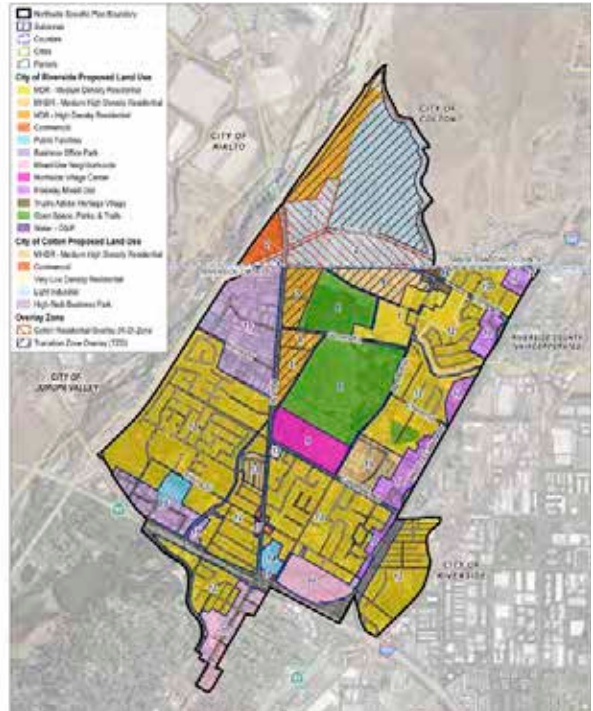


NORTHSIDE SPECIFIC PLAN

Final Program Environmental Impact Report

PREPARED FOR
The City of Riverside



PREPARED WITH ASSISTANCE FROM

DUDEK

605 Third Street
Encinitas, CA 92024

FINAL

**Northside Neighborhood & Pellissier Ranch Specific Plan
Program Environmental Impact Report**

Prepared for:

City of Riverside

Community & Economic Development Department
Planning Division

3900 Main Street, 3rd Floor
Riverside, California 92522

Contact: Patricia Brenes, Principal Planner

Prepared by:

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OCTOBER 2020

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1 Introduction

The City of Riverside is proposing the Northside Neighborhood and Pellissier Ranch Specific Plan (Northside Specific Plan). The Specific Plan Area (SPA) is located on the border between the County of San Bernardino and County of Riverside within the Southern California region, and covers approximately 2,000 acres. The SPA includes approximately 1,600 acres within the City of Riverside, approximately 336 acres within the City of Colton, and approximately 83 acres within the unincorporated County of Riverside. The Northside Specific Plan is a program-level document intended to guide future development and redevelopment in the SPA to meet the land use, mobility, sustainability, social equity, and economic goals. The plan includes land use designation changes, as well as circulation, mobility and trail plans. The Northside Specific Plan also includes compliance measures, development standards, allowable uses, and implementation guidance for future development.

1.1 Purpose

Before approving a project, the California Environmental Quality Act (CEQA) requires the lead agency to prepare and certify a Final Environmental Impact Report (EIR). As described in CEQA statute and the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, with consideration of other conditions, including economic, social, technological, legal, and other benefits. As required by CEQA, this final EIR assesses the significant direct and indirect environmental impacts of the proposed program, as well as cumulative impacts. This final PEIR is an informational document only, the purpose of which is to identify the significant impacts of the Northside Specific Plan on the environment; to indicate how those significant impacts could be avoided or significantly lessened, including feasible mitigation measures; to identify any significant and unavoidable adverse impacts that cannot be mitigated to less than significant; and to identify reasonable and feasible alternatives to the proposed program that would avoid or substantially lessen any significant adverse environmental impacts and achieve the fundamental objectives of the Northside Specific Plan. This final program-level EIR for the Northside Specific Plan has been prepared by the City of Riverside in accordance with the California Environmental Quality Act (CEQA; California Public Resources Code, Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.), as well as CEQA's Significance Determination Thresholds (Appendix G of the CEQA Guidelines).

1.2 Process

The City of Riverside is the lead agency, defined in CEQA Guidelines Sections 15050 and 15367 as the “public agency which has the principal responsibility for carrying out or approving a project.” This EIR is intended to analyze the environmental impacts associated with the discretionary actions that require ultimate approval by the Riverside City Council for portions of the project within the City of Riverside and its Sphere of Influence (SOI). In addition, the document may be utilized by responsible agencies and trustee agencies, which are defined in CEQA Guidelines Sections 15381 and 15386, respectively. For this project, the responsible agencies include, but are not limited to, the City of Colton and County of Riverside. The trustee agencies include the California Department of Fish and Wildlife.

