RIVERSIDE COUNTY
PLANNING DEPARTMENT

Charissa Leach
Director

Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: August 30, 2021

TO: Responsible/Trustee Agencies

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Southwest Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Keller Crossing (Specific Plan Amendment No. 380A01, General Plan Amendment 210004, Change of Zone 2100012, and Tentative Tract Map 38163)

PROJECT LOCATION: South of the Scott Road, west of Highway 79, north of Keller Road, and east of Pourroy Road.

PROJECT DESCRIPTION: The proposed Project consists of applications for the first amendment to the Keller Crossing Specific Plan (SP00380A01), a General Plan Amendment (GPA210004), Change of Zone (CZ2100012), and a Tentative Tract Map (TTM38163). The adopted Keller Crossing Specific Plan allows for development of a 201.1-acre property with 250 Mixed Use (MU) dwelling units, 42 Medium Density Residential (MDR) dwelling units, 25 Low Density Residential (LDR) dwelling units, and 3 Very Low Density Residential (VLDR) dwelling units for a total of 320 dwelling units. Additionally, the adopted Keller Crossing Specific Plan allows for development of 37.8 acres of Commercial Retail, and open space on 61.1 acres. The Project Applicant proposes to amend the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to instead allow for future development of a 191.4-acre property with 177 Medium Density Residential (MDR) dwelling units on 37.9 acres, 179 Medium High Residential (MHR) dwelling units on 32.3 acres, and 80 Very High Residential (VHR) dwelling units that are Age-Qualified on 5.4 acres, for a total of 436 dwelling units. Additionally, the Project Applicant proposes 18 acres and up to 176,000 square feet of Commercial Retail uses, a 5.8-acre public park (Open Space-Recreation),12.9 acres of manufactured slopes, including a 3.8-acre buffer along Pourroy Road (Open Space-Manufactured Slopes), a 6.2-acre water quality management basin (Open Space-Water), and 61.1 acres designated Open Space-Conservation for MSHCP conservation purposes. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a General Plan Amendment (GPA210004);
2. Adoption of Amendment No. 1 to Specific Plan No. 333 (SP00380A01);
3. Adoption by ordinance of a Change of Zone (CZ2100012); and
4. Adoption by resolution of Tentative Tract Map (TTM38163)

LEAD AGENCY:
Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Deborah Bradford, Project Planner

PROJECT SPONSOR:
Applicant: D.R. Horton a Los Angeles Holding Company, Inc.
Address: 2280 Wardlow Circle, Suite 100
Corona, CA, 92878
Attn: Jennifer O'Leary

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

SCOPE OF ANALYSIS
It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

- Aesthetics
- Agriculture & Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire
- Mandatory Findings of Significance

PUBLIC SCOPING MEETING:
A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30 p.m. or as soon as possible thereafter
DATE OF SCOPING SESSION: September 27, 2021

Information on how to participate in the hearing will be available on the Planning Department website at: https://planning.rctlma.org/. For further information regarding this project please contact Project Planner Deborah Bradford at (951) 955-6646 or email at dbradfor@rivco.org or go to the County Planning Department's Planning Commission agenda web page at http://planning.rctlma.org/PublicHearings.aspx.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Deborah Bradford, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

If you have any questions please contact Deborah Bradford, Project Planner at (951) 955-6646.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Deborah Bradford, Project Planner for John Hildebrand, Interim Planning Director

RIVERSIDE COUNTY
PLANNING DEPARTMENT

Charissa Leach
Director

Applicant's Notice of Preparation of a Draft Environmental Impact Report

DATE: August 30, 2021

TO: D.R. Horton a Los Angeles Holding Company, Inc.
2280 Wardlow Circle, Suite 100
Corona, CA, 92878

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1. Adoption by resolution of a General Plan Amendment (GPA210004);
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3. Adoption by ordinance of a Change of Zone (CZ2100012); and
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Pursuant to the Riverside County Rules to Implement the California Environmental Quality Act of 1970, it has been determined that the above referenced project may have a significant effect on the environment and an Environmental Impact Report (EIR) is required.

OPTION TO REVISE PROJECT:
Upon receipt of this notice, the project sponsor may revise the project to avoid or mitigate any adverse impact. If the potential adverse effects are substantially mitigated by the revised project, an EIR shall not be required and a Mitigated Negative Declaration or a Negative Declaration (statement of no significant effect) shall be prepared.

APPEAL:
The staff requirement to prepare an EIR may be appealed to the Planning Commission within ten (10) days of receipt of this notice. The appeal must be made in writing and contain brief discussion of how the project will avoid the

environmental effects listed on the attachment. The appeal must be accompanied by: (1) adhesive labels containing the names and addresses of all property owners within a minimum of 600 feet of the project boundaries that total at least 25 different property owners; and (2) the appropriate filing fee. (Refer to the Current Riverside County Planning Department Fee Schedule).

PREPARATION OF THE DRAFT EIR:
The Draft EIR shall address the following environmental subject areas:

- Aesthetics
- Agriculture & Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire
- Mandatory Findings of Significance

The Draft EIR must meet the form and content requirements of the Planning Department. The sponsor should advise the consultant to meet with the staff on a regular basis to ensure an adequate document is prepared in a timely fashion. A preliminary draft shall be submitted for review and if determined acceptable, the consultant will be notified of the appropriate number of final draft copies to be provided for distribution to state and local agencies and interested parties.

The Draft EIR must be submitted within 120 days of this Notice unless an extension of not more than thirty (30) days is received and granted by the Department.

PUBLIC SCOPING MEETING:
A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

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EIR FEES:
The appropriate fee for an EIR (Refer to the Current Riverside County Planning Department Fee Schedule) must be submitted to the Planning Department within thirty (30) days of this Notice.

PROJECT PRESUMED ABANDONED:
Unless the EIR fee and the Draft EIR are submitted within the time periods specified above, the project will be presumed abandoned, and there will be no further processing of the development application(s) by the County of Riverside, and no refund of previously paid filing fees.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Deborah Bradford, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

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RIVERSIDE COUNTY PLANNING DEPARTMENT



Deborah Bradford, Project Planner for John Hildebrand, Interim Planning Director

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Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Deborah Bradford, Project Planner for John Hildebrand, Interim Planning Director

Document Root (Read-Only)

Selected Document

2021080570 - NOP - Keller Crossing Specific Plan No. 333, Amendment No. 1

Riverside County
Created - **8/30/2021** | Submitted - **8/30/2021** | Received - **8/30/2021** | Published - **8/30/2021**
Jerrica Harding

Document Details

Lead Agency

Riverside County

Document Type

Notice of Preparation

Document Status

Published

Title

Keller Crossing Specific Plan No. 333, Amendment No. 1

Present Land Use

Vacant, agriculture (dryland farming)

Document Description

Notice of Preparation for Amendment No. 1 to Keller Crossing Specific Plan No. 333. The proposed Project consists of applications for the first amendment to the Keller Crossing Specific Plan (SP00380A01), a General Plan Amendment (GPA210004), Change of Zone (CZ2100012), and a Tentative Tract Map (TTM38163). The adopted Keller Crossing Specific Plan allows for development of a 201.1-acre property with 250 Mixed Use (MU) dwelling units, 42 Medium Density Residential (MDR) dwelling units, 25 Low Density Residential (LDR) dwelling units, and 3 Very Low Density Residential (VLDR) dwelling units for a total of 320 dwelling units. Additionally, the adopted Keller Crossing Specific Plan allows for development of 37.8 acres of Commercial Retail, and open space on 61.1 acres. The Project Applicant proposes to amend the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to instead allow for future development of a 191.4-acre property with 177 Medium Density Residential (MDR) dwelling units on 37.9 acres, 179 Medium High Residential (MHR) dwelling units on 32.3 acres, and 80 Very High Residential (VHR) dwelling units that are Age-Qualified on 5.4 acres, for a total of 436 dwelling units. Additionally, the Project Applicant proposes 18 acres and up to 176,000 square feet of Commercial Retail uses, a 5.8-acre public park (Open Space-Recreation),12.9 acres of manufactured slopes, including a 3.8-acre buffer along Pourroy Road (Open Space-Manufactured Slopes), a 6.2-acre water quality management basin (Open Space-Water), and 61.1 acres designated Open Space-Conservation for MSHCP conservation purposes.

Attachments

Aerial Photograph (2021-08-25).pdf

Keller Crossing NOP (Agency) (2021-08-25).pdf

SCH NOC (2021-08-25) - SIGNED.pdf

SCH NOC Form APNs.pdf

SCH NOP (2021-08-25) SIGNED.pdf

SCH Summary Form (2021-08-25).pdf

Winchester Quadrangle, 2018 Map (2021-07-15).pdf

Contacts

Riverside County Planning Department - *Deborah Bradford*

4080 Lemon Street 12th Floor
Riverside, CA 92501
Phone : (951) 955-6646
dbradfor@RIVCO.ORG

Regions

Unincorporated

Counties

Riverside

Cities

(None)

Location Details

Cross Streets

NW corner of Keller Road at Winchester Road (SR-79)

Coordinates

33°37'50.94"N 117°05'46.17"W

Zip Code - 92596 | **Total Acres** - 191.4 | **Jobs** - 353 |
Parcel Number - 472-110-(001, 002, 003, 004, 007, 008, 009, 032, 033, 034) |
State Highways - State Route 79 | **Railways** - None | **Airports** - Pines Airpark |
Schools - Harvest Hill Steam Academy, Liberty High School | **Waterways** - None |
Township - 6S | **Range** - 2W | **Section** - 21 | **Base** - San Bern

Local Action Types

General Plan Amendment | Land Division (Subdivision, etc.) | Rezone | Specific Plan

Development Types

Residential (Units 436, Acres 75.6) |
Commercial (Sq. Ft. 176000, Acres 18.0, Employees 353) | Recreational (5.8-acre park) |
Other (Open Space - 86.7 acres)

Project Issues

Aesthetics | Agriculture and Forestry Resources | Air Quality | Biological Resources |
Cultural Resources | Cumulative Effects | Drainage/Absorption | Energy |
Flood Plain/Flooding | Geology/Soils | Greenhouse Gas Emissions | Growth Inducement |
Hazards & Hazardous Materials | Hydrology/Water Quality | Land Use/Planning |
Mandatory Findings of Significance | Mineral Resources | Noise | Population/Housing |
Public Services | Recreation | Schools/Universities | Sewer Capacity | Solid Waste |
Transportation | Tribal Cultural Resources | Utilities/Service Systems | Vegetation |
Wetland/Riparian | Wildfire

Review Agencies

Air Resources Board | Caltrans, Aeronautics | Caltrans, District 8 - San Bernardino/Riverside | Caltrans, Trans Planning | Conservation, Department of | Emergency Services, Office of | Fish and Wildlife, Region 6 - Inland Deserts, Ontario |
Forestry and Fire Protection, Department of | Highway Patrol, California |
Historic Preservation, Office of |
Housing and Community Development, California Department of |
Native American Heritage Commission, California | Natural Resources Agency, California |
Parks and Recreation, Department of |
Regional Water Quality Control Board, Region 8 - Santa Ana |
Regional Water Quality Control Board, Region 9 - San Diego |
SWRCB, Division of Drinking Water | SWRCB, Division of Water Rights |
Toxic Substances Control, Department of | Water Resources, Department of

Review Period

Review Started

8/31/2021

Review Ended

9/30/2021

Signature

Title

Date

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Keller Crossing Specifc Plan Amendment No. 1

Lead Agency: Riverside County | Contact Person: Deborah Bradford, Project Planner

Mailing Address: P.O. Box 1409 | Phone: 951-955-6646

City: Riverside | Zip: 92502-1409 | County: Riverside County

Project Location: County: Riverside County | City/Nearest Community: Cities of Menifee and Murrieta

Cross Streets: Northwest of Keller Road/Highway 79 intersection | Zip Code: 92596

Longitude/Latitude (degrees, minutes and seconds): 33 ° 37 ′ 52.11 ″ N / 117 ° 05 ′ 45.03 ″ W Total Acres: 191.4

Assessor's Parcel No.: See attached list | Section: 21 | Twp.: 6S | Range: 2W | Base: S. Bern.

