

BBG KRG, INC.  
P.O. Box 1839  
Corona, CA. 92878

January 27, 2021

Riverside County Planning Department  
ATTN: Phayvanh Nanthavongdouangsy, Project Planner  
PO Box 1409, Riverside, CA 92502-1409

SUBJECT: NOTICE OF PREPARATION – TEMESCAL VALLEY COMMERCE CENTER (GPA 200007, CZ 2000028, AND CUP 200044

Dear Ms. Nanthavongdouangsy,

We appreciate the opportunity to provide comments on the Notice of Preparation for the Temescal Valley Commerce Center project. We are the majority owners (hereinafter “Owners”) of the adjacent Serrano Commerce Center Specific Plan No. 353, which was approved by the Board of Supervisors on June 22, 2010. Concurrently with the Specific Plan, we obtained approval of Tentative Parcel Map No. 32885 to subdivide the project and provide roadway dedications, etc. In addition, the project is conditioned to construct significant on- and off-site infrastructure improvements, in which the Temescal Valley Commerce Center project would be an active participant in.

The Owners have partnered with Waypoint-Lewis, LLC, to act as the master developers of the Serrano Commerce Center, and work with the County on obtaining approval of the Final Map and associated final engineering to advance the first phase of development within Serrano Commerce Center. Our project will provide significant benefits to the County of Riverside with the re-alignment of Temescal Canyon Road to the east side of the I-15 Freeway, as well as other infrastructure improvements in the corridor.

While we support and encourage the development of the Temescal Valley Commerce Center project, we believe it is important that we raise concerns to ensure that the Environmental Impact Report analyzes and identifies appropriate mitigation measures for the proposed project. The Temescal Valley Commerce Center project requires analysis of offsite improvements and impacts to the Owners property, and thus we need to ensure a fair analysis of impacts. Our concerns are summarized as follows:

1) Biological Resources:

- a. Ensure that biological surveys, sensitive plant and species surveys, and jurisdictional delineations analyze the full extent of areas temporarily and permanently impacted by roadway, channelization, and grading improvements. This should also include analysis of areas impacted by channelization up to the I-15 Freeway/Caltrans right-of-way line through the Owners property.

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2) Hydrology/Water Quality:

- a. Ensure that the horizontal and vertical channel alignments proposed are consistent with Tentative Parcel Map No. 32885. Shifting significant grade control structures onto the Owners property will significantly increase erosivity, velocity, and increase the public safety risk to the future bridge structure on Temescal Canyon Road. The developer should analyze channel alignments that fairly distributes grade control structures on both properties and limits the potential risk to the future bridge structure. Any modifications to the alignments must be coordinated with the Owners and the County.
- b. The channel design should include the full reach from the Temescal Wash to the I-15/Caltrans right-of-way, and the associated impacts therewith. Similar analysis should be conducted of any interim drainage improvements if the ultimate connection to the I-15/Caltrans right-of-way is not constructed.

3) Transportation:

- a. The project Traffic Impact Analysis should include the I-15-Temescal Canyon Road interchange, including all on- and off-ramps, pursuant to Caltrans guidance to ensure mitigation and/or fair share addresses existing safety and operational deficiencies (i.e. bike lanes, etc).
- b. The project Traffic Impact Analysis should include intersections proposed within the Serrano Commerce Center, and fair share contributions assigned to those proposed intersections if applicable.
- c. The project applicant should ensure that the horizontal and vertical alignment of Temescal Canyon Road that lies within the Owners fee title property is designed consistent with the approved Tentative Parcel Map No. 32885. Any such modifications to the alignments must be coordinated with the Owners and the County.

We appreciate the opportunity to comment on the Notice of Preparation, and we look forward to ongoing coordination with the developer and the County to advance this project.

Sincerely,



Thomas M Garrett  
Chief Executive Officer