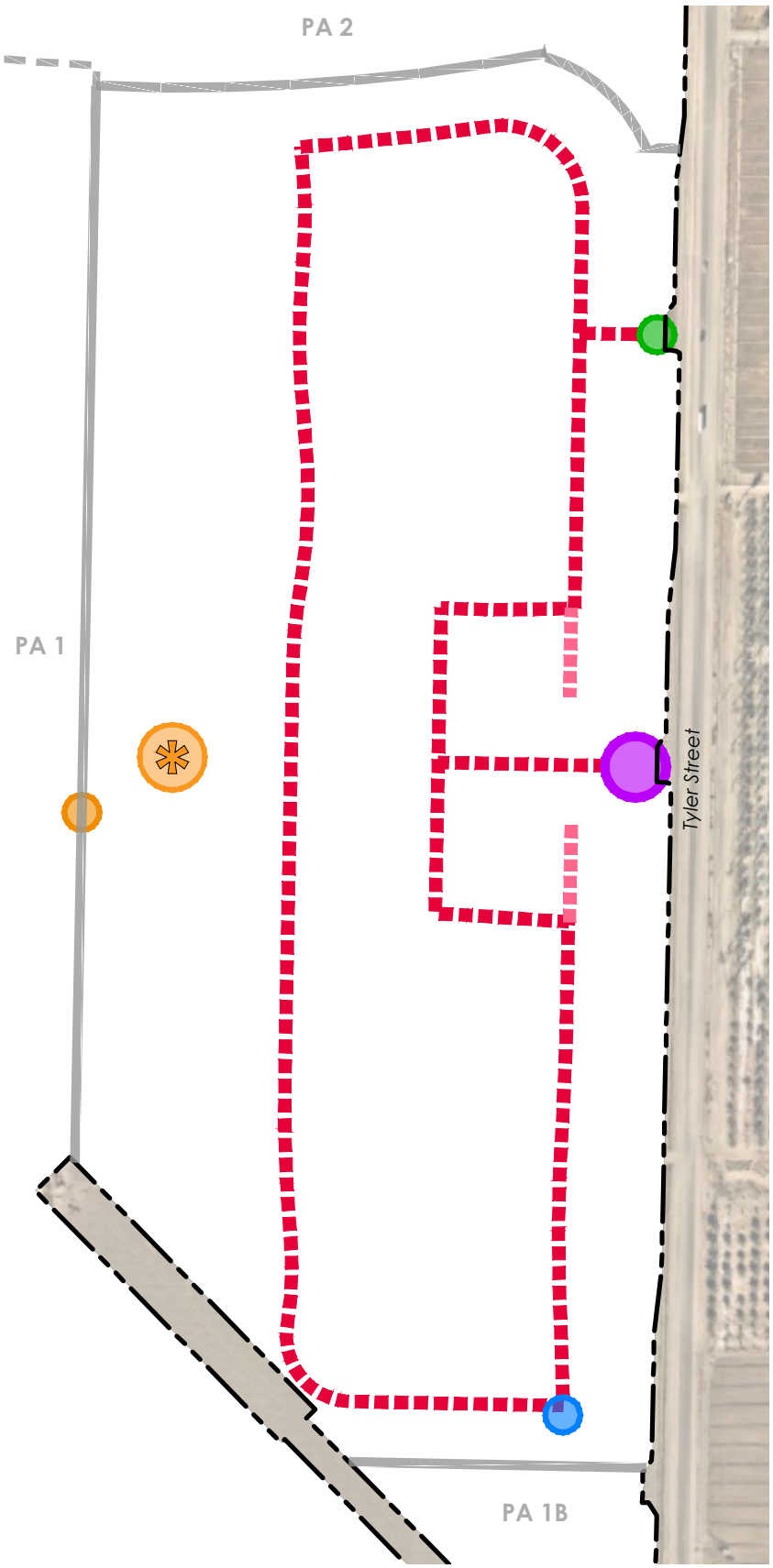
Planning Area 3 contains approximately 72 acres for medium density residential development located in the eastern portion of the Specific Plan. It allows up to 390 attached and detached residential units at no less than 5 dwelling units per acre. Representative uses within this planning area include single-family detached and attached homes, clubhouses and other community amenities.

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards.

Planning Area Standards

1. The primary and secondary entries to Planning Area 3 are on Tyler Street.
2. This planning area will be developed with a community recreation center to serve neighborhood residents. The community center will, at a minimum, include a community clubhouse and swimming pool. Other complimentary amenities, such as sports courts (pickleball, tennis, bocce ball, etc.), multi-use turf gathering and recreation areas, dog parks, community gardens, shaded barbecue & picnic facilities, bathrooms, trails, tot lots and par courses may also be included subject to market demand and demographic characteristics.
3. Refer to Chapter 2 for project-wide planning standards.
4. Refer to Chapter 4 for landscape and architectural design guidelines.
5. Planning Area 3 is located within Land Use Compatibility Zone D for the Jacqueline Cochran Regional Airport. Implementing development plans will incorporate the necessary Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan).
6. Refer to Figure 3.3 Planning Area 3 Overview for more access, entry, and Planning Area specific detials.



Legend	
	Project Boundary
	Planning Area Boundary
	Local Street (37' ROW)
	Local Street (33' ROW)
	Community Clubhouse
	Primary Entry
	Secondary Entry
	EVA Only Access
	Cart Entry

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 3 OVERVIEW

FIGURE 3.3

3.4a Planning Area 4a – Horse Park Workforce Housing

Planning Area Description

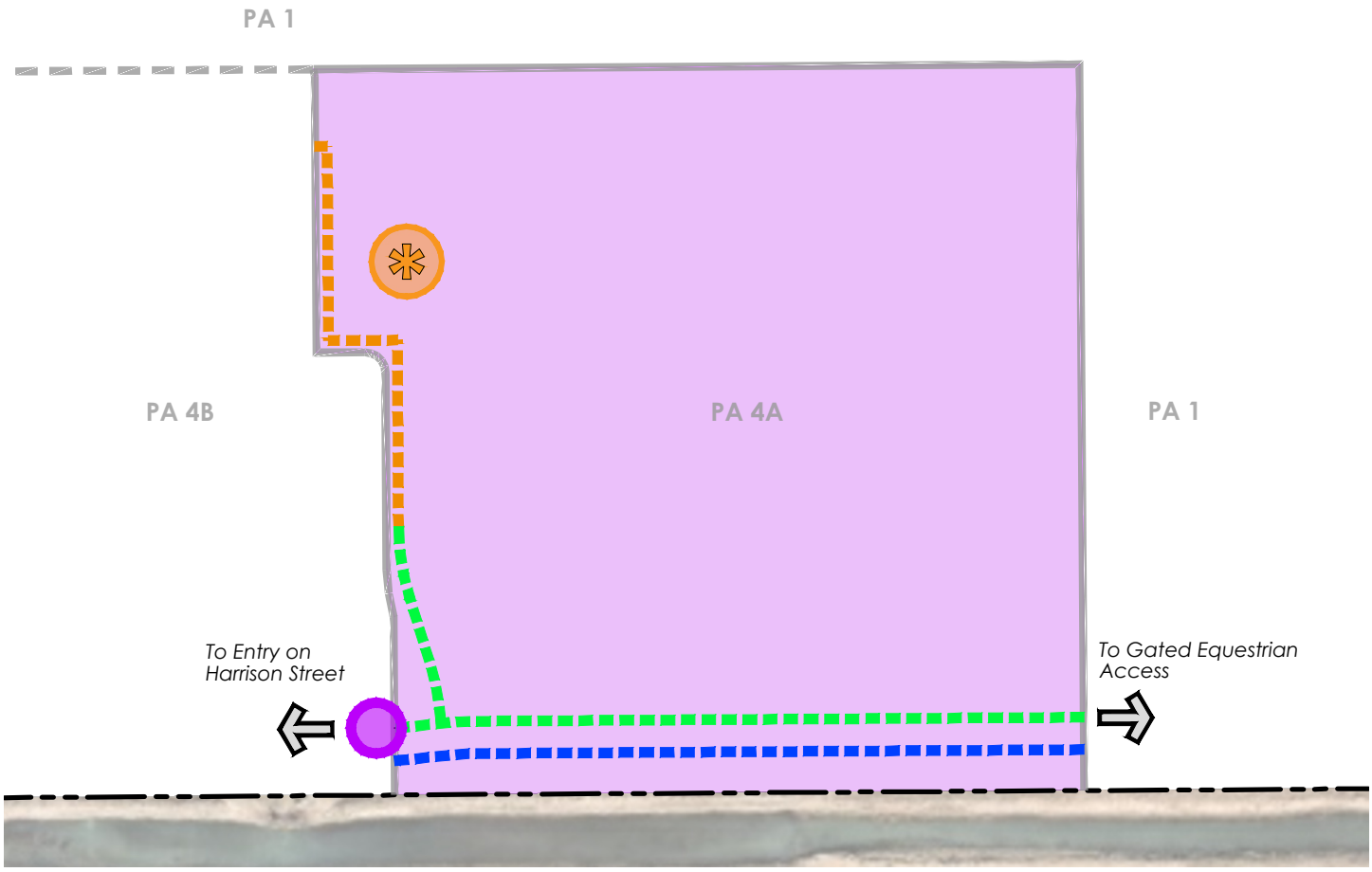
Planning Area 4a contains approximately 18.3 acres of land for highest density residential development located in the southern portion of the Specific Plan. It allows for development of workforce housing consisting of modular housing units (between 300-500 dwelling units).

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards.

Planning Area Standards

1. The primary entry to Planning Area 4a is from Harrisson Street with secondary access to Harrison Street via the Primary Collector road.
2. This planning area will be developed with a community laundromat, outdoor gathering space and barbeque amenities to serve resident workers.
3. Refer to Chapter 2 for project-wide planning standards.
4. Refer to Chapter 4 for landscape and architectural design guidelines.
5. A public trail easement will be dedicated adjacent to 64th Avenue.
6. Planning Area 4 is located within Land Use Compatibility Zone D for the Jacqueline Cochran Regional Airport. Implementing development plans will incorporate the necessary Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan).
7. Refer to Figure 3.4 Planning Area 4a Overview for more access, entry, and Planning Area specific detials.



Legend	
	Project Boundary
	Planning Area Boundary
	Local Street (60' ROW)
	Local Street (30' ROW)
	Public Trail (20' Easement)
	Workforce Cottage Housing
	Community Amenity
	Primary Entry

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 4A OVERVIEW

FIGURE 3.4A

3.4b Planning Area 4b –Workforce RV Housing

Planning Area Description

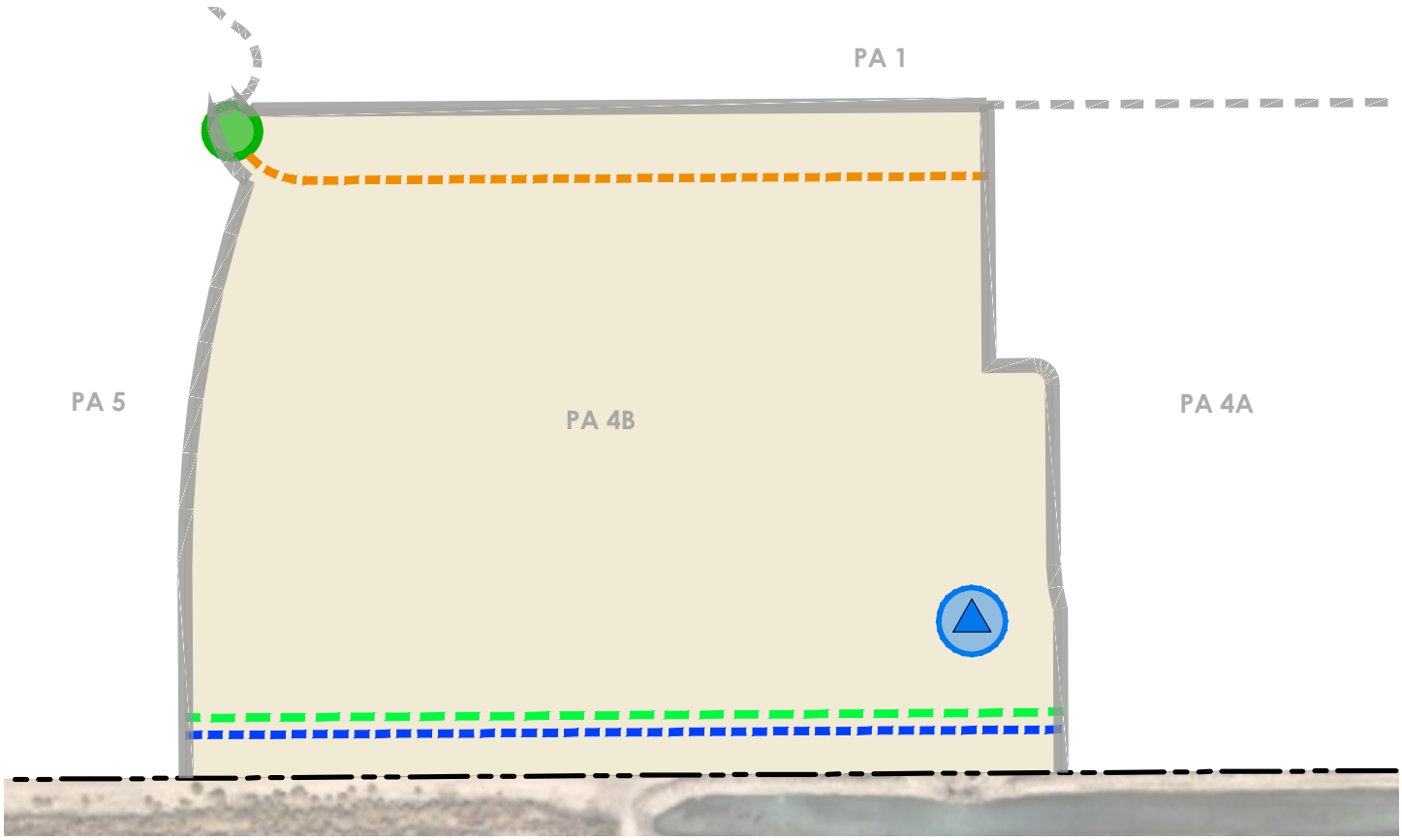
Planning Area 4b contains approximately 22.8 acres of land located in the southerly portion of the Specific Plan intended to supplment access to workforce housing by providing recreational vehicle parking spaces (up to 320 stalls) for those who travel from show to show and live out of an RV.

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards.

Planning Area Standards

1. The primary entry to Planning Area 4b is from Harrison Street with secondary access to Harrison Street via the Primary Collector road.
2. This planning area will be developed with a community laundromat, outdoor gathering space and barbeque amenities to serve resident workers.
3. Refer to Chapter 2 for project-wide planning standards.
4. Refer to Chapter 4 for landscape and architectural design guidelines.
5. A public trail easement will be dedicated adjacent to 64th Avenue.
6. Planning Area 4 is located within Land Use Compatibility Zone D for the Jacqueline Cochran Regional Airport. Implementing development plans will incorporate the necessary Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan).
7. Refer to Figure 3.4b Planning Area 4b Overview for more access, entry, and Planning Area specific detials.



Legend	
	Project Boundary
	Planning Area Boundary
	Local Street (60' ROW)
	Local Street (30' ROW)
	Public Trail (20' Easement)
	Workforce RV Housing
	Potential Well Site
	Secondary Entry

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 4B OVERVIEW

FIGURE 3.4B

3.5 Planning Area 5 – Resort/Hotel

Planning Area Description

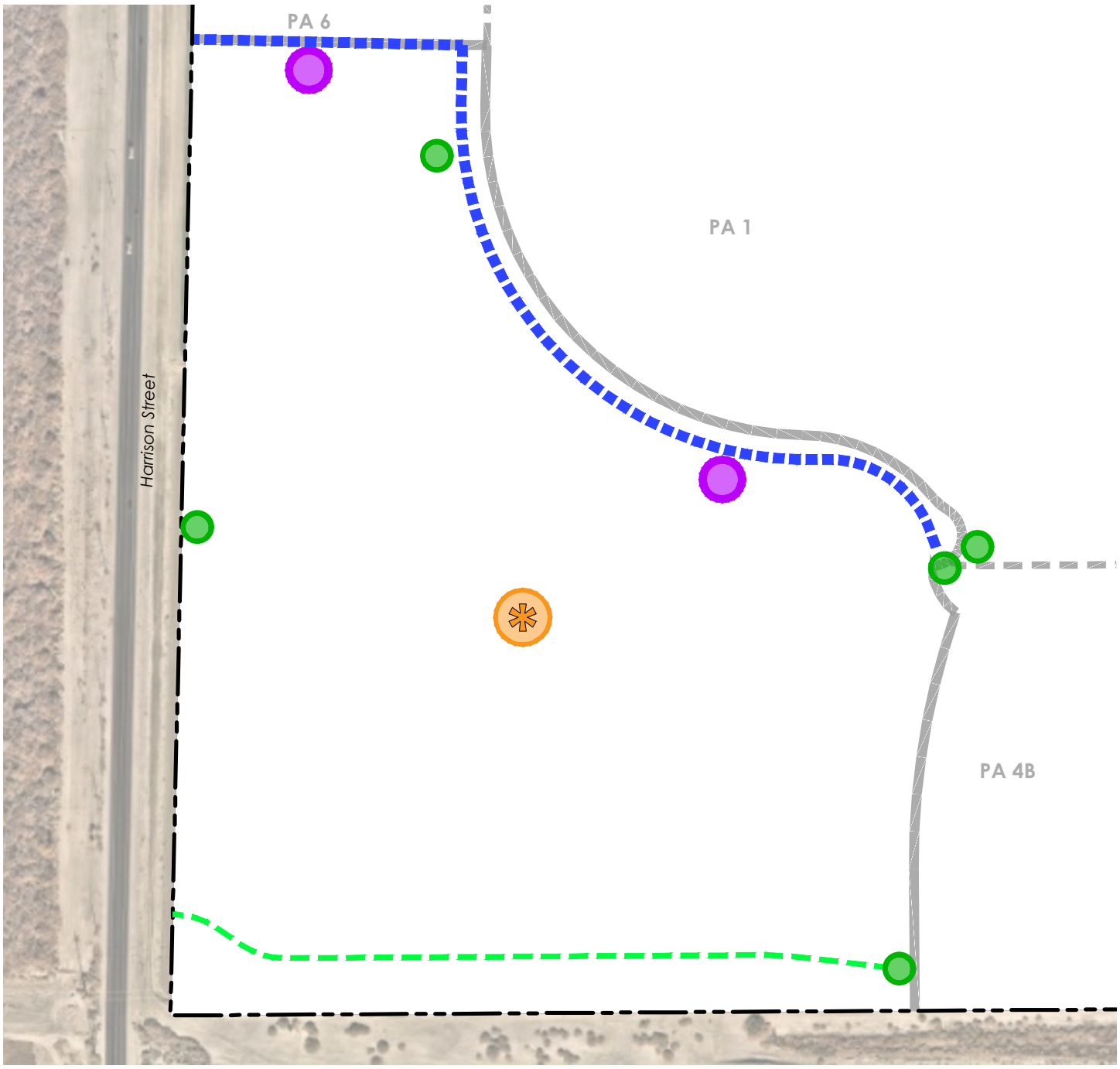
Planning Area 5 contains approximately 55 acres of land located on the westerly portion of the Specific Plan and will allow for primarily hotel, retail, and extended stay condomium uses.

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards.

Planning Area Standards

1. The primary and secondary entries to Planning Area 5 are to Harrison Street via the Primary Collector Road.
2. This planning area will include a central water feature or recreational amenity as a focus for resort living.
3. Refer to Chapter 4 for landscape and architectural design guidelines.
4. Refer to Chapter 2 for project-wide planning standards.
5. Planning Area 5 is located within Land Use Compatibility Zone D and E for the Jacqueline Cochran Regional Airport. Implementing development plans will incorporate the necessary Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan).
6. Refer to Figure 3.5 Planning Area 5 Overview for more access, entry, and Planning Area specific detials.



Legend	
	Project Boundary
	Planning Area Boundary
	Local Street (60' ROW)
	Primary Collector with Public Access (23'-112' ROW Varies)
	Central Resort Amenity
	Primary Entry
	Secondary Entry

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 5 OVERVIEW

FIGURE 3.5

3.6 Planning Area 6 – Commercial Village

Planning Area Description

Planning Area 6 consists of approximately 22 acres of land located in the western portion of the Specific Plan bordering Harrison Street and will promote a variety of commercially oriented development such as retail, restourant, recreation and similar uses.

Planning Area Zoning

See Ordinance No. 348 (Chapter 5 – Specific Plan Zoning Ordinance) for allowable uses and development standards.

Planning Area Standards

1. The primary and secondary entries to Planning Area 6 are to Harrison Street via the Primary Collector Road.
2. Refer to Chapter 2 for project-wide planning standards.
3. Refer to Chapter 4 for landscape and architectural design guidelines.
4. Planning Area 6 is located within Land Use Compatibility Zone D for the Jacqueline Cochran Regional Airport. Implementing development plans will incorporate the necessary Zone D consistency criteria as per Table 2A of the RCALUCP (included as Appendix A of this Specific Plan).
5. Refer to Figure 3.6 Planning Area 6 Overview for more access, entry, and Planning Area specific detials.

Legend	
	Project Boundary
	Planning Area Boundary
	Primary Collector with Public Access (23'-112' ROW Varies)
	Primary Entry
	Secondary Entry

NORTH
N.T.S.

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

PLANNING AREA 6 OVERVIEW

FIGURE 3.6

CHAPTER 4: DESIGN GUIDELINES

4.1 Overview and Purpose

The guidelines contained in this Chapter are intended to allow for flexible, creative design for the development of a high-quality equestrian center, a variety of commercial and resort uses, and various residential neighborhoods within the Thermal Ranch Specific Plan. These guidelines identify unifying elements for site planning, building, and landscape design which are intended to be compatible with the surrounding area and promote high-quality development within the Specific Plan. This comprehensive approach represents an understandable and predictable role in shaping the physical future by emphasizing site design, building form, and landscape design. The exhibits, photos, and illustrations provided are conceptual only and do not depict final designs, nor should they limit the range of expression among the developer or their professional design team. General and commercial design guidelines for this project are provided in this Chapter below. For residential uses, the project intends to largely follow the County Wide Design Standards and Guidelines which will be attached in the Appendix when available.

4.2 Vision Statement and Community Character

The Thermal Ranch Specific Plan is envisioned as a unique living and lifestyle community comprising of various residential neighborhoods, a variety of commercial and resort uses (retail space, hotels, golf, RV park, etc.), all surrounding a world-class equestrian center. The equestrian center which lies at the heart of the project will serve as the project's focal point, providing a sense of place and establishing the character for the Thermal Ranch community. The equestrian center will largely focus on farmhouse and agrarian architecture. Due to the variety of uses proposed, the design guidelines provided in this chapter will focus on broad concepts rather than specific details. The Thermal Ranch character will be captured through carefully integrating architecture and landscape into the overall design, resulting in a pedestrian/equestrian-oriented community and visually engaging place to live and ride.

4.3 General Design Guidelines

Site Design

Integration of effective site planning techniques, incorporated with basic design elements will enhance the visual experience of the development. Key site planning principles include:

- Site design should be compatible with the surrounding development and the public street frontages.
- Buildings should be located and orientated to respect the need for privacy of surrounding uses, especially adjoining residential development.
- Develop a pedestrian-friendly site design encouraging pedestrian links such as interior pathways, greenways, and crosswalks are encouraged to connect future onsite uses.
- Uses that are developed should complement other uses onsite and be compatible with the overall vision of the Specific Plan and community.

- Entries shall be clear, identifiable, and street oriented driveways must be provided at the project and parking entrances. Parking entrances should be designed to ensure safe pedestrian access and provide clean line-of-sight-walkways.

- Public gathering spaces such as outdoor plazas and patios shall be encouraged in commercial retail or restaurant buildings. Inviting outdoor spaces create an environment of relaxation and community interaction. Trees, planting, and comfortable site furnishings contribute to enhanced enjoyment of these spaces. Dynamic and seasonal shading strategies for exterior occupied spaces such as plazas and seating areas shall be incorporated.

- Promote safe pedestrian movement through highly visible pathways and walkways. Pedestrian and plaza spaces shall be thoughtfully separated from parking lots and vehicular movement through creative landscaping and built structures.

Lighting

Lighting contributes to the safety and security of commercial and residential development. It should complement and enhance the architectural style of buildings and contribute to the overall character of the center.

- Sufficient lighting shall be provided to ensure safe vehicular, equestrian, and pedestrian orientation and the security of persons, property, and vehicles during low-light periods.

- Lighting must be high quality and attractive and should be selected as part of the overall building and landscape theme. Creative fixture design is encouraged.

- Commercial buildings may use distinctive accent lighting on buildings to highlight individual tenants, provided that the lighting is complementary to the overall lighting style of each commercial center.

- Specialized lighting is appropriate for entries, building towers, public art, water features, and other unique architectural elements.

- Light fixtures must be the appropriate scale and location to avoid spillover or glare into surrounding areas.

- Lighting fixtures shall be constructed of durable materials, have vandal-resistant covers, and be resistant to tampering.

- Lighting fixtures should include photocell control to reduce energy usage.

Lighting design for different uses. Lights can serve for both nighttime visibility and ambiance

Signage

Signs and graphics play a large role in creating and reinforcing the desired feel of a vibrant community and provide for residential and business identity and individuality. Non-residential signs are intended for identification and wayfinding and to help orient visitors and direct them to the appropriate activities. Residential signage is intended to help establish the character of particular development while continuing the community theme.

Signs within the Thermal Ranch Specific Plan should comply with the following guidelines:

- Reinforce that character, branding, and identity.
- Be simple and easily readable, enhance the center's environment, and not contribute to visual clutter.
- Be in scale with the buildings and the surrounding pedestrian environment.
- Provide significant contrast between lettering colors and background colors for legibility.
- Be aesthetically pleasing and visually complement the style of the associated building and community.
- Conceal sign conduits, transformers, junction boxes, etc. from view.
- Use permanent sign materials.
- Not cover windows or important architectural features.
- Use typefaces that are easy-to-read.
- Maximum dimensions for message sign areas shall be limited to dimensions established by Riverside County Ordinance No. 348.

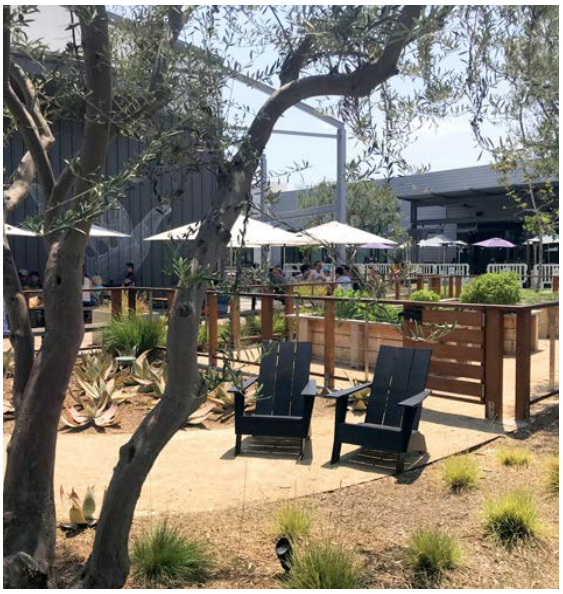
- Monument signs shall be placed in a landscape or plaza area and not inhibit pedestrian circulation.

Signage and monumentation examples

Public Spaces

A vibrant and convenient pedestrian environment is encouraged throughout the project. The following are recommendations regarding public spaces:

- Public pedestrian spaces or plazas should contain seating, shaded areas, lighting, and landscaping to create friendly, safe, and comfortable spaces.
- Active commercial uses such as restaurants, building entries, storefront display windows that encourage window shopping, and outdoor eating areas should front onto public spaces.
- Large, paved areas should be broken into smaller visual surfaces through the use of changes in decorative paving, such as stone, brick, or stamped concrete.
- In commercial areas, tree wells and landscaping in planters should be provided along pedestrian walkways and drive aisles.



Public spaces with seating, shade trees, lighting, and interesting landscape elements

Non-Vehicular Circulation

- On-site amenities for bicycle parking shall be provided at safe and convenient areas.
- Bicycle lanes should be clearly marked with pavement striping and bicycle routes with appropriate signage.
- The project should include a convenient and interconnected system of equestrian, pedestrian, golf cart, and bicycle paths as appropriate to each Planning Area.

Fencing and Walls

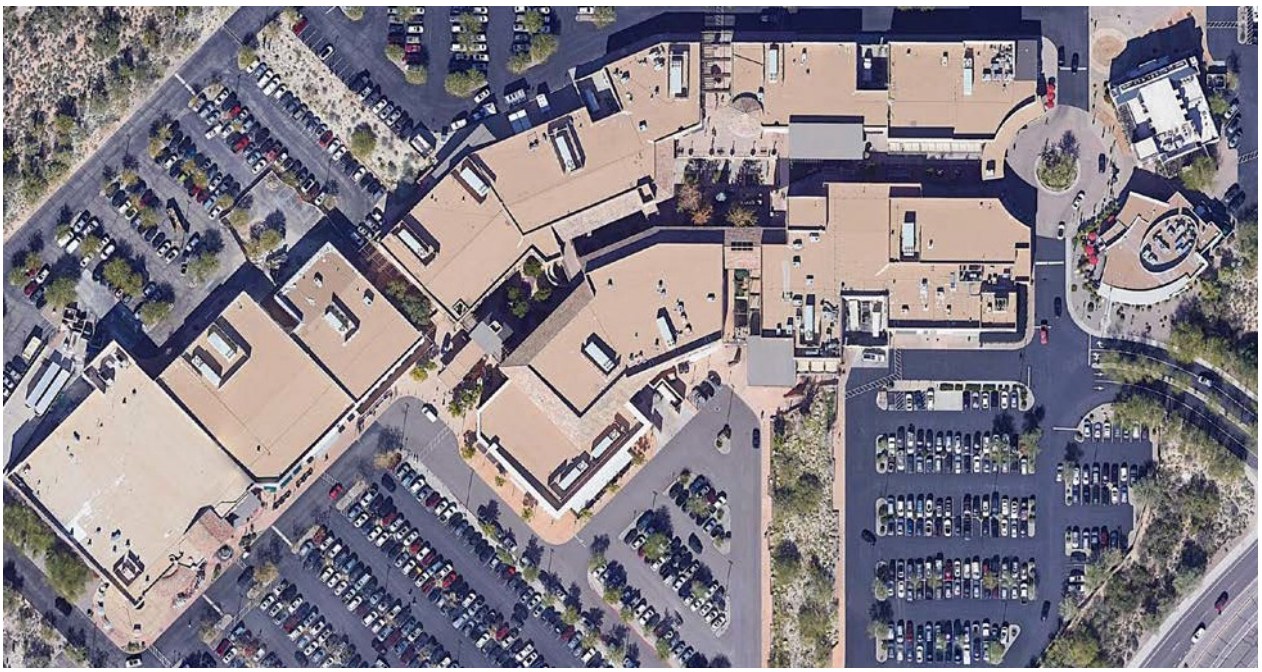
- Fences and walls in commercial areas may be used to define space, such as café seating, but should not obstruct pedestrian passage.
- Open space areas adjacent to streets and pedestrian rights-of-way shall avoid fencing or use view fencing if fencing is required for safety reasons.
- Fencing or walls should be used to screen trash receptacles and service areas. Such fencing and walls must be of solid construction and a minimum of 6 feet high.

Wall and fence examples, style should be appropriate to use

4.4 Commercial Architecture

The following recommendations should be addressed in the planning of the commercial area:

- Buildings should be grouped to create a concentrated, positive outdoor setting.
- Building entrances should create a visually inviting storefront with direct, identifiable, and safe access from streets and pedestrian walkways.
- Commercial development should be designed with an internal circulation system that includes well-defined pedestrian paths to avoid vehicular and pedestrian conflicts. Few or no parking spaces should back onto major entry drive aisles.
- Entries to commercial buildings should be clearly articulated and accessible from parking.
- Entries to buildings that front walkways and gathering places should include awnings, overhangs, arcades, or other architectural treatments to articulate the entry.
- Service areas should be screened from public view, whenever feasible.
- Site design should provide for outdoor seating areas.
- Service areas and loading functions should be integrated into a circulation pattern that minimizes conflicts with vehicles and pedestrian.



Example commercial layout (for illustrative purpose only)

- Site design should provide for outdoor seating areas.

Service areas and loading functions should be integrated into a circulation pattern that minimizes conflicts with vehicles and pedestrians.

Building Form

The commercial center should be designed to create a human-scale form that encourages walking and reduces the mass and bulk of large buildings. Building form should be articulated to add interest and reduce the appearance of building height and bulk. This can be achieved through the following design techniques:

- All sides of buildings visible to the public should be detailed and designed with interesting facades.
- Vary building materials, colors, and architectural elements, such as windows, entries, overhangs, awnings, arcades, recesses, trellises, and roof lines.
- Create a building base at the pedestrian level with high-quality materials that visually anchor the building to the ground plane.
- Individual tenant spaces in commercial centers should be easily identifiable: Place columns, piers, or pilasters between building bays.
- Vary the building facades with recessed entrances, creating niches for landscaping and pedestrians.
- Arcades and roof overhangs are encouraged for shading.
- Vary building or roof heights if style appropriate.
- Integration of a landmark feature into the building design is encouraged to help define the community image. Such features could include steeples, towers, or other vertical architectural elements that provide prominent symbols visible from surrounding neighborhoods and major roadways. Special treatment for corner buildings is encouraged.
- Building materials and colors should complement the architectural style of the community but may be used in a way to create a distinctive identity.
- Entries should be clearly articulated and easily accessible from parking lots and parking structures.

- Commercial frontages should provide a transparent facade area, such as windows, entries, and storefront displays, along the commercial street.

Building fronts with visibility both in and out, pronounced entries, engaging frontages

Materials and Finishes

High-quality, attractive, and durable materials should be used for all buildings, landscaping, paving, and signage.

- Durable exterior materials should be used on all sides of buildings.
- The predominant color on a building should be compatible with the overall character of the commercial center.
- Accent materials such as brick, stone, wood, or wrought iron may be used to highlight architectural elements.

Varied use of materials and colors to create architectural interest

4.5 Residential Architecture

Residential Planning Areas will utilize the County Wide Design Standards and Guidelines for residential projects as provided in Appendix B of this Specific Plan.

4.6 Architectural Character

Figures 4.1 – 4.11 Architectural Character Imagery on the following pages is intended to present representative examples of the design intent and features described in the Specific Plan's architectural guidelines. The images are not intended to promote any particular architectural style but rather depict design features (such as massing, form, materials, etc.) that reflect the types of developments that would be compatible within the Specific Plan. The images shown in these figures are purely conceptual and future developments are not required to match in terms of intensity or architectural style.