Within 2 Miles: State Hwy #: Highway 79 | Waterways: None

Airports: Pines Private Airfield | Railways: None | Schools: Temecula Prep School & Susan La Vorgna Elementary

Document Type:

CEQA: ☒ NOP ☐ Draft EIR ☐ Early Cons ☐ Supplement/Subsequent EIR ☐ Neg Dec (Prior SCH No.) ☐ Mit Neg Dec Other:

NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI

Other: ☐ Joint Document ☐ Final Document ☐ Other:

Local Action Type:

☐ General Plan Update ☒ General Plan Amendment ☐ General Plan Element ☐ Community Plan
☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan
☒ Rezone ☐ Prezone ☐ Use Permit ☒ Land Division (Subdivision, etc.)
☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☒ Other: Specific Plan Amendment

Development Type:

☒ Residential: Units 436 Acres 75.6
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☒ Commercial: Sq.ft. 176,000 Acres 18.0 Employees ____
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☐ Educational:
☒ Recreational: 5.8 acre recreational park (OS-R)
☐ Water Facilities: Type ____ MGD ____
☐ Transportation: Type
☐ Mining: Mineral
☐ Power: Type ____ MW
☐ Waste Treatment: Type ____ MGD
☐ Hazardous Waste: Type
☐ Other: OS-CH: 61.1 acres, OS-MS: 12.9 acres, OS-W: 6.2 acres

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☒ Agricultural Land ☒ Air Quality ☒ Archeological/Historical ☒ Biological Resources ☐ Coastal Zone ☒ Drainage/Absorption ☐ Economic/Jobs
☐ Fiscal ☒ Flood Plain/Flooding ☒ Forest Land/Fire Hazard ☒ Geologic/Seismic ☒ Minerals ☒ Noise ☒ Population/Housing Balance ☒ Public Services/Facilities
☒ Recreation/Parks ☒ Schools/Universities ☐ Septic Systems ☒ Sewer Capacity ☒ Soil Erosion/Compaction/Grading ☒ Solid Waste ☒ Toxic/Hazardous ☒ Traffic/Circulation
☒ Vegetation ☒ Water Quality ☒ Water Supply/Groundwater ☒ Wetland/Riparian ☒ Growth Inducement ☒ Land Use ☒ Cumulative Effects ☐ Other:

Present Land Use/Zoning/General Plan Designation:

Undeveloped/Specific Plan Zone/Very Low Density Residential, Low Density Residential, Medium Density Residential, Commercial Retail, Mixed Use and Conservation Open Space

Project Description: *(please use a separate page if necessary)*

The proposed Project consists of applications for the first amendment to the Keller Crossing Specific Plan (SP00380A01), a General Plan Amendment (GPAA21004), a Change of Zone (CZ2100012), and a Tentative Map (TM38163). The Project Applicant proposes to amend the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to allow for future development of a 191.4-acre property with 177 Medium Density Residential (MDR) dwelling units on 37.9 acres, 179 Medium High Residential (MHR) dwelling units on 32.3 acres, and 80 Very High Residential (VHR) dwelling units that are Age-Qualified on 5.4 acres, for a total of 436 dwelling units. Additionally, the Project Applicant proposes 18 acres of Commercial Retail uses, a 5.8-acre public park (Open Space-Recreation),12.9 acres of manufactured slopes, including a 3.8-acre buffer along Pourroy Road (Open Space-Manufactured Slopes), a 6.2-acre water quality management basin (Open Space-Water), and 61.1 acres designated Open Space-Conservation for MSHCP conservation purposes.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

S	Air Resources Board		Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	S	Parks & Recreation, Department of
	California Highway Patrol		Pesticide Regulation, Department of
S	Caltrans District # 8		Public Utilities Commission
	Caltrans Division of Aeronautics	S	Regional WQCB # 9
	Caltrans Planning		Resources Agency
	Central Valley Flood Protection Board		Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
S	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of		State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of		SWRCB: Water Quality
	Energy Commission		SWRCB: Water Rights
S	Fish & Game Region # 6		Tahoe Regional Planning Agency
	Food & Agriculture, Department of		Toxic Substances Control, Department of
	Forestry and Fire Protection, Department of		Water Resources, Department of
	General Services, Department of		
	Health Services, Department of		Other:
	Housing & Community Development		Other:
S	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date August 31, 2021 Ending Date September 30, 2021

Lead Agency (Complete if applicable):

Consulting Firm: T&B Planning, Inc.
Address: 3200 El Camino Real, Suite 100
City/State/Zip: Irvine, CA 92602
Contact: Jerrica Harding, AICP
Phone: 714-505-6360 ext. 101

Applicant: D.R. Horton a Los Angeles Holding Company, Inc.
Address: 2280 Wardlow Circle, Suite 100
City/State/Zip: Corona, CA 92878
Phone: 951-739-5460

Signature of Lead Agency Representative: Deborah Bradford **Date:** 8/30/2021

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Keller Crossing APNs

- 472-110-001
- 472-110-002
- 472-110-003
- 472-110-004
- 472-110-007
- 472-110-008
- 472-110-009
- 472-110-032
- 472-110-033
- 472-110-034

Notice of Preparation

To: State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814 (Address)

From: Riverside County
P.O. Box 1409
Riverside, CA 92502-1409 (Address)

Subject: Notice of Preparation of a Draft Environmental Impact Report

Riverside County will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☐ is ☒ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Deborah Bradford at the address shown above. We will need the name for a contact person in your agency.

Project Title: Keller Crossing Specific Plan Amendment #1 (SPA380A01, GPA210004, CZ2100012, TTM38163)

Project Applicant, if any: D.R. Horton a Los Angeles Holding Company, Inc.

Date _____ Signature _____

Title Project Planner

Telephone 951-955-6646

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Print From

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: _____

Project Title: Keller Crossing Specific Plan Amendment

Lead Agency: Riverside County

Contact Name: Deborah Bradford, Project Planner

Email: dbradfor@rivco.org Phone Number: (951) 955-6646

Project Location: West of Highway 79, north of Keller Road, and east of Pourroy Road, unincorporated Riverside County

City *County*

Project Description (Proposed actions, location, and/or consequences).

The proposed Project consists of applications for the first amendment to the Keller Crossing Specific Plan (SP00380A01), a General Plan Amendment (GPA210004), Change of Zone (CZ2100012), and a Tentative Map (TTM38163). The Project Applicant proposes to amend the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to instead allow for future development of a 191.4-acre property with 177 Medium Density Residential (MDR) dwelling units on 37.9 acres, 179 Medium High Residential (MHR) dwelling units on 32.3 acres, and 80 Very High Residential (VHR) dwelling units that are Age-Qualified on 5.4 acres, for a total of 436 dwelling units. Additionally, the Project Applicant proposes 18 acres of Commercial Retail uses, a 5.8-acre public park (Open Space-Recreation),12.9 acres of manufactured slopes, including a 3.8-acre buffer along Pourroy Road (Open Space-Manufactured Slopes), a 6.2-acre water quality management basin (Open Space-Water), and 61.1 acres designated Open Space-Conservation for MSHCP conservation purposes.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

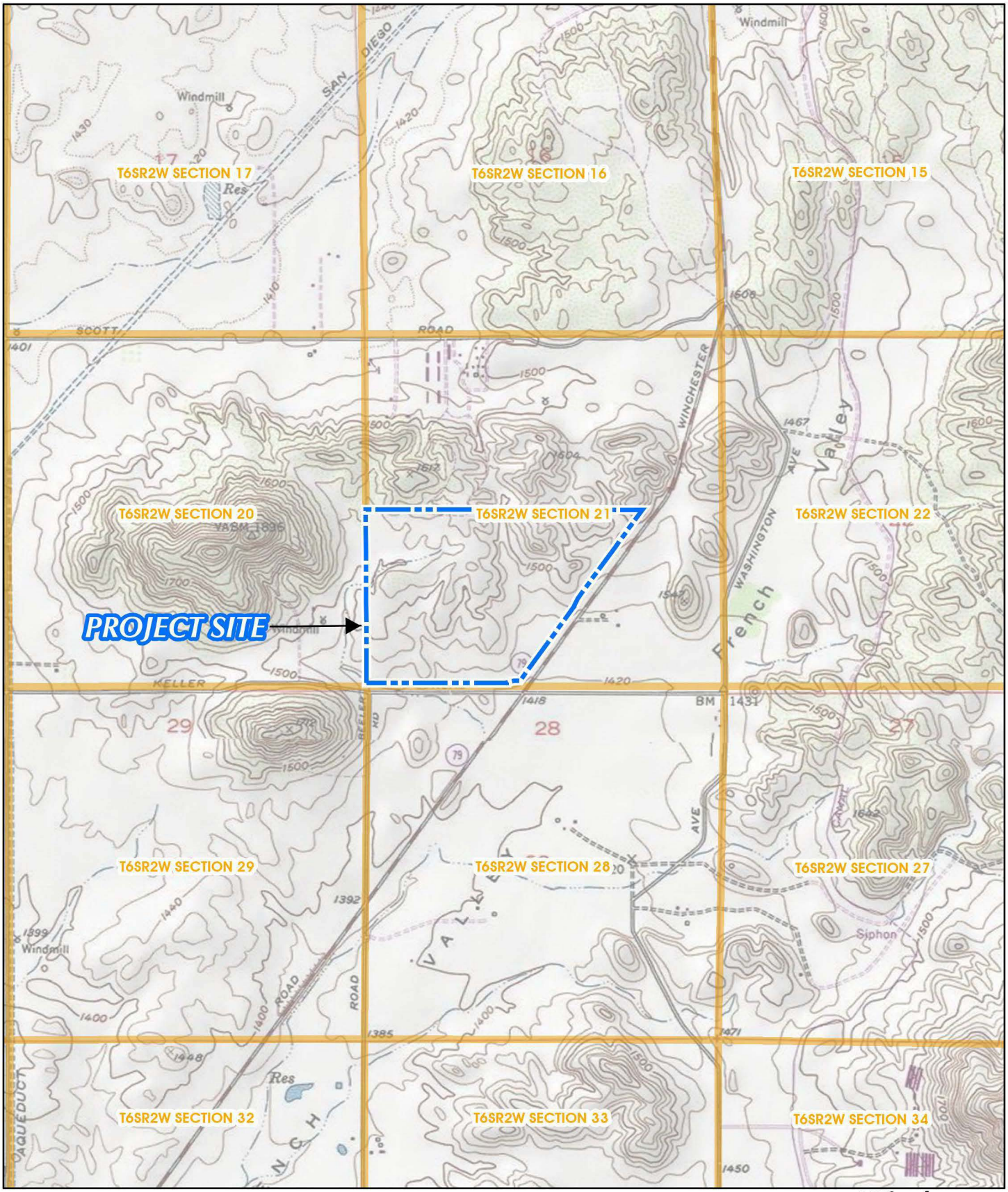
The Draft EIR shall address the following environmental subject areas: Aesthetics; Agriculture & Forest Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Geology / Soils; Greenhouse Gas Emissions; Hazards & Hazardous Materials; Hydrology / Water Quality; Land Use / Planning; Mineral Resources; Noise; Paleontological Resources; Population / Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities / Service Systems; Wildfire; and Mandatory Findings of Significance. Mitigation measures, if required, will be identified by the forthcoming EIR.

