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**Draft Environmental Impact Report (EIR) for
Keller Crossing Specific Plan No. 380, Amendment No. 1 Project (Proposed Project)
(SCH No.: 2021080570)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project is a proposed master-planned residential community located on approximately 196.1 acres of unincorporated land and consists of up to 694 residential units on approximately 87.37 acres, an 8.88-acre public community park, 61.42 acres of conserved open space for habitat protection, 16 acres of water quality/detention basins, 3.49 acres of conservation open space, and 18.89 acres of major roadways.¹

The Proposed Project is located within the French Valley Community of the Southwest Area Plan in western Riverside County, California and is bound to the south by Keller Road, to the west by the future alignment of Pourroy Road, and to the east by Winchester Road (SR-79).² The nearest sensitive receptor (e.g., residential development) is located 13 ft. to the south of construction site.³

Construction of the Proposed Project is anticipated to occur in multiple overlapping phases, and for the purpose of analysis, it is assumed to span from October 2025 through January 2030 (a period of five years).⁴

¹ Keller Crossing Specific Plan No. 380, Amendment No. 1 Draft EIR, p. S-3.

² *Ibid.*, p. S-2.

³ *Ibid.*, p. 4.3-24.

⁴ *Ibid.*, p. S-28.

South Coast AQMD Comments*Recommend Conducting a Project-Specific Analysis of Localized Air Quality Impacts during Project Operation*

Based on the Draft EIR, only the regional air quality impacts during the Proposed Project operation have been provided by the Lead Agency in the Draft EIR,⁵ with no analysis provided for the localized operational emissions. The Lead Agency has stated that the quantitative operational localized significance threshold (LST) analyses were not performed for the Proposed Project, because “*according to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings).*”⁶ However, this statement is not comprehensively accurate. LST methodology guideline states that the primary emissions from operational activities include but ***are not limited to*** NOx and CO combustion emissions from stationary sources and/or on-site mobile equipment.⁷ This approach is inconsistent with the scope of analysis required by CEQA for environmental review of a CEQA project. CEQA Guidelines section 15126 explains that “*all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation.*” The Draft EIR should address potential localized air quality effects from operation, particularly where development-related emissions could affect nearby sensitive receptors and surrounding communities.

Without this information, the Draft EIR does not provide sufficient factual support or transparency regarding the magnitude of localized operational emissions associated with the Proposed Project, the effectiveness of the proposed mitigation measures, or the basis for its significance conclusions to the Proposed Project’s air quality impacts.

Thus, it is recommended to add a table in the air quality impact section for evaluating the maximum daily on-site operational emissions using CalEEMod land use emissions software, and subsequently, compare these emissions against the South Coast AQMD LSTs. It is important to note that consistent with South Coast AQMD guidance, a project-specific dispersion modeling analysis or other refined localized air quality analysis should be prepared for operational emissions to adequately evaluate potential localized impacts, and the results should be included in the Final EIR. As indicated in Table 3-2 of the South Coast AQMD LST methodology, the LST screening tables are based on specific assumptions regarding project area, emission distribution, and receptor distance, and are not applicable to projects larger than five acres. Because the Proposed Project site is 196 acres in size and exceeds the applicability criteria for the screening tables, reliance on the LST screening values alone may not accurately characterize localized air quality impacts. Projects of this size, or those excluded from the methodology based on Table 3-2, may involve different emission dispersion patterns, multiple concurrent construction activities, and varying distances between emission sources and nearby sensitive receptors. These conditions are not accounted for in the screening approach.

⁵ *Ibid.*, p. 4.3-33, Table 4.3-11.

⁶ *Ibid.*, p. 4.3-34.

⁷ South Coast AQMD Localized Significance Threshold Methodology, p. 1-4. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

Recommend Further Evaluation of Potential Human Health Consequences

The Draft EIR includes a quantitative Construction Health Risk Assessment in Appendix B-2 evaluating potential health risks associated with toxic air contaminant emissions from construction activities. However, based on a review of Section 3.4 (Air Quality) of the Draft EIR⁸, the Lead Agency does not provide a quantitative analysis of the potential human health consequences associated with the criteria air pollutant emissions for this large proposed residential development project. The February 2023 Friant Community Plan Update and Friant Ranch Specific Plan contained a detailed quantitative analysis of Human Health Consequences,⁹ which demonstrates that this type of analysis can be performed.