A draft EIR was prepared and distributed by the City of Riverside for an extended 60-day public review between March 26, 2020 and May 25, 2020. Comments on the Draft EIR were received during the comment period, and those comments are included and responded to in this Final EIR. The Draft EIR and public review comments will be submitted to the Planning Commission for review prior to their decision on if to recommend the Northside Specific Plan for approval or denial. This Final EIR will be submitted to the City Council for requested certification and action on the Project. Consistent with State law (Public Resources Code 21092.5), responses to agency comments are

being forwarded to each commenting agency more than 10 days prior to City Council public hearing. In addition, a notification email regarding the availability of the Final EIR will be sent to all those who requested to be notified about the project and provided their email address. The Final EIR is available for the public to review online at the Northside Specific Plan website (northsideplan.com) as well as the City website (<https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents>). Physical copies will be made available as possible at the Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522.

1.3 Organization

Per CEQA Guidelines section 15132, the Final EIR shall include:

- (a) The Draft EIR or a revision of the Draft.
- (b) Comments and recommendations received on the Revised Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Revised Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

The final EIR for the Northside Neighborhood and Pellissier Ranch Specific Plan (Northside Specific Plan) is comprised of an errata, response to public review comments, and the Draft EIR with associated appendices. More specifically, the Final EIR is organized as follows:

- **Chapter 1 – Introduction.** Provides an overview of the purpose, process and organization of the final EIR.
- **Chapter 2 - Response to Comments.** Includes an index of those who provided comments on the Draft EIR. Provides response to comments in side-by-side format, with the comment letter on the left side and the response on the right side.
- **Chapter 3 – Errata.** This section provides the revisions made to the Draft EIR and associated technical reports based on public review comments and staff-initiated text changes.
- **Chapter 4 - Mitigation, Monitoring, and Reporting Program.** This section provides corrections and additions to the Draft EIR, based on comments received during and after the public review period and based on staff-initiated text changes.
- **Chapter 5 – Draft EIR.** This section includes the Draft EIR that was previously circulated for public review on March 26, 2020. This also includes the Draft EIR appendices.

2 Responses to Comments

2.1 Introduction

This chapter of the final program Environmental Impact Report (EIR) includes a copy of all comment letters that were submitted to the City of Riverside during the 60-day public review period for the draft EIR for the Northside Neighborhood and Pellissier Ranch Specific Plan (Northside Specific Plan) project, along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The 60-day public review period for the draft EIR began on March 26, 2020, and ended on May 25, 2020.

All written comment letters received on the draft EIR have been coded with a letter to facilitate identification and tracking (see Table 2-1). These comment letters were organized into commenter category, with the categories consisting of agency (A), Tribes (T), organizations (O), and individuals (I). Within those categories, the comment letters are assigned a number based on the date received. Each comment with a single theme, issue, or concern was subsequently numbered. To aid readers, the bracketed comment letter is provided on the left-side of the page, and the corresponding responses are on the right side of the page.

Table 2-1. Comments Received on the Draft Program Environmental Impact Report

Comment Letter	Commenter	Date
<i>Agencies</i>		
A1	Riverside County Airport Land Use Commission (ALUC)	4-13-2020
A2	CA Department of Fish and Wildlife	5-26-2020
A3	City of Colton	5-21-2020
A4	Greater Riverside Chambers of Commerce	5-26-2020
A5	Metropolitan Water District (MWD)	4-16-2020
A6	Riverside County Flood Control and Water Conservation District	4-8-2020
A7	South Coast Air Quality Metropolitan District (SCAQMD)	5-19-2020
A8	Western Municipal Water District (WMWD)	3-27-2020
A9	Metropolitan Water District (MWD)	5-26-2020
<i>Tribe</i>		
T1	Rincon Band of Luiseno Indians	4-22-2020
<i>Organizations</i>		
O1	Citizens United for Resources and the Environment	5-26-2020
O2	Northside Improvement Association	5-26-2020
O3	Raincross Group	5-12-2020
O4	Spanish Town Heritage Foundation (Nancy Melendez)	5-26-2020
O5	Springbrook Heritage Alliance	5-25-2020
O6	Springbrook Heritage Alliance	5-15-2020
O7	Sunmeadows	5-21-2020
O8	Sunmeadows	5-26-2020
O9	Center for Community Action and Environmental Justice (Olea, Ricardo)	5-26-2020