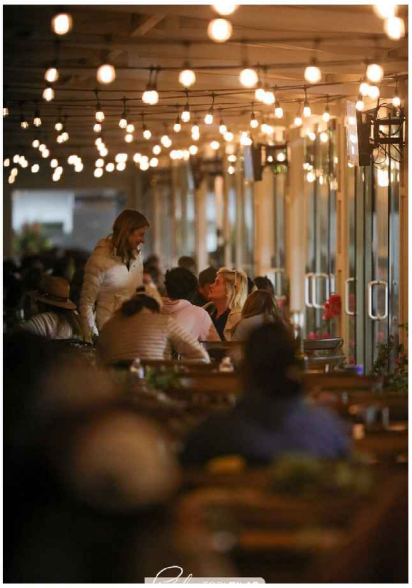
EQUESTRIAN CENTER INSPIRATION

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: EQUESTRIAN CENTER

FIGURE 4.1

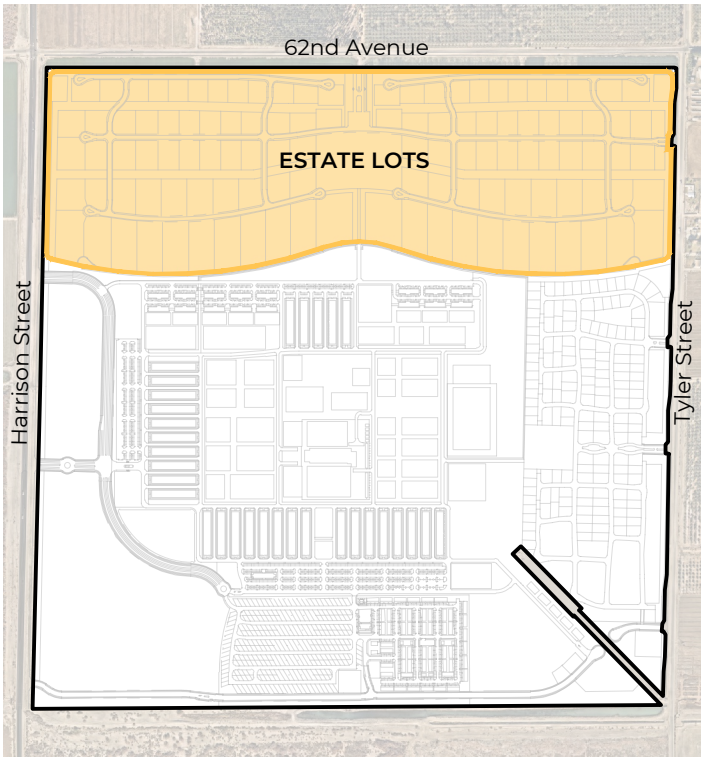


Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: EQUESTRIAN CENTER 2

FIGURE 4.2



CUSTOM HOMES & LUXURY AMENITIES

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: ESTATE LOTS 1

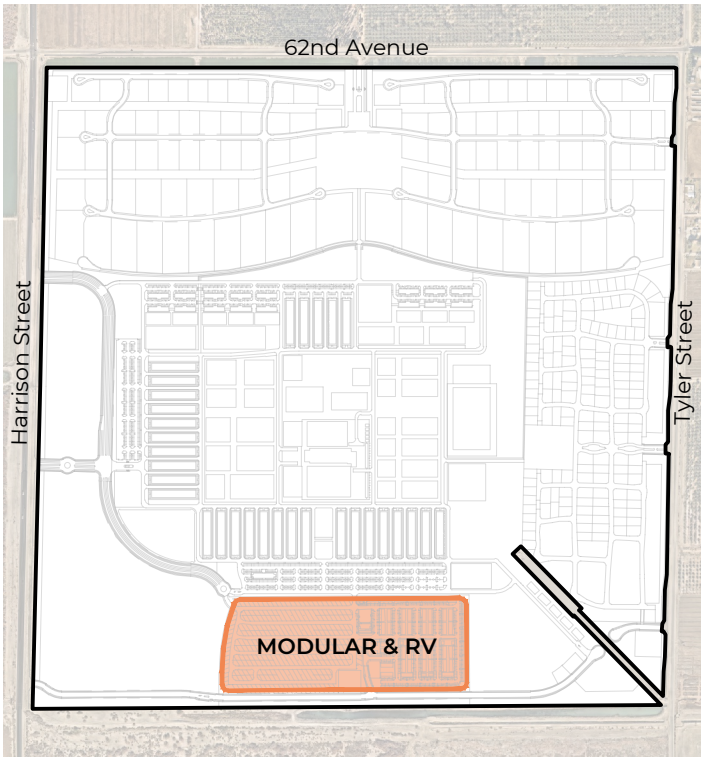
FIGURE 4.3

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: ESTATE LOTS 2

FIGURE 4.4



MODULAR & RV HOMES

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: MODULAR / RV HOMES 1

FIGURE 4.5

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: MODULAR / RV HOMES 2

FIGURE 4.6

PERSPECTIVE - FRONT VIEW

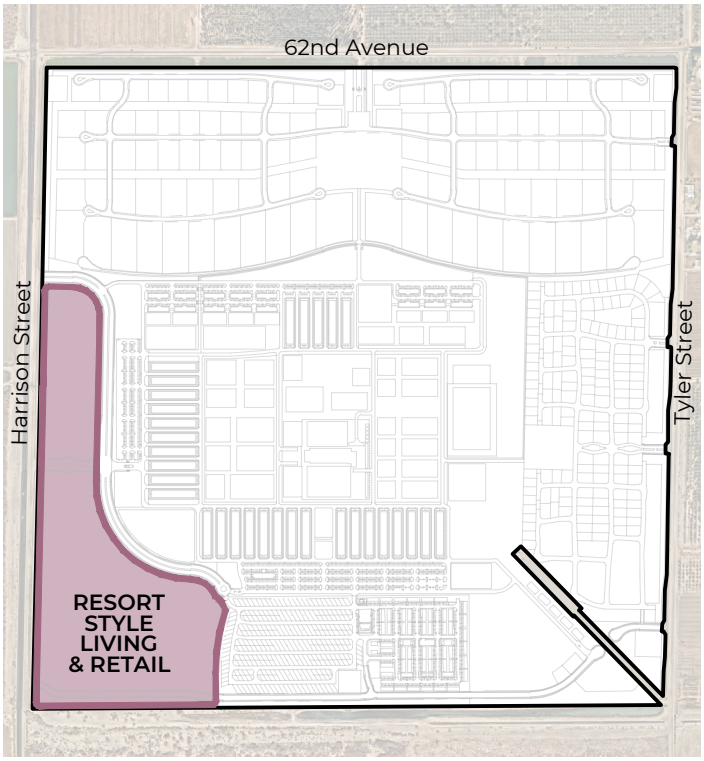
PERSPECTIVE - REAR VIEW

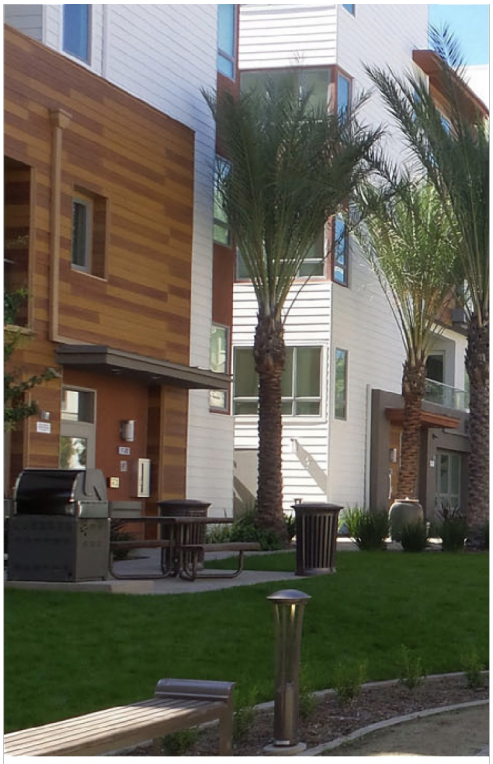
Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: MODULAR / RV HOMES 3

FIGURE 4.7





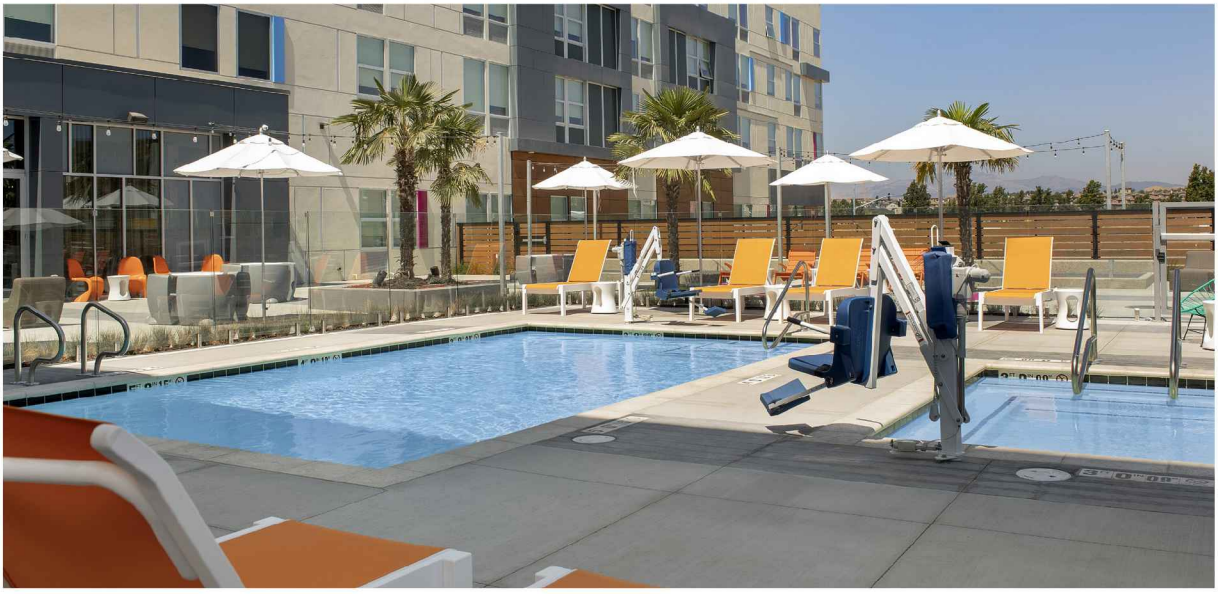
RESORT LIVING & RETAIL

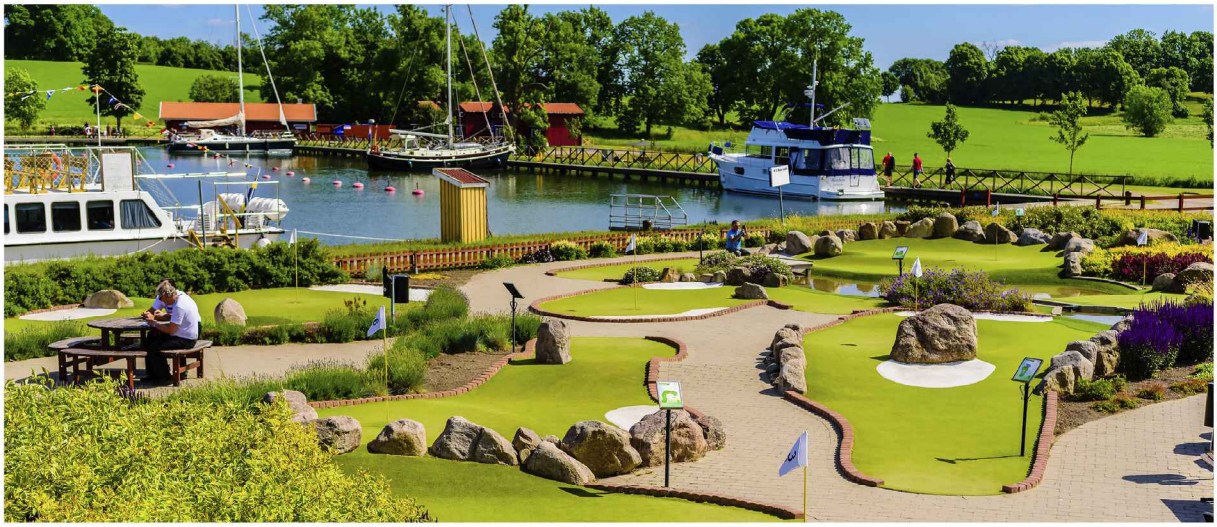
Source: MSA Consulting, Inc.

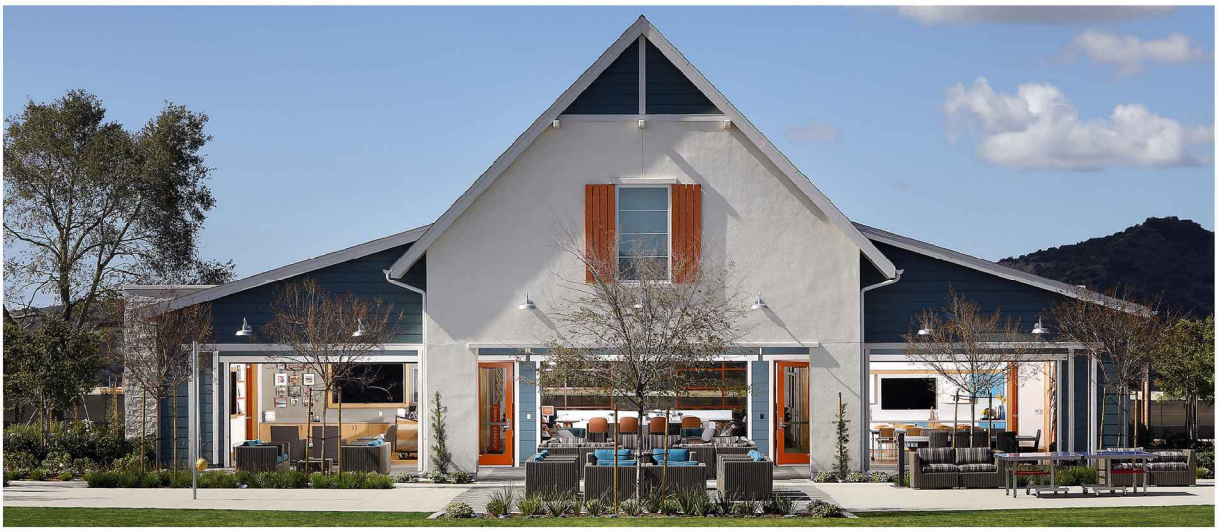
Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: RESORT LIVING & RETAIL 1

FIGURE 4.8





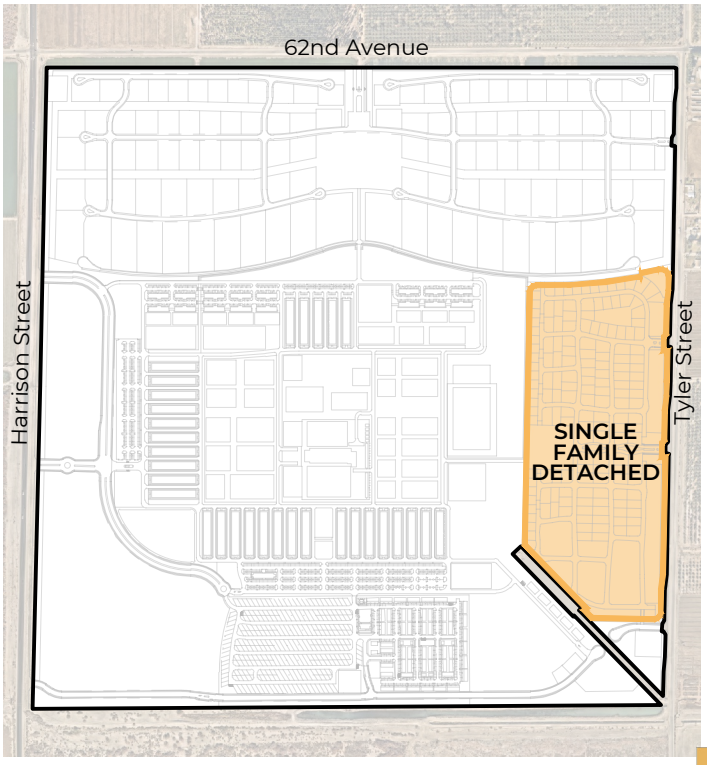


Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

ARCHITECTURAL CHARACTER: RESORT LIVING & RETAIL 2

FIGURE 4.9



SINGLE FAMILY HOMES & TOWNHOMES

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

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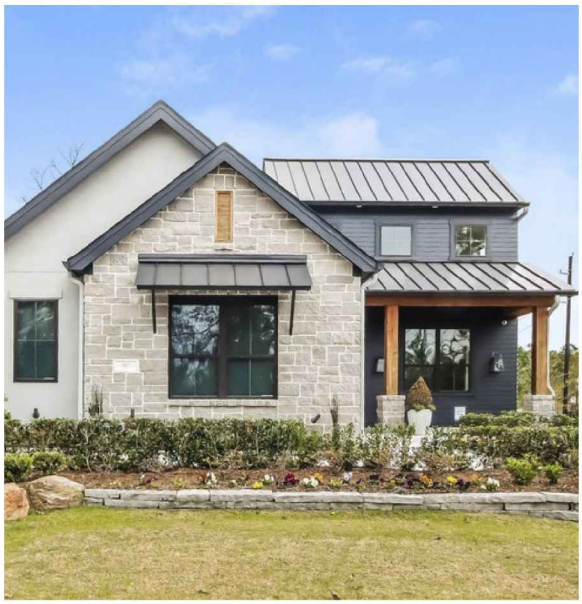
ARCHITECTURAL CHARACTER: SINGLE FAMILY DETACHED & TOWNHOMES 1

FIGURE 4.10



Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

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ARCHITECTURAL CHARACTER: SINGLE FAMILY DETACHED & TOWNHOMES 2

FIGURE 4.11

4.7 Landscaping

The following landscape design guidelines are intended to ensure a high level of creative landscape design within the Thermal Ranch Specific Plan. Because a wide range of uses are permitted within this Specific Plan, specific design guidelines are provided to account for a variety of development contexts. The guidelines established in this section will ensure that all landscape development within this Specific Plan is complementary within the project and with the surrounding community. All projects within this Specific Plan must be consistent with the design guidelines and features covered in this section.

The guidelines have an emphasis on non-invasive drought tolerant plant materials that are climate-appropriate, water efficient, and sustainable. The plant palette throughout the Specific Pan area shall utilize a low maintenance and low water palette. The landscaping and irrigation plans and system shall comply with all County ordinances relating to water efficiency and shall be an automatic system with an irrigation timer and two drip or bubbler heads per tree to produce deep root irrigation. The water use calculations for this system will be prepared and submitted per Coachella Valley Water District (CVWD) irrigation design requirements. *Figure 4.11 Plant Palette* provides a list of plant materials approved for use in the Thermal Ranch Specific Plan. Plant materials not listed in the plant palette may be used provided they are drought tolerant and compatible with the project and desert environment.

The community character is further enhanced through landscape elements. Selective plantings reinforce the scale of pedestrian walkways, streetscapes, equestrian areas, and gathering spaces. The landscape design should incorporate the following concepts:

- Landscape treatments should maximize the use of native desert and compatible drought- tolerant plant materials. Species must comply with the County and Coachella Valley Water District water conservation ordinance requirements.
- Encourage the use of plants as a major design element including using contrasting texture and mass planting of bold or fine plant material.
- Use of turf grass should be limited to equestrian uses, functional play, and active use areas.
- Incorporate trees to shade walkways, plazas, standing areas, and recreation spaces.

- Landscaping should be an integral component to the overall project design
- Landscaping should enhance the quality of developments by framing and softening the appearance of buildings, screening undesirable views, buffering incompatible uses and providing shade
- Street frontages along Harrison Street and Ave 64 should provide for a consistent and attractive landscape treatment while also allowing for visibility of retail buildings from public views.
- Primary entries to be enhanced with the use of iconic plantings and signage.
- Trash enclosures shall be screened from public view with walls and or plantings.
- Shading provided by tree groupings will be incorporated into the overall retail commercial area.
- Landscape lighting will be provided to enhance pedestrian areas and nodes along with certain planting groups.
- Retail Commercial Buildings should be designed to incorporate landscape planters into store frontage. This can be done by means of raised planters, sidewalk cutouts, or portable planters.

Sustainability and Water Efficiency

The plant palette throughout the Specific Pan area shall utilize a low maintenance and low water palette. Turf grasses will only be permitted in "use" areas that include open lawn for play/ recreation and for the infiltration portions of detention basins. Annual plant materials are allowed in accent landscaping areas but shall not be allowed in permanent planting areas of the Specific Plan.

The landscaping and irrigation plans and system shall comply with all City ordinances relating to water efficiency and shall be an automatic system with an irrigation timer and two drip or bubbler heads per tree to produce deep root irrigation. The water use calculations for this system will be prepared and submitted per Coachella Valley Water District's (CVWD) irrigation design requirements.

Landscape lighting will include tree and shrub up lights, path lights, and step lights. All lighting will be low voltage and have low maintenance LED fixtures. The selective use of up lights will be limited to high-profile specimen tree and shrubs and will be shielded to reduce glare and hot

spots. There shall be zero lumen foot candle for all exterior lighting at any property line of abutting properties and/or public right-of-way. Lighting for landscaping, pathways and stairways, monuments and signs shall be installed as needed for security and safety purposes.

Detention Basis

Detention basins shall include desert riparian trees, desert cactus and succulents, and select groundcovers combined with rock outcroppings. Gathering areas with gabion structures are encouraged around the basins to activate these open spaces. Natural, undulating landforms are preferred over geometrically graded basins.

Any graded area left in an undeveloped condition shall be planted with drought tolerant landscaping and/or decomposed granite if they remain inactive for a period of 6 months following completion of grading. This shall include all pads or portion of the subject parcel and shall include fencing as appropriate. All landscaping and fencing shall remain in place and shall be regularly irrigated and maintained until the property has received authorization from the City to begin initial construction. The final landscape plan for each parcel or Planning Area shall contain detailed information for the planting, irrigation and maintenance of the vacant pad areas and/or undeveloped portions of the parcel.

Landscape Standards

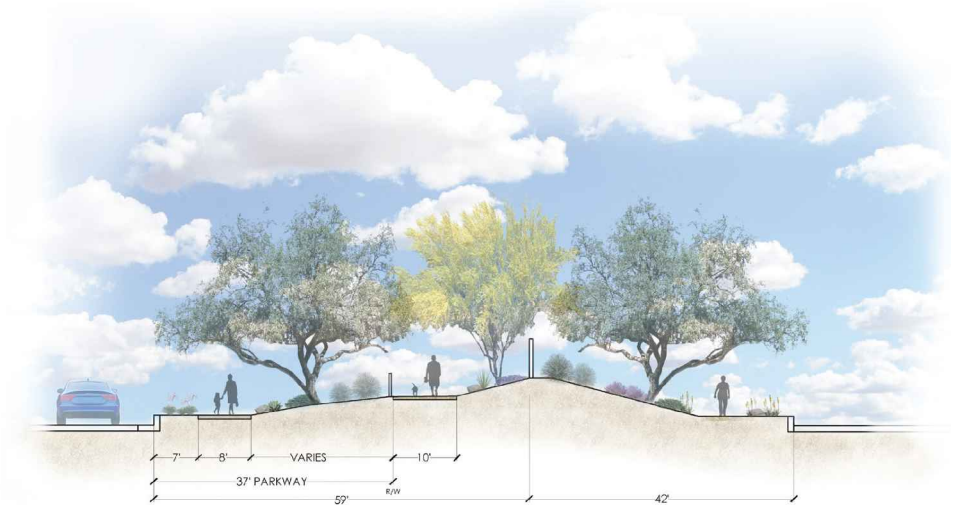
Landscape standards (ex. minimum landscape requirements, parking lot requirements, lighting, minimum number of trees, etc.) within this Specific Plan will be consistent with those outlined in Ordinance 348 and with Riverside County Airport Land Use Commission (RCALUC) Landscape Criteria (as summarized in Table 1 and Table 2 in Appendix A of this Specific Plan).

Perimeter Streets and Edge Conditions

Screening and buffering adjacent conditions will be required for successfully integrating into the surrounding community. Some edge requirements include:

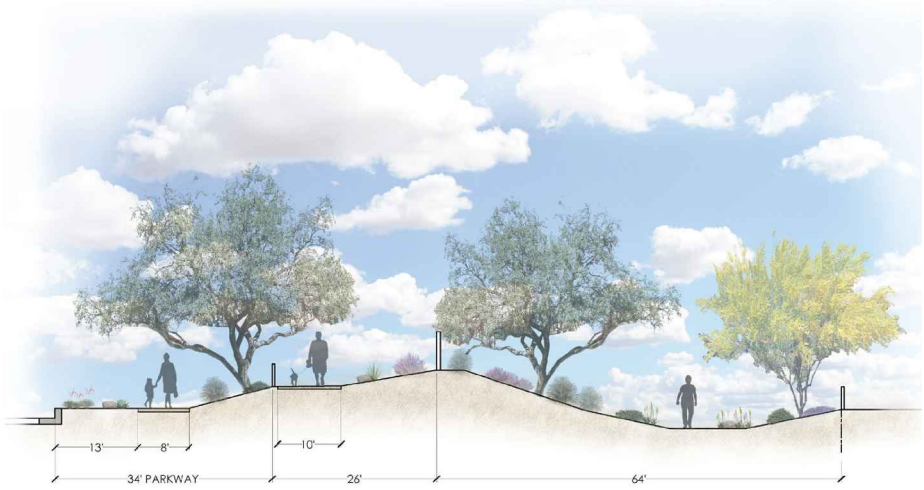
- Landscaped parkways
- Sidewalks on 62nd Ave, Tyler Street, and Harrison Street
- Landscape buffers with screen planting and wall treatments

Refer to FIGURE 4.12 Conceptual Landscape Street Sections and FIGURE 2.4A TYPICAL STREET SECTIONS – PUBLIC for detailed landscape and street sections.



62ND AVENUE

TYLER STREET



HARRISON STREET

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

CONCEPTUAL LANDSCAPE STREET SECTIONS

FIGURE 4.12

LARGE AND MEDIUM TREES (15 GAL.-36" BOX)
EUCALYPTUS SPECIES
OLEA EUROPAEA 'SWANHILL' / FRUITLESS OLIVE
PARKINSONIA SPECIES
PROSOPIS SPECIES
TIPUANA TIPU / TIPU TREE
SCHINUS MOLLE / CALIFORNIA PEPPER
UPRIGHT TREES (15 GAL.-36" BOX)
ACACIA SALICINA / WILLOW ACACIA
ACACIA SALIGNA / ORANGE WATTLE
ACACIA STENOPHYLLA / SHOESTRING ACACIA
ACACIA WILLARDIANA / PALO BLANCO
CALLISTEMON SPECIES
SMALL TREES (15 GAL.-36" BOX)
ACACIA ANEURA / MULGA
ACACIA FARNESIANA / SWEET ACACIA
CAESALPINIA CACALACO "SMOOTHIE" / CASCALOTE
CHILOPSIS LINEARIS / DESERT WILLOW
CITRUS SPECIES
PALMS (20'-30' HT.)
BISMARCKIA NOBILIS / BISMARCK PALM
BEAUCARNEA RECURVATA / PONY TAIL PALM
BRAHEA ARMATA / BLUE MEXICAN PALM
CHAMAEROPS HUMILIS / MEDITERRANEAN FAN PALM
PHOENIX DACTYLIFERA / DATE PALM
WASHINGTONIA ROBUSTA / MEXICAN FAN PALM
LARGE ACCENTS (5-15 GAL.)
AGAVE SPECIES
DASYLIRION WHEELERI / GREY DESERT SPOON
FEROCACTUS ACANTHODES / COMPASS BARREL CACTUS
FOUQUIERIA SPLENDENS / OCOTILLO
NOLINA NELSONII / BLUE NOLINA
OPUNTIA SPECIES
YUCCA SPECIES

SMALL ACCENTS (1 GAL.)
ALOE SPECIES
ECHINOCACTUS GRUSONII / GOLDEN BARREL CACTUS
HESPERALOE SPECIES
PILOSOCEREUS AZUREUS / BLUE TORCH CACTUS
GRASSES (1-5 GAL.)
SPOROBOLUS AIROIDES / ALKALI SACATON
SPOROBOLUS WRIGHTII / GIANT SACATON
MUHLENBERGIA RIGENS / DEER GRASS
PENSTEMON SPECIES
LARGE SHRUBS (5 GAL.)
CAESALPINIA PULCHERRIMA / BIRD OF PARADISE
LEUCOPHYLLUM SPECIES
SENNA SPECIES
SIMMONDSIA CHINENSIS / JOJOBA
TECOMA SPECIES
THEVETIA PERUVIANA / YELLOW OLEANDER
MEDIUM SHRUBS (5 GAL.)
BOUGAINVILLEA SPECIES
CALLISTEMON VIMINALIS 'LITTLE JOHN' / LITTLE JOHN BOTTLEBRUSH
DALEA SPECIES
EREMOPHILA SPECIES
JUNIPERUS CONFERTA / BLUE PACIFIC
LANTANA SPECIES
OLEA EUROPAEA 'MONTRA' / DWARF OLIVE
GROUNDCOVERS (1-5 GAL.)
ACACIA REDOLENS 'DESERT CARPET' / BANK CATCLAW
BACCHARIS X 'CENTENNIAL' / COYOTE BUSH
PORTULACARIA AFRA / ELEPHANT'S FOOD
PYRACANTHA X FORTUNEANA 'GRABERI' / CHINESE FIRETHORN
VINE (1-5 GAL.)
BOUGAINVILLEA X 'BARBARA KARST'
ROSA BANKSIAE 'ALBA PLENA' / LADY BANK'S ROSE

Source: MSA Consulting, Inc.

Exhibit Date: September 16, 2025

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PLANT PALETTE

FIGURE 4.13

CHAPTER 5: SPECIFIC PLAN ADMINISTRATION

5.1 Overview

This chapter describes the procedures for administration and implementation of the Thermal Ranch Specific Plan. The Riverside County Planning Department shall have the responsibility for plan administration and implementation as established in this chapter.

5.2 Implementation

Entitlement approvals and construction permits shall be reviewed by all applicable departments and agencies (Planning, Public Works, Building and Safety, Fire, etc.) where necessary to ensure consistency with the Specific Plan and applicable building codes. This Specific Plan establishes the general intent and comprehensive framework for the future development of the Thermal Ranch Project. However, prior to construction, various implementing approvals are required, as noted below:

Plot Plans– Future development projects within Planning Areas 5 and 6 shall follow the Plot Plan Permit process with Public Hearing (Ord. 348, Section 18.30.D.2) to ensure that project architecture, landscape, and site design have been reviewed by the Planning Commission for consistency with this Specific Plan.

Minor Plot Plans – Future Residential Clubhouse facilities within Planning Areas 2 and 3 shall follow the Administrative Minor Plot Plan process without public hearing (Ord. 348, Section 18.30.D.1) to ensure that project architecture, landscape, and site design have been reviewed by the Planning Director for consistency with this Specific Plan.

Tentative Parcel Map / Tentative Tract Map– Tentative Parcel and Tentative Tract Maps are intended to implement the project and subdivide the property into smaller parcels/lots for development or sale, including the use of Schedule J Maps for financing purposes. Tentative Maps may be filed with each phase or subphase of development as necessary in accordance with the Subdivision Map Act and Ordinance No. 460. Each Tentative Map will require review and approval by the Planning Commission.

Substantial Conformance – An approved Plot Plan may be modified to provide developers with design flexibility to respond to changing market conditions and buyer preference. Such changes may be made administratively as a Substantial Conformance determination by the Planning Director (Ord. 348, Section 18.43.B.1). Modifications listed in Section 18.43.B.1 may also include project architecture and building placement. Application materials for the substantial conformance request shall be filed in accordance with Section 18.43.A and processed in accordance with the procedures outlined in Section 18.43.D.1.

5.3 Administration

Whenever an application for an implementing project is not in substantial conformance with this Specific Plan, an amendment shall be adopted to the provisions of Ordinance 348, Section 2.8 prior to the approval of the implementing project. Per Ordinance 348, a Specific Plan Amendment requires public hearings by the Planning Commission and the Board of Supervisors.

Whenever an implementing project varies from but is in substantial conformance with this Specific Plan, an application for a determination of substantial conformance shall be made per Section

2.11 of Ordinance 348. Per the County Ordinance a determination of substantial conformance shall be made by the Planning Director and will require a public hearing by the Planning Commission.

Administrative Changes - Minor modifications that are consistent with the purpose and intent of the Thermal Ranch Specific Plan are allowed at the discretion of the County Planning Director or designee. Therefore, it is intended that this Specific Plan provide County Staff with the flexibility to interpret the details of project development as well as those items described in general terms in the Specific Plan without requiring a Specific Plan Amendment.

Requests for administrative changes shall be made in writing. If/when it is determined that changes or adjustments are necessary or appropriate, these shall be approved administratively by the County Planning Director or designee. After approval, any such administrative change shall be attached to the Specific Plan as an addendum and may be further changed and amended from time to time as necessary.

Representative examples of such changes may include, but are not limited to:

- The addition of new information to the Specific Plan maps or text that do not substantially change the effect of any regulation. The new information may include more detailed, site-specific information.
- Changes to infrastructure such as drainage systems, roads, water and sewer systems, etc.
- Deviations not exceeding 10% of the development regulations set forth in Chapter 3 of this Specific Plan will be considered on a case-by-case basis, subject to the discretion and approval of the Development Services Director.

Formal Amendments - If it has been determined that the proposed change is not in conformance with the intent of the current Specific Plan approval, the Specific Plan may be amended in accordance with the procedures set forth Article II of the Riverside County Zoning Ordinance (Ordinance 348).

Single Family Residential Architecture – Construction drawings for single family residences in Planning Areas 2 and 3 may be submitted for plan check to the Building and Safety Department subject to consistency with the Countywide Design Guidelines as noted in Section 4.5 and contained in Appendix B.

5.4 Interpretation

Uses Not Listed - The County Planning Director or designee may determine that a use not listed is included within, similar to, or comparable to a listed use and, once so determined; it shall be treated in the same manner as a listed use.

Application of Standards - Where there is ambiguity between the Specific Plan and the Zoning Code, the County Planning Director shall review pertinent information and make a determination as to which code or standard applies. All determinations shall be in writing and shall be attached to the Specific Plan as noted under *Administrative Changes*, earlier in this section.

5.5 Funding & Financing

The Thermal Ranch Specific Plan is intended to be developed primarily using private funds. Other forms of financing (CFD) may also be considered.

5.6 Maintenance

Development and infrastructure within the Specific Plan may be maintained through the establishment a homeowner's association ("HOA") through Covenants, Conditions, and Restrictions ("CC&Rs"), a Community Facilities District (CFD), a Lighting, Landscape and Maintenance District (LLMD), or any other mechanism (or combination of) as deemed appropriate by relevant County Staff.

5.7 Enforcement

The enforcement of the provisions of this Specific Plan shall be by the following:

- The County of Riverside Planning Department shall enforce the development standards and regulations set forth herein.
- Any administrative decision or interpretation of this Plan may be appealed to the Planning Commission in accordance with the provisions of Ordinance 348. Likewise, any decision by the Planning Commission may be appealed to the County Board of Supervisors.
- The County of Riverside Planning Department shall administer the provisions of this Specific Plan in accordance with the State of California Government Code, Subdivision Map Act, Ordinance 348, and the County of Riverside General Plan.
- The Specific Plan development procedures, regulations, standards, and specifications shall supersede the relevant provisions of Ordinance 348 as they currently exist or may be amended in the future.
- All regulations, conditions, and programs contained herein shall be deemed separate distinct and independent provisions of this Specific Plan. In the event that any such provision is held invalid or unconstitutional, the validity of all the remaining provisions of this Specific Plan shall not be affected.
- Any development regulation and building requirement not addressed in this Specific Plan shall be subject to all relevant County of Riverside ordinances, codes, and regulations.

CHAPTER 6: SPECIFIC PLAN ZONING

See Specific Plan Zoning Ordinance (Riverside County Ordinance No. 348.XXXX) attached to this Specific Plan.