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

There are no known areas of controversy regarding the Project at this time.

Provide a list of the responsible or trustee agencies for the project.

Regional Water Quality Control Board
California Department of Fish and Wildlife
U.S. Army Corps of Engineers
Riverside County Flood Control and Water Conservation District (RCFCWCD)
South Coast Air Quality Management District (SCAQMD)
Eastern Municipal Water District (EMWD)



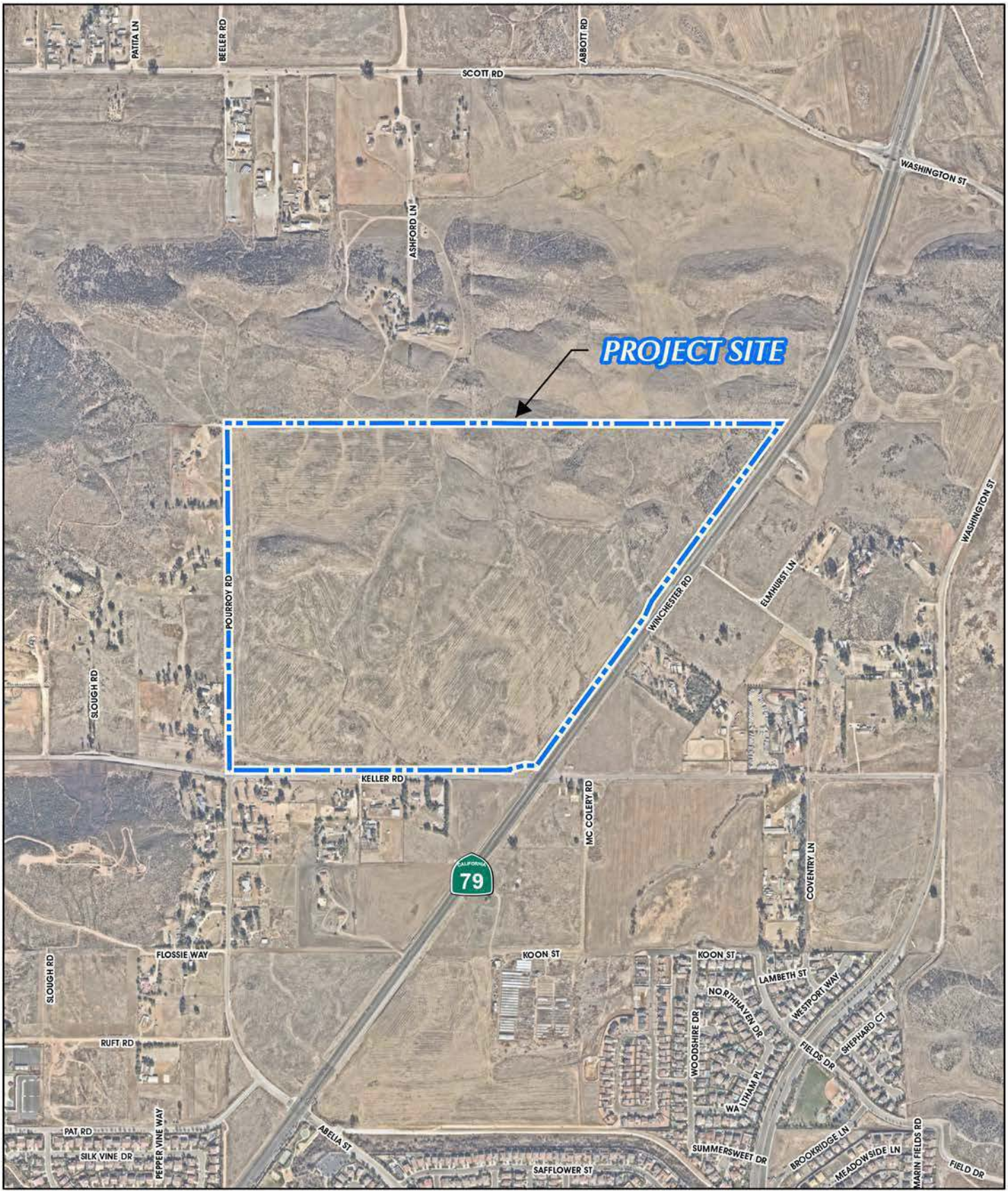
Source(s): ESRI, USGS (2013), RCTLMA (2021)

Winchester Quadrangle, 2018

Keller Crossing (SP No. 380, Amendment No. 1)

0 500 1,000 2,000 Feet

USGS Quadrangle Map



Source(s): ESRI, RCTLMA (2021), Nearmap (2021)

Keller Crossing (SP No. 380, Amendment No. 1)

Aerial Photograph

0 250 500 1,000 Feet

USGS Quadrangle Map

Jer Harding

From: Bradford, Deborah <DBradfor@RIVCO.ORG>
Sent: Tuesday, September 28, 2021 1:57 PM
To: Jer Harding
Subject: FW: Keller Crossing Project

Importance: High

Hi Jer,
Please see the end of the thread for the email from Brian James.

From: Bradford, Deborah
Sent: Monday, September 27, 2021 4:13 PM
To: Tsang, Kevin <KTSANG@RIVCO.ORG>
Subject: FW: Keller Crossing Project
Importance: High

Hi Kevin,
Please go to bottom of thread for Brian James' comments.
Thanks,
Deborah

From: Sarabia, Elizabeth <ESarabia@RIVCO.ORG>
Sent: Friday, September 24, 2021 3:41 PM
To: brian james <brianj83@yahoo.com>
Cc: Bradford, Deborah <DBradfor@RIVCO.ORG>; Brady, Russell <rbrady@RIVCO.ORG>
Subject: RE: Keller Crossing Project

Good afternoon Brian,

If you wish to participate remotely during the September 27th Director's Hearing please provide me with the name, phone number, or screen name you will be using to log into the meeting via Zoom. Please also provide the item number and your position (opposed, support, neutral) for the proposed project at least 24 hours prior to the start of the meeting.

Once we have the needed information you will receive an email confirming your registration which will contain the remote access information.

All interested parties must register to participate remotely prior to the meeting. Participants that cannot be identified will not be allowed to speak.

Please let me know if you have any questions.

Thank you,

Elizabeth Sarabia, TLMA Commission Secretary
TLMA - Planning Department | County of Riverside
P.O. Box 1409 | 4080 Lemon Street, 12th Floor
Riverside, CA 92501-1409
Phone: (951) 955-7436 | Information Line: (951) 955-3200
esarabia@rivco.org | http://rctlma.org/
Click the link to compete our survey - **How are we doing?**

-----Original Message-----
From: Brady, Russell <rbrady@RIVCO.ORG>
Sent: Friday, September 24, 2021 3:38 PM
To: brian james <brianj83@yahoo.com>
Cc: Sarabia, Elizabeth <ESarabia@RIVCO.ORG>; Bradford, Deborah <DBradfor@RIVCO.ORG>
Subject: RE: Keller Crossing Project

I've cc'd Elizabeth Sarabia here who you can coordinate with on getting access to the meeting.

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

-----Original Message-----
From: brian james <brianj83@yahoo.com>
Sent: Friday, September 24, 2021 3:20 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Re: Keller Crossing Project

I am interested in attending the EIR via zoom. Would this be coordinated through you or Deborah?