Table 2-1. Comments Received on the Draft Program Environmental Impact Report

Comment Letter	Commenter	Date
Individuals		
I1	Eldred, Cynthia L	5-7-2020
I2	Kasner, Sharon (Spanish Town Heritage Foundation)	5-25-2020
I3	Krick, John	5-26-2020
I4	Mary Hamilton Trust (Brent McManigal; Gresham Savage Molan & Tilden)	5-26-2020
I5	McHugh, Martin	5-8-2020
I6	Melendez, Nancy	5-25-2020
I7	Ponnech, Sala	5-26-2020
I8	Ruiz, Diana	5-26-2020
I9	Snyder, Erin	5-25-2020
I10	Tanner, Judy	5-4-2020
I11	Transition Properties, LP (Andrew Lee, Allen Matkins Leck Gamble Mallory & Natsis LLP)	5-25-2020
I12	Wohlgemuth, Pete	5-26-2020
I13	Wood, Jim	5-27-2020
Late Letters		
Agencies		
A10	Greater Riverside Chambers of Commerce	9-3-2020
A11	Western Municipal Water District (WMWD)	9-4-2020
Organizations		
O10	Riverside Woman's Club	9-2-2020
O11	Roquet Family	9-3-2020
O12	Springbrook Heritage Alliance	9-2-2020
O13	Springbrook Heritage Alliance	9-3-2020
O14	Sunmeadows	9-1-2020
O15	Northside Improvement Association	9-3-2020
Individuals		
I14	Baker, Linda	8-31-2020
I15	Mateja, Sharon	9-3-2020
I16	McHugh, Martin	8-30-2020
I17	Public Commission Meeting	9-3-2020
I18	Shardlow, Jonathan	8-26-2020
I19	Snyder, Erin	9-2-2020
I20	Wood, Jim	9-3-2020

To finalize the EIR for the proposed Northside Specific Plan, the following responses have been prepared to comments that were received during the public review period. Comments that raise environmental issues have been thoroughly addressed in these responses. Comments that do not require a response include those that (1) do not address the adequacy or completeness of the Draft PEIR; (2) do not raise environmental issues; (3) do not address the proposed project; or (4) require the incorporation of additional information not relevant to environmental issues.

Section 15088 of the CEQA Guidelines, Evaluation of and Response to Comments, states:

- (a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- (b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- (c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.
- (d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the Lead Agency should either:
 - (1) Revise the text in the body of the EIR, or
 - (2) Include marginal notes showing that the information is revised in the response to comments.

Revisions to the Draft EIR have been prepared to make clarifications, corrections, or minor revisions to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments or independently by the City of Riverside. Therefore, this Chapter 2, Responses to Comments, along with Chapter 3, Errata, are included in the final EIR for consideration by the City of Riverside.

Section 15088.5, Recirculation of an EIR Prior to Certification, of the CEQA Guidelines states the following:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043) (b)
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
 - (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
 - (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
 - (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.
 - (f) The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.
 - (1) When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.
 - (2) When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.
 - (3) As part of providing notice of recirculation as required by Public Resources Code Section 21092.1, the lead agency shall send a notice of recirculation to every agency,

person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR in order to be considered by the agency.

- (g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.

The draft EIR revisions and information presented in the responses to comments do not result in any conditions set forth in Section 15088.5 of the CEQA Guidelines requiring that the EIR be recirculated prior to its certification. Although CEQA requires recirculation of an EIR when “new significant information is added to the EIR” after the EIR is circulated for public review and before it is certified, “new information” added to the EIR “is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” CEQA Guidelines § 15088.5(a); *Laurel Heights Improvement Assn. of San Francisco, Inc. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1129. Recirculation is not required when new information is added that “merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” In response to comments received on the Draft PEIR, this Final PEIR includes additional information to clarify information or make minor modifications to the PEIR.

2.2 Comment Letters and Responses

The following section includes the comment letters regarding the draft EIR received by the City of Riverside during the public review period and the City of Riverside responses to each comment. With respect to comment letters received, individual comments within the body of each letter have been identified and numbered. Brackets delineating the individual comments and alphanumeric identifiers have been added in the right margins of each letter. Responses to the bracketed comments are provided on the right side of the response table.