APPENDIX A
ALUC Table 2A. Basic Compatibility Criteria
ALUC Landscape Criteria Table 1 and Table 2

Zone	Locations	Maximum Densities / Intensities					Additional Criteria	
		Residential (d.u./ac) [1]	Other Uses (people/ac) [2]			Req'd Open Land [3]	Prohibited Uses [4]	Other Development Conditions [5]
			Average [6]	Single Acre [7]	with Bonus [8]			
A	Runway Protection Zone and within Building Restriction Line	0	0	0	0	All Remaining	› All structures except ones with location set by aeronautical function › Assemblages of people › Objects exceeding FAR Part 77 height limits › Storage of hazardous materials › Hazards to flight [9]	› Avigation easement dedication
B1	Inner Approach/ Departure Zone	0.05 (average parcel size ≥20.0 ac.)	25	50	65	30%	› Children's schools, day care centers, libraries › Hospitals, nursing homes › Places of worship › Bldgs with >2 aboveground habitable floors › Highly noise-sensitive outdoor nonresidential uses [10] › Aboveground bulk storage of hazardous materials [11] › Critical community infrastructure facilities [12] › Hazards to flight [9]	› Locate structures maximum distance from extended runway centerline › Minimum NLR of 25 dB in residences (including mobile homes) and office buildings [13] › Airspace review required for objects >35 feet tall [14] › Avigation easement dedication
B2	Adjacent to Runway	0.1 (average parcel size ≥10.0 ac.)	100	200	260	No Req't	Same as Zone B1	› Locate structures maximum distance from runway › Minimum NLR of 25 dB in residences (including mobile homes) and office buildings [13] › Airspace review required for objects >35 feet tall [14] › Avigation easement dedication
C	Extended Approach/ Departure Zone	0.2 (average parcel size ≥5.0 ac.)	75	150	195	20%	› Children's schools, day care centers, libraries › Hospitals, nursing homes › Bldgs with >3 aboveground habitable floors › Highly noise-sensitive outdoor nonresidential uses [10] › Hazards to flight [9]	› Minimum NLR of 20 dB in residences (including mobile homes) and office buildings [13] › Airspace review required for objects >70 feet tall [15] › Deed notice required
D	Primary Traffic Patterns and Runway Buffer Area	**(1)** ≤0.2 (average parcel size ≥5.0 ac.) *or* [16] **(2)** ≥5.0 (average parcel size ≤0.2 ac.)	100	300	390	10%	› Highly noise-sensitive outdoor nonresidential uses [10] › Hazards to flight [9]	› Airspace review required for objects >70 feet tall [15] › Children's schools, hospitals, nursing homes discouraged [17] › Deed notice required
E	Other Airport Environs	No Limit	No Limit [18]			No Req't	› Hazards to flight [9]	› Airspace review required for objects >100 feet tall [15] › Major spectator-oriented sports stadiums, amphitheaters, concert halls discouraged beneath principal flight tracks [18]
*	Height Review Overlay	Same as Underlying Compatibility Zone				Not Applicable	Same as Underlying Compatibility Zone	› Airspace review required for objects >35 feet tall [14] › Avigation easement dedication

See Chapter 3 for airport-specific additions or exceptions to these policies

Table 2A

Basic Compatibility Criteria

Acceptable.
The trees above have a vertical branching structure that minimizes perching and nesting opportunities.

Not acceptable.
Examples of trees that are attractive to birds because of horizontal branching structure.

Not acceptable.
Trees, shrubs and plants that produce wildlife edible fruit and seeds should be avoided.

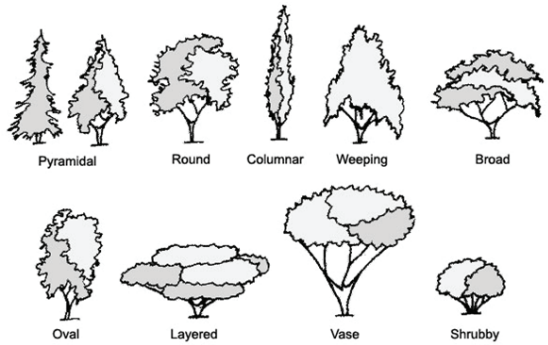
Landscaping needs to be aesthetically pleasing, but it must coincide with the responsibility for aviation safety.

TABLE 2. Acceptable Plants from Riverside County Landscaping Guide

	Scientific Name	Common Name	WOCOLS Region 1, 2	Sunset Zone
TREES	*Cercis occidentalis*	Western Redbud	VL: 1, 2, L: 3,4	2-24
	Olea europaea 'Swan Hill'	Fruitless Olive	GL: 1,2; L: 3, 4, M: 5,6	8,9; 11-24
	Pinus spp.	Pine, various species	Varies by species	Varies by species
	Rhus lancea	African Sumac	L: 1-4; M: 5-6	8-9; 12-24
	*Robinia neomexicana**	Desert Locust	L: 1-4; M: 5-6	2-3, 7-11, 14, 18-24
	Robinia x ambgua	Locust	L: 1-4; M: 5-6	2-24
	Ulmus parvifolia	Chinese Elm	M: 1-6	3-24
SHRUBS	*Aloysia triphylla*	Lemon Verbena	L: 1-6	9-10;12-21
	Cistus spp.	Rockrose	L: 1-6	6-9, 14-24
	Dalea pulchra	Bush Dalea	L:6	12,13
	Encelia farinosa	Brittlebush	VL:3; L:3-6	
	Gravellia Noelli	Noel's Grevellia	L: 1-4; M: 6	
	Justicia californica	Chuparosa	M: 1,6; VL: 3; L: 4-5	
	Langana camara	Busn lantana	L: 1-4; M: 6	
	Lavendula spp.	Lavender	L: 105; M: 5-6	2-24; varies
	Nandina domestica species	Heavenly Bamboo	L: 1-4; M: 5-6	
	Rosmarinus officinalis 'Tuscan Blue'	Tuscan Blue Rosemary	L: 1-4; M: 5-6	
	Salvia greggia	Autumn sage	L: 1-4; M: 5-6	
GROUND COVER	*Artemisia pycnocephala*	Sandhill Sage	VL:1	
	Oenothera caespitosa	White Evening Primrose	L: 1-2, 3-5	103,7-14, 18-21
	Oenothera stubbei	Baja Evening Primrose	L:1-6	10-13
	Penstemon baccharifolious	Del Rio	L: 4-6	10-13
	Trachelospermum jasminoides	Star Jasmine	M:1-6	8024
	Zauschneria californica	California Fuchsia	L: 1,2,4; VL: 3; M.5-6	2011, 14-24
GRASSES	*Cortaderia dioica [syn. C. selloana]*	Pampass Grass	N/A	N/A
	Festuca spp.	Fescue	Varies by Species	Varies by Species
	Zoysia 'Victoria'	Zoylsia Grass	60% of ETO	8-9, 12-24
ACCENT GRASSES	*Agave species*	Agave	L: 1-4, 6	10, 12-24 (Varies)
	Aloe species	Aloe	L: 1-4, 6	8-9, 12-24
	Chondropetalum Itectorum	Cape Rush	H:1; M:3	8-9, 12-24
	Dasylirion species	Desert Spoon	VL: 1, 4-6	10-24
	Deschampsia caespitosa	Tufted Hair Grass	L: 1-4	2-24
	Festuca (ovina) glauca	Blue Fescue	L: 1-2; M:3-6	1-24
	Dietes bicolor	Fortnight Lily		VL:1, L:3-6
	Echinocactus grusonii	Golden Barrel Cactus	VL:1-2, L: 3-4, 6	12-24
	Fouquieria splendens	Octillio	L: 1, 4-6; VL: 3	10-13, 18-20
	Hesperaloe parviflora	Red / Yellow Yucca	VL:3, L: 4-6	2b, 3, 7-16, 18-24
	Muhlenbergia rigens	Deer Grass	L: 1,3; M: 2, 4-6	4-24
	Opuntia species	Prickly Pear, Cholla	VL: 1-3; L: 4-6	Varies by Species
	Penstemon parryi	Parry's Beardtongue	L:1-6	10-13
	Penstemon superbus	Superb Beardtongue	L: 1-6	10-13
	Tulbaghia violacea	Society garlic	M:1-4, 6	13-24
	Yucca species	Yucca	L:1-6	Varies by Species

Not recommended are trees that overlap, allowing birds to move safely from tree to tree without exposure to the weather or predators.

Tree species should be selected and planted so that, at maturity, overlapping crown structures will be minimized.



Trees approved for planting should have varied canopy types and varied heights, both at time of planting and at maturity. A combination of the styles illustrated above is recommended.

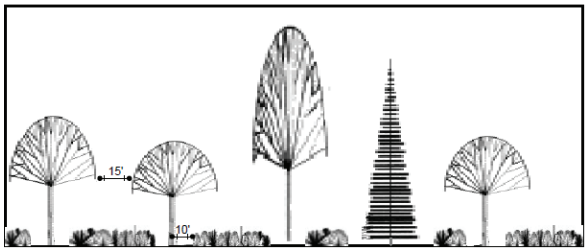


Figure 1. Selection of shrubs should be a mix of deciduous and coniferous species with no more than 50 percent evergreen species.

Plant Selection, Irrigation, and Wildlife Management. Riverside County requires landscaping for proposed development and redevelopment projects, and it is also committed to the use of native and drought-tolerant plants to reduce landscape-related water use. The County of Riverside Guide to California Friendly provides a lengthy plant palette to help landscape architects, planners, and the public select pant materials that will reduce water use in accordance with local and state goals: (http://rctlma.org/Portals/7/documents/landscaping_guidelines/Guide_to_California_Friendly_Landscaping.pdf.)

Many of the plants on the "County of Riverside California Friendly Plant List" could attract potentially hazardous wildlife species. Table 2 provides a reduced species list, nearly all of which were excerpted from the Friendly Plant List, but are less likely to support potentially hazardous wildlife. Project sponsors should use this list for projects within an AIA.

The list is not meant to be exhaustive, and other species may be appropriate based on the project location or other project-related circumstances. Sponsors who wish to propose plant materials that are not included in Table 1 will need to demonstrate to the ALUC that proposed species will be unlikely to attract hazardous wildlife to the AIA.

General Guidelines. Other factors can affect wildlife behavior. Landscaping can provide a food source, opportunities for shelter, nesting and perching. Proposed landscaping can help to discourage wildlife through the application of the following guidelines summarized below and described in Table 1.

- **Close the Restaurant!** Do not use plant material that produce a food source, such as edible fruit, seeds, berries, drupes, or palatable forage for grazing wildlife. When possible, select a non-fruiting variety or male cultivar.
- **No Vacancy!** Avoid densely branched or foliated trees; they provide ideal nesting habitat and shelter.
- **Prevent Loitering!** Select tree species that exhibit a vertical branching structure to minimize nesting and perching opportunities (Figure 1).

Mead & Hunt

Table 1. Design Guidance for Plant Materials

TREES	**Avoid/Prevent Contiguous Canopy** 1. Prevent overlapping crown structures. Contiguous crowns can provide safe passage for wildlife. Provide sufficient distance between plants to ensure that at least 15 feet of open space will remain between mature crowns (Figure 1). 2. Prevent homogenous canopy types and tree height. Variable canopy height will reduce thermal cover and protection from predators. ■ Provide significant variation between the type of canopy and height of the species, both at planting and at maturity. ■ Provide no more than 20% evergreen species on site, and never plant evergreens in mass or adjacent to each other.
SHRUBS/ACCENTS/GRASSES	**Limit Coverage** Limit the amount of cover and avoid massing to prevent the creation of habitat for birds or small mammals. ■ Mix deciduous, herbaceous, and evergreen species. ■ Do not plant species in mass. At a minimum, provide sufficient spacing to equal the width of each species at maturity. Avoid species with the potential to creep near shrubs (Figure 2). ■ Provide at least 10 feet between trees and other species greater than 1 foot in height.
GROUNDCOVER/TURF	**Prevent the natural succession of landscape!** Groundcover plays a transitional role between shrubs, grasses, and trees, and this succession creates an ideal habitat for diverse wildlife (see Figure 2). 1. Provide a buffer and sharp edges between groundcover, turf, shrubs and trees, using hardscape or mulching. 2. When possible, use alternative groundcovers, such as decorative paving and hardscapes instead of planted groundcover/turf. 3. The use of groundcover/turf may be impractical or undesirable based on irrigation needs or site-specific conditions. Consider using the following: ■ Artificial turf in place of groundcover, which can reduce maintenance and eliminate irrigation needs (Figure 2A). ■ Porous concrete to cover smaller areas (Figure 2B). ■ Permeable pavers to provide visual interest while promoting drainage (Figure 2C).
VINES	**Limit Coverage** Limit the amount of cover and avoid massing to prevent the creation of habitat for birds or small mammals. ■ Do not use vines to create overhead canopy or to cover structures. ■ Do not plant vines to grow on the trunk or branches of trees. ■ Minimize vines to areas of 5 feet or less in width. Vines require considerably more maintenance than other plant materials.

Acceptable plants from the Riverside County Landscaping Guide

Chinese Elm | Heavenly Bamboo | California Fuchsia | Deer Grass | Society Garlic

LANDSCAPING NEAR AIRPORTS:

Special Considerations for Preventing or Reducing Wildlife Hazards to Aircraft

Landscaping makes a visual statement that helps to define a sense of space by complementing architectural designs and contributing to an attractive, inviting facility. In some cases, a landscaping plan can be used to restore previously disturbed areas. However, such landscape plans are not always appropriate near airports.

Wildlife can pose hazards to aircraft operations, and more than 150 wildlife strikes have been recorded at Riverside County. The Riverside County Airport Land Use Commission (ALUC) prepared this guidance for the preparation of landscape designs to support FAA's efforts to reduce wildlife hazards to aircraft. This guidance should be considered for projects within the Airport Influence Area (AIA) for Riverside County Airports. The following landscape guidance was developed by planners, landscape architects and biologists to help design professionals, airport staff, and other County departments and agencies promote sustainable landscaping while minimizing wildlife hazards at Riverside County's public-use airports.

Discouraging Hazardous Wildlife. Plant selections, density, and the configuration of proposed landscaping can influence wildlife use and behavior. Landscaping that provides a food source, perching habitat, nesting opportunities, or shelter can attract raptors, flocking birds, mammals and their prey, resulting in subsequent risks to aviators and the traveling public.

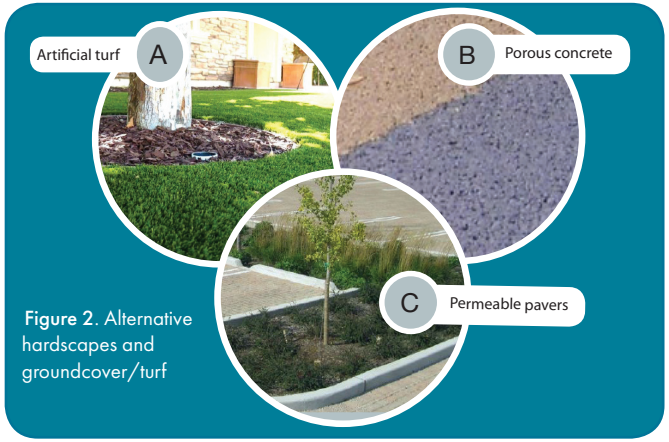
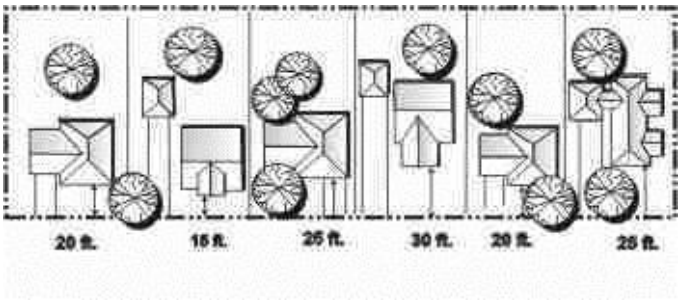


Figure 2. Alternative hardscapes and groundcover/turf

Riverside County Airport Land Use Commission

APPENDIX B
Countywide Design Standards and Guidelines

COUNTYWIDE DESIGN STANDARDS & GUIDELINES



COUNTY OF RIVERSIDE

Adopted: January 13, 2004
Amended: August 20, 2014

COUNTY OF RIVERSIDE

ADOPTED BY
RIVERSIDE COUNTY BOARD OF SUPERVISORS
ON JANUARY 13, 2004

AMENDED BY THE PLANNING COMMISSION
ON AUGUST 20, 2014

These Standards are based upon and include provisions from the following:

Standards for the Third and Fifth Supervisorial District as
ADOPTED BY
RIVERSIDE COUNTY BOARD OF SUPERVISORS
ON JULY 17, 2001
and
Standards for the Second Supervisorial District

ADOPTED BY RIVERSIDE COUNTY BOARD OF
SUPERVISORS ON SEPTEMBER 15, 1998
REVISED OCTOBER 23, 1998
REVISED AUGUST 27, 2002
REVISED OCTOBER 8, 2002
and
Draft Design Standards for the Fourth Supervisorial District

Based upon the Board action, these Standards and Guidelines are **not** applicable to those residential subdivisions described within, that as of January 13, 2004, had completed the environmental process, with the related environmental document done and the subdivision set for public hearing. The Standards and Guidelines are applicable to all other residential subdivisions described within.

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Building Articulation
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Garage Door Treatments

Riverside County Design Standards & Guidelines

I. INTRODUCTION

> *The physical character of our communities cannot be divorced from the values they respect. Sooner or later, these values manifest themselves in how our development decisions are made and how those decisions shape our communities. Where our values and actions are synchronized, our communities prosper; where they are in conflict, so are the communities. (Riverside County Integrated Plan (RCIP), 2002)*

Riverside County, like a quilt, is a composite of differing lifestyles connected together through common strands. The RCIP and subsequent General Plan are designed to ensure that the quilt retains its core identity by guiding future growth that respects the diversity of the region, shapes and configures development in relation to the land it occupies and ensures that its various parts relate to its whole. This unity of form also promotes innovative development that actively accommodates a balance of housing, employment, and service opportunities for the citizenry.

The Countywide Design Standards and Guidelines for the County of Riverside (hereinafter "Guidelines") are for the use of those property owners and design professionals submitting development applications to the County of Riverside Planning Department. The following design guidelines and standards have been developed by the County of Riverside with assistance of representatives from several of the municipalities in the County. In addition, it is intended that this document will provide the baseline criteria, in which to measure and to evaluate justifications for potential density bonuses under the RCIP Incentives Program. Where certain standards apply specifically to one Supervisorial District, that notation appears in the document.

This document includes both design "standards" and design "guidelines. "Design standards are considered mandatory requirements and usually include the term "shall." Standards are often quantitative or have performance criteria that can be measured. Design guidelines are more generalized statements, alternatives, or illustrations of what is expected and encouraged. In this sense, the "guidelines" may offer ways to meet a certain "standard." The degree to which the design guidelines are met is subject to a finding or determination made by the County. Variations to either the design standards or guidelines may be considered by the Planning Commission or Board of Supervisors in the review of any project.

A. Design Strategies

To successfully shape the County's future, piecemeal regulations must be replaced by overall strategies, guidelines, and standards that maintain base values and promote connectivity. Design strategies have been developed to provide for the continuous evolution of urban and rural form consistent with the sense of knowing where one is, the enjoyment in moving through urban/rural environments and providing the opportunity to experience physical and visual variety and diversity throughout the County. Enhancing community edges, landmarks, districts, nodes, and paths can strengthen the physical and visual experiences creating this composite image of Riverside County. Design strategies include:

- Recognizing each community in the County as an identifiable and unique place.
- Defining corridors that, on the one hand link communities, but on the other create distinctive edges that separate and protect each community's qualities and character.
- Promoting interesting juxtapositions that contrast boundaries between distinctly different characteristics of existing neighborhoods.
- Identifying and protecting commonly used view points, view paths, natural panoramas and views of major community landmarks.
- Protecting, repairing, restoring and interconnecting natural watercourses and associated riparian habitat which serve as a unifying element.
- Planning and designing streets and thoroughfares which are visually integrated into the landscape by promoting a distinct sense of district, neighborhood and place.
- Preserving natural and built landmarks which create a special or unique community flavor.
- Protecting and preserving buildings, structures and established public places which are historically and culturally significant to local communities and County institutions.
- Planning and designing new neighborhoods in ways that make them visually distinctive / identifiable and please the senses.

In an attempt to advance quality and visually distinctive development responsive to the natural and built environment of Riverside County, the Board of Supervisors has adopted these Residential Design Standards & Guidelines. These standards and guidelines have been crafted to assist those individuals submitting development applications to better understand the design context from which the County will evaluate project submittals.

The Planning Commission or the Board of Supervisors may consider variations to the design standards as part of their hearing process. Staff may modify design guidelines during the project review process if alternatives meet the intent or context of the adopted guidelines. However, changes to the guidelines will be noted as part of staff reports to the Hearing Officer, Planning Commission, or Board of Supervisors.

B. Planning Objectives

Based on the Design Strategies outlined in the RCIP and Riverside County General Plan, it is the County's desire to advance several specific development goals including:

- Ensure that new homes are constructed in neighborhoods that are interesting and varied in appearance.
- Utilizing building materials and enhanced landscaping to promote a look of quality, both at the time of initial occupancy, as well as in future years.
- Encouraging efficient use of land while creating high quality communities that will maintain their economic values and long-term desirability as places to live and work.

- Incorporating conveniently located and accessible neighborhood parks, trails, and open space.
- Providing functional public access to recreational opportunities in relation to the overall open space system.

C. Applicability

Provisions of the Riverside County Residential Design Standards & Guidelines supplement the minimum specifications for land development in Riverside County Ordinance No. 348, and will be incorporated by reference in all applicable development Conditions of Approval. The Standards & Guidelines pertain to the following types of projects located within the County:

- The "Residential Standards" in this document are required for any residential subdivision with a minimum lot size of one- half acre or less, and is located in the following residential zoning categories: R-1, R-1A, R-2, R-2A, R-3, R-3A, R-4 and R-6 and the following General Plan Land Use Designations: Low Density Residential (0.5 acre minimum), Medium Density Residential (2-5 dwelling units per acre), Medium High Density Residential (5-8 dwelling units per acre), High Density Residential (8-14 dwelling units per acre), Very High Density Residential (14-20 dwelling units per acre), Highest Density Residential (20+ dwelling units per acre).
- Where a residential lot is smaller than 7,200 square feet, the Standards & Guidelines related to unit location, setbacks, % of lot coverage and street frontage may be waived if the project applicants demonstrate that they have addressed the Planning Objectives in Paragraph B as well as providing a sense of privacy and personal space for each residential unit.
- The Residential Design Standards & Guidelines will be evaluated for effectiveness and revised as appropriate in conjunction with the pending update of the Riverside County Ordinance 348.

D. Exceptions

The County Design Standards & Guidelines shall apply to all applicable development projects unless:

- Other standards have been imposed upon an individual development project by the Planning Commission and/or the Board of Supervisors.
- Other standards have been adopted by the Board of Supervisors relative to a particular designated area of a District (e.g., Community Plans / Specific Plans).
- Physical constraints of an individual site make the application of a particular standard or guideline impractical.

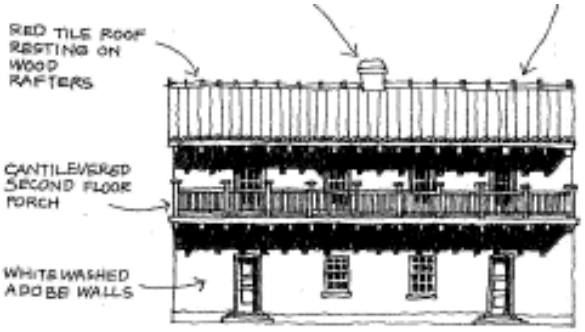
Commercial / Industrial Design Standards & Guidelines

Design Standards & Guidelines for Commercial/Industrial development and Multiple-Family Residential are currently being drafted and will be published in separate documents.

II. RESIDENTIAL
A. Design Style

A design style or a common palette of architectural features is encouraged for each neighborhood or community usually through a planned development, Specific Plan or the Incentive Program. A design style is not required; however, consistency in the design features and use of materials is encouraged.

Craftsman Style



Monterrey Style

Queen Anne Style

B. Articulation of Building Facades

Long unarticulated building facades shall be avoided by incorporating varying setbacks of the building footprint in a varied fashion along the residential street. Projecting architectural features such as bowed or bay windows, columns, offset roof planes, and similar features should be used to create both vertical and horizontal articulation on the building elevations. These design elements shall also be included on the rear facades and sides of homes that are adjacent to or visible from streets or open spaces. Houses shall be arranged in a manner that creates a harmonious, varied appearance of building heights and setbacks.

Special design features, such as covered front porches, garage placement to rear of a lot, use of multiple floor plans, window and door articulation, extended overhangs and building edge treatments (such as arbors, awnings or trellises) are encouraged. Windows should be framed with compatible materials to create well-defined "edge" treatments and be designed to provide distinctive shadows on the building facades. These design features may be accomplished in a manner similar to the following photographic examples.

Recessed windows

Entry Features, porch and setback garage

Front Porch with Offsetting Planes

Bow or Bay Windows

C. Varied Roof Planes

Roof articulation may be achieved by changes in plane or by the use of traditional roof forms such as gables, hips, and dormers. A-frame type roofs and mansard roofs are discouraged unless part of a coordinated design theme style.

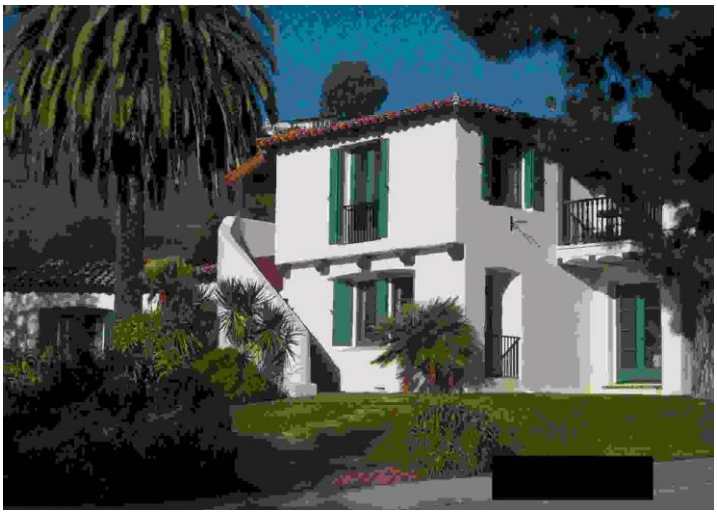
Flat Roof/Contemporary Style

Multiple Gables

Varied Roof Forms

D. 360 Degree Architecture

Architectural design treatments such as building offsets, recessed windows, trellises, overhangs, or other features shall occur on those facades of the residence that are visible from streets or open spaces.



E. Streetscape Design

1. Varied Building Heights/Rooflines - Minimum Number of Single Story Units

Houses and garages shall be arranged in a manner that creates a harmonious, varied appearance of building heights. All projects of ten or more residential lots should include at least one single-story floor plan. In the Fourth District, single-story homes should be located on the perimeter of the development area.

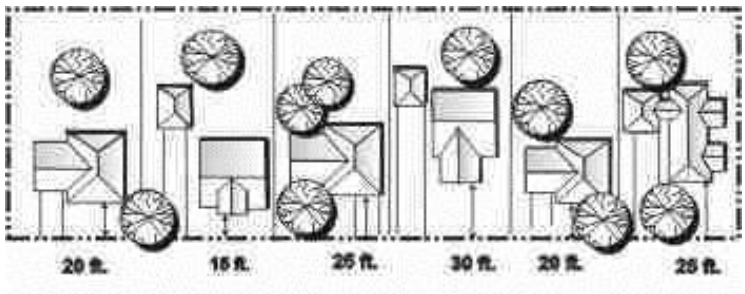
2. Multiple Floor Plans and Elevations

Floor Plans. At a minimum, there should be three different floor plans for tract maps with 50 or less units. Reverse floor plans are not included as different floor plan. For tract maps with from 51 to 99 units, there shall be at least four different floor plans. Tract maps with 100 units or more shall provide five different floor plans and an additional floor plan for every 100 dwelling units above 100 units. For development projects that are to be constructed in phases, a phasing plan shall be submitted to assure that the requirements for the number of floor plans is being met.

Elevations. Each floor plan shall have at least three distinct elevations. One elevation shall not be repeated more than each fourth house**.** Please note that adding or deleting false shutters, or similar types of minimal elevation changes will not suffice as one of the required distinct elevations.

3. Variable Front Yard Setbacks

Homes and garages shall be placed at varying distances from the street and have varying entry locations. Front yard setbacks shall average 20 feet, and may be varied by up to 25%, in increments of any size. The minimum front yard setback shall not be less than 15 feet.

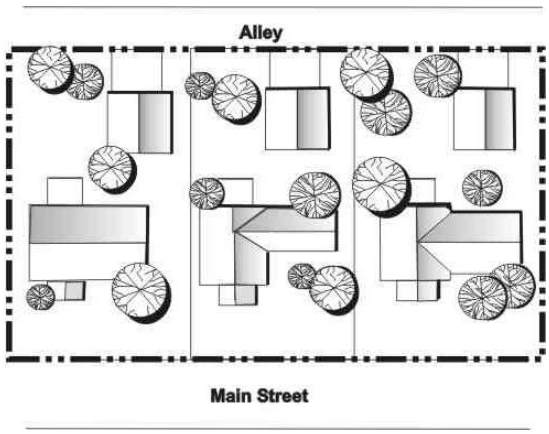


4. Colors and Materials

The colors and materials on adjacent residential structures should be varied to establish a separate identity for the dwellings. A variety of colors and textures of building materials is encouraged, while maintaining overall design continuity in the neighborhood. Color sample boards shall be submitted as a part of the application and review process.

F. Garage Location and Design

The visual impact of garages should be reduced by the use of additional setback from the curb face where garage doors must face the street or by the use of side-facing or rear garages (including detached garages) where possible. Residential plans that feature attached garage designs whose entries are from the side ("side-loaded garages") are also encouraged. Where more than two garage doors face the street, the third garage door should have an increased setback or offset. Setbacks for the side-loaded garages shall be consistent with those specified in Ordinance 348. Garage access from an alley is also encouraged. All new residences with garages shall be provided with roll-up (i.e. on tracks) garage doors (either sectional wood or steel). At least 25% of the garage doors in any project should have windows. Building and lot layouts shall conform to Riverside County standards regarding minimum garage setbacks from access streets, minimum yard requirements, and maximum height. Detached garages located at the rear of the property, and "drive through" or "tandem" garages are also encouraged.



Garages with Alley Access

Side-Facing Garage Door

Offset Garage Doors

Decorated Garage Doors with Windows

G. Walls and Fencing

Walls and Fencing shall be designed in accordance with the following standards:

- Front yard return walls shall be constructed of masonry (slump stone or material of similar appearance, maintenance, and structural durability) and shall be a minimum of five feet in height.

- Side yard gates are required on one side of front yard, and shall be constructed of wrought iron, wood, vinyl, or tubular steel. Side and rear yard fencing shall be masonry, slump stone or other material of similar appearance, maintenance, and structural durability. Chain link fencing is not permitted. All construction must be of good quality and sufficient durability with an approved stain and/or sealant to minimize water staining. (Applicants shall provide specifications that shall be approved by the Planning Department).

- All new residences constructed on lots of less than 18,000 square feet shall include rear and side yard fencing constructed of masonry block that is a minimum of five (5) feet in height. The maximum height of walls or fencing shall be six (6) feet in height. In the desert areas, block walls are discouraged on the perimeter in favor of increased setbacks with extensive drought tolerant landscaping, berms and fencing such as split rails.

- If vinyl fencing is allowed, at minimum it shall: be of commercial grade, have aluminum posts, have an aluminum rail on the bottom of the panel to prevent sagging, and shall meet at least 101 mph wind speed requirement(101mph is the standard at the time of this writing, contact Building and Safety for the most recent standard). See exhibit N for more details.

- Vinyl fencing may be used instead of block wall for interior side or interior rear property lines of residential lots as long as they cannot be seen from public or street view. (See exhibit O)

- In the event of an elevation change between two lots that would causes the side yard fencing to be elevated two or more feet above the lower lot return wall, the first 5 feet of the interior side yard fencing shall be of the same type of wall as the return wall, after which vinyl fencing may be used.

- Except for the desert areas, all lots having rear and/or side yards facing local streets or otherwise open to public view shall have fences or walls constructed of decorative block, stucco, or other attractive and durable material.

- Corner lots shall be constructed with wrap-around decorative block wall returns. (Note: exceptions for the desert area discussed above.)

- Wrought iron or tubular steel fence sections may be included within tracts where view opportunities and/or terrain warrant its use. Where privacy of views is not an issue, tubular steel or wrought iron sections should be constructed in perimeter walls in order to take advantage of casual view opportunities.

- Wrought iron, tubular steel, wood, vinyl, or chain link fences, or gates are allowed where a residence is being constructed on a lot of at least 18,000 square feet.

- Wood fencing, where permitted, shall be constructed with galvanized steel posts set in concrete to a minimum depth of 24 inches with domed caps. Wood fencing or other like-material walls are not permitted along reverse frontage areas.

- Community perimeter or theme walls shall be solid walls located where view opportunities are not available. Plain concrete block walls are not permitted along reverse frontage areas. Brick, slump stone, tile, textured concrete, stucco on masonry or steel framing or other material walls which require little or no maintenance are required. Use of ivy or other vegetative material to soften and punctuate the appearance of walls and reduce the likelihood of graffiti is strongly encouraged. The use of capping in conjunction with other vertical design elements to temper the top line of the wall is also encouraged. In the event that circumstances occur that a community perimeter or theme wall becomes effectively an interior side or interior rear wall to residential lots, at the discretion of the Planning Department, vinyl fencing may be substituted for the wall as long as no portion of the vinyl fencing is visible to the public.

- Swimming pool fencing shall meet all County safety provisions of the Building Code. Fences around swimming pools shall have an outside surface free of provisions, cavities, or other physical characteristics that would serve as handholds or footholds that could enable a child below the age of five to climb.

H. Lighting

Outdoor lighting, other than street lighting, shall be low to the ground or shielded and hooded to avoid shining onto adjacent properties and streets. Street lighting standards are addressed by other County Regulations. Ordinance No. 655 (45 miles from Mt. Palomar) lighting requirements shall be observed were applicable. Illuminated street address lighting fixtures shall be installed on the front yard side of each dwelling to facilitate location of the street address numbers for safety and public convenience and to compensate for dark sky lighting considerations. "Night skies" provisions such as lower lighting levels, backlit addresses and street signs, and other indirect lighting methods shall be required in the desert areas and Mt. Palomar District.

I. General Site Plan Requirements

Building and lot layouts shall conform to Riverside County standards regarding minimum garage setbacks from access streets, minimum yard requirements, maximum height requirements, and other county standards, unless specific variances are granted.

The following information shall be submitted with the building permits application and as a part of the Final Site Plan of Development.

- Building footprints for each lot which identify the model number of the home shall be included on the tract map.
- Front, rear, and side elevations of all facades of all models to be constructed within the tract shall be included on separate sheets.
- Front, rear, and side yard setbacks of all homes shall be shown on the tract map.
- Typical landscape plans for each model (including all plant names/varieties and container sizes)
- Landscape plans for reverse frontages and neighborhood entry statements and medians (including all plant names/varieties and container sizes).
- Material and color sample boards shall be provided.

J. Mailbox Design

Installation of cast iron, cast aluminum, brick, or slump stone-encased curbside mailboxes are encouraged. Each mailbox installation shall conform to current United States Postal Service standards.

K. Residential Design Features

1. All new residences should have at least one clean-burning fireplace. Fireplaces in the living room or family room areas are required in the Second Supervisorial District.

2. Provision for solar heating/cooling equipment or other energy conservation or saving equipment is encouraged. As required in Ordinance No. 460, subdivision layout and design shall address future passive or natural heating and cooling opportunities. Attention to the extreme heat conditions in the summer shall be viewed as a significant element in project review. Homes and buildings should be oriented to receive the greatest amount of afternoon shade or other protection from the sun. Lot size and configuration should consider future orientation of a structure to take advantage of shade and prevailing winds.

3. In the desert regions, evaporative ("swamp") coolers are required as well as refrigerated air conditioners. Solar heating and saline swimming pools are encouraged in the desert areas.

L. Residential Lot Design

All "Schedule A" residential tracts within the Districts shall be designed consistent with the following design standards.

1. Schedule of Design Standards

Description	For lots 7200 square feet or greater	For lots less than 7200 square feet
Minimum net usable area (See section L (5) below)	6500 sq. ft.	Not less than 85% of total area
Minimum lot widths (frontage) Variation of lot width is encouraged	65 ft. An average of seventy (70 feet) or wider of road frontage, as measured at the property line. (The average excludes lots fronting on cul-de-sacs or street knuckles)	50 ft. A minimum of fifty (50) percent of the lots within each tract should have fifty-five (55) feet or wider of road frontage, as measured at the property line.
Lot width at frontage on cul-de-sac lots or street knuckle [1]	The minimum lot frontage on a knuckle or a cul-de-sac shall be 40 feet measured along the property line unless otherwise specified in the development standards of the zoning classification.	The minimum lot frontage on a knuckle or a cul-de-sac shall be 40 feet measured along the property line unless otherwise specified in the development standards of the zoning classification.
Minimum front yard setback for side-loaded garages	15 ft.	10 ft.
Recommended minimum depth of rear yards	20 ft.	15 ft.
Spacing between Structures [3]	10 ft.	10 ft.

Notes to Schedule of Design Standards

(1) The For purposes of satisfying the minimum frontage requirement, corner lots with angle cuts shall be measured at their rear property line.

(2) Planned Residential Development or Specific Plan or the Incentives Program provisions allow for smaller setbacks on a case by case basis, with minimum spacing determined by UBC requirements.