> On Sep 24, 2021, at 10:41 AM, Brady, Russell <rbrady@rivco.org> wrote:
>
> The concerns regarding potential impacts on traffic, noise, light pollution, and water well are something we can pass along and ensure they are addressed in the Environmental Impact Report (EIR) that is being kicked off currently.
>
> Keller Road is required to be realigned so it comes in close to 90 degrees to Winchester Road. So as a result of that, the project is working through different options on how with the realigned Keller Road the properties to the south (including yours) would maintain access. Attached is a sheet of the first submittal of the Tentative Tract Map that is in process and how it so far has planned for this access to have a road coming off of Keller Road that would come south and head east for properties to have access. I believe there were comments on this exhibit about whether this new road would connect back up to Keller Road to the east as this sheet shows or if it would simply end in a cul de sac at the last lot that

would utilize it. So that may still be subject to change, but we did indicate a need for the developer to reach out to the property owners that would access via this to at least make them aware of this and solicit any feedback.
>
> There is a scoping session for the kick off of the EIR preparation to be held on Monday at 1:30. Let us know if you would like to attend that via Zoom or over the phone and I can connect you with staff that can get you access to that.
>
> Also, Deborah Bradford is the planner assigned to this project. She is out of the office currently, but will be back on Monday. So any future correspondence on the project please direct to her.
>
> Let us know if you have any questions or concerns.
>
>
> 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
>
>
>
> -----Original Message-----
> From: brian james <brianj83@yahoo.com>
> Sent: Friday, September 24, 2021 9:12 AM
> To: Brady, Russell <rbrady@RIVCO.ORG>
> Subject: Keller Crossing Project
>
> CAUTION: This email originated externally from the Riverside County email system. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.
>
> Good morning,
> My name is Brian James, and I a resident at 32125 Keller Rd. The proposed changes have been brought to my attention and I have a few concerns.
> It appears there are only two access points to the project, with one of them ending up right in front of my house. The additional traffic (noise and light pollution) is a concern to me.
> What is the proposed access to and from my property?
> Also, how will construction affect my water well?
>
> Thank you for your time,
> Brian James
> 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

> <https://urldefense.com/v3/__http://www.countyofriverside.us/__;!!JTyG
> X330HN5x6Ko!XbXN65Xhl84A67tgLrXzNey-x6c_yRSlHKmIJOHHieZrCfuidQjSqr1TBV
> Xfnw$ > <TTM 38163 - Exhibit A - Map - Sheet 2.pdf>

Jer Harding

From: Bradford, Deborah <DBradfor@RIVCO.ORG>
Sent: Tuesday, September 28, 2021 12:52 PM
To: Jer Harding
Subject: FW: Keller Crossing Scope

Good Afternoon Jer,
Another email addressing their concerns.
Thanks,
Deborah

From: Zive Petrovski <zivepetrovski@gmail.com>
Sent: Tuesday, September 28, 2021 10:33 AM
To: Bradford, Deborah <DBradfor@RIVCO.ORG>; Morgan Kimbell <morgy_08@yahoo.com>; Kirk Gurling <gonetocostarica@gmail.com>; Dennis Francis Tuffin <dftuffin@gmail.com>; Brian James <brianj83@yahoo.com>
Cc: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Re: Keller Crossing Scope

Good morning Deborah,

I hope this email finds you well. I had one other major concern/question that came to mind regarding the scope meeting yesterday. To my knowledge, the area of the proposed Keller Crossing site had a minimum lot size requirement that were issued December 9th 2013. I believe Mr. Tuffin eluded to this in the meeting yesterday but it was never addressed in either the scope meeting or the documentation provided thus far. With that I am unaware of any notification/information that has been made readily available of any upzoning changes allowing higher density development at the location of the proposed build site. Has this rezoning already taken place without the knowledge of the nearby residents or is this going to be addressed at a later date? For example per Zoning Ordinance No. 348.4767 planning area 1 is to be a minimum lot size of 2 acres as well as other drastic lot size differences between what shows up Riverside Counties Planning Departments Public Site (https://planning.rctlma.org/Specific-Plans/Approved-Specific-Plans-Documents#300) vs what was presented to local residents this year. My concern is that there is a massive deviation as to what is currently being presented vs what was put into record by your office in Dec 2013. With these drastic changes in upzoning this proposed project would not simply be an admendment to previous plans but should be treated as a new proposed plan with changes to zoning which need to allow public participation with the planning commision to discuss/agree/disagree with these changes.

Thank you

Zive Petrovski

On Mon, Sep 27, 2021 at 5:01 PM Zive Petrovski <zivepetrovski@gmail.com> wrote:

> Thank you for the update. Would you be able to provide me with a copy of today's recording?
>
> Thank you
>
> Zive
>
> On Mon, Sep 27, 2021, 4:05 PM Bradford, Deborah <DBradfor@rivco.org> wrote:
>
> > Good Afternoon,

Good Afternoon,

I am sorry that you had difficulty accessing the meeting today.

I will forward your comments to the applicant for their review. Given, that the applicant is preparing a new EIR all studies and reports will be subjected to current federal, state and local standards. The comments received at the Scoping Session or via email will be addressed by the applicant and be provided in the CEQA document. The Draft Environmental Impact Report (DEIR) will be sent to the State Clearinghouse where federal, state and local agencies will review and be able to provide comment within the 45-day circulation period. In addition the DEIR will be provided to the community and surrounding property owners for review as well. I will make sure you are notified directly regarding the proposed Project.

Please let me know if you have any other questions or concerns.

Thank you,

Deborah

From: Zive Petrovski <zivepetrovski@gmail.com>
Sent: Monday, September 27, 2021 3:12 PM
To: Brady, Russell <rbrady@RIVCO.ORG>; Bradford, Deborah <DBradfor@RIVCO.ORG>
Subject: Fwd: Keller Crossing Scope

Hello Ms. Bradford,

My apologies for the technical difficulties earlier today. I was unable to unmute my phone to speak. There are a few questions/concerns that I have regarding the plans you have provided. This is not an exhaustive list and I may have some follow up concerns.

- What considerations are taken into the potential of 1100 (per calculation in pg 2-10 of Keller Crossing SP380-A1 First Screencheck Draft - Collated (07-09-21) additional residential vehicles on top of the additial commercial traffic going from Winchester to Leon via Keller Rd? Will existing portions of Keller Rd be upgraded to accommodate the large increase in traffic?

- There are currently a few houses that will be equal or lower in elevation to the detention basin in the proposed plan. Has a study been done to ensure that water will not seep through the surrounding lower elevation and cause any adverse effects?

- What will this project do to existing well water quality and availability. Increased traffic and housing may cause pollution in the surrounding area and eventually into the water table local residents receive their water.

- With the increase in homes and WiFi usage has there been a study for any adverse effects that additional 2.4Ghz, 5GHz, and additional Cell Phone (5G included) usage can cause to surrounding wildlife and residents.

- There is a new home that is on the corner of Keller and Pourroy. The new plans show that New Keller will be constructed VERY closely to that site. Is it safe to have a secondary highway that close to a resident?

- Will road way signage be put up for Old Keller declaring it a private road as well as changing it to a residential roadway (25 MPH)?

- We were told that there may be an ability to get utilities to existing residents in the immediate area, however this does not show up on your plan. Will this be offered or was this stated as sleight of hand?

- Will the surrounding schools be able to accommodate the increase in traffic as well as students?

- In the recent years I have noticed that a few species of birds of prey (hawks/eagles/owls) have been breeding locally (neighbors trees) and they use the site area as a hunting grounds. How will this affect these animals ability to breed and survive? There are also other animals of concern such as Coyotes. How likely are these animals to survive if the site area is highly populated.

- Will this site be strictly electrical? I did not see in your plans as to where other utilities are coming in. Where will the natural gas lines be located? Where will the new telecom lines be pulled?

- With the additional tenants and electrical use will each home be provided with solar? Will these homes be ZNE? How will the new power consumption affect our ageing power lines down Old Keller?

- Will all new homes and buildings be up to required SERE rating at time of final construction?

- What studies have been done for adverse effects to local air quality have been done with the increase of traffic? Some local residents may be susceptible to medical issues caused by pollutants or different pollen. Does your list of plants/trees take this into consideration?

With the very minimal time I had to review the scope (30 mins prior to the meeting). These are just a few questions I had that your scope did not address. I will send you a follow up with a few more things that come up.

I also ask that you can keep the local residents as well as myself as up to date as you can. We would like to stay informed as new material comes out.

One final note. Please provide all of us a link to a copy of today's recording.

Respectfully,

Zive Petrovski

C: 951.265.7428

O: 951.393.5250

Confidentiality Disclaimer

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County of Riverside California

Jer Harding

From: Bradford, Deborah <DBradfor@RIVCO.ORG>
Sent: Tuesday, September 28, 2021 12:59 PM
To: Jer Harding
Subject: FW: Keller Crossing Scope

Another email from Zive Petrovski

From: Zive Petrovski <zivepetrovski@gmail.com>
Sent: Monday, September 27, 2021 3:12 PM
To: Brady, Russell <rbrady@RIVCO.ORG>; Bradford, Deborah <DBradfor@RIVCO.ORG>
Subject: Fwd: Keller Crossing Scope

Hello Ms. Bradford,

My apologies for the technical difficulties earlier today. I was unable to unmute my phone to speak. There are a few questions/concerns that I have regarding the plans you have provided. This is not an exhaustive list and I may have some follow up concerns.

- What considerations are taken into the potential of 1100 (per calculation in pg 2-10 of Keller Crossing SP380-A1 First Screencheck Draft - Collated (07-09-21) additional residential vehicles on top of the additial commercial traffic going from Winchester to Leon via Keller Rd? Will existing portions of Keller Rd be upgraded to accommodate the large increase in traffic?

- There are currently a few houses that will be equal or lower in elevation to the detention basin in the proposed plan. Has a study been done to ensure that water will not seep through the surrounding lower elevation and cause any adverse effects?

- What will this project do to existing well water quality and availability. Increased traffic and housing may cause pollution in the surrounding area and eventually into the water table local residents receive their water.

- With the increase in homes and WiFi usage has there been a study for any adverse effects that additional 2.4Ghz, 5GHz, and additional Cell Phone (5G included) usage can cause to surrounding wildlife and residents.

- There is a new home that is on the corner of Keller and Pourroy. The new plans show that New Keller will be constructed VERY closely to that site. Is it safe to have a secondary highway that close to a resident?

- Will road way signage be put up for Old Keller declaring it a private road as well as changing it to a residential roadway (25 MPH)?

- We were told that there may be an ability to get utilities to existing residents in the immediate area, however this does not show up on your plan. Will this be offered or was this stated as sleight of hand?

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- In the recent years I have noticed that a few species of birds of prey (hawks/eagles/owls) have been breeding locally (neighbors trees) and they use the site area as a hunting grounds. How will this affect these animals ability to breed and survive? There are also other animals of concern such as Coyotes. How likely are these animals to survive if the site area is highly populated.

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- With the additional tenants and electrical use will each home be provided with solar? Will these homes be ZNE? How will the new power consumption affect our ageing power lines down Old Keller?

- Will all new homes and buildings be up to required SERE rating at time of final construction?

- What studies have been done for adverse effects to local air quality have been done with the increase of traffic? Some local residents may be susceptible to medical issues caused by pollutants or different pollen. Does your list of plants/trees take this into consideration?

With the very minimal time I had to review the scope (30 mins prior to the meeting). These are just a few questions I had that your scope did not address. I will send you a follow up with a few more things that come up.

I also ask that you can keep the local residents as well as myself as up to date as you can. We would like to stay informed as new material comes out.

One final note. Please provide all of us a link to a copy of today's recording.

Respectfully,

Zive Petrovski
C: 951.265.7428
O: 951.393.5250

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County of Riverside California

Jer Harding

From: Bradford, Deborah <DBradfor@RIVCO.ORG>
Sent: Thursday, September 30, 2021 9:23 AM
To: Jer Harding
Subject: FW: Notice of Preparation for the Keller Crossing Project

Hi Jer,
Please see email below.
Thanks,
Deborah

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Thursday, September 30, 2021 9:20 AM
To: Bradford, Deborah <DBradfor@RIVCO.ORG>
Subject: RE: Notice of Preparation for the Keller Crossing Project

Thanks Deborah!