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Response to Comment Letter A1

Riverside County Airport Land Use Commission (ALUC)

**Paul Rull
April 13, 2020**

The comment provides a statement that the project is outside the airport influence area and therefore the ALUC has no comments. As described on Draft EIR page 3.8-5, the “SPA east of I-215 is within the Airport Influence Area and within Zone E” of the March Air Reserve Base. There are no residential density limits in this area, but there are limits on potential flight hazards (such as very tall structures and uses that attract birds) and Real Estate Disclosure requirements.” As discussed on Draft EIR page 3.8-20, “Future site-specific development projects that occur within Zone E or Airspace Protection Surfaces for the March ARB would be required to be reviewed by the City for consistency with the ALUCP (**CM-HAZ-5**).” For that reason, the Draft EIR concluded a less than significant hazard impact related to airports. The City would continue to coordinate with the ALUC and provides no further response to this comment herein.

A1-1

Comment Letter A1

From: Rull, Paul <PRull@ROVCD.ORG>
Sent: Monday, April 13, 2020 8:03 AM
To: Estevan, Jay
Subject: [External] Northside Specific Plan transmittal ALUC comments

Hi Jay,
Thank you for transmitting the project to ALUC for review. Please note that the project is located outside the airport influence area and ALUC has no comments at this time.
If you have any questions, please feel free to contact me.

Paul Rull
ALUC Principal Planner



Riverside County Airport Land Use Commission
1400 North Main Street, 1st Floor
Riverside, CA 92501
(951) 950-6883
(951) 950-5177 Fax
PRull@ROVCD.ORG
www.aluc.org

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City of Escondido California


Response to Comment Letter A2

CA Department of Fish and Wildlife
 Scott Wilson, Environmental Program Manager
 May 26, 2020

A2-1 The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

A2-2 The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

A2-3 The comment describes the CDFW's role as a Trustee Agency. It is acknowledged that CDFW is a Trustee Agency in Draft EIR Section 1.2.2. This comment does not identify any new significant environmental issues or impacts that were not already addressed in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.



STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY
 DEPARTMENT OF FISH AND WILDLIFE
 Inland Owens Region
 3600 Inland Empire Blvd., Suite C-221
 Ontario, CA 91764
www.dfw.ca.gov

RAYON ANDERSON, Director
 CHARLTON K. BOWMAN, Director

Comment Letter A2

May 26, 2020
 Sent via email

Jay Eastman
 Principal Planner
 City of Riverside
 3900 Main Street, 3rd Floor
 Riverside, CA 92522

Subject: Draft Environmental Impact Report (DEIR)
 Northside Specific Plan Project
 State Clearinghouse No. 2019039168

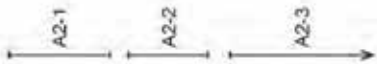
Dear Mr. Eastman:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) from City of Riverside (City, Lead Agency) for the Northside Specific Plan Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 7117, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15395, subd. (a)) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id. § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public



CEQA is codified in the California Public Resources Code in sections 21000 et seq. The CEQA Guidelines are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