(3) Yard encroachments permitted under Ordinance No. 348 may interrupt this spacing. However, on lots less than 7,200 square feet, such encroachment into the side yard may occur in only one side yard, and the side yard into which the gate opens must remain a minimum of five feet in width.

(4) A patio and patio cover may extend into a rear yard by right up to 10 feet (no Planning permit required, only Building and Safety Department permit.) For all lots, swimming pools and swimming pool equipment may extend into the backyard, with a setback adjustment, to within five feet of the property line.

2. Minimum Lot size

The minimum residential lot size within a Schedule "A" housing tract should be no smaller than 7,200 square feet. Reductions in the lot size may be permitted only through a discretionary review process. Projects located within a Specific Plan or Planned Residential Development or participating in the Incentives Program may have reduced lot areas based upon the quality of the

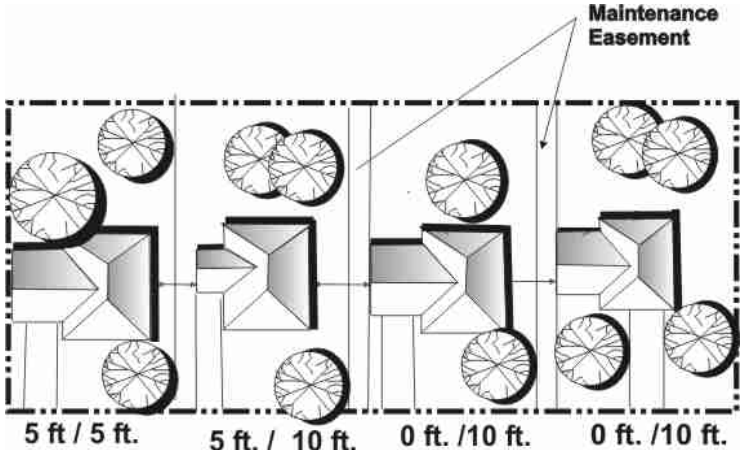
design and the provision of additional open space areas, parks or other exceptional public improvements or amenities**.** The lot area should not be less than 5,000 square feet for a detached single-family residential unit in the (2-5 D.U./acre) Medium Density Residential designation. For developments in the Medium High Density designation (5-8 D.U./acre) and the High Density designation (8-14 D.U./acre), the minimum lot size will be determined through the discretionary review process and will be based upon the types of housing products proposed, and the specific amenities to be provided.

3. Maximum Lot Coverage

No residential lot within a "Schedule A" housing tract should have a lot coverage of greater than 50% (including the garage).

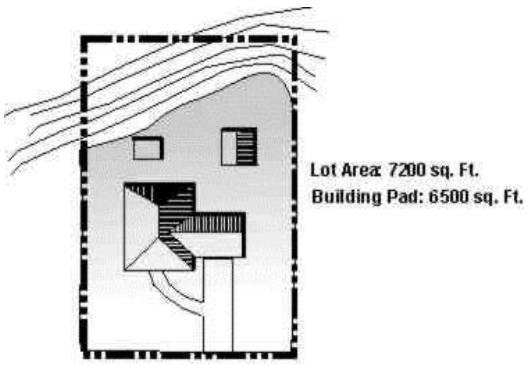
4. Minimum Spacing Between Structures

Side yards should be varied to add interest and usable space, however, the minimum spacing between two structures shall be ten feet. In the case of zero lot line developments, a three (3) foot maintenance easement shall be provided.



5. Minimum Net Usable Area

For projects with lots of 7,200 square feet or greater, the minimum net usable area for development should be 6,500 square foot pads or twenty foot level rear yards. Side yards shall be a minimum of five feet level on one side with no encroachments and the opposite side yard shall be a minimum of five feet with limited encroachments (three feet clear). Usable areas of less than 6500 square feet may be permitted through a specific plan, planned development application or through the Incentives Program. For lots with steep topography, the minimum net usable area shall be determined by the Planning Director based upon the site constraints analysis in order to minimize disturbance to the sloped areas. The site design should minimize cut and fill as much as possible.



Minimum Level Building Area

M. Watercourses and Drainage

The planning and design of residential communities should protect the natural land forms watercourses and drainage patterns of the site. Consideration should be given to linear parks and enhancement of the edges along watercourses and drainage ways. Efforts should be made to protect and preserve the natural vegetation along watercourses and to re-vegetate degraded areas.

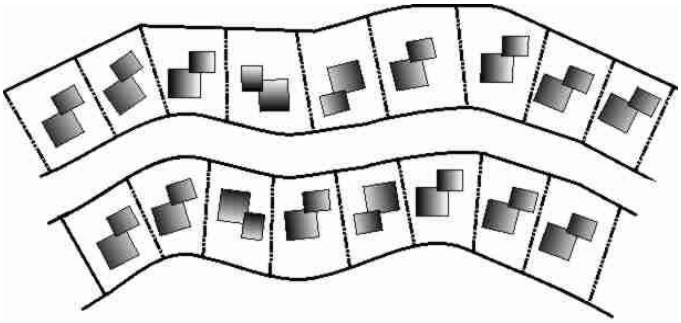
N. Recreational Vehicle Parking

1. No recreational vehicle shall be stored in the front yard, or on the driveway in the front of any residential structure.

2. The storage of boats, camper trailers, or other watercraft or non-commercial vehicle may be permitted in the side yard so long as it is located behind an opaque wall, fence, or gate. A paved parking surface is required.

III. RESIDENTIAL STREET DESIGN

Residential streets shall be designed with the goal of facilitating the desired general residential design concepts. The following elements shall be used to accomplish this goal:



Curvilinear Streets add interest to the Streetscape

A. Street Pattern: Curvilinear and Grid Street Design

The design of the overall street pattern should present a variety of streetscapes, offer various driving and pedestrian experiences, clearly distinguish between streets of varying purposes and carrying capacities and ensure safe, walkable local neighborhoods. Curvilinear streets offer an ever-changing scene while straight streets offer concentrated focus and landmark/vista opportunities. Either may be permissible. Grids, particularly with short, walkable blocks are encouraged as are traffic calming features associated with neighborhood streets such as chicanes, chokers or bulbs, T-intersections, diverters and round-a-bouts. To the extent possible, direct connections with adjoining properties and projects are encouraged to alleviate congestion on arterials and secondary highways. All applicants are requested to consult with Transportation and Planning Staff concerning an acceptable street design concept. Examples of acceptable designs are available upon request. Projects are encouraged to be designed with efficient street circulation patterns that provide visual interest and creativity to the subdivision design.

B. Street Width Reductions

The County General Plan and ordinances provide for local roads (36-foot wide within a 56-foot right- of- way) that may serve to reduce speeds in residential areas and encourage pedestrian use, while providing for emergency vehicular access.

Within planned private communities, a further reduction in local street width may be appropriate, subject to the review and approval of the Transportation Department. In these instances, the private streets should have parking restrictions in place and enforced by a Home Owner's Association to assure that proper access for emergency vehicles is maintained at all times.

C. Minimum Street, Median, Reverse Frontage, and Parkway Widths

The following table shows the minimum street, median, and parkway widths (refer to the Exhibit indicated in the Exhibit column for illustrated sections of these requirements). These standards are adopted as a part of the General Plan and are duplicated here as a convenient reference. Separate standards may be adopted for rural and mountainous areas.

Street Type	Total Width:		Median Width	Total Minimum Parkway Width per Side	Landscaping	Side walk	Exhibit
	ROW	Curb to Curb					
Local	56'	36'	Not required	10'	5'	5'	F
Collector	74'	44'	Not required	15'	10'	5'	G
Secondary	100'	64'	Not required	18'	13'	5' [1]	**H**
Major	**118'**	**76'**	**12'** Painted	**21'**	**16'**	**5' [2]**	**I**
Arterial (Commercial)	**128'**	**86'**	**18'**	**21'**	**15"**	**6'**	**J**
Arterial (Residential)	**128'**	**86'**	**18' [3]**	**21'**	**16'**	**5' [2]**	**K**
Urban Arterial (Commercial)	**152'**	**110'**	**14'**	**21'**	**15'**	**6'**	**L**
Urban Arterial (Residential)	**152'**	**110'**	**14' [3]**	**21'**	**16'**	**5' [2]**	**M**

(1) 5' Sidewalk in middle of 18' parkway
(2) 5' Meandering sidewalk for 21' parkways
(3) Curbed and landscaped medians

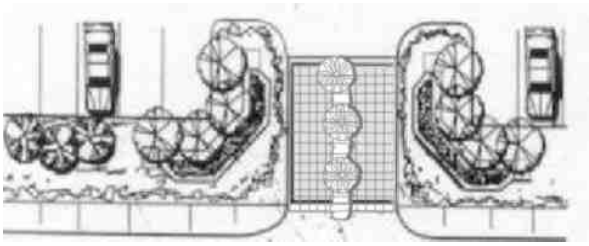
D. Bus and Transit - Related Facilities

Bus stops, turnouts, bus shelters, and other transit facilities shall be provided in accordance with the standards established by the Riverside Transit Agency and other applicable agencies. Residential areas planned adjacent to commercial centers shall consider convenient vehicular and pedestrian access to the centers and transit access areas.

IV. LANDSCAPE DESIGN STANDARDS

A. Neighborhood Entry Statements

Any Schedule A Subdivision with 50 lots or greater shall have entry statements that create a distinctive image of a particular residential development. This entry feature should be designed to assist passing motorists to easily identify the development, and should complement the overall appearance of the greater community of which it is a part. Exhibit “C” provides an illustrative example of an entry monument and landscaping. All intersections of General Plan roads classified as Secondary Highway or higher shall have tract entrance designations. A tract entrance designation shall consist of a neighborhood identification sign on a decorative wall or monument, with at least a twelve-foot depth of landscaping (measured from the right-of-way line) surrounding the wall or monument (Exhibit “B”). No element of the tract entrance designation shall be placed within the public right-of-way. The developer shall create private party maintenance arrangements for these elements at the time the project is built.



B. Corner Cutbacks or Cutoffs

Corner cutbacks or cutoffs shall be included at all intersections of General Plan roads classified as Secondary Highway or higher with all designated tract entrances. A minimum curb radius of 35 feet shall be provided at these intersections (Exhibit C).

C. Landscaped Medians

Where required, landscaped street medians shall be constructed for the following road classifications within the Districts, consistent with the following Exhibits:

Exhibit "J" Commercial Arterial Highway
Exhibit "K" Residential Arterial Highway
Exhibit "L" Commercial Urban Arterial Highway
Exhibit "M" Residential Urban Arterial Highway

Similarly, at all designated residential tract entrances from roadways classified as Secondary Highways or higher, a landscaped entry median shall be installed. Decorative trees, shrubs, and drought tolerant landscaping planted in medians should be clustered in random patterns rather than planted in evenly-spaced locations. Other acceptable median treatments include stamped concrete or river rock between landscaped areas.

D. Reverse Frontage Treatments

Where reverse frontage occurs on Schedule "A" residential streets, the following guidelines shall apply:

- The reverse frontage is defined as the parkway and sidewalk widths combined. Wider reverse frontage treatments should be employed on General Plan roadways with eighty-eight feet of right-of-way or more or where design considerations would make them appropriate (e.g., where project amenities like bike or jogging paths are included).

- Meandering walks should be constructed to provide a random influence to the rigid geometry of the adjoining street scene. Adequate parkway widths are required to assure that the sidewalks create unique landscaping opportunities and do not take on a cramped, arbitrary appearance. Meandering walks that are designed to make use of existing mature trees or other natural aspects, e.g., large boulders, are encouraged.

- Meandering sidewalks are encouraged and should be incorporated at the Specific Plan Map/Tentative Tract Map stage of project development. When a meandering sidewalk is appropriate along a particular reverse frontage, it shall be constructed consistent with the standards and examples shown in Exhibit A and Exhibit E.

- Equestrian or hiking trails and bikeways and other recreational facilities shall be integrated into such treatments wherever required by current adopted local and regional trails system plans.

- The location of lakes, parks, and other open space assets adjacent to major roads and other community entry points is encouraged to enhance community appearance and identity.

- Reverse frontage treatments shall be maintained by a property owners' association or other maintenance entity, approved by the County, which insures maintenance in perpetuity.

- Community perimeter (or theme) walls shall be solid walls located where view opportunities are not available. Plain concrete block walls are not permitted along reverse frontage areas. Wood fencing or other like-material walls are not permitted along reverse frontage areas. Brick, slump stone, tile, textured concrete, or other material walls that require little or no maintenance are required. Use of ivy or other vegetative material to soften and punctuate the appearance of walls and reduce the likelihood of graffiti is strongly encouraged. The use of capping in conjunction with other vertical design elements to temper the top line of the wall is also encouraged.

- Where privacy of views is not an issue, powder-coated tubular steel or wrought iron sections may be constructed in perimeter walls in order to take advantage of casual view opportunities. A combination of a two- foot to three-foot high solid wall base with a wrought iron or tubular steel fence section between solid pilasters is a recommended design alternative.

- The typical maximum height of walls or fencing shall be six feet. Note that a greater height for perimeter walls may be required where noise mitigation or other special circumstances would dictate.

- Recreational amenities should be encouraged as a part of reverse frontage treatments.

- For a maximum effect, landscaping within the reverse frontage treatments shall be designed to have a “stepped-up” appearance, with low flowering ground cover nearest the curb, progressing to low and/or medium height plants or shrubs, and on to randomly clustered street trees near the perimeter wall of the tract. Plants shall be selected from the applicable Water District’s approved list.

E. Yard Landscaping Requirements

All new residences shall be provided with front yard landscaping and an automatic irrigation system. Drought tolerant landscape materials should be used as much as possible, especially in the desert areas. Landscaping shall be provided as follows:

- A minimum of six, five-gallon shrubs, one 24" box tree (minimum 2" caliper), and one 15 gallon or larger tree (minimum 1" caliper) shall be planted along the front of all homes (garage and side yard gate areas are excluded).

- Creative project design uses of hardscape, decorative gravels, placement of landscaping for afternoon shade and water efficient irrigation systems are encouraged.

- Landscaping should also consider the often high wind conditions of many portions of the county, providing hedges and windbreaks where appropriate, such as in common areas, and the strong securing of recently planted trees.

- Street parkways and common lots, such as retention basins, shall be provided with landscaping consisting of decorative gravels, living ground covers, shrubs, and some trees

- Additional street facing common landscape planters should be encouraged in subdivision design for bikeways, recreational trails, neighborhood entry statements and noise buffering.

- An appropriate maintenance entity shall be required for landscaping installed outside of the street right-of-way.

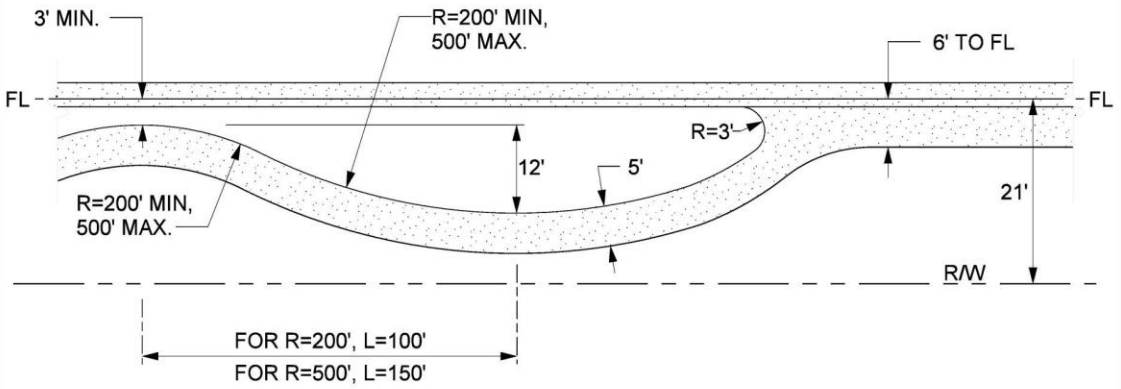
- Location of landscaping shall be in accordance with applicable County Ordinances.

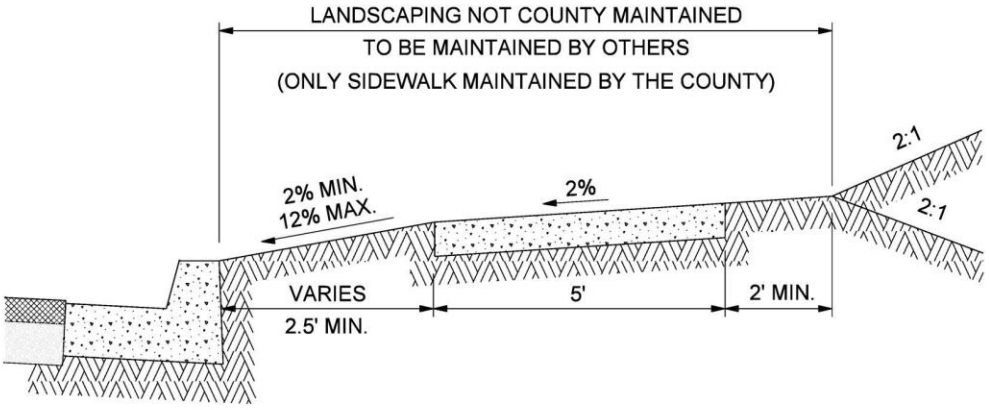
- Drought tolerant landscape materials shall be provided in accordance with Ordinance No. 348.

APPENDIX A

Exhibit A: Meandering Sidewalk
Exhibit B: Entry Monument and Landscaping
Exhibit C: Entry Median Landscaping and Concrete Stamping
Exhibit D: Landscaped Berms
Exhibit E: Reverse Frontage Treatments
Exhibit F: General Local Street
Exhibit G: Collector Streets
Exhibit H: Secondary Highway
Exhibit I: Major Highway
Exhibit J: Commercial Arterial Highway
Exhibit K: Residential Arterial Highway
Exhibit L: Commercial (Urban) Arterial Highway
Exhibit M: Residential (Urban) Arterial Highway

Exhibit A





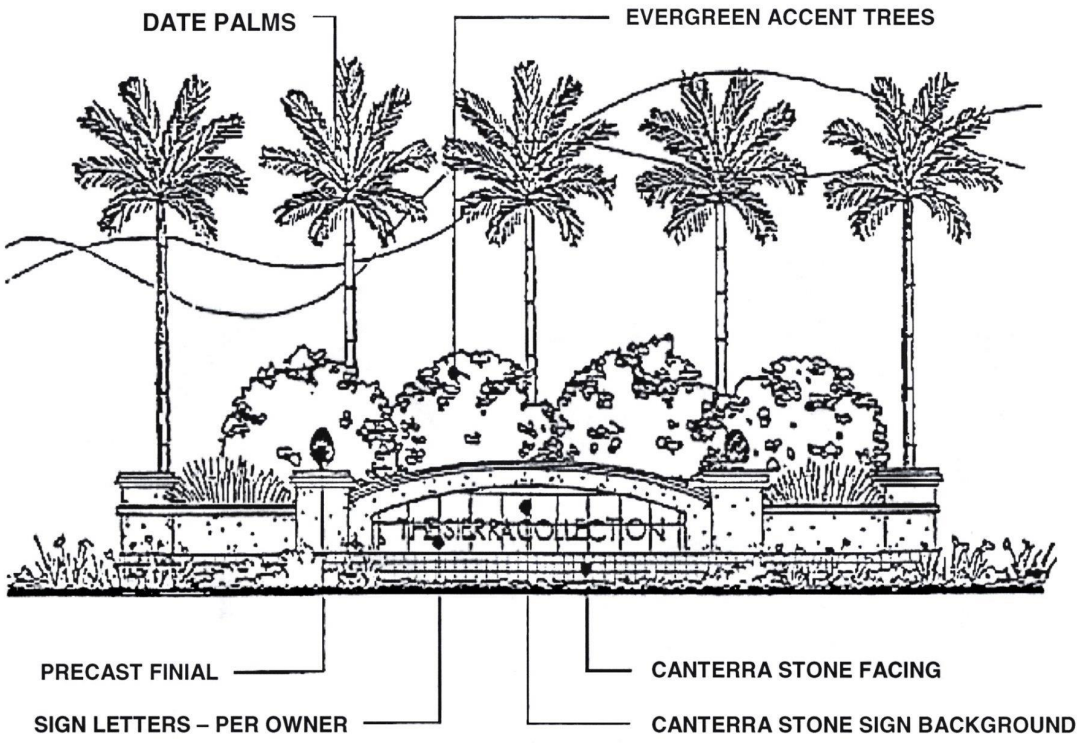
NOTES:

1. RADII FOR CURVED SIDEWALK SHALL VARY BETWEEN 200' AND 500' AT FRONT OF SIDEWALK.
2. SIDEWALK SHALL BE A MINIMUM OF 6' IN WIDTH ADJACENT TO CURB.
3. SIDEWALK SHALL BE 3' AWAY FROM CURB FACE EXCEPT AT CURB RETURNS AND BUS STOPS.
4. SIDEWALK LAYOUT ON PLANS IS CONCEPTUAL ONLY. APPROVAL OF THE FINAL SIDEWALK LAYOUT SHALL BE MADE IN THE FIELD AND ADJUSTED AS NECESSARY TO MEET FIELD CONDITIONS AS APPROVED BY THE INSPECTOR PRIOR TO FINAL CONSTRUCTION.

COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	MEANDERING SIDEWALK
1-29-04	

Exhibit B

ENTRY MONUMENT AND LANDSCAPING

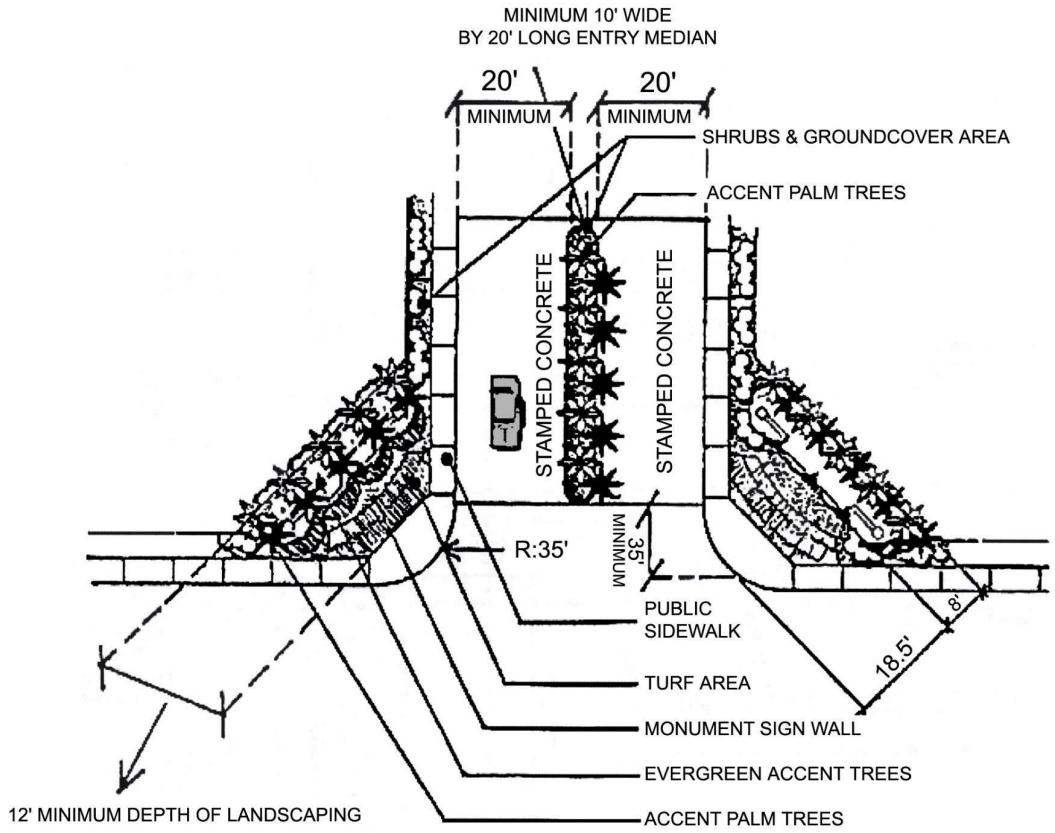


UPLIGHTING OF LANDSCAPING AND SIGN IS REQUIRED

COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	ENTRY MONUMENT AND LANDSCAPING

Exhibit C

ENTRY MEDIAN LANDSCAPING & CONCRETE STAMPING



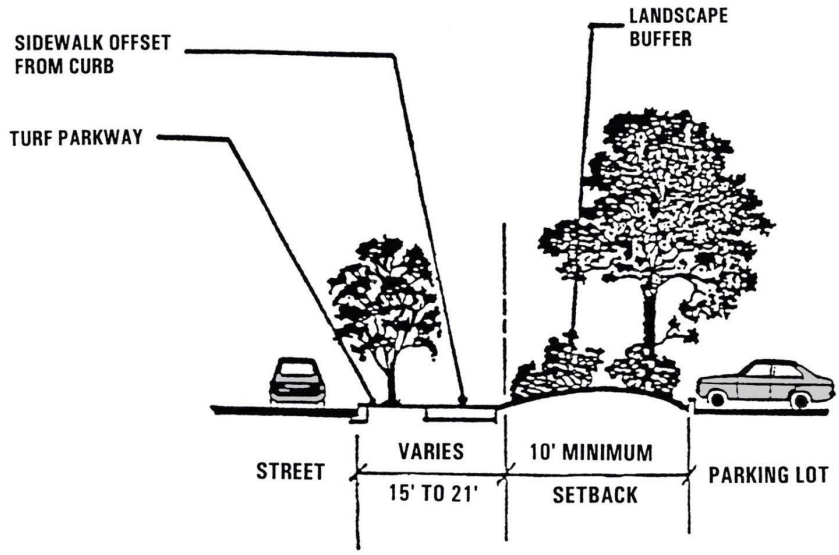
THE CROSS-SECTIONAL R.O.W. AT THE ENTRY TO THE TRACT WILL BE WIDER THAN STANDARD.

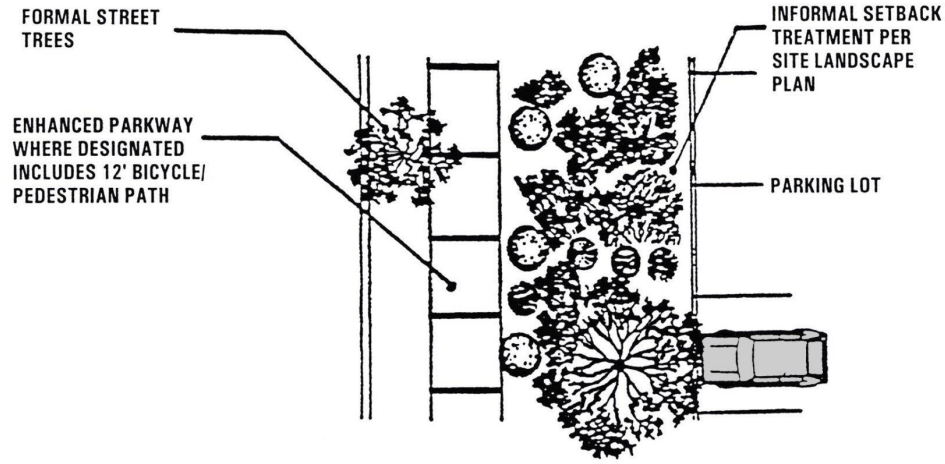
THE ENTRY R.O.W. SHALL TRANSITION TO THE STANDARD R.O.W. PRIOR TO THE FIRST INTERSECTING STREET WITHIN THE TRACT.

COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	ENTRY MEDIAN LANDSCAPING AND CONCRETE STAMPING

Exhibit D

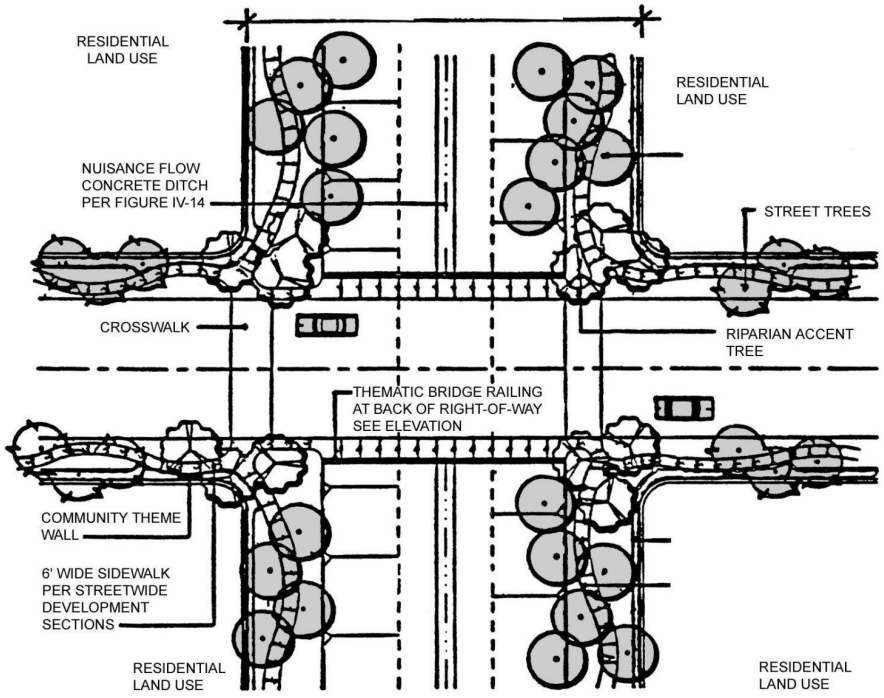
LANDSCAPED BERMS





COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	LANDSCAPED BERMS

Exhibit E



EXAMPLE OF DESIGN ADJACENT TO EASTVALE DRAINAGE PLAN FLOOD CHANNELS.

COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	REVERSE FRONTAGE TREATMENTS

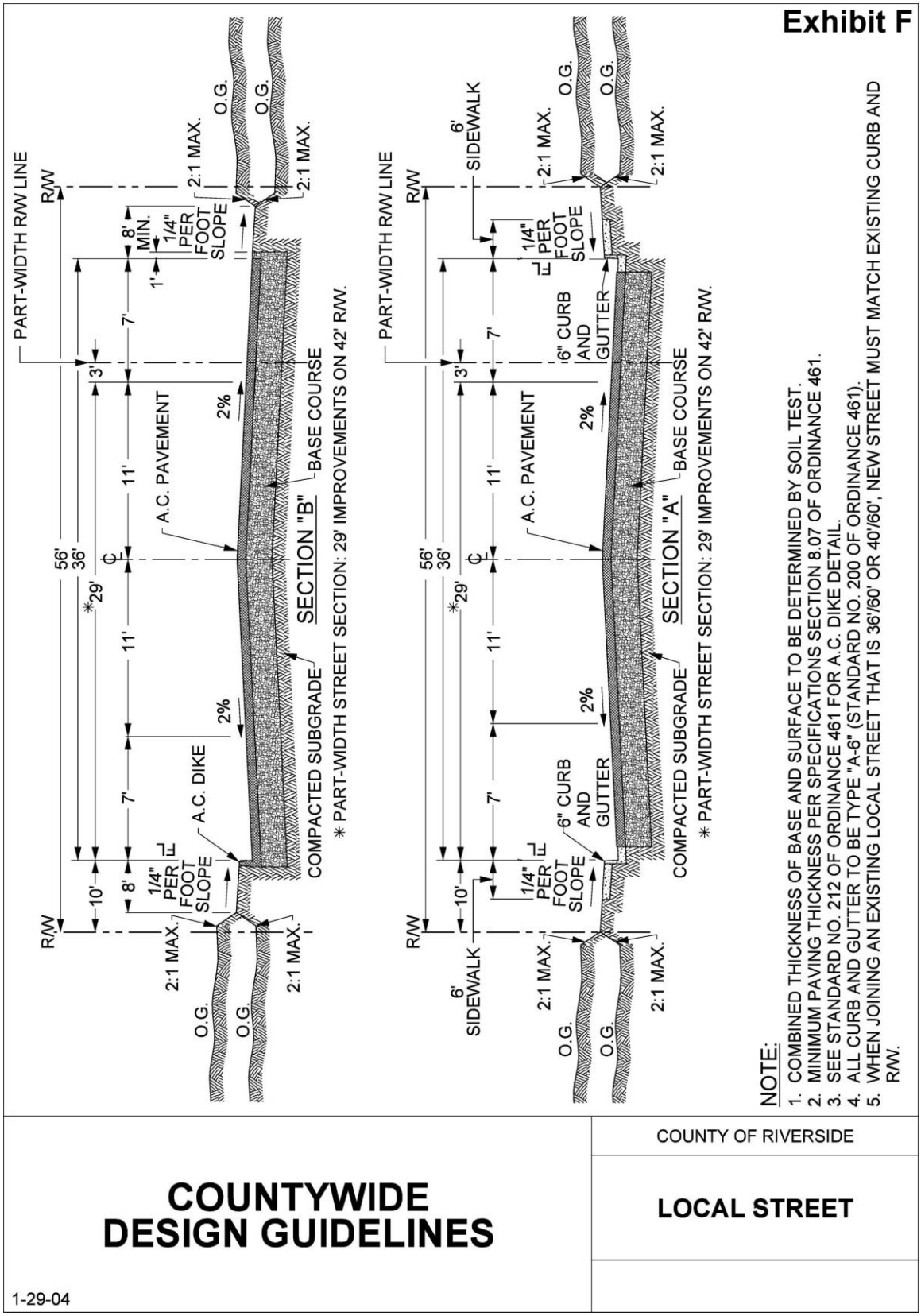


Exhibit F
PART-WIDTH R/W LINE
R/W
56'
36'
*29'
3'
7'
11'
11'
7'
10'
8'
1/4" PER FOOT SLOPE
2:1 MAX.
O.G.
A.C. PAVEMENT
2%
A.C. DIKE
BASE COURSE
COMPACTED SUBGRADE
SECTION "B"
* PART-WIDTH STREET SECTION: 29' IMPROVEMENTS ON 42' R/W.
8' MIN.
1'
6' SIDEWALK
6" CURB AND GUTTER
SECTION "A"
NOTE:
1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.
3. SEE STANDARD NO. 212 OF ORDINANCE 461 FOR A.C. DIKE DETAIL.
4. ALL CURB AND GUTTER TO BE TYPE "A-6" (STANDARD NO. 200 OF ORDINANCE 461).
5. WHEN JOINING AN EXISTING LOCAL STREET THAT IS 36'/60' OR 40'/60', NEW STREET MUST MATCH EXISTING CURB AND R/W.
COUNTYWIDE DESIGN GUIDELINES
COUNTY OF RIVERSIDE
LOCAL STREET
1-29-04

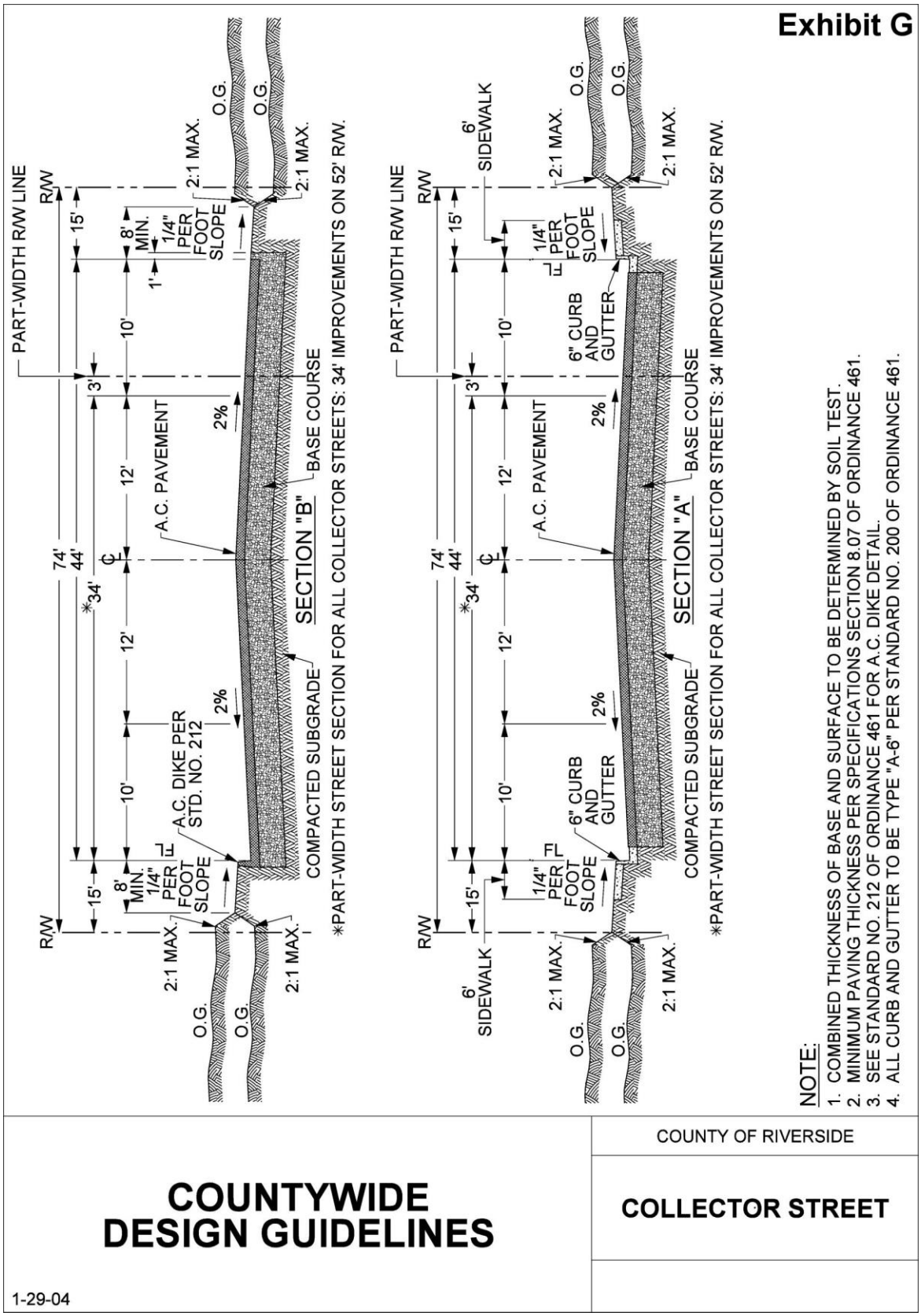
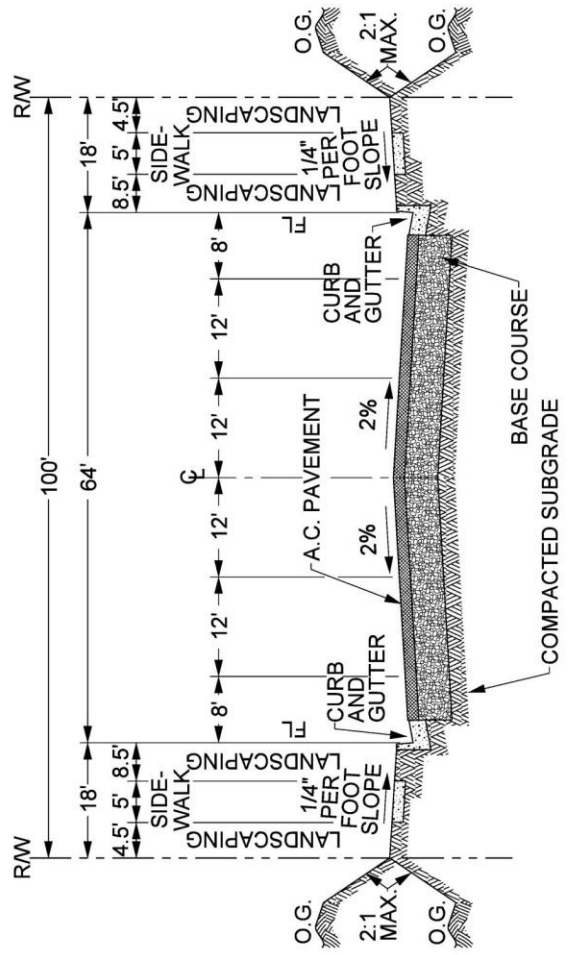


Exhibit G
PART-WIDTH R/W LINE
R/W
15'
8' MIN.
1/4" PER FOOT SLOPE
1'
2:1 MAX.
O.G.
74'
44'
*34'
3'
12'
10'
2%
A.C. PAVEMENT
BASE COURSE
COMPACTED SUBGRADE
SECTION "B"
A.C. DIKE PER STD. NO. 212
*PART-WIDTH STREET SECTION FOR ALL COLLECTOR STREETS: 34' IMPROVEMENTS ON 52' R/W.
6' SIDEWALK
6" CURB AND GUTTER
SECTION "A"
NOTE:
1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.
3. SEE STANDARD NO. 212 OF ORDINANCE 461 FOR A.C. DIKE DETAIL.
4. ALL CURB AND GUTTER TO BE TYPE "A-6" PER STANDARD NO. 200 OF ORDINANCE 461.
COUNTYWIDE DESIGN GUIDELINES
COUNTY OF RIVERSIDE
COLLECTOR STREET
1-29-04

Exhibit H



NOTE:
1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.

COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	SECONDARY HIGHWAY
1-29-04	

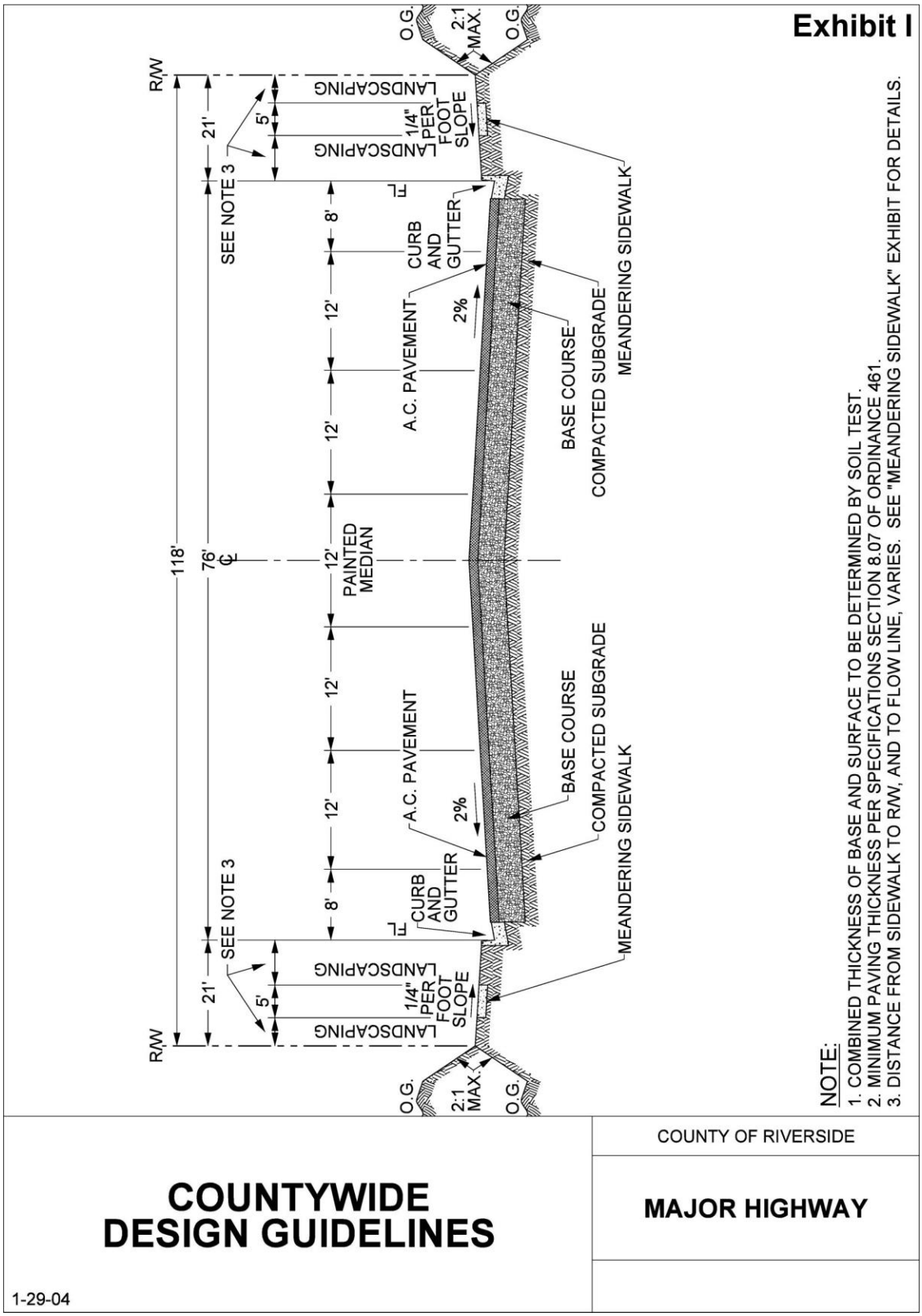
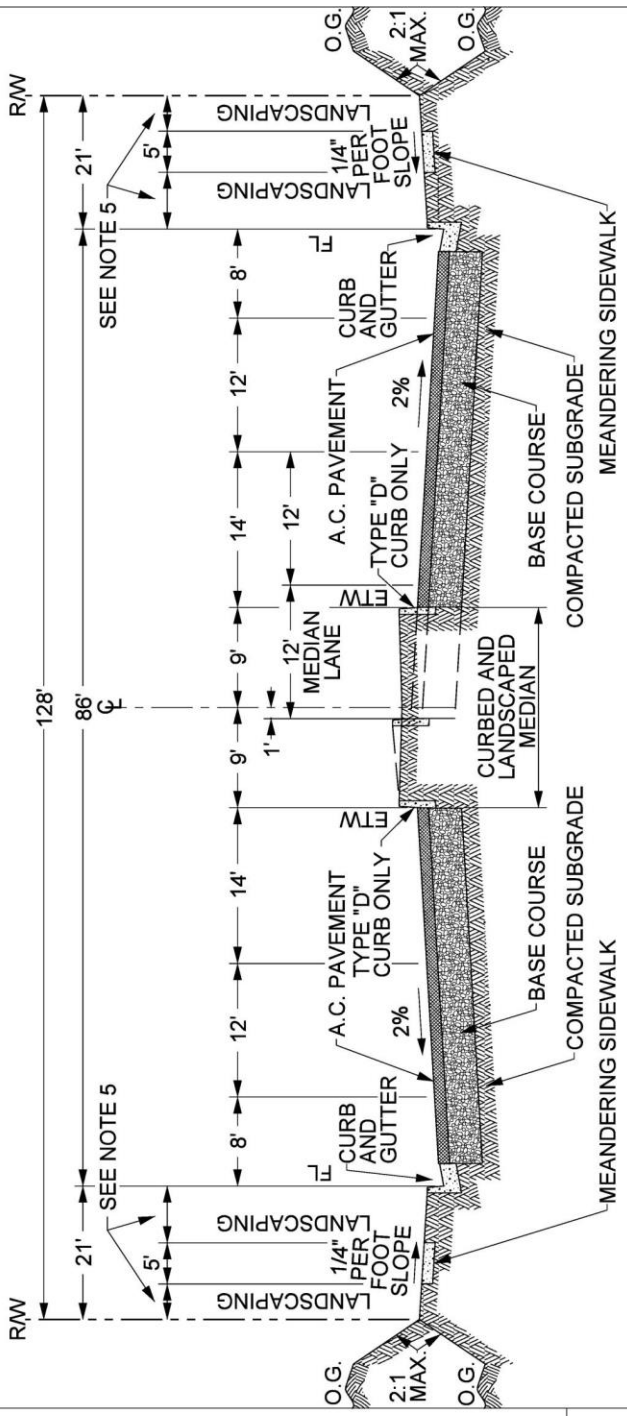


Exhibit I
R/W
21'
5'
LANDSCAPING
1/4" PER FOOT SLOPE
LANDSCAPING
SEE NOTE 3
8'
CURB AND GUTTER
12'
A.C. PAVEMENT
2%
BASE COURSE
COMPACTED SUBGRADE
MEANDERING SIDEWALK
118'
76'
12'
PAINTED MEDIAN
O.G.
2:1 MAX.
NOTE:
1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.
3. DISTANCE FROM SIDEWALK TO R/W, AND TO FLOW LINE, VARIES. SEE "MEANDERING SIDEWALK" EXHIBIT FOR DETAILS.
COUNTYWIDE DESIGN GUIDELINES
COUNTY OF RIVERSIDE
MAJOR HIGHWAY
1-29-04

Exhibit J



NOTE:

1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.
3. SEE STANDARD NO. 113 OF ORDINANCE 461 FOR LANDSCAPE MEDIAN REQUIREMENTS, INCLUDING MEDIAN CURB.
4. CURB AND GUTTER TO BE TYPE "A-8" (STANDARD NO. 201 OF ORDINANCE 461).
5. DISTANCE FROM SIDEWALK TO R/W, AND TO FLOW LINE, VARIES. SEE "MEANDERING SIDEWALK" EXHIBIT FOR DETAILS.

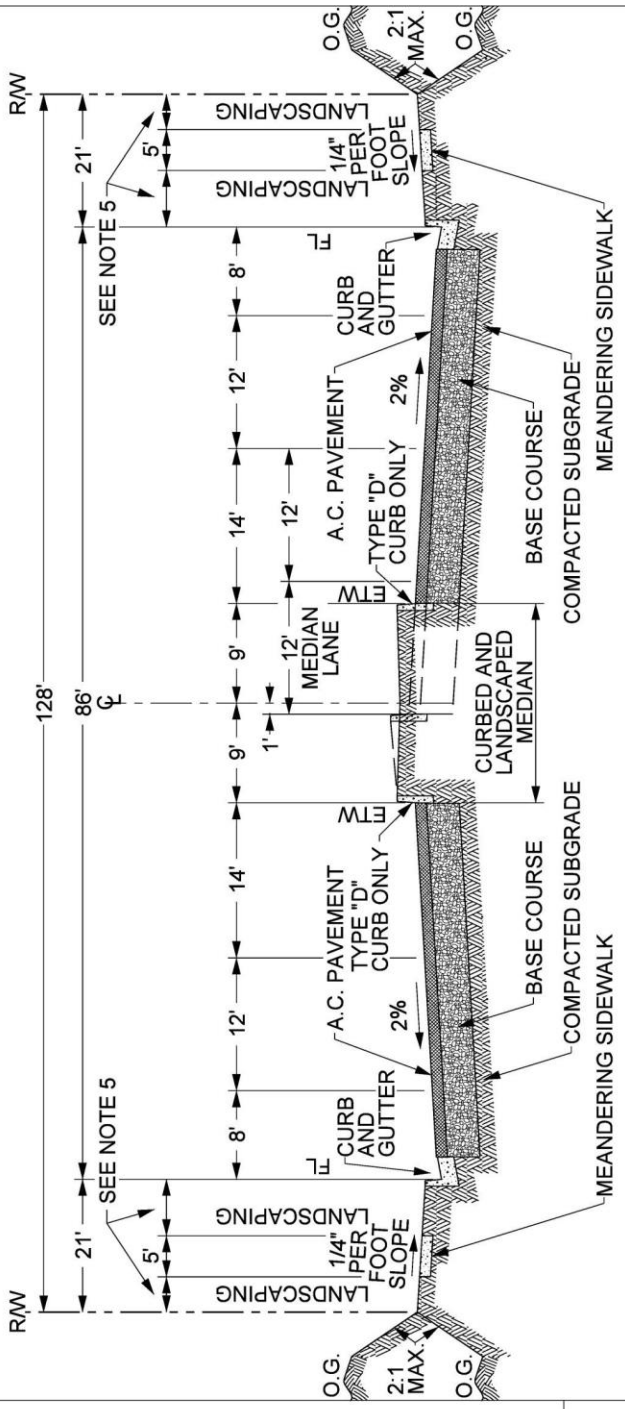
COUNTYWIDE DESIGN GUIDELINES

COUNTY OF RIVERSIDE

ARTERIAL HIGHWAY

1-29-04

Exhibit K



NOTE:

1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.
3. SEE STANDARD NO. 113 OF ORDINANCE 461 FOR LANDSCAPE MEDIAN REQUIREMENTS, INCLUDING MEDIAN CURB.
4. CURB AND GUTTER TO BE TYPE "A-8" (STANDARD NO. 201 OF ORDINANCE 461).
5. DISTANCE FROM SIDEWALK TO R/W, AND TO FLOW LINE, VARIES. SEE "MEANDERING SIDEWALK" EXHIBIT FOR DETAILS.

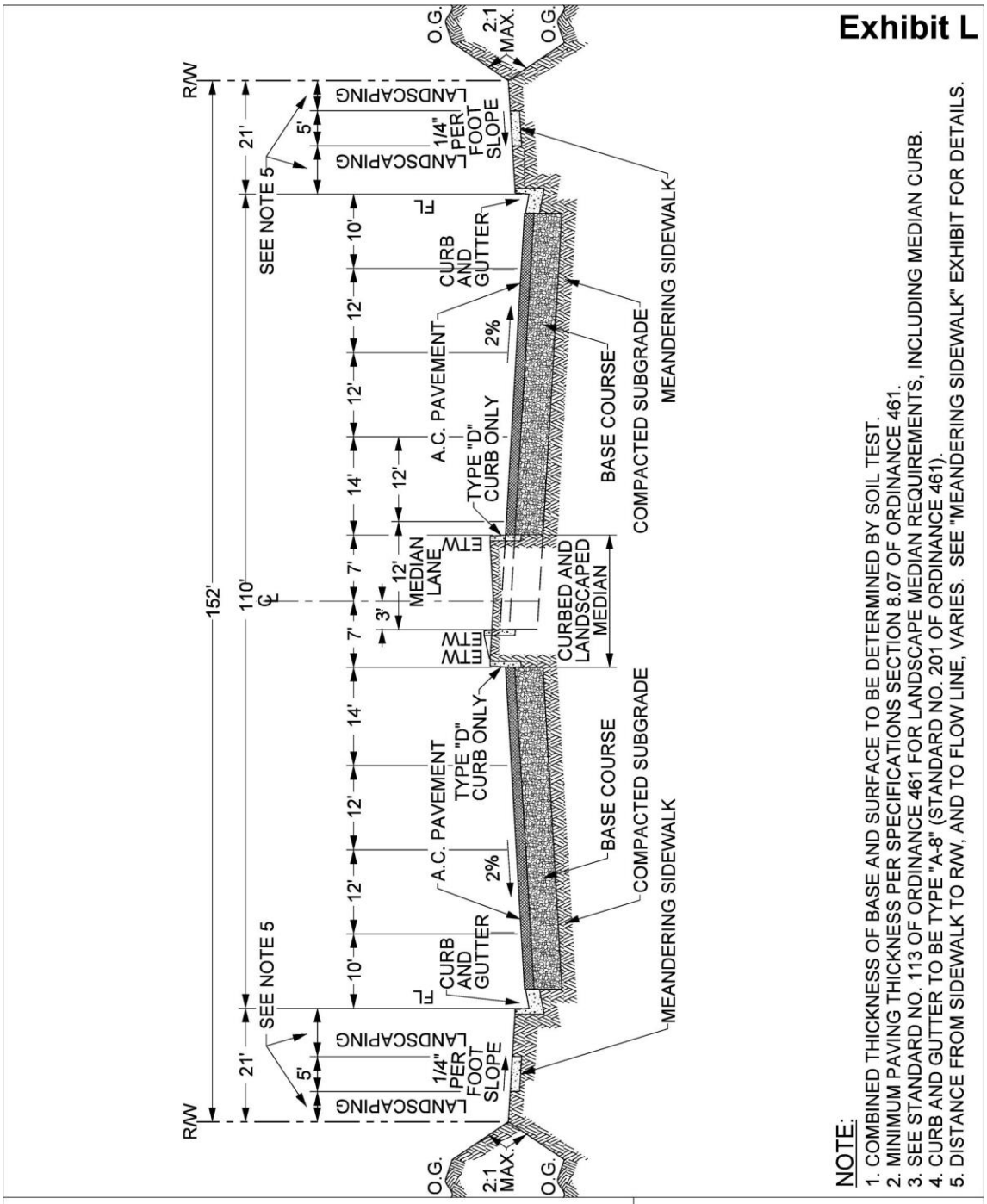
COUNTYWIDE DESIGN GUIDELINES

COUNTY OF RIVERSIDE

ARTERIAL HIGHWAY

1-29-04

Exhibit L



NOTE:

1. COMBINED THICKNESS OF BASE AND SURFACE TO BE DETERMINED BY SOIL TEST.
2. MINIMUM PAVING THICKNESS PER SPECIFICATIONS SECTION 8.07 OF ORDINANCE 461.
3. SEE STANDARD NO. 113 OF ORDINANCE 461 FOR LANDSCAPE MEDIAN REQUIREMENTS, INCLUDING MEDIAN CURB.
4. CURB AND GUTTER TO BE TYPE "A-8" (STANDARD NO. 201 OF ORDINANCE 461).
5. DISTANCE FROM SIDEWALK TO R/W, AND TO FLOW LINE, VARIES. SEE "MEANDERING SIDEWALK" EXHIBIT FOR DETAILS.

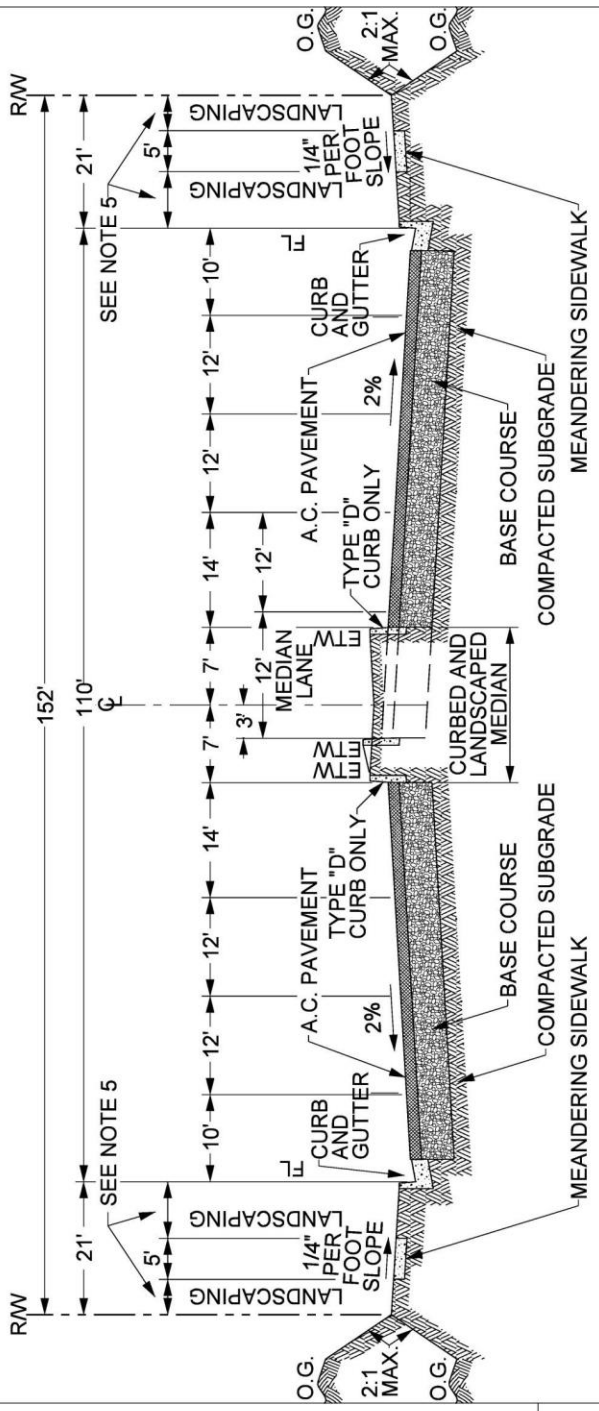
COUNTYWIDE DESIGN GUIDELINES

COUNTY OF RIVERSIDE

URBAN ARTERIAL HIGHWAY

1-29-04

Exhibit M



NOTE:

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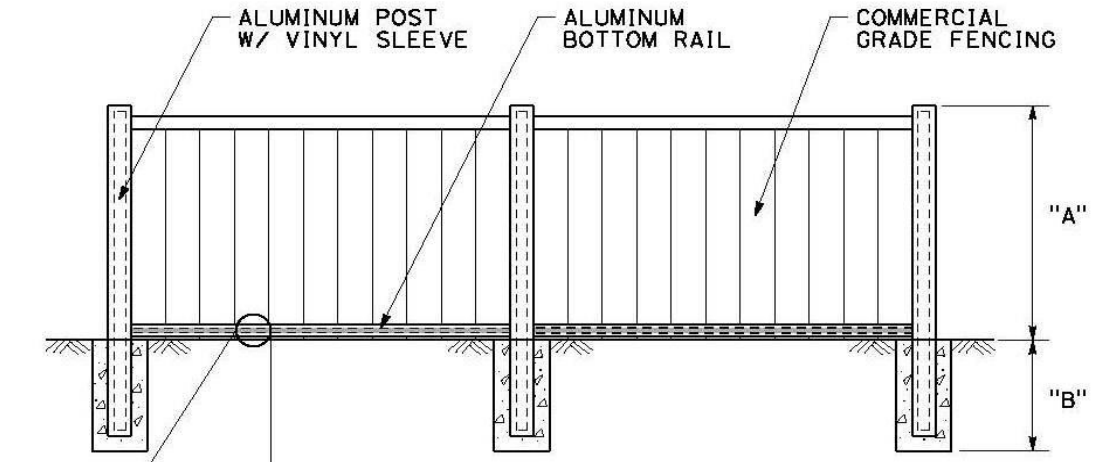
3. SEE STANDARD NO. 113 OF ORDINANCE 461 FOR LANDSCAPE MEDIAN REQUIREMENTS, INCLUDING MEDIAN CURB.
4. CURB AND GUTTER TO BE TYPE "A-8" (STANDARD NO. 201 OF ORDINANCE 461).
5. DISTANCE FROM SIDEWALK TO R/W, AND TO FLOW LINE, VARIES. SEE "MEANDERING SIDEWALK" EXHIBIT FOR DETAILS.

COUNTYWIDE DESIGN GUIDELINES	COUNTY OF RIVERSIDE
	URBAN ARTERIAL HIGHWAY
1-29-04	

Exhibit N

NOTES:

1. ALL VINYL FENCING MUST BE COMMERCIAL GRADE.
2. ALUMINUM POST AND ALUMINUM BOTTOM RAILS ARE REQUIRED (NO WOOD OR GALVANIZED MATERIAL).
3. ALL SUBMITTALS REQUIRE PLANS AND CALCULATIONS FOR 101 MPH WIND SPEED. MINIMUM EXPOSURE "C".
4. PLANS AND CALCULATIONS SHALL BE SUBMITTED WITH FENCE AND WALL PLOT PLAN.
5. ALL FENCING INSTALLATIONS WILL REQUIRE CONTRACTOR CERTIFICATIONS.
6. GROUND MOUNT ONLY, NOT TO EXCEED 7 FEET IN HEIGHT.
7. ANY DEVIATIONS FROM THIS STANDARD WILL REQUIRE PLANNING DEPARTMENT APPROVAL AND MAY REQUIRE BUILDING PERMITS.
8. FOOTING DEPTHS SHOULD BE PER TABLE 1 AS SHOWN BELOW.



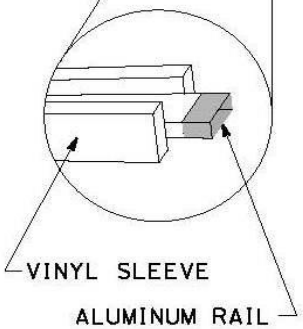
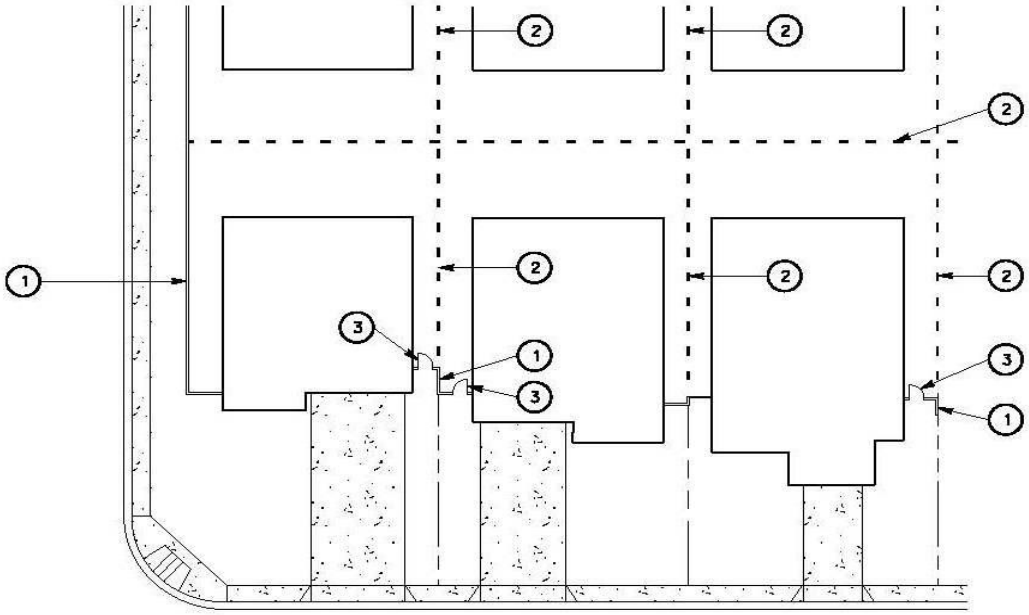


TABLE 1

FENCE HEIGHT	FOOTING DEPTH
"A"	"B"
5'0"	20"
6'0"	24"
7'0"	28"

	COUNTY OF RIVERSIDE PLANNING DEPARTMENT
	INTERIOR VINYL FENCING FOR TRACT HOMES
(951) 955-3200	COUNTYWIDE DESIGN GUIDELINES
FAX: (951) 955-1817	8-20-14

Exhibit O



LEGEND:

— (1) DECORATIVE MANSONRY BLOCK WALL ALONG PORTIONS VIEWABLE FROM STREET.

- - (2) VINYL FENCING AT REAR AND SIDEYARDS BETWEEN LOTS.

⌐ (3) 3' WIDE SIDEYARD ACCESS GATE.

	COUNTY OF RIVERSIDE PLANNING DEPARTMENT
	INTERIOR VINYL FENCING FOR TRACT HOMES
(951) 955-3200	COUNTYWIDE DESIGN GUIDELINES
FAX: (951) 955-1817	8-20-14

Appendix B

ADDITIONAL PHOTOGRAPHIC EXAMPLES

Building Articulation

Front Porch Treatments

Examples of Landscape Buffers, Mini-Parks, and Paseos

Walls and Fences

Garage Door Treatments

Y:\Planning Master Forms\Misc Public Forms and Documents\Countywide Design Standards and Guidelines.doc

ORDINANCE NO. 348.XXX

AN ORDINANCE OF THE COUNTY OF RIVERSIDE

AMENDING ORDINANCE NO. 348 RELATING TO ZONING

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

Section 1. Section XXX of Ordinance No. 348, and Official Zoning Plan Map No. XXX, as amended, are further amended by placing in effect in the Lower Coachella Valley District the zone or zones as shown on the map entitled "Change of Official Zoning Plan Amending Ordinance No. 348, Map No. XXX, Change of Zone Case No. XXXXX," which map is made a part of this ordinance.

Section 2. Article XVIIa of Ordinance No. 348 is amended by adding thereto a new Section 17.XXX to read as follows:

SECTION 17.XXX SPECIFIC PLAN ZONE REQUIREMENTS AND STANDARDS FOR SPECIFIC PLAN NO. 401.

a. Planning Area 1.

(1) The uses permitted in Planning Area 1 of Specific Plan No. 401 shall be the same as those uses permitted in Article IXa, Section 9.25 of Ordinance No. 348, except that the uses permitted pursuant to Section 9.25.A. (1), (2), (8), (9), shall not be permitted. In addition, the permitted uses identified under Section 9.25A shall include the following:

A. EQUESTRIAN ESTABLISHMENT. A full-service equestrian facility where horses are kept, sheltered, trained, nursed or boarded. Permitted uses include but are not limited to showgrounds, competition arenas, event areas, riding rings and fields, barns, stables, pastures, vet farrier, horse trails, maintenance facilities, parking, and feed storage buildings.

B. Commercial retail, restaurants, and other services associated with Equestrian Establishment uses.

C. Farming and agricultural operations as interim uses.

(2) The development standards for the permitted uses described in Planning Area 1 of Specific Plan No. 401 shall be the same as those standards identified in Section 9.26 of Ordinance No.

348, except that the development standards set forth in Section 9.26 shall be deleted and replaced with the following:

A. There shall be no minimum lot size

B. The minimum interior setbacks shall be 10 feet. The minimum setback from Harrison St, Tyler St, and Ave 64 shall be 20 feet. The minimum distance between buildings shall be 10 feet.

C. All buildings and structures shall not exceed 75 feet.

D. 0.18 parking spaces to be provided per daily guest. 0.14 RV parking stalls to be provided per each horse stall.

E. Trash areas shall be screened with an opaque six-foot high fence or wall and shall have an opaque gate.

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article VI of Ordinance No. 348.

b. Planning Area 2.

(1) The uses permitted in Planning Area 2 of Specific Plan No. 401 shall be the same as those uses permitted in Article VI, Section 6.1 of Ordinance 348, except that the uses permitted pursuant to Section 6.1A (3), (5), (7), (8), (9), B(1), (3), (6), C, and E shall not be permitted. In addition, the permitted uses under Section 6.1A shall include the following:

A. Residential Amenities including but not limited to horse trails, golf cart paths, and clubhouses.

B. Keeping of horses with a maximum of 3 horses per acre.

C. Farming and agricultural operations as interim uses.

(2) The development standards for Planning Area 2 of Specific Plan No. 401 shall be the same as those standards identified in Section 6.2 except that the development standards in 6.2 (B), (E), and (G) shall be deleted and replaced with the following:

B. The minimum lot size shall be 20,000 square feet.

E. The minimum front yard setback shall be 20 feet. The minimum side yard setback shall be 10 feet. The minimum rear yard setback shall be 10 feet

G. The maximum building lot coverage shall be 60 %

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article VI of Ordinance No. 348.

c. Planning Area 3.

(1) The uses permitted in Planning Area 3 of Specific Plan No. 401 shall be the same as those uses permitted in Article VI, Section 6.1 of Ordinance 348, except that the uses permitted pursuant to Section 6.1A, 2, 3, 5, 7., 8, 9, B(1), (3), (6), (C), and (E) shall not be permitted. In addition, the permitted uses under Section 6.1A shall include the following:

A. Residential Amenities including but not limited to horse trails, golf cart paths, and clubhouses (including associated restaurant, bar, and other ancillary uses).

B. Farming and agricultural operations as interim uses.

(2) The development standards for Planning Area 3 of Specific Plan No. 401 shall be the same as those standards identified in Section 6.2 except that the development standards in 6.2 (B), (E), and (G) shall be deleted and replaced with the following:

B. Minimum lot size for detached single family shall be 5,000 square feet. Minimum lot size for multi-family shall be 2,000 square feet.

E. The front yard shall be not less than 10 feet. Minimum side yard setback for detached single family shall be 5 feet. There shall be no side yard setback for multi-family dwellings. The rear yard shall not be less than ten feet.

G. Maximum building coverage shall be 80% for detached residential dwellings. Maximum building coverage shall not be applicable to attached dwellings.

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article VI of Ordinance No. 348.

d. Planning Area 4a.

(1) The uses permitted in Planning Area 4A of Specific Plan No. 401 shall be the same as those uses permitted in Article VIII, Section 8.1 of Ordinance 348, except that the uses permitted pursuant to Section 8.1 (A), (B) 1, 2, 3, 6, 13, 15, 16, 18, 19, 20, 21, 22, 23, 24, 25, 26. (C), & (D) shall be

deleted. In addition, the permitted uses under section 8.1.A shall include Farming and agricultural operations as interim uses and section 8.1.B shall include the following:

A. Employee Housing

B. General / Convenience Store

C. Accessory uses and structures (including but not limited to gate house, dog park, shade structures, swimming pools, laundromat, etc.)