The plans have been reviewed and have no comments regarding this housing project. I will wait for the commercial development plans (when that time comes) to provide input, as RTA does operate through that area, on Winchester Rd. Looking into the future, it would be great to add a bus stop here, to include a crosswalk on Winchester & Keller.

Thank you,

Mauricio Alvarez, MBA
Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
Website | Facebook | Twitter | Instagram
1825 Third Street, Riverside, CA 92507

From: Bradford, Deborah <DBradfor@RIVCO.ORG>
Sent: Thursday, September 30, 2021 8:31 AM
To: Mauricio Alvarez <malvarez@riversidetransit.com>
Subject: RE: Notice of Preparation for the Keller Crossing Project

We do not have plans for that at this time.

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Thursday, September 30, 2021 8:19 AM
To: Bradford, Deborah <DBradfor@RIVCO.ORG>
Subject: RE: Notice of Preparation for the Keller Crossing Project

CAUTION: This email originated externally from the **Riverside County** email system.
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Are there any plans for the commercial lot at the northwest corner of Winchester and Keller?

Thanks,

Mauricio Alvarez, MBA
Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
Website | Facebook | Twitter | Instagram
1825 Third Street, Riverside, CA 92507

From: Bradford, Deborah <DBradfor@RIVCO.ORG>
Sent: Monday, September 27, 2021 8:43 AM
To: Mauricio Alvarez <malvarez@riversidetransit.com>
Subject: RE: Notice of Preparation for the Keller Crossing Project

I have attached the proposed Tentative Tract Map for your review. Please let me know if there is anything else you need.
Thanks,
Deborah

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Friday, September 24, 2021 3:49 PM
To: Bradford, Deborah <DBradfor@RIVCO.ORG>
Subject: FW: Notice of Preparation for the Keller Crossing Project

Hello Deborah,

Would you be able to provide the development plans for the Keller Crossing project, so that I can provide comments?

Thank you,

Mauricio Alvarez, MBA
Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
Website | Facebook | Twitter | Instagram
1825 Third Street, Riverside, CA 92507

From: Deborah Bryant <dbryant@tbplanning.com>
Sent: Monday, August 30, 2021 1:18 PM
To: Jer Harding <jharding@tbplanning.com>
Subject: Notice of Preparation for the Keller Crossing Project

Dear Interested Parties:

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Southwest Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). The attached notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

The proposed Project consists of applications for the first amendment to the Keller Crossing Specific Plan (SP00380A01), a General Plan Amendment (GPA210004), Change of Zone (CZ2100012), and a Tentative Tract Map (TTM38163). The adopted Keller Crossing Specific Plan allows for development of a 201.1-acre property with 250 Mixed Use (MU) dwelling units, 42 Medium Density Residential (MDR) dwelling units, 25 Low Density Residential (LDR) dwelling units, and 3 Very Low Density Residential (VLDR) dwelling units for a total of 320

dwelling units. Additionally, the adopted Keller Crossing Specific Plan allows for development of 37.8 acres of Commercial Retail, and open space on 61.1 acres. The Project Applicant proposes to amend the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to instead allow for future development of a 191.4-acre property with 177 Medium Density Residential (MDR) dwelling units on 37.9 acres, 179 Medium High Residential (MHR) dwelling units on 32.3 acres, and 80 Very High Residential (VHR) dwelling units that are Age-Qualified on 5.4 acres, for a total of 436 dwelling units. Additionally, the Project Applicant proposes 18 acres and up to 176,000 square feet of Commercial Retail uses, a 5.8-acre public park (Open Space-Recreation),12.9 acres of manufactured slopes, including a 3.8-acre buffer along Pourroy Road (Open Space-Manufactured Slopes), a 6.2-acre water quality management basin (Open Space-Water), and 61.1 acres designated Open Space-Conservation for MSHCP conservation purposes. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a General Plan Amendment (GPA210004);
2. Adoption of Amendment No. 1 to Specific Plan No. 333 (SP00380A01);
3. Adoption by ordinance of a Change of Zone (CZ2100012); and
4. Adoption by resolution of Tentative Tract Map (TTM38163)

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Deborah Bradford, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409
DBradfor@RIVCO.ORG

If you have any questions please contact Deborah Bradford, Project Planner at (951) 955-6646.

Sincerely,

Jerrica Harding, AICP
Senior Associate
T&B PLANNING, INC.
4909 Murphy Canyon Road, Suite 405, San Diego, CA 92123
Office: 619.501.6041 x 101
jharding@tbplanning.com
www.tbplanning.com
Nationally Certified Women's Business Enterprise (WBENC)

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Jer Harding

From: Deborah Bryant
Sent: Wednesday, September 01, 2021 8:00 AM
To: Jer Harding
Subject: FW: Notice of Preparation for the Keller Crossing Project

FYI

From: Dan Silver <dsilverla@me.com>
Sent: Monday, August 30, 2021 1:23 PM
To: Deborah Bryant <dbryant@tbplanning.com>
Cc: dbradfor@rivco.org
Subject: Re: Notice of Preparation for the Keller Crossing Project

Deborah

Thank upon for this notice. EHL is in receipt of the NOP. Please retain us on mailing and distribution lists for future CEQA documents and hearing notices. We will be particularly interested in MSHCP compliance.

Regards
Dan

On Aug 30, 2021, at 1:18 PM, Deborah Bryant <dbryant@tbplanning.com> wrote:

Dear Interested Parties:

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Southwest Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). The attached notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

The proposed Project consists of applications for the first amendment to the Keller Crossing Specific Plan (SP00380A01), a General Plan Amendment (GPA210004), Change of Zone (CZ2100012), and a Tentative Tract Map (TTM38163). The adopted Keller Crossing Specific Plan allows for development of a 201.1-acre property with 250 Mixed Use (MU) dwelling units, 42 Medium Density Residential (MDR) dwelling units, 25 Low Density Residential (LDR) dwelling units, and 3 Very Low Density Residential (VLDR) dwelling units for a total of 320 dwelling units. Additionally, the adopted Keller Crossing Specific Plan allows for development of 37.8 acres of Commercial Retail, and open space on 61.1 acres. The Project Applicant proposes to amend the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to instead allow for future development of a 191.4-acre property with 177 Medium Density Residential (MDR) dwelling units on 37.9 acres, 179 Medium High Residential (MHR) dwelling units on 32.3 acres, and 80 Very High Residential (VHR) dwelling units that are Age-Qualified on 5.4 acres, for a total of 436 dwelling units. Additionally, the Project Applicant proposes 18 acres and up to 176,000 square feet of Commercial Retail uses, a 5.8-acre public park (Open Space-Recreation),12.9 acres of manufactured slopes, including a 3.8-acre buffer along Pourroy Road (Open Space-Manufactured Slopes), a 6.2-acre water quality management

basin (Open Space-Water), and 61.1 acres designated Open Space-Conservation for MSHCP conservation purposes. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a General Plan Amendment (GPA210004);
2. Adoption of Amendment No. 1 to Specific Plan No. 333 (SP00380A01);
3. Adoption by ordinance of a Change of Zone (CZ2100012); and
4. Adoption by resolution of Tentative Tract Map (TTM38163)

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

Please send all written correspondence to:

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If you have any questions please contact Deborah Bradford, Project Planner at (951) 955-6646.

Sincerely,

Jerrica Harding, AICP
Senior Associate
T&B Planning, Inc.
4909 Murphy Canyon Road, Suite 405, San Diego, CA 92123

Office: 619.501.6041 x 101
jharding@tbplanning.com
www.tbplanning.com
Nationally Certified Women's Business Enterprise (WBENC)

<Keller Crossing NOP (Agency) (2021-08-25).pdf><SCH NOC (2021-08-25) - SIGNED.pdf><SCH NOC Form APNs.pdf><SCH NOP (2021-08-25) SIGNED.pdf><SCH Summary Form (2021-08-25).pdf><Aerial Photograph (2021-08-25).pdf><Winchester Quadrangle, 2018 Map (2021-07-15).pdf>

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
https://ehleague.org

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

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September 29, 2021

Ms. Deborah Bradford, Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, California 92502-1409
E-mail: dbradfor@rivco.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Keller Crossing Specific Plan Amendment [SCAG NO. IGR10471]

Dear Ms. Bradford,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Keller Crossing Specific Plan Amendment ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.[1]

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Keller Crossing Specific Plan Amendment in Riverside County. The proposed project includes an amendment to the site's specific plan and General Plan land use designations and to amend the site's zoning classifications to allow for the development of 436 dwelling units (including medium, medium-high, and very high density and age-qualified housing), up to 176,000 square feet of Commercial Retail uses, a 5.8-acre public park, 12.9 acres of manufactured slopes, a 6.2-acre water quality management basin, and 61.1 acres designated Open Space-Conservation on a 191.4-acre site.

When available, please email environmental documentation to *IGR@scag.ca.gov* providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE KELLER CROSSING SPECIFIC PLAN AMENDMENT [SCAG NO. IGR10471]

CONSISTENCY WITH CONNECT SOCAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCAL GOALS

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCAL GOALS	
Goal #1:	*Encourage regional economic prosperity and global competitiveness*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*
Goal #3:	*Enhance the preservation, security, and resilience of the regional transportation system*
Goal #4:	*Increase person and goods movement and travel choices within the transportation system*
Goal #5:	*Reduce greenhouse gas emissions and improve air quality*
Goal #6:	*Support healthy and equitable communities*
Goal #7:	*Adapt to a changing climate and support an integrated regional development pattern and transportation network*
Goal #8:	*Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
Goal #9:	*Encourage development of diverse housing types in areas that are supported by multiple transportation options*
Goal #10:	*Promote conservation of natural and agricultural lands and restoration of habitats*

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL GOALS		
	Goal	Analysis
Goal #1:	*Encourage regional economic prosperity and global competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the Connect SoCal webpage. Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect

SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the Connect SoCal Demographics and Growth Forecast Technical Report. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted County of Riverside Forecasts			
	Year 2020	**Year 2030**	**Year 2035**	**Year 2045**	**Year 2020**	**Year 2030**	**Year 2035**	**Year 2045**
Population	19,517,731	20,821,171	21,443,006	22,503,899	2,492,601	2,852,599	2,995,509	3,251,705
Households	6,333,458	6,902,821	7,170,110	7,633,451	784,783	930,216	987,738	1,086,113
Employment	8,695,427	9,303,627	9,566,384	10,048,822	822,826	961,268	1,008,943	1,102,721

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the PEIR webpage and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

RIVERSIDE COUNTY
DEPARTMENT OF
WASTE RESOURCES
Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY
dbradfor@rivco.org

September 7, 2021

Ms. Deborah Bradford, Project Planner
Riverside County Planning Department
P.O. Box 1409
Riverside, CA 92502

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Keller Crossing Project (Specific Plan Amendment No. 380A1, General Plan Amendment No. 210004, Change of Zone No. 2100012, and Tentative Tract Map No. 38163) (Project) in the County of Riverside

Dear Ms. Bradford:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the Project. The Project is for an amended development for mixed use dwelling units, residential dwelling units, commercial retail and open space uses located south of Scott Road, west of Highway 79, north of Keller Road, and east of Pourroy Road in the County of Riverside. The RCDWR offers the following comments for your consideration while preparing the Project's DEIR.