For context, the Bloomington Business Park Specific Plan Project¹⁰ was required to recirculate its Draft EIR following a legal challenge in San Bernardino County Superior Court (Case No. CIVSB2228456). In that proceeding, the court directed the County to set aside its prior approvals, finding that the EIR was legally inadequate with respect to its analysis of air quality impacts, including the application of the Friant Ranch methodology for evaluating health effects. As articulated in the court's ruling, "*a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact.*"¹¹ This standard underscores the requirement under CEQA that an EIR provide a meaningful, evidence-based analysis that allows decision-makers and the public to understand the extent and severity of a project's environmental and public health impacts.

Therefore, it is recommended the Lead Agency to review the analyses in the above-referenced documents, perform a quantitative health effect analysis specific to the Proposed Project where feasible, and incorporate the results in the Final EIR.

Emission Reductions from Health Risk Strategies

South Coast AQMD is concerned about the potential public health impacts of siting existing and new sensitive populations within the proximity of existing air pollution sources (e.g., freeway, railroad). For this reason, prior to approving this Proposed Project as well as any future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in the new project area and provide effective mitigation. Additionally, South Coast AQMD suggests that the Lead Agency review and apply the guidance provided in: 1) the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective¹² which provides criteria for evaluating and reducing air pollution impacts associated with new projects involving land use decisions; and 2) CARB's technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.¹³

⁸ Keller Crossing Specific Plan No. 380, Amendment No. 1 Draft EIR, p. 4.3-38.

⁹ Quantitative Analysis of Human Health Consequences Analysis, Table 3.3-8. Available at: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/72347-friant-prr-deir_2-7-23.pdf

¹⁰ Bloomington Business Park Specific Plan Project (SCH: 2020120545). Available at: <https://ceqanet.lci.ca.gov/2020120545/10>

¹¹ Bloomington Business Park Specific Plan Project. Court Ruling. p. 34 of PDF. Available at: https://www.climatecasechart.com/documents/california-superior-court-found-that-ceqa-review-for-industrial-rezoning-improperly-analyzed-greenhouse-gas-reduction-measures_4d86

¹² California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf

¹³ CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, HVAC systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities. In some cases, MERV 15 or better is recommended, for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. However, enhanced filtration systems have limitations. For example, filters rated MERV 13 or higher are able to screen out greater than or equal to 50% of DPM¹⁴ but they have no ability to filter out volatile organic compound (VOC) emissions. Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms,¹⁵¹⁶ 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, including 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, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Draft EIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in the Draft EIR. Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

*Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures
and Project Design Considerations*

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures for Operational Air Quality Impacts

Mobile Sources

Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.

¹⁴ U.S. EPA, "What is a MERV rating?" Available at: <https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating>.

¹⁵ South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration for Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.

¹⁶ South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration for Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.

2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act¹⁷
2. South Coast AQMD 2022 Air Quality Management Plan,¹⁸ specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast
 - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹⁹

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,²⁰ Rule 203 – Permit to Operate,²¹ Rule 401 – Visible Emissions,²² Rule 402 – Nuisance,²³ Rule 403 – Fugitive Dust,²⁴ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,²⁵ Rule 1113 – Architectural Coatings,²⁶ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,²⁷ Rule 1179 – Publicly Owned Treatment Works Operations,²⁸ Regulation XIII – New Source Review,²⁹ Rule 1401 – New Source Review of Toxic Air Contaminants,³⁰ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,³¹ Rule 1470 – Requirements for

¹⁷ State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

¹⁸ South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

¹⁹ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

²⁰ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

²¹ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

²² South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

²³ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

²⁴ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

²⁵ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²⁶ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

²⁷ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

²⁸ South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

²⁹ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

³⁰ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

³¹ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,³² etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Zoya Banan, Ph.D., Air Quality Specialist, at ZBanan@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

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³² South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>