(2) The development standards for Planning Area 4A of Specific Plan No. 401 shall be the same as those standards identified in Section 8.2 except that the development standards in 8.2 shall be deleted and replaced with the following:

A. There shall be no minimum lot size.

B. The minimum setback from the southerly specific plan boundary shall be 20 feet. The minimum setback from Interior Property Line shall be 10 feet.

C. The minimum side yard shall be five feet for buildings that do not exceed 35 feet in height. Any portion of a building which exceeds 35 feet in height shall be set back from each side lot line five feet plus two feet for each foot by which the height exceeds 35 feet; if the side yard adjoins a street, the side setback requirement shall be the same as required for a front setback. No structural encroachments shall be permitted in the front, side, or rear yard except as provided in Section 18.19. of Ordinance No. 348.

D. The maximum building lot coverage shall be 75%.

E. The maximum ratio of floor area to lot area shall not be greater than two to one, not including basement floor area.

F. All buildings and structures shall not exceed 50 feet in height.

G. 1 parking space per dwelling unit shall be provided.

In addition, the following development standards shall also apply:

AA. Dwelling unit size is allowed to be a minimum of 300 square feet for standard units and 400 square feet for accessible designed units.

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article VIII of Ordinance No. 348.

Planning Area 4B.

(1) The uses permitted in Planning Area 4B of Specific Plan No. 401 shall be the same as those uses permitted in Article IXa, Section 9.25 of Ordinance 348, except that the uses permitted pursuant to Section 9.25 (A)), (B), and (D) shall be deleted. In addition, farming and agricultural operations as interim uses shall be permitted as a by right use and the permitted uses Under Section 9.25A shall include the following:

A. Recreational Vehicle Park (including extended occupancy parks)

B. General / Convenience Store

C. Accessory uses and structures (including but not limited to RV resort office, gate house, dog park, shade structures, swimming pools, laundromat).

The development standards for Planning Area 4B of Specific Plan No. 401 shall be the same as those standards identified in Section 9.26, 19.97, 19.98, 19.98a, and 19.98b except that the development standards in Section 9.26 shall be deleted and replaced with the following:

A. There shall be no minimum lot size.

B. The minimum setback from the southerly specific plan boundary shall be 20 feet. The minimum setback from Interior Property Lines shall be 10 feet

C. Maximum building height shall not be greater than 50 feet.

D. 1 automobile parking space to be provided for each RV space.

E. Trash areas shall be screened with an opaque six-foot high fence or wall and shall have an opaque gate.

In addition, the following development standards shall also apply:

AA. The maximum building lot coverage shall be 75%.

BB. All signage shall comply with the provisions of Article XIX of County Ordinance No. 348.

CC. Removal of garbage and rubbish shall comply with the requirements of County Ordinance No. 513 and of the trash hauler.

DD. Lighting shall be indirect, hooded and positioned so as to reflect onto the access roads and away from the recreational vehicle spaces and adjoining property unless otherwise approved by the approving body. Lighting standards for roads and recreational vehicle sites shall be a maximum of ten feet in height. The height of all light standards shall be measured from the elevation of the adjoining pavement of the access roads. Lighting standards in recreational areas may be taller than ten feet. All recreational vehicle parks in the Mt. Palomar Street Lighting Area shall comply with the lighting policies set forth in County Ordinance No. 655.

EE. The park shall be graded so that there will be no depressions in which surface water will accumulate or as approved by the County Flood Control District.

FF. DISTANCE BETWEEN RECREATIONAL VEHICLES AND BUILDINGS.

a. Recreational vehicle spaces shall be designed so as to provide the maximum distance between recreational vehicles, taking into account minimum recreational vehicle space size requirements as established within this ordinance.

b. In vacation recreational vehicle parks, recreational vehicle utility connections may be arranged so as to allow grouping of recreational vehicles, up to four vehicles per utility connection, if this is desired by the recreational vehicle owners. However, recreational vehicle owners shall not be required to group more than two to a utility connection unless they so request.

c. Where recreational vehicle spaces are located near any permitted building, the minimum distance between the recreational vehicle and said building shall be 15 feet.

GG. All structures and recreational vehicle pads shall be set back from all side and rear property lines not less than three feet, except where a side or rear property line abuts a street, the setback shall be not less than 20 feet. Where the recreational vehicle park is adjacent to an existing single

family development, a 100 foot setback shall be provided for structures exceeding one story.

HH. Maximum building heights shall be as permitted in the zoning classification in which the recreational vehicle park is located.

II. MANAGEMENT.

a. A caretaker responsible for the management of the park shall be present on the premises of the park at all times when the park is occupied.

b. Maintenance and Storage Yard. All storage of supplies, maintenance materials and equipment outside of buildings shall be provided within a storage area. Any storage shall be located outside any required yard and completely screened from adjoining properties with a decorative masonry wall or fencing six feet in height and further buffered with landscaping materials eight feet in height.

JJ. One washing machine and dryer shall be provided for every 50 recreational vehicle spaces or fraction thereof.

KK. Recreational vehicle parks which do not provide each recreational vehicle space with a connection to an approved sanitary sewer system shall provide sanitation stations designed to receive the discharge from the sewage holding tanks of recreational vehicles.

a. The sanitary station shall be constructed in accordance with specifications set forth in Title 25 of the California Administrative Code.

b. If a sanitation station is provided, it shall be located within the park in such a manner so as not to be obnoxious to the tenants of the park and shall be set back 100 feet from adjoining residential development, unless approved by the approving body.

LL. Interior access roads within the recreational park shall not be less than 24 feet wide and be paved with a minimum thickness of three inches of asphalt concrete or six inches of Portland Cement Concrete, or with such alternate surfacing as recommended by a soils engineer. The approving body may reduce the minimum width of interior access roads to 20 feet where one way interior access roads are utilized.

MM. Each recreational vehicle space shall front on or be served by an interior access road.

NN. In accordance with Title 25 of the California Administrative Code, the following standards shall be met.

a. Only one power supply connection shall be made to a recreational vehicle.

b. Electric power supply equipment shall be located on the rear half of the recreational vehicle space within four feet of the location or proposed location of the recreational vehicle on the space.

OO. Each recreational vehicle space shall have a minimum width of 32 feet and depth of 45 feet.

PP. INDIVIDUAL SPACE IMPROVEMENTS:

a. Each site shall contain a level, stabilized recreational vehicle parking pad of crushed stone, decomposed granite, paving or other suitable material.

b. Each recreational vehicle space may be provided with a ten foot by 25 foot parking area of asphalt concrete, Portland Cement Concrete, rock, decomposed granite/or similar material.

c. All areas not in hard surface shall be landscaped pursuant to Section 18.12. of this ordinance, unless otherwise approved by the approving body.

QQ. ELECTRICAL SERVICES.

a. Each recreational vehicle space shall be provided with an electrical service outlet.

b. Each recreational vehicle space may be provided with connection to telephone service.

RR. Each recreational vehicle space shall be provided with a fresh water service outlet delivering safe and potable water. Each recreational vehicle space shall be provided with a connection to an approved sanitary sewer system.

SS. Only one recreational vehicle connected to utilities shall be allowed per site. No other vehicle parked at the recreational vehicle site, except for the primary recreational vehicle, shall be used for human habitation on a temporary or permanent basis. In addition to the primary recreational vehicle, two cars, vans or trucks may be parked at the recreational vehicle space. One recreational vehicle may be substituted for these other vehicles provided it is the only available source of transportation to and from the recreational vehicle park.

TT. Wheels shall not be removed from recreational vehicles.

UU. ACCESSORY STRUCTURE.

a. Ramadas and patio covers are allowed.

b. Accessory storage structures may be allowed at individual vehicle spaces.

c. All structures shall comply with the requirements of Title 25 of the California Administrative Code, except where this ordinance is more restrictive, the more restrictive standards shall apply.

d. No more than 60 percent of the area of each individual recreational vehicle site may be covered by the recreational vehicle and accessory structures.

e. Structures to assist the handicapped shall be allowed.

f. Awnings are permitted in accordance with the provisions of Title 25 of the California Administrative Code.

VV. Recreational vehicle park shall be screened or fenced as follows: For extended occupancy parks in Category III, IV, or open space land use areas a decorative masonry wall, earthen berm and block wall, fencing, or landscaping screen, or combination thereof shall be on all property lines as specified by the approving body. Where walls and fences are utilized an additional landscape buffer shall be provided as set forth in Section 18.12. of this ordinance. The exterior side of all block walls shall be coated with a protective coating that will facilitate the removal of graffiti.

WW. Only recreational vehicles which can connect to sewer and water service at the recreational vehicle space shall be allowed to stay for longer than 30 consecutive days or 120 days in any one year. All recreational vehicles which are sited within a recreational vehicle park on a long term or permanent basis shall be registered with the California Department of Motor Vehicles.

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article IXa of Ordinance No. 348.

e. Planning Area 5.

(1) The uses permitted in Planning Area 5 of Specific Plan No. 401 shall be the same as those uses permitted in Article IXa, Section 9.25, except that the uses permitted pursuant to Section 9.25 (A) 2 and (D) shall be deleted. In addition, farming and agricultural operations as interim uses shall be a use allowed by right and the permitted uses identified under Section 9.25A shall include the following:

A. Resort Condominiums, short-term vacation rentals.

B. Recreational amenities associated with hotel or resort condominium uses including but not limited to: clubhouses, swimming pools, recreational amenities, spa, gym)

C. Retail and personal service commercial uses

(2) The development standards for Planning Area 5 of Specific Plan No. 401 shall be the same as those standards identified in Section 9.26 except that the development standards in 9.26 shall be deleted and replaced with the following:

A. There shall be no minimum lot size

B. Minimum interior setbacks between parcels within the Specific Plan shall be 10 feet. Minimum setback from Harrison St shall be 20 feet.

C. Building height shall not exceed a maximum height of 75 feet

D. Automobile storage space shall be provided as required by Section 18.12. of Ordinance no. 348. Not less than five percent of the parking area shall be landscaped. No planting area shall be less than five feet wide at any point.

E. Trash areas shall be screened with an opaque six-foot high fence or wall and shall have an opaque gate.

In addition, the following development standards shall also apply:

AA. Maximum building lot coverage shall be 75%

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article VI of Ordinance No. 348.

f. Planning Area 6.

(1) The uses permitted in Planning Area 6 of Specific Plan No. 401 shall be the same as those uses permitted in Article IX, Section 9.1 of Ordinance No. 348, except that the uses permitted pursuant to Section 9.1.A 5, 6, 7, 28, 29, 35, 42, 79, 9.1.B. 5, 6, 11, 12, 18, 19, 9.1.D. 2, 3, 6, 10, 11, 12, 13, 18, 19, 20, & G shall not be permitted. In addition Farming and agricultural operations as interim uses shall be permitted by right.

(2) The development standards for Planning Area 6 of Specific Plan No. 401 shall be the same as those standards identified in Section 9.4 except that B and C shall be deleted and replaced with the following:

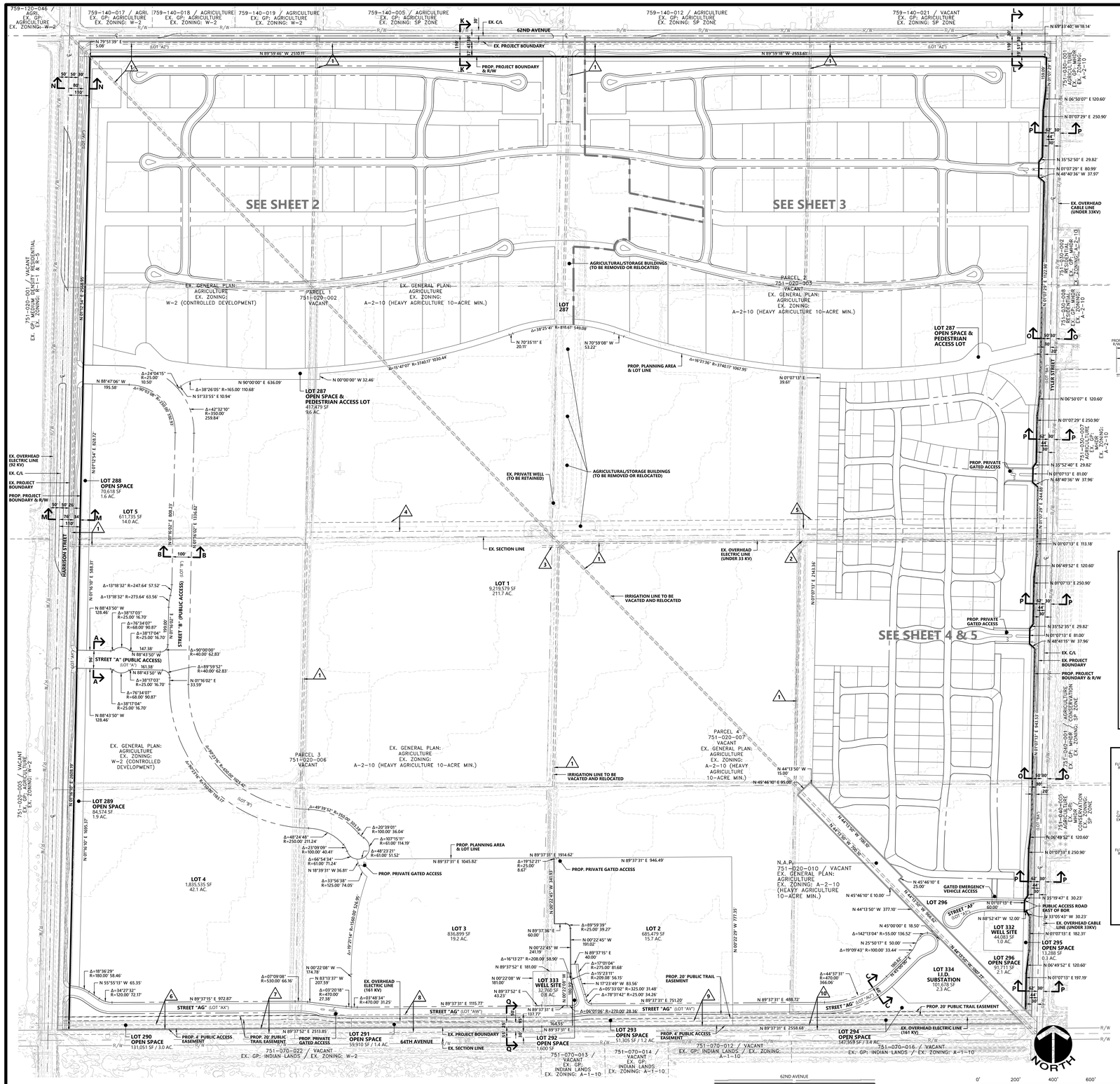
B. Minimum setback from Harrison St shall be 20 feet. Minimum interior setback shall be 10 feet.

C. Building height shall not exceed a maximum height of 75 feet.

In addition, the following development standards shall also apply:

AA. Maximum building lot coverage shall be 75%

(3) Except as provided above, all other zoning requirements shall be the same as those requirements identified in Article IX of Ordinance No. 348.


759-120-046 / AGRI. EX. GP: AGRICULTURE EX. ZONING: W-2
759-140-017 / AGRI. EX. GP: AGRICULTURE EX. ZONING: W-2
759-140-018 / AGRICULTURE EX. GP: AGRICULTURE EX. ZONING: W-2
759-140-019 / AGRICULTURE EX. GP: AGRICULTURE EX. ZONING: W-2
759-140-005 / AGRICULTURE EX. GP: AGRICULTURE EX. ZONING: SP ZONE
759-140-012 / AGRICULTURE EX. GP: AGRICULTURE EX. ZONING: SP ZONE
759-140-021 / VACANT EX. GP: AGRICULTURE EX. ZONING: SP ZONE
751-020-001 / VACANT EX. GP: AGRICULTURE EX. ZONING: R-1-1 & R-1-5
751-020-005 / VACANT EX. GP: AGRICULTURE EX. ZONING: R-1-1
62ND AVENUE
EX. C/L
EX. PROJECT BOUNDARY
PROP. PROJECT BOUNDARY & R/W
SEE SHEET 2
SEE SHEET 3
SEE SHEET 4 & 5
PARCEL 1 751-020-002 VACANT
PARCEL 2 751-020-003 VACANT
PARCEL 3 751-020-006 VACANT
PARCEL 4 751-020-007 VACANT
EX. GENERAL PLAN: AGRICULTURE EX. ZONING: W-2 (CONTROLLED DEVELOPMENT)
EX. GENERAL PLAN: AGRICULTURE EX. ZONING: A-2-10 (HEAVY AGRICULTURE 10-ACRE MIN.)
AGRICULTURAL/STORAGE BUILDINGS (TO BE REMOVED OR RELOCATED)
EX. PRIVATE WELL (TO BE RETAINED)
EX. SECTION LINE
IRRIGATION LINE TO BE VACATED AND RELOCATED
EX. OVERHEAD ELECTRIC LINE (UNDER 33 KV)
PROP. PLANNING AREA & LOT LINE
PROP. PRIVATE GATED ACCESS
PROP. 20' PUBLIC TRAIL EASEMENT
PROP. 4' PUBLIC ACCESS EASEMENT
EX. PROJECT BOUNDARY
EX. OVERHEAD ELECTRIC LINE (161 KV)
GATED EMERGENCY VEHICLE ACCESS
PUBLIC ACCESS ROAD EAST OF BOR
EX. OVERHEAD CABLE LINE (UNDER 33KV)
LOT 1 9,219,579 SF 211.7 AC.
LOT 4 1,835,535 SF 42.1 AC.
LOT 5 611,735 SF 14.0 AC.
LOT 287 OPEN SPACE & PEDESTRIAN ACCESS LOT 417,479 SF 9.6 AC.
LOT 288 OPEN SPACE 70,618 SF 1.6 AC.
LOT 289 OPEN SPACE 84,574 SF 1.9 AC.
LOT 290 OPEN SPACE 131,051 SF / 3.0 AC.
LOT 291 OPEN SPACE 59,910 SF / 1.4 AC.
LOT 293 OPEN SPACE 51,305 SF / 1.2 AC.
LOT 294 OPEN SPACE 147,508 SF / 3.4 AC.
LOT 295 OPEN SPACE 13,288 SF 0.3 AC.
LOT 296 OPEN SPACE 91,711 SF 2.1 AC.
LOT 2 685,479 SF 15.7 AC.
LOT 3 836,899 SF 19.2 AC.
LOT 287 OPEN SPACE & PEDESTRIAN ACCESS LOT
LOT 319
LOT 332 WELL SITE 44,085 SF 1.0 AC.
LOT 333 WELL SITE 32,760 SF 0.8 AC.
LOT 334 I.I.D. SUBSTATION 100,678 SF 2.3 AC.
STREET "A" (PUBLIC ACCESS) (LOT "A")
STREET "B" (PUBLIC ACCESS) (LOT "B")
STREET "AG" (LOT "AG")
STREET "AF" (LOT "AF")
TYLER STREET
HARRISON STREET
64TH AVENUE
751-070-022 / VACANT EX. GP: INDIAN LANDS / EX. ZONING: W-2
751-070-013 / VACANT EX. GP: INDIAN LANDS EX. ZONING: A-1-10
751-070-014 / VACANT EX. GP: INDIAN LANDS EX. ZONING: A-1-10
751-070-012 / VACANT EX. GP: INDIAN LANDS / EX. ZONING: A-1-10
751-070-016 / VACANT EX. GP: INDIAN LANDS / EX. ZONING: A-1-10
751-040-001 / AGRICULTURE MSHP / EX. ZONING: SP ZONE
751-040-004 / AGRICULTURE MSHP / EX. ZONING: SP ZONE
751-040-005 / AGRICULTURE MSHP / EX. ZONING: SP ZONE
751-020-002 / RESIDENTIAL EX. GP: AGRICULTURE EX. ZONING: A-2-10
751-020-004 / RESIDENTIAL EX. GP: AGRICULTURE EX. ZONING: A-2-10
751-020-008 / RESIDENTIAL EX. GP: AGRICULTURE EX. ZONING: A-2-10
N.A.P. 751-020-010 / VACANT EX. GENERAL PLAN: AGRICULTURE EX. ZONING: A-2-10 (HEAVY AGRICULTURE 10-ACRE MIN.)
N 69°13'40" W 18.14'
N 06°50'07" E 120.60'
N 01°07'29" E 250.90'
N 35°52'50" E 29.82'
N 01°07'29" E 80.99'
N 48°40'36" W 37.97'
N 01°07'13" E 81.00'
N 48°40'36" W 37.96'
N 01°07'13" E 113.18'
N 06°49'52" E 120.60'
N 01°07'13" E 250.90'
N 35°52'35" E 29.82'
N 01°07'13" E 81.00'
N 48°41'15" W 37.96'
N 01°07'13" E 197.19'
N 19°19'47" E 30.23'
N 31°05'41" W 30.23'
N 88°52'47" W 12.00'
N 01°07'13" E 182.31'
N 06°49'52" E 120.60'
N 01°07'29" E 110.28'
N 01°07'29" E 944.53'
N 01°07'29" E 1343.36'
N 01°07'29" E 1344.88'
N 01°07'29" E 1345.63'
N 01°07'29" E 1346.38'
N 01°07'29" E 1347.13'
N 01°07'29" E 1347.88'
N 01°07'29" E 1348.63'
N 01°07'29" E 1349.38'
N 01°07'29" E 1350.13'
N 01°07'29" E 1350.88'
N 01°07'29" E 1351.63'
N 01°07'29" E

THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

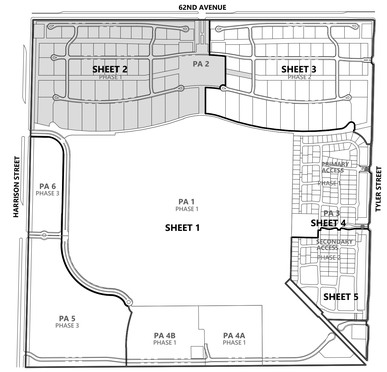
TENTATIVE TRACT MAP NO. 38578

SCHEDULE A SUBDIVISION

EXHIBIT DATE: SEPTEMBER 16, 2025

REVISIONS

NO.	DATE	DESCRIPTION



KEY TO MAP SHEETS

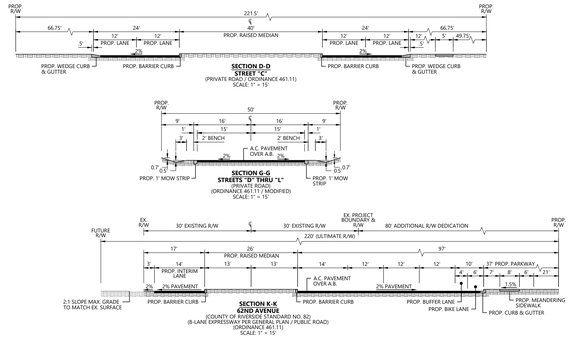
SCALE: 1" = 800'

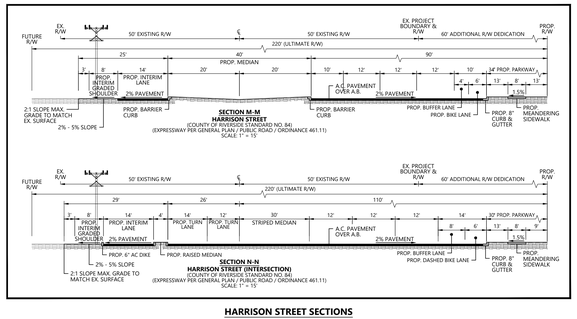
LINE DATA

NO.	BEARING	LENGTH
L1	N 00°00'14" E	22.00'
L2	N 89°59'46" W	1290.64'
L3	N 84°10'28" W	485.46'
L4	N 00°00'14" E	106.86'
L5	N 45°00'00" E	64.15'
L6	N 00°00'14" E	631.77'
L7	N 08°50'15" E	50.09'
L8	N 05°49'32" E	67.93'
L9	N 00°00'14" E	45.59'
L10	N 25°00'00" E	40.50'
L11	N 00°00'14" E	579.47'
L12	N 14°00'36" W	67.30'
L13	N 78°49'26" W	27.82'
L14	N 75°59'24" E	457.02'
L15	N 89°59'46" W	1521.99'
L16	N 00°00'14" E	607.45'

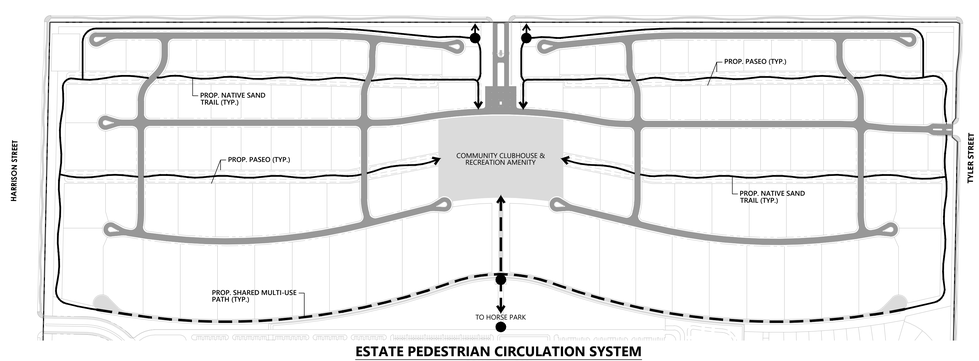
CURVE DATA

NO.	DELTA	RADIUS	LENGTH
C1	05°49'18"	2400.00'	243.86'
C2	44°59'46"	150.00'	117.80'
C3	44°59'46"	150.00'	117.80'
C4	08°50'01"	425.00'	65.52'
C5	05°49'18"	400.00'	40.64'
C6	24°59'46"	150.00'	65.44'
C7	24°59'46"	150.00'	65.44'
C8	14°00'50"	300.00'	73.38'
C9	10°42'55"	1000.00'	187.02'
C10	22°21'02"	2700.00'	1053.25'
C11	25°11'10"	3200.00'	1406.65'



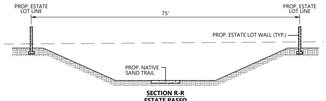


HARRISON STREET SECTIONS



ESTATE PEDESTRIAN CIRCULATION SYSTEM

SCALE: 1" = 300'



LEGEND	
	ESTATE PASEO TRAIL - NATIVE SAND TRAIL (NON-ADA)
	SHARED MULTI-USE PATH (PEDESTRIAN/HORSE/GOLF CART/VEHICLE)
●	RESIDENT GATE TO EXTERNAL TRAIL SYSTEM

ABBREVIATIONS

(E)	EAST	NO.	NUMBER
(N)	NORTH	N.T.S.	NOT TO SCALE
(S)	SOUTH	O/H	OVERHEAD
(W)	WEST	OS/PP	OPEN SPACE / PARKS
A.C.	ASPHALT CONCRETE	PE	PAD ELEVATION
AC.	ACREAGE	PG.	PAGE
APN	ASSESSORS PARCEL NUMBER	P/L	PROPERTY LINE
BNDRY	BOUNDARY	PROP.	PROPOSED
C/L	CENTERLINE	P.U.E.	PUBLIC UTILITY EASEMENT
C&G	CURB AND GUTTER	R	RADIUS
E/P	EDGE OF PAVEMENT	R-L	LOW DENSITY (RESIDENTIAL)
ESMT.	EASEMENT	R/W	RIGHT OF WAY
EX.	EXISTING	SF	SQUARE FEET
MAX.	MAXIMUM	STD.	STANDARD
M.B.	MAP BOOK	TYP.	TYPICAL
MIN.	MINIMUM	UG	UNDERGROUND

LEGEND

679.3	EXISTING SPOT ELEVATIONS
	EXISTING CONTOURS
4	EXISTING EASEMENT DELTA
C	EXISTING CABLE
DRN	EXISTING IRRIGATION DRAIN LINE
	EXISTING EASEMENT
E	EXISTING ELECTRIC
G	EXISTING GAS
IRR	EXISTING IRRIGATION
	EXISTING LOT LINE
	EXISTING EDGE OF PAVEMENT
T	EXISTING TELEPHONE
O/H T	EXISTING OVERHEAD TELEPHONE
R/W	EXISTING RIGHT OF WAY
S	EXISTING SEWER
FM	EXISTING SEWER FORCE MAIN
W	EXISTING WATER
	TENTATIVE TRACT MAP BOUNDARY
	PROPOSED AND EXISTING CENTER LINE
	PROPOSED CURB
	PROPOSED EASEMENT
	PROPOSED LOT LINE
	PROPOSED RIGHT OF WAY

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Planning • Environmental Services • Dry Utility Coordination • GIS
34200 Bob Hope Drive Rancho Mirage, CA 92270 | 760.320.9811 | MSAConsultinginc.com

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THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE TRACT MAP NO. 38578

SCHEDULE A SUBDIVISION

EXHIBIT DATE: SEPTEMBER 16, 2025

REVISIONS

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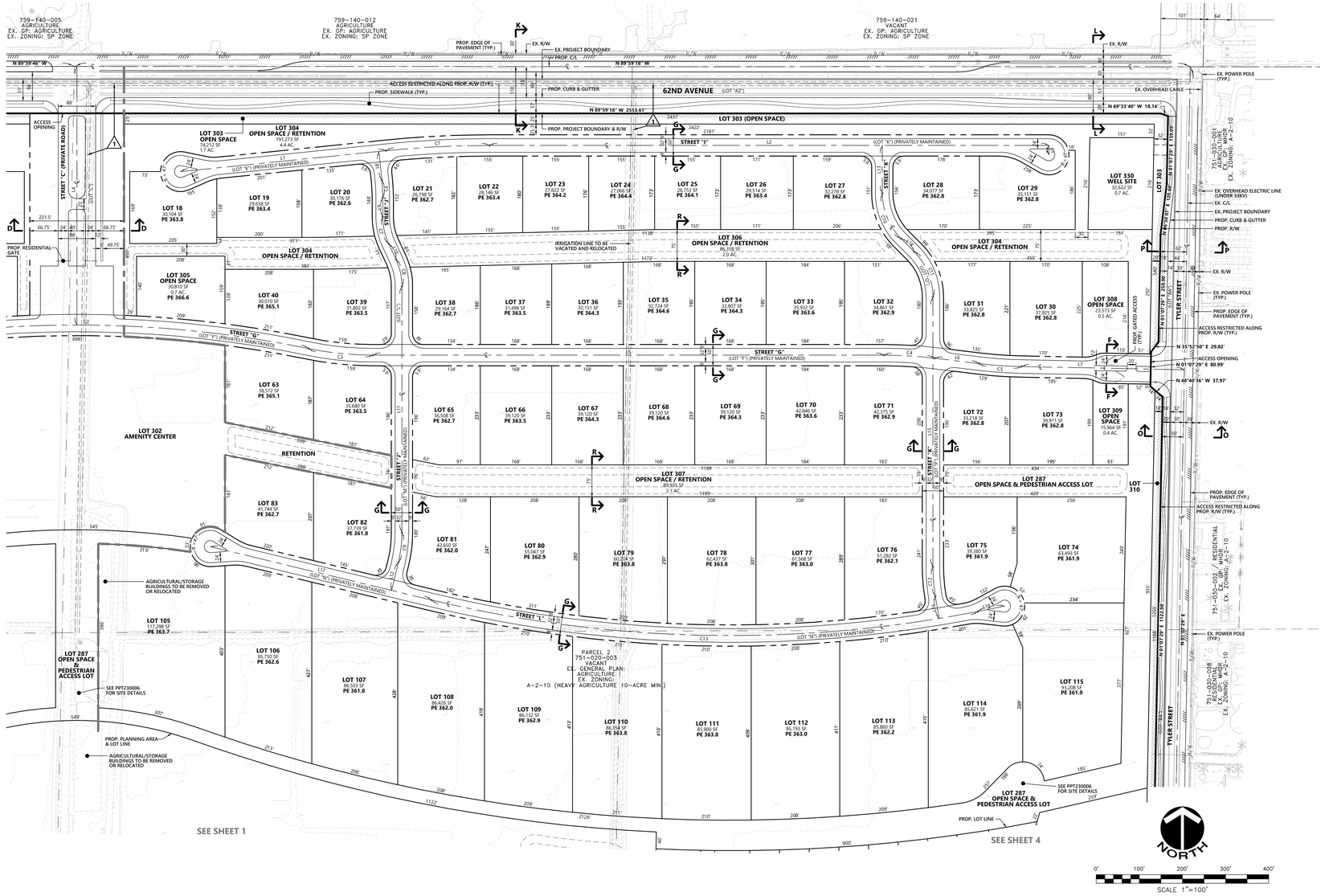
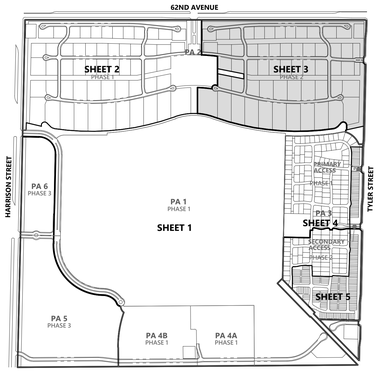




KEY TO MAP SHEETS

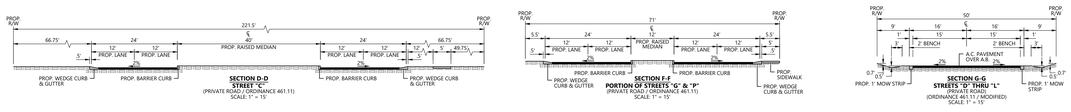
SCALE: 1" = 800'

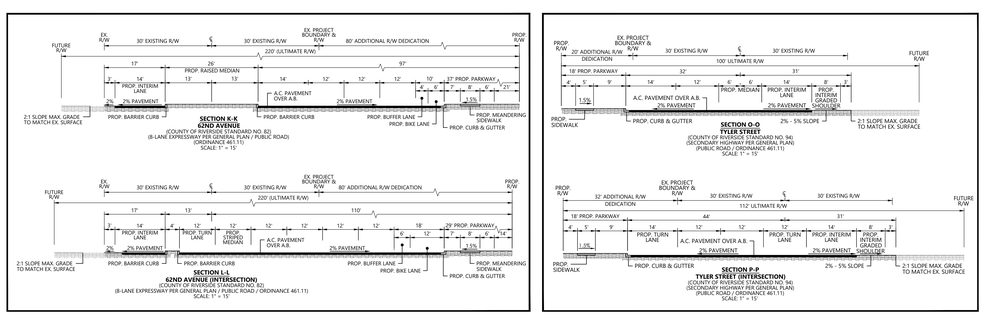
LINE DATA

NO.	BEARING	LENGTH
L1	N 84°10'55" E	485.46'
L2	N 89°59'46" W	1314.69'
L3	N 00°00'14" E	22.00'
L4	N 00°00'14" E	607.45'
L5	N 89°59'46" W	1200.98'
L6	N 83°07'29" W	104.79'
L7	N 88°52'31" W	382.60'
L8	N 05°49'05" W	67.93'
L9	N 00°00'14" E	45.65'
L10	N 21°50'00" W	40.45'
L11	N 00°00'14" E	577.95'
L12	N 13°13'40" E	68.01'
L13	N 00°00'14" E	112.87'
L14	N 45°00'00" W	43.87'
L15	N 00°00'14" E	633.75'
L16	N 09°23'49" W	53.07'
L17	N 76°26'20" W	534.52'
L18	N 78°49'32" E	63.73'

CURVE DATA

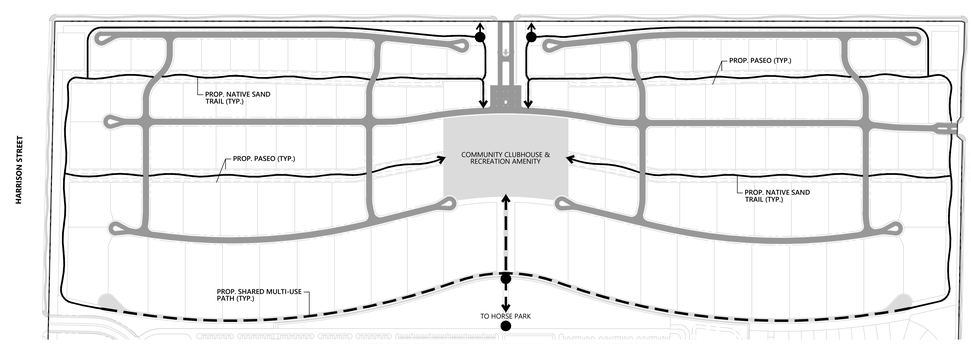
NO.	DELTA	RADIUS	LENGTH
C1	05°49'19"	2400.00'	243.87'
C2	22°21'02"	2700.00'	1053.25'
C3	11°38'07"	750.00'	152.31'
C4	06°52'17"	1000.00'	119.93'
C5	05°45'02"	1000.00'	100.37'
C6	05°49'19"	400.00'	40.64'
C7	25°00'14"	150.00'	65.46'
C8	25°00'14"	150.00'	65.46'
C9	13°33'26"	300.00'	70.99'
C10	45°00'14"	150.00'	117.82'
C11	45°00'14"	150.00'	117.82'
C12	09°24'03"	425.00'	69.73'
C13	24°44'08"	3000.00'	1295.15'