1. Build-out of the Project may have the potential to increase the amount of waste that could adversely affect solid waste facilities. To assess waste impacts, the DEIR should include the projected maximum amount of waste generated from build-out of the Project, using appropriate waste generation factors for the proposed land uses.

   Note- CalRecycle's website may be helpful to determine the Project's waste generation: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates

2. The following information can be useful in the analysis of the solid waste impacts:

   a) Solid waste generated within the Project area is collected by Waste Management Inc. (WMI), with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTS) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation.

   b) The franchise waste hauler primarily uses the El Sobrante landfill for disposal, but may also utilize the Badlands and/or Lamb Canyon landfills for disposal of the waste generated from the proposed Project. Descriptions of the local landfills are provided below:

      El Sobrante Landfill:

      The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson

Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2020 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 51.4 million tons.[1] In 2020, the El Sobrante Landfill accepted a daily average of 10,710 tons with a period total of approximately 3,298,730 tons. The landfill is expected to reach capacity in approximately 2055.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 20.5 million tons[2]. As of January 1, 2021 (beginning of day), the landfill had a total remaining disposal capacity of approximately 4.3 million tons.[3] The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2022.[4] From January 2020 to December 2020, the Badlands Landfill accepted a daily average of 2,740 tons with a period total of approximately 844,010 tons. Landfill expansion potential exists at the Badlands Landfill site.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 20.7 million tons.[5] As of January 1, 2021 (beginning of day), the landfill has a total remaining capacity of approximately 8.1 million tons[6]. The current landfill remaining disposal capacity is estimated to last, at a minimum, until

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[1] 2020 El Sobrante Landfill Annual Report- Based on 128,616,066 tons remaining capacity (40% for in-county waste).
[2] GASB_18_ 2020 – Engineering Estimate for total landfill capacity
[3] GASB_18_2020 & SiteInfo
[4] SWFP # 33-AA-0006
[5] GASB 18_ 2020 – Engineering Estimate for total landfill capacity
[6] GASB 18_2020 & SiteInfo

approximately 2029.[7] From January 2020 to December 2020, the Lamb Canyon Landfill accepted a daily average of 1,926 tons with a period total of approximately 593,215 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

3. To further reduce potential impacts to solid waste services, the RCDWR offers the following suggestions for consideration (on subsequent land development projects), which were developed to meet the goals and standards of State legislation and regulations addressing solid waste, including recycling and organics management to help reduce the Project's anticipated solid waste impacts and enhance the County's efforts to comply with the State's mandate of 50% solid waste diversion from landfilling:

   - Prior to issuance of a building permit: A Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., solar panels, cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts, the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials, the facilities and/or haulers that will be utilized, and the targeted recycling or reduction rate. During project construction, the project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.

   - Prior to final building inspection: Evidence (i.e., receipts or other type of verification) to demonstrate project compliance with the approved WRP shall be presented by the project proponent to the Planning Division of the Riverside County Department of Waste Resources. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.

   - Recycling Collection Plan: Prior to issuance of a building permit, the applicant shall submit one electronic (1) copy of a Recyclables Collection and Loading Area plot plan to the Riverside County Department of Waste Resources for review and approval to WastePlanning@rivco.org. The plot plan shall conform to Design Guidelines for Recyclables Collection and Loading Areas, provided by the Department of Waste Resources (found at http://www.rcwaste.org/business/planning/design) and shall show the location of and access to the collection area for recyclable materials, shall demonstrate space allocation for trash and recyclable materials and have the adequate signage indicating the location of each bin in the trash enclosure. The project applicant is advised that clearance of the Recyclables Collection and Loading Area plot plan only satisfies the Waste Resources' conditions for Recyclables Collection and Loading Areas space allocation and other Recyclables Collection and Loading Area Guideline items. Detailed drawings of the Trash Enclosure and its particular construction details, e.g., building materials, location, construction methods etc., should be included as part of the Project plan submittal to the Riverside County Department of Building and Safety.

[7] SWFP # 33-AA-0007

- Recyclables Collection and Loading Area Inspection: Prior to final building inspection, the applicant shall construct the recyclables collection and loading area in compliance with the Recyclables Collection and Loading Area plot plan, as approved and verified through inspection by the Riverside County Department of Waste Resources.

- Recycling and Organics Compliance: Prior to final inspection, the applicant shall complete a Mandatory Commercial Recycling and Organics Recycling Compliance form (Form D). Form D requires applicants to identify programs or plans that address commercial and organics recycling, in compliance with State legislation/regulation. Once completed, Form D shall be submitted to the Recycling Section of the Department of Waste Resources for approval. For more information go to: www.rcwaste.org/business/planning/applications. To obtain Form D, please contact the Recycling Section at 951-486-3200, or email to: Waste-CompostingRecycling@rivco.org.

- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.

- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.

- Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.

- AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions. The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:

    - Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.

    - Subscribe to a recycling service with waste hauler.

    - Provide recycling service to tenants (if commercial or multi-family complex).

    - Demonstrate compliance with requirements of California Code of Regulations Title 14.

    - For more information, please visit: http://www.rcwaste.org/business/recycling/mcr

- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services. Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:

    - Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.

    - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.

Thank you for allowing us the opportunity to comment on the NOP. Please continue to include the RCDWR in future transmittals. Please email me at khesterl@rivco.org if you have any questions regarding the above comments.

Sincerely,



Kinika Hesterly
Urban/Regional Planner IV

DM# 279681

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
dbradfor@rivco.org
Deborah Bradford, Project Planner
County of Riverside, Planning Department
P.O. Box 1409
Riverside, California 92502

September 20, 2021

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Keller Crossing

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project will include, among others, 436 residential units and is located in close proximity to State Route 79, and to facilitate the purpose of an EIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment[5] to disclose the potential health risks[6].

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*[7] is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory[8].

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook[1], South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan[9], and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy[10].

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[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.
[6] *Ibid.*
[7] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: http://www.arb.ca.gov/ch/handbook.pdf.
[8] CARB's technical advisory can be found at: https://www.arb.ca.gov/ch/landuse.htm.
[9] South Coast AQMD's 2016 Air Quality Management Plan can be found at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf (starting on page 86).
[10] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters[11], a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
RVC210901-06
Control Number

[11] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.

Dennis F. Tuffin

dftuffin@gmail.com

Tel. (951) 897-5713

September 30, 2021

Riverside County Planning Department

Attn: Ms. Deborah Bradford, Project Planner

Email- DBradfor@rivco.org

P.O. Box 1409, Riverside, Ca. 92502-1409

Tel. 951-955-6646

Cc: Russell Brady-email-rbrady@rivco.org

RE: Specific Plan 380-Amendment #1 (380A01)-General Plan Amendment-"SCOPING SESSION" September 27, 2021-AND OPPOSITION COMMENTS IN RESPONSE TO THE PLAN TO AMEND THE ENVIRONMENTAL IMPACT REPORT AND TO LIMIT TO SCOPE OF NEW ENVIRONMENTAL REVIEW

To the County of Riverside Planning Department and Director;

Please accept these comments on behalf of the undersigned and residents near the above referenced Project -Specific Plan 380.amendment.01 (hereinafter the "Project" and hereinafter the "Amendment"). Generally and specifically, I, Dennis F. Tuffin and Kirk R. Gurling and some of the residents continue to oppose this project as we have since its inception and the inception and beginning of Specific Plan 380.

STATEMENTS AND REASONS FOR OUR OPPOSSITION-

1. THIS PROJECT HAS LONG BEEN OPPOSED BY THE NEIGHBORHOOD AND ALL THESE LONG STANDING OBJECTIONS, INCLUDING THOSE THAT WERE THE SUBJECT OF LITIGATION-see (RESIDENTS AGAINST SPECIFIC PLAN 380 VS. COUNTY OF RIVERSIDE, HANNA MARITAL TRUST-SUPERIOR COURT #RIC 1312923 & COURT OF APPEAL CASE # EO63292 (hereinafter Specific Plan 380 litigation), APPLY TO OUR OBJECTIONS AND OPPOSITION TO THIS AMENDMENT (380a001).

   This project, prior to Amendment, was the subject of litigation by the residents near the project as Residents Against Specific Plan 380. As representatives and participants in that litigation we hereby incorporate all our objections against Specific Plan 380 raised in that litigation

with full force and effect in our opposition to this Amendment of Specific Plan 380. For the purpose of complying with the California Environmental Quality Act (hereinafter CEQA) we give notice to the County and to the Applicant/s as the defendant in the above described litigation that the plaintiffs reiterate all the objections described and plead in that litigation again, and object again, in the same manner, form and substance to the amendments and changes now proposed) to this Amendment (described by the County as380A01) (hereinafter the Amendment). Additionally, we further objects and oppose those changes proposed by the Amendment as described below.

2. THIS PROJECT IS SIGNIFICANTLY DIFFERENT THAN SP380 AND NOT AN AMENDMENT. THESE SIGNIFICANT CHANGES AND THE CHANGED CIRCUMSTANCES OF THE TIMES AND THE AREA AND THE COUNTY REQUIRE A NEW APPLICATION.

   Even with the little information disclosed by the County Planning Department (hereinafter the County) it is clear that this is not an Amendment to an existing Specific Plan but instead a new "Specific Plan". A new Application and Review, including a new Environmental Impact Report (hereinafter EIR), an EIR de novo should be required. The

passage of time, the changing conditions, including changes in the area and the County, the changes in climate, in fire hazard, in water supply vulnerability, the collapse in commercial real estate, the pandemic, the changing traffic patterns and practices (evolving both because of the long passage of time and the pandemic), the increased need and requirement for communications infrastructure including robust internet (as manifest during the pandemic), the increased need for medical services and fire/ambulance services, the challenges to education and increased need for support for schools and for school supporting services, are all different than the conditions prevailing at the time of the original SP380 application and review. The County needs to do realistic planning and not sciolistic, or pro forma, or anachronistic planning.

3. TRAFFIC INFRASTRUCTURE AND TRAFFIC PATTERNS IN THE THIS PROJECT ARE NOT CONSISTANT OR SAFE WITH THE EXISTING COMMUNITY CONDITIONS AND/OR COUNTY CONDITIONS AND THE PROPOSED CHANGES THREATEN THE SAME.