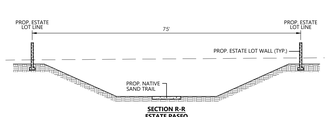
62ND AVENUE SECTIONS

TYLER STREET SECTIONS



ESTATE PEDESTRIAN CIRCULATION SYSTEM

SCALE: 1" = 300'



LEGEND	
	ESTATE PASEO TRAIL - NATIVE SAND TRAIL (NON-ADA)
	SHARED MULTI-USE PATH (PEDESTRIAN/HORSE/GOLF CART/VEHICLE)
●	RESIDENT GATE TO EXTERNAL TRAIL SYSTEM

ABBREVIATIONS

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(W)	WEST	OS/PP	OPEN SPACE / PARKS
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AC.	ACREAGE	PG.	PAGE
APN	ASSESSORS PARCEL NUMBER	P/L	PROPERTY LINE
BNDRY	BOUNDARY	PROP.	PROPOSED
C/L	CENTERLINE	P.U.E.	PUBLIC UTILITY EASEMENT
C&G	CURB AND GUTTER	R	RADIUS
E/P	EDGE OF PAVEMENT	R-L	LOW DENSITY (RESIDENTIAL)
ESMT.	EASEMENT	R/W	RIGHT OF WAY
EX.	EXISTING	SF	SQUARE FEET
MAX.	MAXIMUM	STD.	STANDARD
M.B.	MAP BOOK	TYP.	TYPICAL
MIN.	MINIMUM	UG	UNDERGROUND

LEGEND

679.3	EXISTING SPOT ELEVATIONS
	EXISTING CONTOURS
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E	EXISTING CABLE
DRN	EXISTING IRRIGATION DRAIN LINE
	EXISTING EASEMENT
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G	EXISTING GAS
IRR	EXISTING IRRIGATION
	EXISTING LOT LINE
	EXISTING EDGE OF PAVEMENT
T	EXISTING TELEPHONE
O/H T	EXISTING OVERHEAD TELEPHONE
R/W	EXISTING RIGHT OF WAY
S	EXISTING SEWER
FM	EXISTING SEWER FORCE MAIN
W	EXISTING WATER
	TENTATIVE TRACT MAP BOUNDARY
	PROPOSED AND EXISTING CENTER LINE
	PROPOSED CURB
	PROPOSED EASEMENT
	PROPOSED LOT LINE
	PROPOSED RIGHT OF WAY

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THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

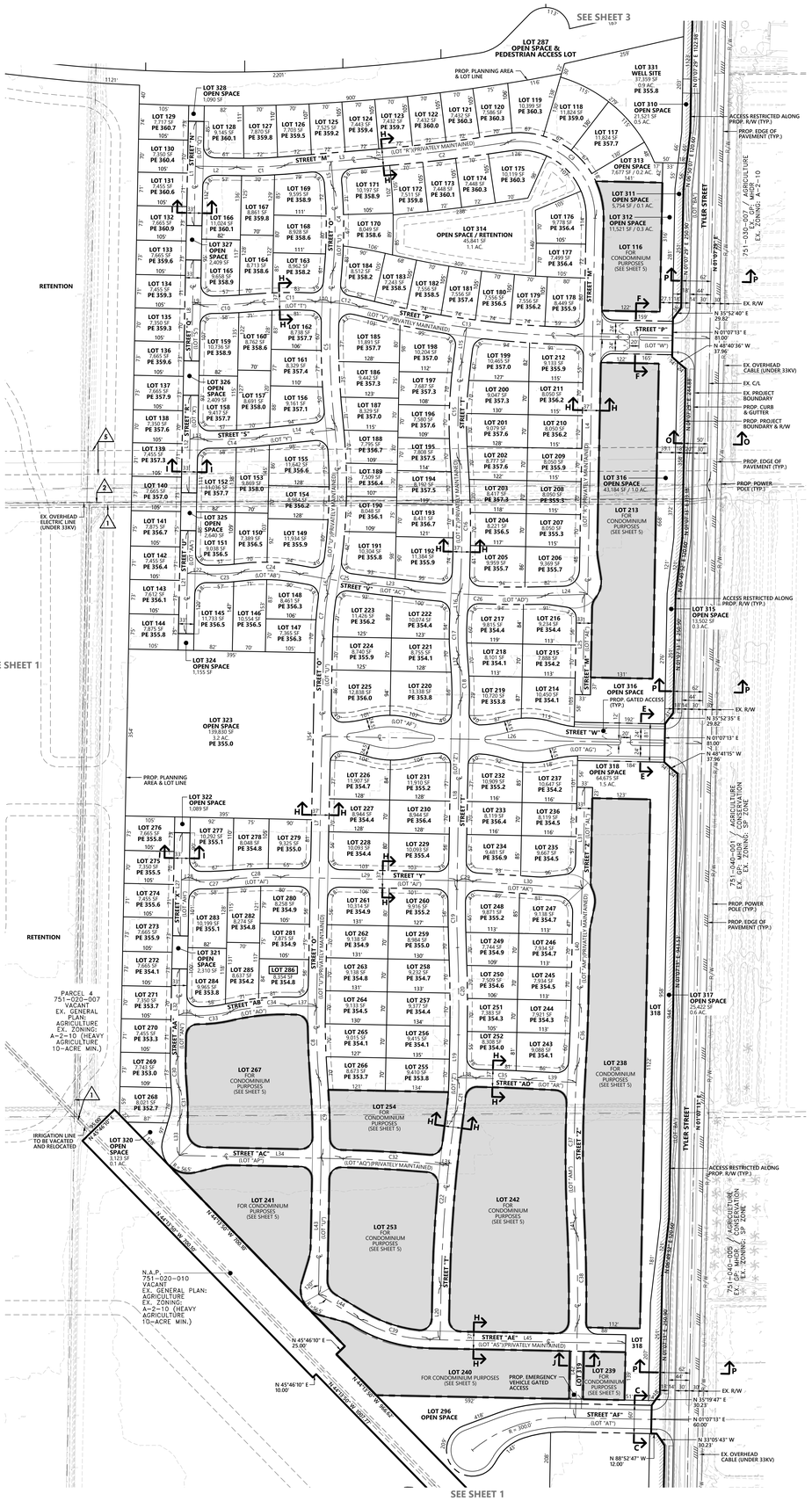
TENTATIVE TRACT MAP NO. 38578

SCHEDULE A SUBDIVISION

EXHIBIT DATE: SEPTEMBER 16, 2025

REVISIONS

NO.	DATE	DESCRIPTION


SEE SHEET 3
SEE SHEET 1
SEE SHEET 1
LOT 287 OPEN SPACE & PEDESTRIAN ACCESS LOT
PROP. PLANNING AREA & LOT LINE
LOT 328 OPEN SPACE 1,090 SF
LOT 331 WELL SITE 37,359 SF 0.9 AC PE 355.8
LOT 310 OPEN SPACE 21,521 SF 0.5 AC.
ACCESS RESTRICTED ALONG PROP. R/W (TYP.)
PROP. EDGE OF PAVEMENT (TYP.)
LOT 311 OPEN SPACE 5,754 SF / 0.1 AC.
LOT 312 OPEN SPACE 11,521 SF / 0.3 AC.
LOT 116 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 313 OPEN SPACE 7,877 SF / 0.2 AC. 14±'
LOT 314 OPEN SPACE / RETENTION 45,841 SF 1.1 AC.
RETENTION
TYLER STREET
751-030-007 / AGRICULTURE EX. ZONING: A-2-10
EX. R/W
EX. OVERHEAD CABLE (UNDER 33KV)
EX. C/L
EX. PROJECT BOUNDARY
PROP. CURB & GUTTER
PROP. PROJECT BOUNDARY & R/W
PROP. EDGE OF PAVEMENT (TYP.)
PROP. POWER POLE (TYP.)
LOT 316 OPEN SPACE 43,184 SF / 1.0 AC.
LOT 213 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 311 OPEN SPACE 13,502 SF 0.3 AC.
PROP. GATED ACCESS (TYP.)
LOT 318 OPEN SPACE 64,675 SF 1.5 AC.
LOT 317 OPEN SPACE 25,422 SF 0.6 AC.
PROP. PLANNING AREA & LOT LINE
LOT 322 OPEN SPACE 1,089 SF
LOT 323 OPEN SPACE 139,830 SF 3.2 AC. PE 355.0
LOT 324 OPEN SPACE 1,155 SF
LOT 325 OPEN SPACE 2,640 SF
LOT 326 OPEN SPACE 2,409 SF
LOT 327 OPEN SPACE 2,409 SF
LOT 320 OPEN SPACE 5,123 SF 0.1 AC.
LOT 321 OPEN SPACE 2,310 SF
LOT 296 OPEN SPACE
LOT 267 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 238 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 254 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 241 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 242 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 253 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 240 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
LOT 239 FOR CONDOMINIUM PURPOSES (SEE SHEET 5)
PROP. EMERGENCY VEHICLE GATED ACCESS
PARCEL 4 751-020-007 VACANT EX. GENERAL PLAN: AGRICULTURE EX. ZONING: A-2-10 (HEAVY AGRICULTURE 10-ACRE MIN.)
N.A.P. 751-020-010 VACANT EX. GENERAL PLAN: AGRICULTURE EX. ZONING: A-2-10 (HEAVY AGRICULTURE 10-ACRE MIN.)
IRRIGATION LINE TO BE VACATED AND RELOCATED
AGRICULTURE PRESERVATION ZONE
AGRICULTURE EX. ZONING: A-2-10
STREET "A" STREET "B" STREET "C" STREET "D" STREET "E" STREET "F" STREET "G" STREET "H" STREET "I" STREET "J" STREET "K" STREET "L" STREET "M" STREET "N" STREET "O" STREET "P" STREET "Q" STREET "R" STREET "S" STREET "T" STREET "U" STREET "V" STREET "W" STREET "X" STREET "Y" STREET "Z" STREET "AA" STREET "AB" STREET "AC" STREET "AD" STREET "AE" STREET "AF"
N 01°07'13" E 2,648.28'
N 01°07'13" E 1,322.64'
N 01°07'13" E 1,325.64'
N 01°07'13" E 1,322.64'
N 01°07'13" E 1,322.64'
N 01°07'13" E 1,322

THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE TRACT MAP NO. 38578

SCHEDULE A SUBDIVISION FOR CONDOMINIUM PURPOSES

EXHIBIT DATE: SEPTEMBER 16, 2025

REVISIONS

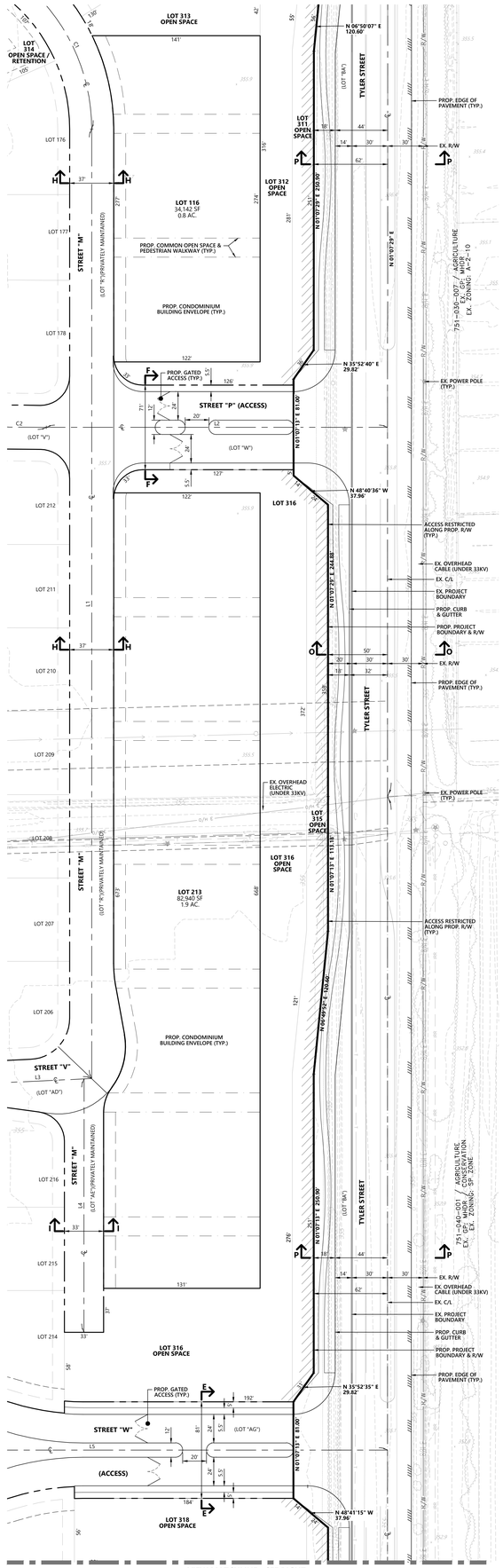
NO.	DATE	DESCRIPTION

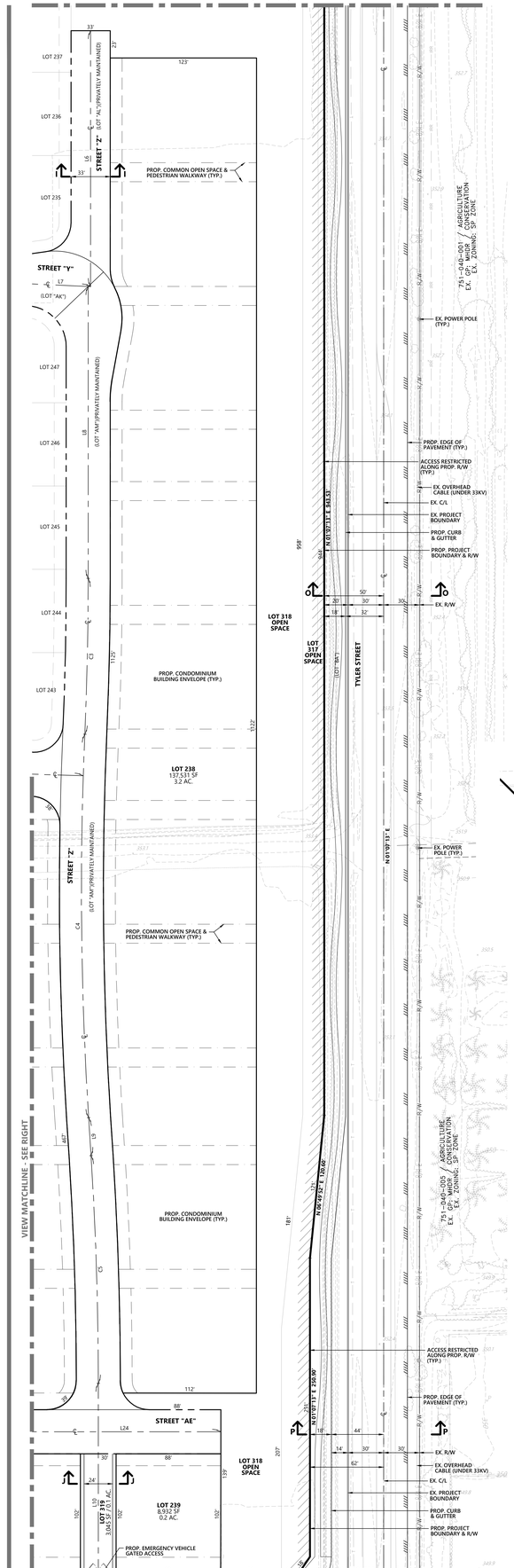
BUILDING DESCRIPTION	NO. OF BUILDINGS	NO. UNITS	SF
A 2-PLEX	4 BUILDINGS (2,499 SF / EA.)	8 UNITS	±9,996 SF
A 3-PLEX	9 BUILDINGS (3,728 SF / EA.)	27 UNITS	±33,552 SF
A 4-PLEX	23 BUILDINGS (4,957 SF / EA.)	92 UNITS	±114,011 SF
B 4-PLEX	11 BUILDINGS (4,547 SF / EA.)	44 UNITS	±50,017 SF
C-TH	5 BUILDINGS (6,383 SF / EA.)	20 UNITS	±31,915 SF
PROPOSED BUILDING TOTAL	52 BUILDINGS	191 UNITS	±239,491 SF

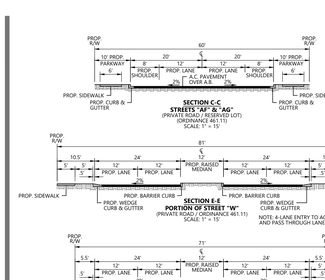
VIEW MATCHLINE - SEE LEFT

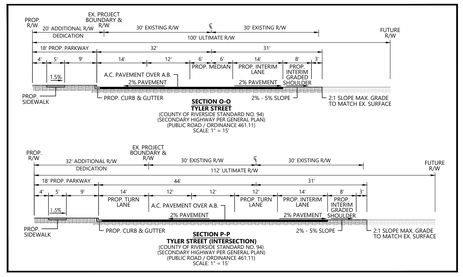
VIEW MATCHLINE - SEE RIGHT

SHEET MATCHLINE - SEE SHEET 4

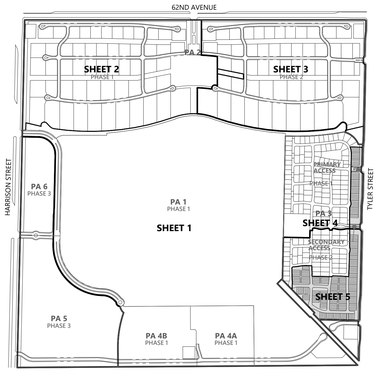






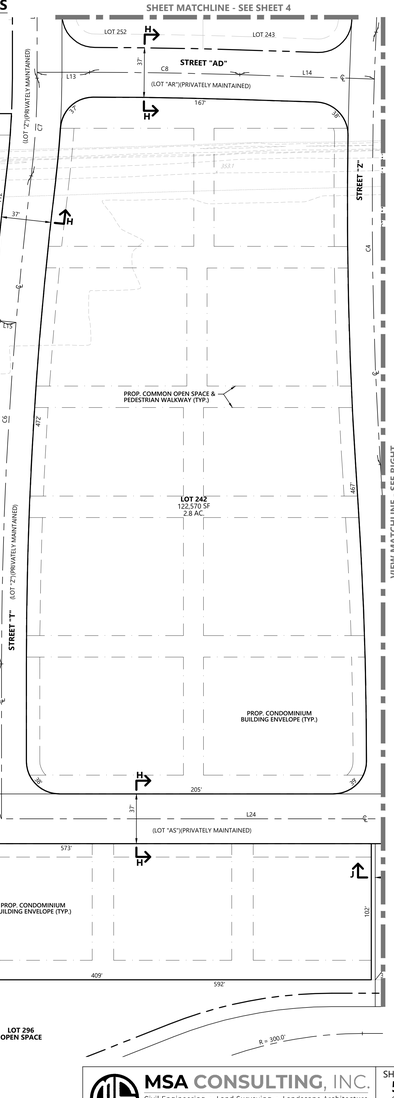


TYLER STREET SECTIONS



KEY TO MAP SHEETS

SCALE: 1" = 800'



LINE DATA		
NO.	BEARING	LENGTH
L1	N 01°03'13" E	197.52'
L2	N 88°52'47" W	286.59'
L3	N 88°27'11" E	90.29'
L4	N 01°03'13" E	212.82'
L5	N 88°52'47" W	806.00'
L6	N 01°07'13" E	215.14'
L7	N 86°12'45" W	233.81'
L8	N 01°07'13" E	345.28'
L9	N 02°32'07" W	32.02'
L10	N 01°07'13" E	200.72'
L11	N 01°07'13" E	115.40'
L12	N 01°07'13" E	95.48'
L13	N 88°52'47" W	39.06'
L14	N 87°02'47" W	100.30'
L15	N 84°09'46" W	11.62'
L16	N 88°52'47" W	347.63'
L17	N 01°07'13" E	781.81'
L18	N 01°07'13" E	80.02'
L19	N 01°07'13" E	186.05'
L20	N 88°52'47" W	35.53'
L21	N 88°52'47" W	60.00'
L22	N 01°07'13" E	290.90'
L23	N 58°52'47" W	101.89'
L24	N 88°52'47" W	414.99'

CURVE DATA			
NO.	DELTA	RADIUS	LENGTH
C1	89°58'56"	160.00'	279.20'
C2	13°14'07"	2000.00'	462.00'
C3	02°30'05"	3000.00'	130.97'
C4	06°09'25"	3000.00'	322.38'
C5	03°39'21"	3000.00'	191.42'
C6	06°57'44"	3000.00'	364.54'
C7	06°57'45"	600.00'	72.91'
C8	01°49'59"	3500.00'	111.98'
C9	03°32'01"	3000.00'	185.02'
C10	04°52'01"	2500.00'	212.36'
C11	05°41'50"	1700.00'	169.04'
C12	05°41'50"	1500.00'	149.15'
C13	06°11'30"	600.00'	64.84'
C14	06°11'30"	600.00'	64.84'
C15	14°12'59"	300.00'	74.44'
C16	14°12'59"	500.00'	124.06'
C17	30°00'00"	300.00'	157.08'

NORTH

0" 40' 80' 120' 160'

SCALE 1"=40'

ABBREVIATIONS

(E)	EAST
(N)	NORTH
(S)	SOUTH
(W)	WEST
A.C.	ASPHALT CONCRETE
AC	ACREAGE
APN	ASSESSORS PARCEL NUMBER
BNDRY	BOUNDARY
C/L	CENTERLINE
C&G	CURB AND GUTTER
E/P	EDGE OF PAVEMENT
ESMT.	EASEMENT
EX.	EXISTING
MAX.	MAXIMUM
M.B.	MAP BOOK
MIN.	MINIMUM
NO.	NUMBER
N.T.S.	NOT TO SCALE
O/H	OVERHEAD
OS/PP	OPEN SPACE / PARKS
PE	PAD ELEVATION
PG.	PAGE
P/L	PROPERTY LINE
PROP.	PROPOSED
P.U.E.	PUBLIC UTILITY EASEMENT
R	RADIUS
R-L	LOW DENSITY (RESIDENTIAL)
R/W	RIGHT OF WAY
SF	SQUARE FEET
STD.	STANDARD
TYP.	TYPICAL
UG	UNDERGROUND

LEGEND

679.3	EXISTING SPOT ELEVATIONS
	EXISTING CONTOURS
Δ	EXISTING EASEMENT DELTA
E	EXISTING CABLE
IRRN	EXISTING IRRIGATION DRAIN LINE
E	EXISTING EASEMENT
E	EXISTING ELECTRIC
G	EXISTING GAS
IRR	EXISTING IRRIGATION
	EXISTING LOT LINE
	EXISTING EDGE OF PAVEMENT
T	EXISTING TELEPHONE
O/H	EXISTING OVERHEAD TELEPHONE
R/W	EXISTING RIGHT OF WAY
S	EXISTING SEWER
FM	EXISTING SEWER FORCE MAIN
W	EXISTING WATER
	TENTATIVE TRACT MAP BOUNDARY
	PROPOSED AND EXISTING CENTER LINE
	PROPOSED CURB
	PROPOSED EASEMENT
	PROPOSED LOT LINE
	PROPOSED RIGHT OF WAY

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THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE TRACT MAP NO. 38578

SCHEDULE A SUBDIVISION FOR CONDOMINIUM PURPOSES

EXHIBIT DATE: SEPTEMBER 16, 2025

REVISIONS

NO.	DATE	DESCRIPTION

LOT MATRIX

1	9,217,254	211.6	EQUESTRIAN LOT
2	685,367	15.7	WORKFORCE HOUSING
3	967,331	22.2	WORKFORCE HOUSING
4	2,047,076	47.0	COMMERCIAL
5	611,735	14.0	COMMERCIAL
6	35,599	0.8	ESTATE LOT
7	31,736	0.7	ESTATE LOT
8	27,016	0.6	ESTATE LOT
9	27,788	0.6	ESTATE LOT
10	27,788	0.6	ESTATE LOT
11	28,048	0.6	ESTATE LOT
12	28,647	0.7	ESTATE LOT
13	29,218	0.7	ESTATE LOT
14	27,345	0.6	ESTATE LOT
15	27,104	0.6	ESTATE LOT
16	29,658	0.7	ESTATE LOT
17	30,104	0.7	ESTATE LOT
18	30,104	0.7	ESTATE LOT
19	29,658	0.7	ESTATE LOT
20	30,176	0.7	ESTATE LOT
21	26,798	0.6	ESTATE LOT
22	28,146	0.6	ESTATE LOT
23	27,622	0.6	ESTATE LOT
24	27,066	0.6	ESTATE LOT
25	26,753	0.6	ESTATE LOT
26	29,514	0.7	ESTATE LOT
27	32,278	0.7	ESTATE LOT
28	34,077	0.8	ESTATE LOT
29	35,151	0.8	ESTATE LOT
30	37,925	0.9	ESTATE LOT
31	33,825	0.8	ESTATE LOT
32	34,861	0.8	ESTATE LOT
33	35,932	0.8	ESTATE LOT
34	32,807	0.8	ESTATE LOT
35	32,724	0.8	ESTATE LOT
36	32,151	0.7	ESTATE LOT
37	31,498	0.7	ESTATE LOT
38	29,164	0.7	ESTATE LOT
39	31,802	0.7	ESTATE LOT
40	30,010	0.7	ESTATE LOT
41	29,976	0.7	ESTATE LOT
42	30,872	0.7	ESTATE LOT
43	28,194	0.6	ESTATE LOT
44	30,427	0.7	ESTATE LOT
45	31,080	0.7	ESTATE LOT
46	31,653	0.7	ESTATE LOT
47	31,735	0.7	ESTATE LOT
48	34,711	0.8	ESTATE LOT
49	33,300	0.8	ESTATE LOT
50	32,383	0.7	ESTATE LOT
51	45,460	1.0	ESTATE LOT
52	57,902	1.3	ESTATE LOT
53	40,322	0.9	ESTATE LOT
54	43,646	1.0	ESTATE LOT
55	43,960	1.0	ESTATE LOT
56	40,192	0.9	ESTATE LOT
57	40,192	0.9	ESTATE LOT
58	40,192	0.9	ESTATE LOT
59	40,192	0.9	ESTATE LOT
60	37,582	0.9	ESTATE LOT
61	36,633	0.8	ESTATE LOT
62	38,623	0.9	ESTATE LOT
63	38,572	0.9	ESTATE LOT
64	35,680	0.8	ESTATE LOT
65	36,508	0.8	ESTATE LOT
66	39,120	0.9	ESTATE LOT
67	39,120	0.9	ESTATE LOT
68	39,120	0.9	ESTATE LOT
69	39,120	0.9	ESTATE LOT
70	42,846	1.0	ESTATE LOT
71	42,375	1.0	ESTATE LOT
72	33,218	0.8	ESTATE LOT
73	39,911	0.9	ESTATE LOT
74	63,493	1.5	ESTATE LOT
75	39,380	0.9	ESTATE LOT
76	51,282	1.2	ESTATE LOT
77	61,568	1.4	ESTATE LOT
78	62,437	1.4	ESTATE LOT
79	60,274	1.4	ESTATE LOT
80	55,047	1.3	ESTATE LOT
81	42,650	1.0	ESTATE LOT
82	37,739	0.9	ESTATE LOT
83	41,744	1.0	ESTATE LOT
84	41,863	1.0	ESTATE LOT
85	38,136	0.9	ESTATE LOT
86	43,122	1.0	ESTATE LOT
87	54,997	1.3	ESTATE LOT
88	59,847	1.4	ESTATE LOT
89	61,831	1.4	ESTATE LOT
90	60,976	1.4	ESTATE LOT
91	50,847	1.2	ESTATE LOT
92	39,491	0.9	ESTATE LOT
93	58,275	1.3	ESTATE LOT
94	93,066	2.1	ESTATE LOT
95	86,445	2.0	ESTATE LOT
96	86,267	2.0	ESTATE LOT
97	85,790	2.0	ESTATE LOT
98	85,683	2.0	ESTATE LOT
99	86,769	2.0	ESTATE LOT
100	86,581	2.0	ESTATE LOT
101	86,341	2.0	ESTATE LOT
102	85,996	2.0	ESTATE LOT
103	85,149	2.0	ESTATE LOT
104	117,279	2.7	ESTATE LOT
105	117,298	2.7	ESTATE LOT
106	85,750	2.0	ESTATE LOT
107	86,503	2.0	ESTATE LOT
108	86,426	2.0	ESTATE LOT
109	86,132	2.0	ESTATE LOT
110	86,354	2.0	ESTATE LOT
111	85,900	2.0	ESTATE LOT
112	85,193	2.0	ESTATE LOT
113	85,860	2.0	ESTATE LOT
114	85,621	2.0	ESTATE LOT
115	93,208	2.1	ESTATE LOT
116	34,142	0.8	CONDOMINIUM LOT
117	11,824	0.3	SINGLE FAMILY DETACHED
118	11,824	0.3	SINGLE FAMILY DETACHED
119	10,399	0.2	SINGLE FAMILY DETACHED
120	7,586	0.2	SINGLE FAMILY DETACHED
121	7,432	0.2	SINGLE FAMILY DETACHED
122	7,432	0.2	SINGLE FAMILY DETACHED
123	7,432	0.2	SINGLE FAMILY DETACHED
124	7,443	0.2	SINGLE FAMILY DETACHED
125	7,525	0.2	SINGLE FAMILY DETACHED
126	7,703	0.2	SINGLE FAMILY DETACHED
127	7,870	0.2	SINGLE FAMILY DETACHED
128	9,145	0.2	SINGLE FAMILY DETACHED
129	7,717	0.2	SINGLE FAMILY DETACHED
130	7,350	0.2	SINGLE FAMILY DETACHED
131	7,455	0.2	SINGLE FAMILY DETACHED
132	7,665	0.2	SINGLE FAMILY DETACHED
133	7,665	0.2	SINGLE FAMILY DETACHED
134	7,455	0.2	SINGLE FAMILY DETACHED
135	7,350	0.2	SINGLE FAMILY DETACHED
136	7,665	0.2	SINGLE FAMILY DETACHED
137	7,665	0.2	SINGLE FAMILY DETACHED
138	7,350	0.2	SINGLE FAMILY DETACHED
139	7,455	0.2	SINGLE FAMILY DETACHED
140	7,665	0.2	SINGLE FAMILY DETACHED
141	7,875	0.2	SINGLE FAMILY DETACHED
142	7,455	0.2	SINGLE FAMILY DETACHED
143	7,612	0.2	SINGLE FAMILY DETACHED
144	7,875	0.2	SINGLE FAMILY DETACHED
145	11,733	0.3	SINGLE FAMILY DETACHED
146	10,554	0.2	SINGLE FAMILY DETACHED
147	7,365	0.2	SINGLE FAMILY DETACHED
148	8,461	0.2	SINGLE FAMILY DETACHED
149	11,934	0.3	SINGLE FAMILY DETACHED
150	7,389	0.2	SINGLE FAMILY DETACHED
151	9,038	0.2	SINGLE FAMILY DETACHED
152	11,036	0.3	SINGLE FAMILY DETACHED
153	9,869	0.2	SINGLE FAMILY DETACHED
154	8,984	0.2	SINGLE FAMILY DETACHED
155	11,642	0.3	SINGLE FAMILY DETACHED
156	9,161	0.2	SINGLE FAMILY DETACHED
157	8,691	0.2	SINGLE FAMILY DETACHED
158	9,417	0.2	SINGLE FAMILY DETACHED
159	10,736	0.2	SINGLE FAMILY DETACHED
160	8,762	0.2	SINGLE FAMILY DETACHED
161	8,329	0.2	SINGLE FAMILY DETACHED
162	8,738	0.2	SINGLE FAMILY DETACHED
163	8,962	0.2	SINGLE FAMILY DETACHED
164	8,713	0.2	SINGLE FAMILY DETACHED
165	8,658	0.2	SINGLE FAMILY DETACHED
166	11,024	0.3	SINGLE FAMILY DETACHED
167	8,861	0.2	SINGLE FAMILY DETACHED
168	8,928	0.2	SINGLE FAMILY DETACHED
169	9,595	0.2	SINGLE FAMILY DETACHED
170	8,049	0.2	SINGLE FAMILY DETACHED
171	10,197	0.2	SINGLE FAMILY DETACHED
172	7,511	0.2	SINGLE FAMILY DETACHED
173	7,448	0.2	SINGLE FAMILY DETACHED
174	7,448	0.2	SINGLE FAMILY DETACHED
175	10,119	0.2	SINGLE FAMILY DETACHED
176	9,778	0.2	SINGLE FAMILY DETACHED
177	7,499	0.2	SINGLE FAMILY DETACHED
178	8,449	0.2	SINGLE FAMILY DETACHED
179	7,556	0.2	SINGLE FAMILY DETACHED
180	7,556	0.2	SINGLE FAMILY DETACHED
181	7,556	0.2	SINGLE FAMILY DETACHED
182	7,556	0.2	SINGLE FAMILY DETACHED
183	7,243	0.2	SINGLE FAMILY DETACHED
184	8,512	0.2	SINGLE FAMILY DETACHED
185	11,891	0.3	SINGLE FAMILY DETACHED
186	9,442	0.2	SINGLE FAMILY DETACHED
187	8,329	0.2	SINGLE FAMILY DETACHED
188	7,795	0.2	SINGLE FAMILY DETACHED
189	7,509	0.2	SINGLE FAMILY DETACHED
190	8,048	0.2	SINGLE FAMILY DETACHED
191	10,304	0.2	SINGLE FAMILY DETACHED
192	11,384	0.3	SINGLE FAMILY DETACHED
193	8,431	0.2	SINGLE FAMILY DETACHED
194	8,192	0.2	SINGLE FAMILY DETACHED
195	7,808	0.2	SINGLE FAMILY DETACHED
196	7,580	0.2	SINGLE FAMILY DETACHED
197	7,687	0.2	SINGLE FAMILY DETACHED
198	10,204	0.2	SINGLE FAMILY DETACHED
199	10,465	0.2	SINGLE FAMILY DETACHED
200	9,047	0.2	SINGLE FAMILY DETACHED
201	9,079	0.2	SINGLE FAMILY DETACHED
202	8,777	0.2	SINGLE FAMILY DETACHED
203	8,417	0.2	SINGLE FAMILY DETACHED
204	8,221	0.2	SINGLE FAMILY DETACHED
205	9,959	0.2	SINGLE FAMILY DETACHED
206	9,369	0.2	SINGLE FAMILY DETACHED
207	8,050	0.2	SINGLE FAMILY DETACHED
208	8,050	0.2	SINGLE FAMILY DETACHED
209	8,050	0.2	SINGLE FAMILY DETACHED
210	8,050	0.2	SINGLE FAMILY DETACHED
211	8,050	0.2	SINGLE FAMILY DETACHED
212	9,133	0.2	SINGLE FAMILY DETACHED
213	82,940	1.9	CONDOMINIUM LOT
214	10,450	0.2	SINGLE FAMILY DETACHED
215	7,888	0.2	SINGLE FAMILY DETACHED
216	9,234	0.2	SINGLE FAMILY DETACHED
217	9,815	0.2	SINGLE FAMILY DETACHED
218	8,101	0.2	SINGLE FAMILY DETACHED
219	10,720	0.2	SINGLE FAMILY DETACHED
220	13,338	0.3	SINGLE FAMILY DETACHED
221	8,755	0.2	SINGLE FAMILY DETACHED
222	10,074	0.2	SINGLE FAMILY DETACHED
223	11,426	0.3	SINGLE FAMILY DETACHED
224	8,740	0.2	SINGLE FAMILY DETACHED
225	12,838	0.3	SINGLE FAMILY DETACHED
226	11,907	0.3	SINGLE FAMILY DETACHED
227	8,944	0.2	SINGLE FAMILY DETACHED
228	10,093	0.2	SINGLE FAMILY DETACHED
229	10,093	0.2	SINGLE FAMILY DETACHED
230	8,944	0.2	SINGLE FAMILY DETACHED
231	11,910	0.3	SINGLE FAMILY DETACHED
232	10,909	0.3	SINGLE FAMILY DETACHED
233	8,119	0.2	SINGLE FAMILY DETACHED
234	9,481	0.2	SINGLE FAMILY DETACHED
235	9,667	0.2	SINGLE FAMILY DETACHED
236	8,119	0.2	SINGLE FAMILY DETACHED
237	10,647	0.2	SINGLE FAMILY DETACHED
238	137,531	3.2	CONDOMINIUM LOT
239	8,932	0.2	CONDOMINIUM LOT
240	51,426	1.2	CONDOMINIUM LOT
241	43,611	1.0	CONDOMINIUM LOT
242	122,570	2.8	CONDOMINIUM LOT
243	9,088	0.2	SINGLE FAMILY DETACHED
244	7,921	0.2	SINGLE FAMILY DETACHED
245	7,934	0.2	SINGLE FAMILY DETACHED
246	7,934	0.2	SINGLE FAMILY DETACHED
247	9,138	0.2	SINGLE FAMILY DETACHED
248	9,871	0.2	SINGLE FAMILY DETACHED
249	7,744	0.2	SINGLE FAMILY DETACHED
250	7,509	0.2	SINGLE FAMILY DETACHED
251	7,383	0.2	SINGLE FAMILY DETACHED
252	8,308	0.2	SINGLE FAMILY DETACHED
253	69,653	1.6	CONDOMINIUM LOT
254	31,445	0.7	CONDOMINIUM LOT
255	9,410	0.2	SINGLE FAMILY DETACHED
256	9,415	0.2	SINGLE FAMILY DETACHED
257	9,377	0.2	SINGLE FAMILY DETACHED
258	9,232	0.2	SINGLE FAMILY DETACHED
259	8,984	0.2	SINGLE FAMILY DETACHED
260	9,916	0.2	SINGLE FAMILY DETACHED
261	10,314	0.2	SINGLE FAMILY DETACHED
262	9,138	0.2	SINGLE FAMILY DETACHED
263	9,138	0.2	SINGLE FAMILY DETACHED
264	9,133	0.2	SINGLE FAMILY DETACHED
265	9,015	0.2	SINGLE FAMILY DETACHED
266	8,673	0.2	SINGLE FAMILY DETACHED
267	71,303	1.6	CONDOMINIUM LOT
268	8,021	0.2	SINGLE FAMILY DETACHED
269	7,743	0.2	SINGLE FAMILY DETACHED
270	7,455	0.2	SINGLE FAMILY DETACHED
271	7,350	0.2	SINGLE FAMILY DETACHED
272	7,665	0.2	SINGLE FAMILY DETACHED
273	7,665	0.2	SINGLE FAMILY DETACHED
274	7,455	0.2	SINGLE FAMILY DETACHED
275	7,350	0.2	SINGLE FAMILY DETACHED
276	7,665	0.2	SINGLE FAMILY DETACHED
277	10,292	0.2	SINGLE FAMILY DETACHED
278	8,048	0.2	SINGLE FAMILY DETACHED
279	9,325	0.2	SINGLE FAMILY DETACHED
280	8,258	0.2	SINGLE FAMILY DETACHED
281	7,875	0.2	SINGLE FAMILY DETACHED
282	8,274	0.2	SINGLE FAMILY DETACHED
283	10,199	0.2	SINGLE FAMILY DETACHED
284	9,965	0.2	SINGLE FAMILY DETACHED
285	8,637	0.2	SINGLE FAMILY DETACHED
286	8,354	0.2	SINGLE FAMILY DETACHED
287	417,479	9.6	OPEN SPACE & PEDESTRIAN ACCESS LOT
288	70,618	1.6	OPEN SPACE
289	84,574	1.9	OPEN SPACE
290	131,849	3.0	OPEN SPACE
291	59,910	1.4	OPEN SPACE
292	1,600	0.0	OPEN SPACE
293	51,305	1.2	OPEN SPACE
294	147,353	3.4	OPEN SPACE
295	13,288	0.3	OPEN SPACE
296	91,711	2.1	OPEN SPACE
297	133,601	3.1	OPEN SPACE
298	265,947	6.1	OPEN SPACE / RETENTION
299	85,684	2.0	OPEN SPACE / RETENTION
300	89,935	2.1	OPEN SPACE / RETENTION
301	30,807	0.7	OPEN SPACE
302	375,599	8.6	AMENITY CENTER
303	74,212	1.7	OPEN SPACE
304	191,273	4.4	OPEN SPACE / RETENTION
305	30,810	0.7	OPEN SPACE
306	86,358	2.0	OPEN SPACE / RETENTION
307	89,935	2.1	OPEN SPACE / RETENTION
308	23,573	0.5	OPEN SPACE
309	15,964	0.4	OPEN SPACE
310	21,521	0.5	OPEN SPACE
311	5,754	0.1	OPEN SPACE
312	11,521	0.3	OPEN SPACE
313	7,677	0.2	OPEN SPACE
314	45,841	1.1	OPEN SPACE / RETENTION
315	13,502	0.3	OPEN SPACE
316	43,184	1.0	OPEN SPACE
317	25,422	0.6	OPEN SPACE
318	64,675	1.5	OPEN SPACE
319	3,045	0.1	GATED EMERGENCY VEHICLE ACCESS
320	3,123	0.1	OPEN SPACE
321	2,310	0.1	OPEN SPACE
322	1,089	0.0	OPEN SPACE
323	139,830	3.2	OPEN SPACE
324	1,155	0.0	OPEN SPACE
325	2,640	0.1	OPEN SPACE
326	2,409	0.1	OPEN SPACE
327	2,409	0.1	OPEN SPACE
328	1,090	0.0	OPEN SPACE
329	32,455	0.7	WELL SITE
330	32,622	0.7	WELL SITE
331	37,359	0.9	WELL SITE
332	44,083	1.0	WELL SITE
333	32,760	0.8	WELL SITE
334	101,678	2.3	I.I.D. SUBSTATION
LOT 'A'	50,247	1.2	STREET "A"
LOT 'B'	358,799	8.2	STREET "B"
LOT 'C'	104,813	2.4	STREET "C"
LOT 'D'	112,097	2.6	STREET "D"
LOT 'E'	24,475	0.6	PORTION OF STREET "E"
LOT 'F'	245,307	5.6	STREET "G"
LOT 'G'	29,305	0.7	PORTION OF STREET "E"
LOT 'H'	105,245	2.4	STREET "H"
LOT 'I'	22,078	0.5	PORTION OF STREET "F"
LOT 'J	26,285	0.6	PORTION OF STREET "F"
LOT 'K'	113,299	2.6	STREET "I"
LOT 'L'	22,397	0.5	PORTION OF STREET "J"
LOT 'M'	25,807	0.6	PORTION OF STREET "J"
LOT 'N'	105,340	2.4	STREET "L"
LOT 'O'	24,817	0.6	PORTION OF STREET "K"
LOT 'P'	28,704	0.7	PORTION OF STREET "K"
LOT 'Q'	7,293	0.2	STREET "N"
LOT 'R'	64,744	1.5	PORTION OF STREET "M"
LOT 'S'	7,062	0.2	STREET "O"
LOT 'T'	10,056	0.2	PORTION OF STREET "P"
LOT 'U'	89,875	2.1	STREET "O"
LOT 'V'	19,952	0.5	PORTION OF STREET "P"
LOT 'W'	10,981	0.3	PORTION OF STREET "P"
LOT 'X'	6,831	0.2	STREET "R"
LOT 'Y'	10,647	0.2	STREET "S"
LOT 'Z'	78,681	1.8	STREET "T"
LOT 'AA'	7,211	0.2	STREET "U"
LOT 'AB'	10,481	0.2	PORTION OF STREET "V"
LOT 'AC'	9,399	0.2	PORTION OF STREET "V"
LOT 'AD'	10,228	0.2	PORTION OF STREET "V"
LOT 'AE'	6,344	0.1	PORTION OF STREET "M"
LOT 'AF'	19,829	0.5	PORTION OF STREET "W"
LOT 'AG'	33,113	0.8	PORTION OF STREET "W"
LOT 'AH'	7,227	0.2	STREET "X"
LOT 'AI'	10,037	0.2	PORTION OF STREET "Y"
LOT 'AJ	9,988	0.2	PORTION OF STREET "Y"
LOT 'AK'	10,018	0.2	PORTION OF STREET "Y"
LOT 'AL'	6,573	0.2	PORTION OF STREET "Z"
LOT 'AM'	35,823	0.8	PORTION OF STREET "Z"
LOT 'AN'	14,806	0.3	STREET "AA"
LOT 'AO'	10,094	0.2	STREET "AB"
LOT 'AP'	12,187	0.3	PORTION OF STREET "AC"
LOT 'AQ'	9,155	0.2	PORTION OF STREET "AC"
LOT 'AR'	8,427	0.2	STREET "AD"
LOT 'AS'	26,240	0.6	STREET "AE"
LOT 'AT'	31,649	0.7	PORTION OF STREET "AF"
LOT 'AU'	76,461	1.8	PORTION OF STREET "AG"
LOT 'AV'	61,792	1.4	PORTION OF STREET "AG"
LOT 'AW'	70,522	1.6	PORTION OF STREET "AG"
LOT 'AX'	92,075	2.1	PORTION OF STREET "AG"
LOT 'AY'	310,679	7.1	HARRISON STREET PUBLIC R/W DEDICATION
LOT 'AZ'	413,464	9.5	62 AVENUE PUBLIC R/W DEDICATION
LOT 'BA'	131,934	3.0	TYLER STREET PUBLIC R/W DEDICATION