   As evidenced by the Highway 79 Traffic Policy litigation and the agreed Highway 79 Policy Area, there is a recurring problem with commercial and residential

structure development outpacing municipal road and infrastructure development and thereby producing unhealthy and unsafe conditions and results This project typifies the problem. The Amendment proposes less road construction within the project than the original Specific Plan. The Amendment would isolate the existing contiguous community even more than the original Specific Plan! And, the original specific plan was so defective that during the redevelopment of Highway 79 significant Governmental Funds were expended to make access to the existing community safe or safer. The new (since 2011) intersection of Keller Road and Highway 79 (hereinafter 79) undoubtedly saved many lives. With the original Specific Plan 380 approved by the Board of Supervisors prior to this Amendment conditions in the existing neighborhood would revert to a state of greater danger than present, and with this Amendment conditions would revert to a yet even more dangerous condition than under the original Specific Plan. With the Amendment there would no longer be a pretense of two points of access to the existing neighborhood and, accordingly, movement, medical and fire service access and safe entry onto Highway 79 would be greatly impeded and, in some cases. probably precluded. The results could be disastrous.

4. GOVERNMENTAL IMPROPRIETY OR MISAPPROPRIATION

There appears to be governmental impropriety or misappropriation related to this project. It is rumored that the public right of way for the intersection of Keller Road and 79 will be gifted to a favored property owner without consideration or justification. This rumor has been alive for the entire history of the review of this project and has never been publicly disclosed or explained or justified. Even worse, the County has long sought to disadvantage the existing neighborhood by curtailing or limiting access from Keller Road to 79. It has been suspected by the neighborhood that the only reason the new (since 2011) intersection was improved when Highway 79 was redeveloped in the last decade was because the State of California (particularly CALTRANS) became aware of the Counties improprieties and misconduct. The County has long neglected the conditions of the roads in the existing neighborhood and neglected the condition of 79 and made access and travel dangerous. The real improvements to 79 in the last decade and to Keller and Pourroy Road in the last four years have been hard fought over by the local residents, and greatly needed for adequate SAFETY AND ACCESS. It is imperative that these improvements continue and not retrograde.

5. GUILE AND SUBTERFUGE IN THE PLANNING AND DEVELOPMENT PROCESS

Another interpretation for the Counties actions could be that the officials don't really endorse Democracy or believe in Democratic decision making. Over the years, it has become manifest that County Supervisors, County Planning Directors, and Highway Directors and even County Planners do have a Master Plan, one that endorses heavy urbanization and high density development. But they do it in a subterfuge. The County knows they cannot or will not accept the responsibility to create the infrastructure to insure the success and safety and environmental soundness of such development and so concedes their ineptitude. Rather, local government, in the field of development believes that some other party, at some later time, usually in exigent circumstances, will repair or replace the County's errors. As evidence of the same, the County often includes rural areas and rural zoning in General Plans and then uses their "special circumstances" exception to violate the General Plan agreements with the County Residents and the County Electorate. Often, the same candidates who runs on a platform of stopping dangerous development becomes

the strongest advocates of development when in office. It is an ugly hypocrisy and a deceit played upon the residents/voters. It is almost custom in the County to give limited notice of planning actions, incomplete or misleading information and preferential treatment to developers and their representatives.

6. ACCESS AND SAFETY-CONGESTION AND INADEQUATE ROADS.

   As described above, traffic and congestion are escalating problems in the County and have significant negative effects upon the lives of the residents. In the case of this instant neighborhood and these instant residents (those living near the Project), there are real, everyday needs for access for Fire Equipment, Medical Equipment,(both often together), Garbage Services, Mail Services, travel for the residents, Agricultural Equipment, Propery Maintenance Equipment and normal travel. All these needs have always been threatened by the theft of Keller Road by the Project. The neighborhood and the existing Keller Road have long historical precedence. The so-called “ReAlignment” of Keller Road is really the misappropriation of Keller Road to serve the needs of a seriously defective Project which itself is handicapped due to its precipitous grades, elevations and unrealistic residential and structural density. The

Project will create tremendous congestion and gridlock as proposed. As proposed, the Project will seriously underserve the residents of the Project and the residents of the existing contiguous neighborhood. It will create a dangerous isolation and impediment for the residents in the existing contiguous neighborhood to reasonable access and movement. Although the plans for the Amendment are not yet finalized, with 416 proposed residential units and additional commercial development, it seems likely that the Amendment Project could be so dense as to become a “warren” or “enclave” in the negative sense that we now think of “ghettos”.

7. DRAINAGE, WATER AND FLOODING

For over a decade the existing neighborhood has experienced increased flooding. Several causes for this flooding are identified. The redevelopment of 79 led to increased flows from the hills on the Project by the removal of much of the pass through which 79 travels on the Eastern boundary of the project and the resulting lowering of the the level of 79 through the hill/pass. This undoubtedly made 79 safer but the County failed to compensate for the increased water flows. This is probably why the County (as the delegated builder of the State

Highway) raised the level of 79 fourteen feet higher (than before the redevelopment) where 79 passes through the existing neighborhood to the South of the Project and the pass. This has caused increased flows and flood waters from the Property of the Project and increased flooding in the downstream existing neighborhood. This problem has been aggravated by the failure of the Property Owner of the Project to properly maintain berms and water courses in the act of conducting agricultural activities on the Property. The combined result has been the migration of water and solid soil amendments downstream into the existing neighborhood and pooling of the same. The old culverts under 79 have been replaced with new larger culverts (or pipes) which are elevated to high to accept the increased flows. The County has often remarked that these deficiencies will be solved through development but has simultaneously planned that some of the drainage needs created by development will be solved by encumbering existing residential property with these obligations and burdens. The net result is that natural drainage patterns in the existing neighborhood have been disturbed and disrupted and the parties who have caused this problem have not taken responsibility. The entire issue of flood waters, water courses, blue line streams, drainage and the interface with development, the Project

and 79 needs to be environmentally studied, reviewed and reported upon with a fresh eye to the present status and the impacts created by the Project.

THE NEIGHBORHOOD AND THE UNDERSIGNED OBJECT TO OTHER ASPECTS OF SPECIFIC PLAN 380 AND THE AMENDMENT. THESE WILL BE LISTED HERE AND ELABORATED UPON FURTHER. IT IS HOPED THAT AFTER THE SCOPING SESSION MORE INFORMATION ABOUT THE AMENDMENT WILL BE SHARED WITH THE EXISTING RESIDENTS AND NEIGHBORHOOD.

Unfortunately, the “Scoping Session” (hereinafter Scope S) provided no information or clarity about the planned Project and, unbelievably, the Project proponents (who were said to be present) didn’t even make a presentation. There were some new documents provided by the Planning Department on the cusp of the Scope S but there was no time to review these before the Scope S. So, any opportunity for the existing neighborhood or residents to participate in a discussion of the environmental challenges posed by the Project was lost. Indeed, the general tenor of the meeting was very stifled and formalistic. It felt as if the moderator was performing an unpleasant task. It seemed clear that everyone understood that the Amendment

represented a very aggressive example of development in a rural neighborhood, with obvious environmental impacts and didn't want to be bothered to even discuss the fact.

8. DAMAGE TO THE AQUIFER AND EXISTING WELLS.

Damage to the wells in the existing neighborhood. Wells, for animal support, for agriculture and for rural residences, are under threat. The County is a direct party in creating this threat. In supporting large wells for County and Municipal water districts and in having no replenishment plan; in supporting high density development in the face of limited water resources; in permitting blasting with explosives which dislocated well water resources; and in having no effective general water saving, resourcing and recycling programs the County is endangering the County and the Residents. This Amendment is a good example of such poor planning. The project needs to be re-reviewed for its impact on water resources and its utilization and preservation of water resources.

9. EXPLOSIVE BLASTING AND ENVIRONMENTAL IMPACTS FROM BLASTING INCLUDING IMPACTS ON WELLS.

Blasting and the negative effects upon the existing neighborhood and the existing wells are singularly and collectively of grave concern to the neighbors. This has been an ongoing problem in the area of the Project and in other parts (including nearby parts) of the County. The County promoted the same rural homesin the past that are now being effected by this present blasting activity. The County has an ongoing obligation to continue to protect the water rights of its existing residents. The environmental impacts of these activities need to be closely evaluated.

10. A COMPREHENSIVE ENVIRONMENTAL STUDY OF THE TRAFFIC AND CONGESTION IMPACTS OF THE PROJECT BOTH IN, AROUND AND BEYOND THE PROJECT IS REQUIRED.

Traffic and traffic congestion and the lack of adequate, contemporary or realistic study is necessary. Conditions have changed significantly in the last ten years. If the goal of the 79 litigation and policy settlement was to ensure the safe and effective operation of 79 in the policy area then that goal is in grave jeopardy. There is so much construction planned and ongoing along 79, in addition to

this aggressively dense Amendment, that it appears unlikely that 79 North will be any more passable than 79 South or 79 North below Benton Road. A complete new traffic and road and transportation plan needs to be undertaken with all connected and related environmental issues evaluated.

11. A COMPLETE ENVIRONMENTAL EVALUATION OF THE KELLER ROAD MASTER PLAN FROM HIGHWAY 215 TO WASHINGTON STREET.

Integration of the impacts of the Master Plan for Keller Road and integrated study of the redevelopment of Keller Road from Highway 215 to the Project and Eastward to Keller's terminus is necessary. A complete Environmental Study and Impact Report of the effect of this redevelopment on present Keller Road, especially near the Project, and in the existing Neighborhood and on 79 would provide needed information for the evaluation of this Project and Amendment. This is an issue where the County has a vision which isn't clearly shared with the residents for fear of a negative political reaction. Keller Road needs to be a sub-arterial highway, almost as big, or as big as the existing 79 to accommodate the development along Keller Road envisioned by the County. This will destroy any vestige of rural life in the area and is at

odds with the General Plans which have been politically agreed to over the last twenty years.

12. A COMPRENSIVE ENVIRONMENTAL EVALUATION OF THE GRADING PLAN FOR THIS PROJECT.

This Project is sited on steeply elevated Property. Per the Grading Plan of the original Specific Plan, that community was described to have a forty foot differential in the elevation of the Southern Boundary of the community and the contiguous Northern boundary of the existing neighborhood. This was always bizarre, and would have effectively isolated the existing community and neighborhood from views, air and light and any sense of continuity with the local area. As this was unacceptable in the original proposal and the Amendment seeks greater density with more Water Detention structures on the South Boundary of the Project than the original Specific Plan, the neighbors and opposition would ask that the Grading, the Water Control, the Aesthetics, the Access, the Light and Air conditions, the Flooding potentials, the Water Quality issues all be subject to new, original, vigorous de novo Environmental Impact Review.