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THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE TRACT MAP NO. 38578

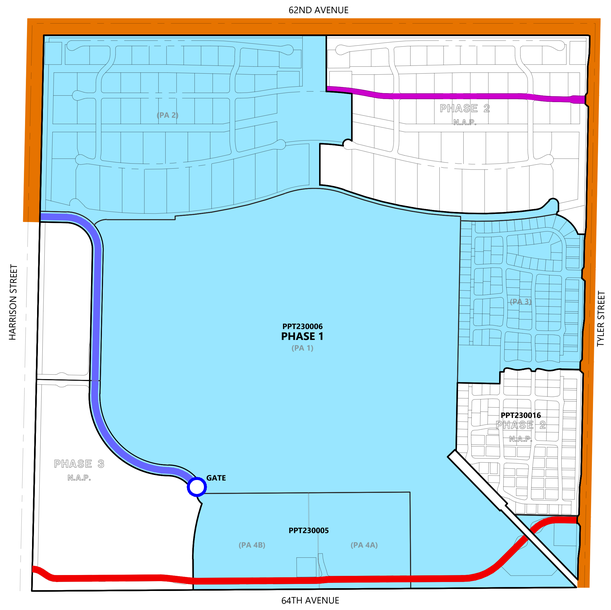
PROPOSED FINAL MAP AND PERIMETER IMPROVEMENT PHASING

EXHIBIT DATE: SEPTEMBER 16, 2025

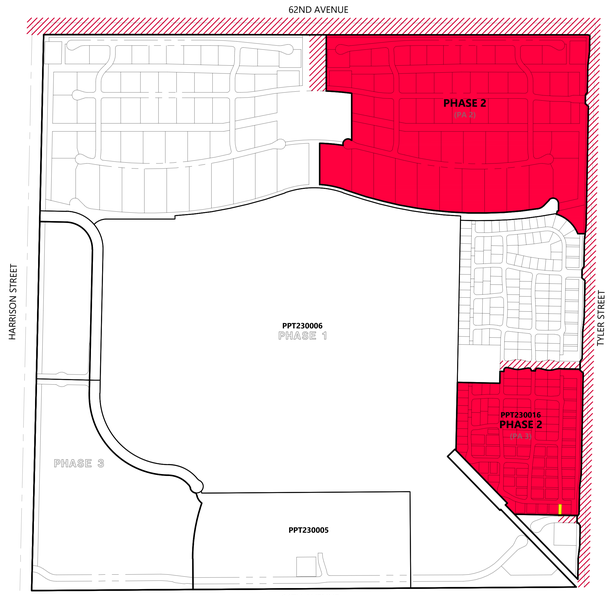
REVISIONS

NO.	DATE	DESCRIPTION

NOTE 1. THE PHASE LINES SHOWN WILL BE THE BOUNDARY FOR THE PHASE OF THE FINAL MAP.



PHASE 1 LEGEND	
	PHASE 1 FINAL MAP
	STREET "B": ON-SITE STREET IMPROVEMENT (PRIVATE WITH PUBLIC ACCESS)
	STREET "AF & "AG": ON-SITE STREET IMPROVEMENT (PRIVATE WITH PUBLIC ACCESS)
	ON-SITE STREET IMPROVEMENT (SECONDARY ACCESS)
	OFF-SITE STREET IMPROVEMENT (PUBLIC)
	PRIVATE GATE

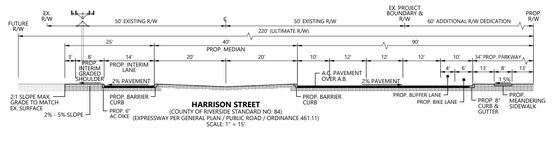


PHASE 2 LEGEND	
	PHASE 2 FINAL MAP (NO OFF-SITE IMPROVEMENTS)
	ON-SITE STREET IMPROVEMENT (EMERGENCY ACCESS)
	ADDITIONAL OFF-SITE IMPROVEMENTS IF BUILT AS PHASE 1

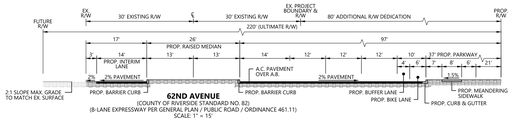
PHASE 3 LEGEND	
	PHASE 3 FINAL MAP
	STREET "A": ON-SITE STREET IMPROVEMENT (PRIVATE WITH PUBLIC ACCESS)
	OFF-SITE STREET IMPROVEMENT (PUBLIC)
	ADDITIONAL OFF-SITE IMPROVEMENTS IF BUILT AS PHASE 1

PHASE 1 STREET SECTIONS

OFF-SITE



HARRISON STREET
(COUNTY OF RIVERSIDE STANDARD NO. 84)
(EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
SCALE: 1" = 15'

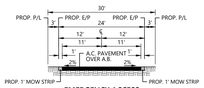


62ND AVENUE
(COUNTY OF RIVERSIDE STANDARD NO. 82)
(8-LANE EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
SCALE: 1" = 15'

TYLER STREET
(COUNTY OF RIVERSIDE STANDARD NO. 94)
(SECONDARY HIGHWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
SCALE: 1" = 15'

PHASE 2 STREET SECTIONS

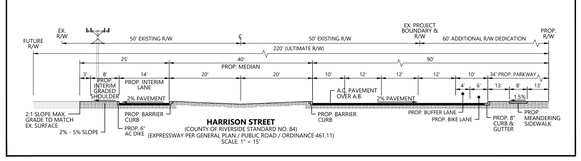
ON-SITE



EMERGENCY ACCESS
(ORDINANCE 461.11)
SCALE: 1" = 15'

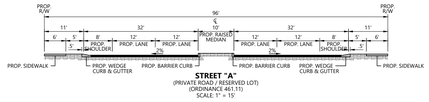
PHASE 3 STREET SECTIONS

OFF-SITE

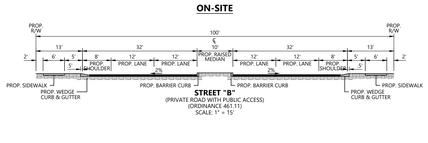


HARRISON STREET
(COUNTY OF RIVERSIDE STANDARD NO. 84)
(EXPRESSWAY PER GENERAL PLAN / PUBLIC ROAD / ORDINANCE 461.11)
SCALE: 1" = 15'

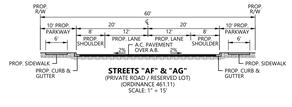
ON-SITE



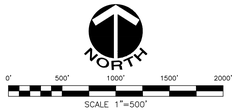
STREET "A"
(PRIVATE ROAD / RESERVED LOT)
(ORDINANCE 461.11)
SCALE: 1" = 15'



STREET "B"
(PRIVATE ROAD WITH PUBLIC ACCESS)
(ORDINANCE 461.11)
SCALE: 1" = 15'



STREETS "AF" & "AG"
(PRIVATE ROAD / RESERVED LOT)
(ORDINANCE 461.11)
SCALE: 1" = 15'



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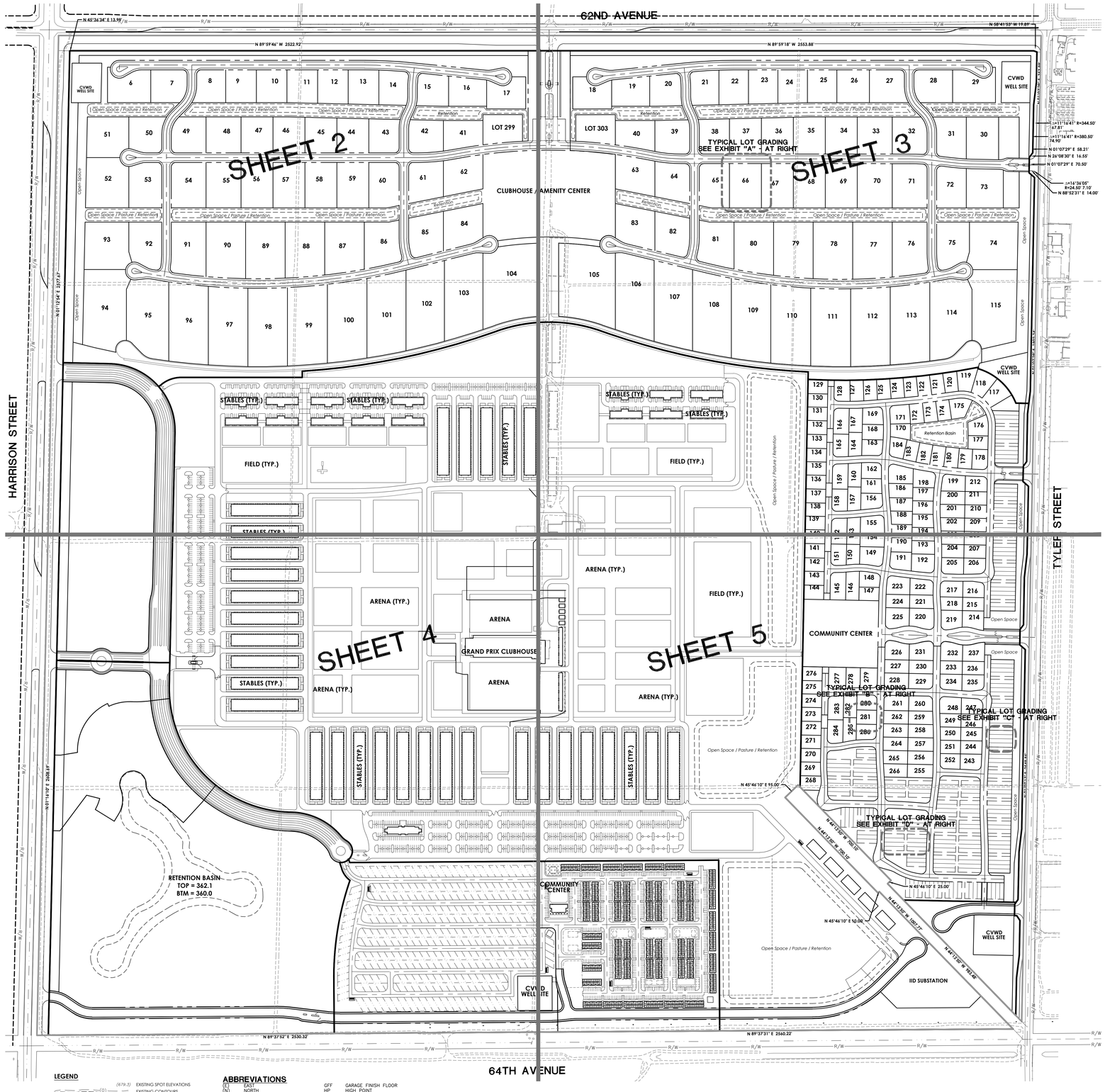


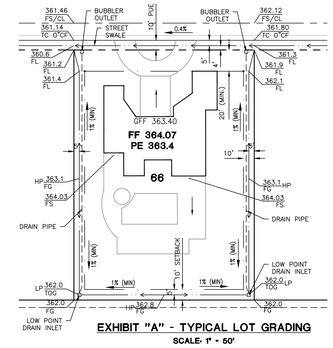


EXHIBIT "A" - TYPICAL LOT GRADING
SCALE: 1" = 50'

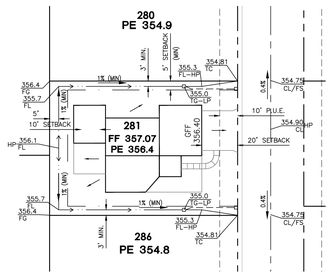


EXHIBIT "B" - TYPICAL LOT GRADING
SCALE: 1" = 30'

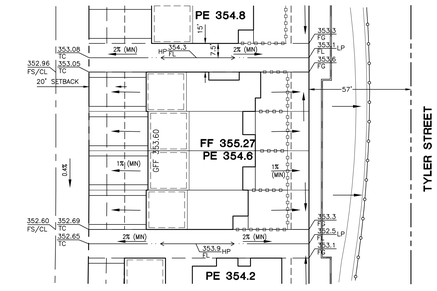


EXHIBIT "C" - TYPICAL LOT GRADING
SCALE: 1" = 30'

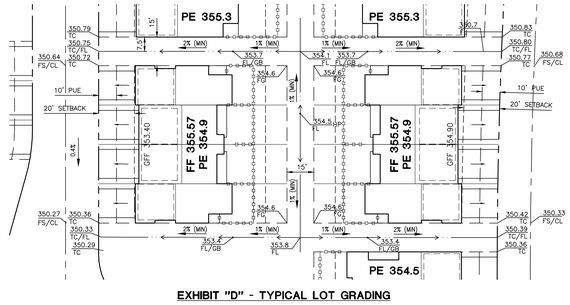


EXHIBIT "D" - TYPICAL LOT GRADING
SCALE: 1" = 30'

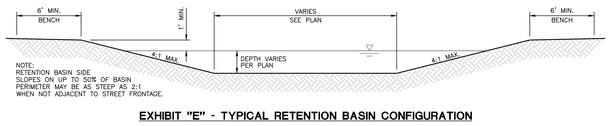
LEGEND

- EXISTING SPOT ELEVATIONS (679.3)
- EXISTING CONTOURS
- PROPOSED SITE CONTOURS
- EXISTING CABLE
- EXISTING EASEMENT
- EXISTING ELECTRIC
- EXISTING GAS
- EXISTING IRRIGATION
- EXISTING LOT LINE
- EXISTING TELEPHONE
- EXISTING OVERHEAD TELEPHONE
- EXISTING RIGHT OF WAY
- EXISTING SEWER
- EXISTING SEWER FORCE MAIN
- EXISTING WATER
- EXISTING PROJECT BOUNDARY
- PROPOSED PROJECT BOUNDARY
- PROPOSED CENTERLINE
- PROPOSED CURB
- PROPOSED EASEMENT
- PROPOSED LOT LINE
- PROPOSED FENCE
- PROPOSED RETAINING WALL
- PROPOSED RESTRICTED ACCESS

ABBREVIATIONS

(E)	EAST	GFF	GARAGE FINISH FLOOR
(N)	NORTH	HP	HIGH POINT
(S)	SOUTH	LP	LOW POINT
(W)	WEST	MAX.	MAXIMUM
(NE)	NORTHEAST	M.B.	MAP BOOK
(NW)	NORTHWEST	MIN.	MINIMUM
(SE)	SOUTHEAST	NO.	NUMBER
(SW)	SOUTHWEST	N.T.S	NOT TO SCALE
ADMIN	ADMINISTRATION	O/H	OVERHEAD
AC	ASPHALT CONCRETE	OS/PP	OPEN SPACE/PARKS
AC	ACREAGE	PE	PAD ELEVATION (STREET C/L +1.5')
APN	ASSESSORS PARCEL NUMBER	PG.	PAGE
BNDRY	BOUNDARY	P/L	PROPERTY LINE
BLDG	BUILDING	PIP	PROTECT IN PLACE
C/L	CENTERLINE	PROP.	PROPOSED
C&G	CURB AND GUTTER	PUE	PUBLIC UTILITY EASEMENT
DWG.	DRAWING	R	RADIUS
DWY	DRIVEWAY	R-L	LOW DENSITY (RESIDENTIAL)
EP	EDGE OF PAVEMENT	R/W	RIGHT OF WAY
ESMT	EASEMENT	SF	SQUARE FEET
EX.	EXISTING	STD.	STANDARD
FF	FINISH FLOOR	TC	TOP OF CURB
FG	FINISH GRADE	TYP.	TYPICAL
FL	FLOWLINE	UG	UNDERGROUND
FS	FINISH SURFACE		

NORTH
0' 200' 400' 600' 800'
SCALE 1"=200'



NOTE:
RETENTION BASIN SIDE SLOPES ON UP TO 50% OF BASIN PERIMETER MAY BE AS STEEP AS 2:1 WHEN NOT ADJACENT TO STREET FRONTAGE.

EXHIBIT "E" - TYPICAL RETENTION BASIN CONFIGURATION
N.T.S.

GRADING NOTES

1. THIS PRELIMINARY GRADING PLAN INDICATES:
   - A. CONCEPTUAL GRADING AND DRAINAGE WITH Q_{100} PEAK FLOW RATES ESTABLISHED FROM THE DEVELOPED CONDITION HYDROLOGY EXHIBIT.
   - B. EXISTING TOPOGRAPHY.
   - C. PAD ELEVATIONS: FINISHED FLOOR ELEVATIONS ARE 8" ABOVE PAD ELEVATION AND ARE NOT SHOWN FOR CLARITY.
   - D. EXISTING DRAIN TILE LINES ARE 7-9 FEET BELOW EXISTING SURFACE, BASED ON AVAILABLE DRAIN TILE PLATS (SEE EXISTING CONDITION HYDROLOGY EXHIBIT IN THE PRELIMINARY HYDROLOGY REPORT). A SEPARATE PLAN WILL BE PREPARED TO SHOW ALL RELOCATED DRAIN TILE LINES AND PROTECTED-IN-PLACE LINES.
   - E. SPOT ELEVATIONS ARE SHOWN TO DEMONSTRATE MINIMUM SLOPE REQUIREMENTS ARE MET (0.35% FOR CONCRETE AND 1.0% FOR OTHER SURFACES).
   - F. ALL PARKING LOTS ARE ASPHALT PAVEMENT WITH CONCRETE CURBS AND GUTTERS TO CONVEY FLOW.
   - G. TYPICAL LOT DRAINAGE IS SHOWN ON DETAILS ON SHEET 1.
   - H. WALLS ARE NOT SHOWN ON THIS PLAN.
   - I. THE PROJECT BMPs ARE THE RETENTION BASINS CAPABLE OF RETAINING THE 100-YEAR STORM AND DEWATERING WITHIN 48 HOURS.

ESTIMATED EARTHWORK QUANTITIES

	CUT (CY)	FILL (CY)
RAW QUANTITIES	1,531,279	827,517
SUBSIDENCE	132,501	71,346
RAW ADJUSTED	1,398,778	898,863
SHRINKAGE		253,526
OVER EXCAVATION	750,843	750,843
OVER EXCAVATION SHRINKAGE		211,776
SUBTOTAL	2,149,622	2,115,009
EXPORT		34,613
TOTAL EARTHWORK	2,149,622	2,149,622

EARTHWORK FACTORS:

THE FOLLOWING FACTORS WERE USED IN THE PREPARATION OF THE EARTHWORK ANALYSIS:

SHRINKAGE:	**(19-25%)**	**22% AVG.**
SUBSIDENCE:	**(0.15-0.25)**	**0.2' AVG.**
OVER-EX.		**3'**

THE UNINCORPORATED AREA IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE TRACT MAP NO. 38578

SCHEDULE A SUBDIVISION

PRELIMINARY GRADING PLAN

EXHIBIT DATE: SEPTEMBER 16, 2025

REVISIONS

NO.	DATE	DESCRIPTION

DATA TABLE

APPLICANT / LAND OWNER:	THERMAL RANCH, LLC		
ADDRESS:	19312 CANYON DRIVE VILLA PARK, CALIFORNIA 92861		
CONTACT:	JEREMY SMITH		
EXHIBIT PREPARER:	MSA CONSULTING, INC.		
ADDRESS:	34200 BOB HOPE DRIVE RANCHO MIRAGE, CALIFORNIA 92270		
CONTACT:	PAUL DEPALATIS, AICP	**TELEPHONE:**	(760) 320-9811
SOURCE OF TOPOGRAPHY:	AEROTECH MAPPING, INC.		
ADDRESS:	200 SPECTRUM CENTER DRIVE, SUITE 300 IRVINE, CALIFORNIA 92618		
DATE OF TOPOGRAPHY:	DECEMBER 7, 2022	**TELEPHONE:**	(619) 606-5020
ASSESSOR'S PARCEL NUMBERS:	751-020-002, -003, -006, -007, -010		

PUBLIC UTILITY PURVEYORS:		
ELECTRIC:	IMPERIAL IRRIGATION DISTRICT	(760) 339-9379
GAS:	SOUTHERN CALIFORNIA GAS COMPANY	(877) 238-0092
TELEPHONE:	FRONTIER COMMUNICATIONS	(800) 921-8101
WATER:	COACHELLA VALLEY WATER DISTRICT	(760) 398-2651
CABLE:	SPECTRUM	(760) 340-2225
SEWER:	COACHELLA VALLEY WATER DISTRICT	(760) 398-2651
USA:	UNDERGROUND SERVICE ALERT	(800) 227-2600

FEMA FLOOD ZONE DESIGNATION:

ZONE "A" - WITHOUT BASE ELEVATION
ZONE "X": AREAS OF 0.2% ANNUAL CHANCE FLOOD
AS SHOWN ON RIVERSIDE COUNTY, CALIFORNIA, FLOOD INSURANCE RATE MAPS, COMMUNITY PANEL MAP NUMBER: 06065C2910H
EFFECTIVE DATE: MARCH 6, 2018

LIQUEFACTION: HIGH LIQUEFACTION ZONE

NOTES: 1. THIS MAP INCLUDES THE ENTIRE CONTIGUOUS OWNERSHIP OF THE LAND DIVIDER.

EXHIBIT LEGEND

- PROPOSED BUILDING OUTLINE
- PROPOSED CENTERLINE
- PROPOSED CURB & GUTTER
- PROPOSED EASEMENT
- PROPOSED LOT LINE
- PROPOSED ROW
- PROPOSED RETAINING WALL
- PROPOSED FLOWLINE
- PROPOSED RETENTION BASIN
- PROPOSED GARAGE STEP
- PROPOSED SIDEWALK
- PROPOSED SETBACK

NOTES

1. ESTATE LOTS (LOTS OVER 1/2 ACRE) WILL HAVE PADS 100' X 100' WITH ON LOT RETENTION.
2. THE PROPOSED TOP OF CURB ELEVATION IS EQUIVALENT TO THE CENTERLINE OF PAVEMENT ELEVATION.
3. EXISTING TILE DRAIN LINES TO BE EITHER PROTECTED IN PLACE OR BE REMOVED BY SEPARATE PERMIT.
4. ALL STREETS TO BE ROUGH GRADING TO 1 FOOT BELOW TOP OF PAVEMENT ELEVATION AT CENTERLINE.
5. SEE TENTATIVE TRACT MAP 38578 FOR STREET SECTIONS AND DISPOSITION OF EXISTING FACILITIES.

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COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP NO. 38578
SCHEDULE A SUBDIVISION
PRELIMINARY GRADING PLAN
THERMAL RANCH

DESIGN BY	SHEET
FS/NM	1
DRAWN BY	OF
FS/NM	5
CHECK BY	
JAD	

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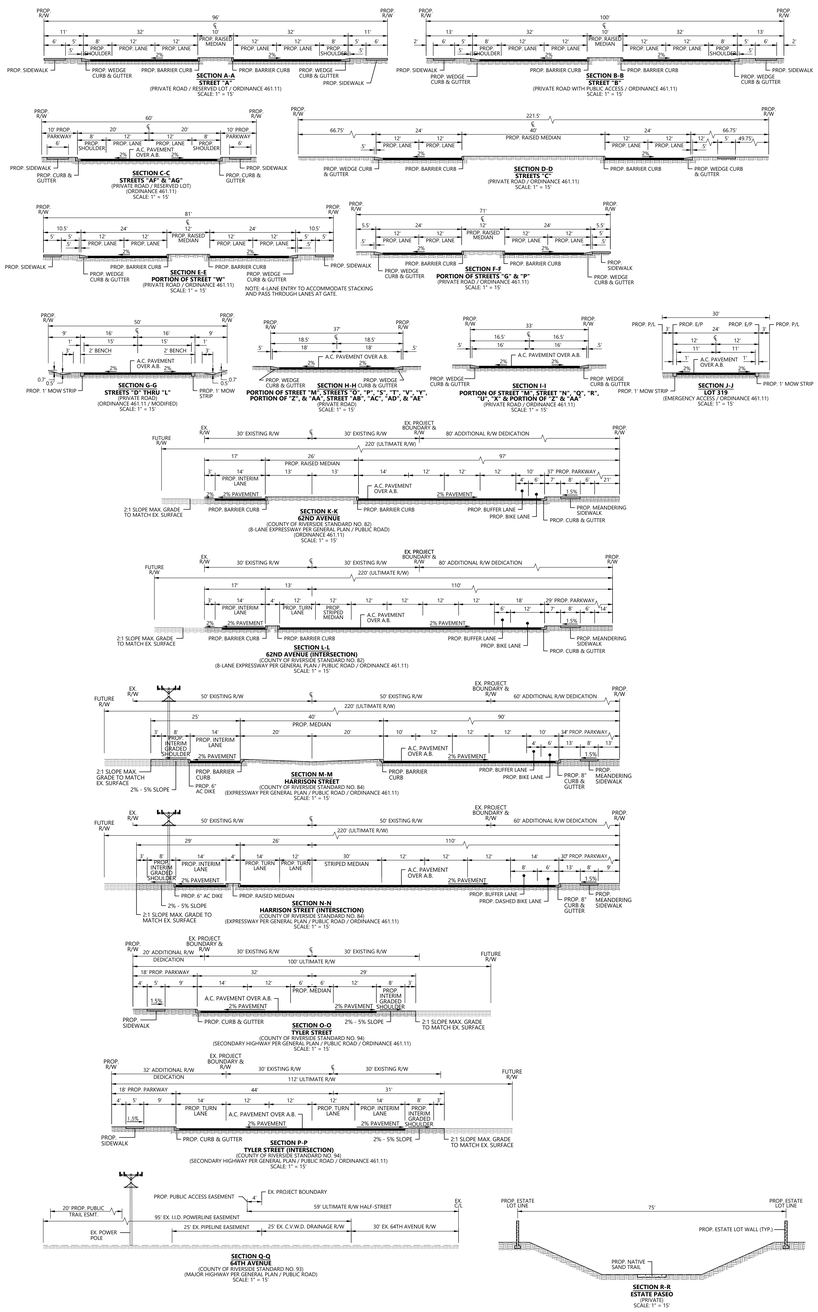

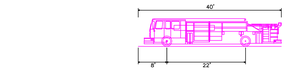

Pumper Fire Truck	
Overall Length	40.000ft
Overall Width	8.167ft
Overall Body Height	7.745ft
Min Body Ground Clearance	0.656ft
Track Width	8.167ft
Lock-to-lock time	5.00s
Max Wheel Angle	45.00°

FIRE APPARATUS DETAIL

FIRE TURNING LEGEND:	
	FIRE TRUCK
	FIRE TRUCK BODY
	FIRE TRUCK CHASSIS

SEPTEMBER 16, 2025

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SHEET 2 OF 5

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