13. SLUDGE AND ANIMAL WASTE SOIL AMENDMENTS ON THE PROJECT SITE AND PROPERTY

The effect of the depositing of Animal Waste upon the Project in the Agricultural Practices of the Owner for over a decade and the migration of this Sludge (or whatever euphemism is preferred) downhill and downstream and its negative effect upon the wells, water and life of the existing neighborhood have long been suffered and endured. The deposit of this Animal Waste Soil Amendment is highly controversial and people can't even agree on whether to call it sludge or some other name. The only thing that people seem to agree on is that they don't especially want to touch the stuff or be near the stuff. For many years the Owners of the Property subject to the Specific Plan and the Amendment have been depositing this odious and harmful substance on their Property and it has been migrating downhill and downstream with negative consequences. It has caused some local residential wells to be unsafe to drink because of elevated nitrate levels. The deposition of this material, its removal and handling, and the impact the deposition has had upon the Property and the neighborhood needs to be have its Environmental Impact reviewed. It (the Sludge) also needs to be evaluated for

compaction suitability. Is it a safe and adequate base for development.

14. TIER FOUR CONSTRUCTION EQUIPMENT AND DUST, EROSION AND NOISE CONTROL AND ABATEMENT

Reaffirming the concerns and opposition to Explosive Blasting likely to occur in the development of this Project, the opponents also note that the Air Quality Mangement District (hereinafter AQMD) opposed the use of less than Tier 3 construction equipment in the building of the original Specific Plan. Given that more than a decade has passed since that AQMD objection and the County's decision to ignore AQMD's objection, and given that the standard for construction equipment is now Tier 4, the opponents of the project seek new, original and denovo Environmental Impact review of these issues. The Noise, Dust, Disruption, Timing, Hours of Operation, Frequency of Road Closures, Erosion and Soil Migration, and all other issues associated with such large construction needs to be environmentally evaluated for Impacts de novo.

15. AFFORDABLE HOUSING REVIEW AND EVALUATON

This Project requires careful review for Affordable Housing objectives and goals. One of the negative aspects of County planning in Riverside is the neglect and hostility expressed and directed at existing rural homeowners and landowners. In County Planning parlance this is referred to as “donut holing”, and the concept is that the rural community is surrounded by and from development, cutoff from infrastructure improvements, isolated both by roads and services, and (in almost a military sense) destroyed. This happens too frequently to be incidental. A kinder and more accurate description would be “blighting”, Intentionally creating a blighted area. This does not create more affordable housing. It devalues existing housing and property without producing any affordable housing. Generally, the new homes are more expensive than the existing rural properties, have higher taxes and expenses, are burdened with special assessments and impose greater demands on schools and services and are more susceptible to economic reversals such as “foreclosures”. Foreclosures were really Riverside County’s greatest boom product for much of the decade after 2008. Now, the need for affordable housing has become an exigency in California, Riverside County, and the United States. Consideration and review of the issues

raised by this emergency need to be fully evaluated and studied in the planning of this Amendment and Project.

16. PUBLIC TRANSIT

Since the improvements at 79 and Keller Road, the existing residents have been waiting for a bus stop. This would benefit handicapped, elderly and non car owning/non-operating persons, both on the West side of 79 where the Project is proposed, and persons on the East Side of 79. This Project, and Specific Plan have no considerations or planning for access to Public Transportation. A Public Transit study needs to be incorporated into the Environmental Impact Report (hereinafter EIR).

17. DROUGHT/CLIMATE CHANGE

The Project area is in a County, and State and National Region experiencing an historic drought. Diamond Valley Reservoir has been dangerously low periodically almost since its construction. The Drought combined with the increased fire danger, evidenced by the increased number of fires in the Project area, and the increased ambient temperatures require greater planning to address these issues and environmental impacts. This Project needs to environmentally consider, review and plan for all these effects of climate change.

18.Congestion

-It appears that the County has surrendered any hope of having a well-constructed road system with reasonable passage from point to point. The Highway 79 litigation and the highway 79 Policy Area are not succeeding in creating safe and regular passage up the main State Route into and past the Project area. The traffic congestion is just escalating and no one seems to have a plan for addressing the problem. This should be environmentally reviewed and reported in the Project EIR.

19. Greenhouse Gases

All the concerns about Climate Change, Traffic Congestion, Drought and Access are effected by and in turn effect and exacerbate the production of Greenhouse Gasses. The decrease of Greenhouse Gases is both the macro goal and micro goal, in the area and in the Project. This problem needs to be environmentally reviewed and considered in all contexts, especially including those related to the Project.

20. Blue Line Streams and Water Courses

The County has a history of under estimating and under evaluating the water courses in the County in planning new development. Flooding is a danger and is often exacerbated by development. This has been discussed above in the discussion of Sludge on the Project Property and in the discussion of the redevelopment of 79. It is important to consider the blue line streams on the Project Property and in the area and to environmentally evaluate all water courses to consider and protect natural habitats, drainage, flooding, residential wells and safety.

21. AGRICULTURAL ACTIVITIES, ZONING, HORSES AND BUSINESSES

This area around the Project has a long history of agricultural life. The Environmental Review (EIR) should evaluate the impacts and effects of the Project on the ability of the neighbors to consider owning large animals, getting access to agricultural well water, conducting activities such as growing crops, and maintaining agricultural wells. There should also be an environmental review of passage of horses through the neighborhood and the Project to protect and continue this activity.

22. BIOLOGICAL RESOURCES, HABITAT, THERMAL WELLS AND WELL WATER

The Project at issue, and other construction permitted by the Planning Department in the Project area have utilized water quality infrastructure which includes large runoff wells and filtration equipment with water quality monitoring equipment and programs. The impact of runoff created by large areas of hardscape must be considered in evaluating the environmental impact on such benefits to the existing neighbors as thermal wells, agricultural wells, large birds, raptors, owls and other indigenous animals slowly being forced out of the area by development. There are many other natural resources that are present and important to the exisiting residents and which would be effected or lost by the development of the Project. Much of the future hopes for extensive solar, wind and thermal power potential will be lost by the spread and density of the Project.

23. ALTERNATIVE ENERGY

The proposed Project should have an extensive alternative energy component and that component should result in a plan. The plan and possibilities should be carefully evaluated in the EIR.

Very Truly Yours;
Dennis F. Tuffiin

NATIVE AMERICAN HERITAGE COMMISSION

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September 10, 2021

Deborah Bradford, Project Planner
Riverside County
P.O. Box 1409
Riverside, CA 95202-1409

Re: 2021080570, Keller Crossing Specific Plan Amendment No. 1 Project, Riverside County

Dear Ms. Bradford:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Domenigoni Barton Properties

33011 Holland Road
Winchester, CA 92596

Phone 951-926-6924
Ranch 951-926-1636
Fax 951-926-4924

River County Planning Dept
4080 Lemon Street, 12th Floor
Riverside, CA 92502-1409

Attn: Deborah Bradford, Project Planner

Project Case No./ Title: Keller Crossing (Specific Plan Amendment No. 380A01

Dear Ms. Bradford,

Domenigoni Barton Properties the owners of Specific Plan 310 North of Keller Crossing have many concerns with amending the current specific plan and change of zones to increase the density of the Keller Crossing project. We are concerned about the additional units and how it will affect the 74/79 policy area and the overall general traffic conditions that additional units will put on the current circulation from Temecula to Winchester to Menifee to Hemet.

We would like to know how this project is circumventing the 74/79 policy area since SP310 had to reduce by 9% at an overall loss of units of more than 400.

Domenigoni Barton properties has not seen the new policy area being amended in the County and what is the protocol for adding units in without modeling traffic in the surrounding area or a full blown new environmental impact study for the surrounding area.

Thank you,
Andy Domenigoni

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
California Highway Patrol
27685 Commerce Center Drive
Temecula, CA 92590
(951) 506-2000
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

September 21, 2021

File No.: 685.14893.17194

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

RE: SCH# 2021080570

The Temecula Area of the California Highway Patrol received the "Notice of Preparation" of the Environmental Impact Report for the proposed Keller Crossing project for State Clearinghouse (SCH) number 2021080570. After review, we have concerns with the potential impact this project could have on traffic congestion, pedestrian and bicyclist safety, and school bus routing.

Our concerns relate to the proposed construction of more than 320 dwelling units and development of 37.8 acres of Commercial Retail. The proposed project is located in close proximity to State Route 79 (Winchester Road) which is a major arterial route that connects French Valley community with Interstate 215 in Riverside County. The purpose of this construction project is to build a residential tract along with commercial retail buildings. Currently, the proposed construction area is rural and undeveloped. This project could have a negative impact on our operations due to an increase in traffic, which could necessitate the need for additional traffic control measures to mitigate the potential increase in traffic collisions and calls for service within our jurisdiction.

If you have any questions regarding these concerns, please contact Sergeant B. Arendt at (951) 506-2000.

Sincerely,

J. J. Penner, Captain
Commander
Temecula Area

Attachments: Checklist

ENVIRONMENTAL IMPACT REPORT
EVALUATION/RESPONSE CHECKLIST
FOR AREA/SECTION

Reference: General Order 41.2

	Action	Reference GO 41.2
☒	Review memorandum for the due date(s).	
☒	Determine if the proposed project might impact local operations and/or public safety. Examples include: housing developments, large commercial projects, large recreational developments or expansions, landfill or quarry operations, hazardous materials storage and/or dump sites, highway construction/improvement projects, new schools, airport improvements, annexations/incorporations, off-highway vehicle facilities, and Indian gaming facilities.	Page 5
☒	Review environmental impact documents to identify issues or concerns with possible impact to departmental operations (i.e., increased response times, enforcement, emergency services, service calls, telecommunications, public safety).	
	Responses	
☒	If comments are advisable:	
☒	Correspondence should focus primarily on traffic safety, congestion, or other impacts to the CHP's mission; however, **Areas shall not indicate to the lead agency that additional personnel, facilities, vehicles, etc., are a means to mitigate departmental service issues**.	Page 7
☒	Ensure the State Clearinghouse number (SCH#) is included in all correspondence.	
☒	Comments shall be provided directly to the lead agency and emailed to State Clearinghouse at state.clearinghouse@opr.ca.gov no later than the designated due date. Provide a copy to Special Projects Section (SPS) via e-mail.	
	For project tracking purposes, SPS must be notified of Area/Section's assessment of the project. After mailing your comments to the SCH or lead agency, send a scanned copy via e-mail to SPS.	
☐	If no impact is determined:	
☐	Via e-mail, please respond "no impact to _____ Area's local operations and/or public safety by SCH# _____ was identified," by the designated SCH due date to the SPS analyst listed on the Environmental Document Review and Response memorandum. Ensure the SCH# is included.	