<p>A2-4</p>	<p>▲ A2-3 Cont.</p> <p>A2-4</p> <p>A2-5</p> <p>A2-6</p> <p>A2-7</p> <p>Jay Eastman, Principal Planner City of Riverside Northside Specific Plan Project, State Clearinghouse No. 2019038188 May 26, 2020 Page 2 of 10</p> <p>agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.</p> <p>CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's take and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.</p> <p>PROJECT DESCRIPTION SUMMARY</p> <p>The Project site is located on the border between the County of San Bernardino and County of Riverside, California. The Project site encompasses 2,000 acres, approximately 1,800 acres are within the City of Riverside, approximately 338 acres are within the City of Colton, and approximately 83 acres are within the unincorporated County of Riverside. The Project site is southwest of La Loma Hills, north of downtown Riverside, west of Hunter Industrial Park, and east of the Santa Ana River.</p> <p>The Northside Specific Plan does not propose a development project. The Northside Specific Plan is a framework that guides future development projects within the Northside Specific Plan Area (SPA). The Northside Specific Plan includes goals and policies related to land use, mobility, sustainability, social equity, and economics.</p> <p>COMMENTS AND RECOMMENDATIONS</p> <p>The DEIR recognizes the potential for several special-status species, including endangered species, to occur within the Project area. CDFW is concerned that the analysis completed may have been inadequate to form a complete inventory of special-status species within the Project area and to identify the level of impacts on those species identified as potentially present.</p> <p>Absent these details, and supporting documentation, it is unclear whether the Project's impacts have been adequately identified, disclosed, and mitigated. CDFW offers the comments and recommendations below to assist the City.</p> <p>Special-Status Plant Species</p> <p>Mitigation Measure (MM) BIO.1a states that special-status plants impacted will be transplanted and preserved. Please note that CDFW does not recommend translocation of established native plants given the low survival rate of transplants. As</p>
<p>A2-4</p>	<p>The comment describes the CDFW's role as a Responsible Agency. It is acknowledged that CDFW is a Trustee Agency in Draft EIR Section 1.2.2. To clarify further, the project consists of a programmatic Specific Plan and the environmental document is a Program EIR. Future development projects proposed within the Northside Specific Plan would be required to comply with the Fish and Game Code as well as CESA, and, as necessary, obtain applicable permits from the CDFW. See Draft EIR Section 1.1.2, Intended Use of the Draft EIR, for additional details. Regardless, the City appreciates CDFW's input at the program level in order to streamline future environmental reviews of future projects proposed within the Northside Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. This comment does not identify any new significant environmental issues or impacts that were not already addressed in the Draft EIR.</p>
<p>A2-5</p>	<p>The comment provides a brief summary of the Northside Neighborhood and Pellissier Ranch Specific Plan. This comment does not identify any new significant environmental issues or impacts that were not already addressed in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.</p>
<p>A2-6</p>	<p>The comment states that the CDFW is concerned that the analysis completed are inadequate to form a complete inventory of species and potential impacts. As discussed in Response A2-4, the project is a programmatic Specific Plan and the environmental document is a Program EIR. Per CEQA Guidelines section 15146 regarding the degree of specificity, this document need not be as detailed as an EIR on the specific construction projects that might follow. Dudek biologists</p>

Response to Comments

completed a thorough review of available information to determine the potential presence of special-status species within the Project area and level of impacts at the program level. As detailed in the Draft EIR Section 3.3.1, the methodology included extensive data and literature review and site visit verifications of select areas. The City has made its best effort to reasonably forecast the conditions that may be present at the time of future development based on this available information; however, future analysis of projects would be required at the time they are proposed to assess if any potential future action may have any significant affects in accordance with CEQA section 15168(c) and (d). It is noted that additional support was added to the Appendix C, which consists of a plant species potential to occur. The specific design of future development is unknown at this time, and it would be speculative at this time to do a project-level impact analysis. No further response can be provided herein, as this specific comment does not provide details on why the analysis may be inadequate. If this is simply an introduction to CDFW suggested modifications to the mitigation measures below, it is noted that each of those modifications are addressed below.

<p>A2-7</p>	<p>City Eastman, Principal Planner City of Riverside Northside Specific Plan Project, State Clearinghouse No. 20190381593 May 26, 2020 Page 3 of 10</p> <p>such, CDFW is concerned that the approach is not appropriate for mitigation. When considering mitigation, it is important that the land ultimately conserved for mitigation has the same or better resource value than the resource value being impacted. Thus, to adequately off-set impacts, CDFW recommends the City considers purchasing credits from a mitigation bank or acquiring and conserving in perpetuity lands with the target resources.</p> <p>CDFW recommends that the City revise MM-BIO-1a and condition the measure to include the following (bold and strikethrough):</p> <p>MM-BIO-1a</p> <p>Prior to ground disturbing activities in areas of a grading permit (SPA) outside of the NSACP, botanical field surveys according to 2015 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities a habitat assessment for the potential effects of state plants to occur shall be conducted by a Qualified Biologist. If there is suitable habitat for special-status plants, then a focused survey during the species bloom/ing period mitigation will be required. If State-listed plants have the potential to be impacted, the applicant shall apply for Incidental Take Permit through the California Department of Fish and Wildlife for authorization of those impacts.</p> <p>For special-status plants, if 100 50% of the area with long-term conservation value for the species cannot be avoided, then additional measures mitigation, in the form of mitigation credits or land acquisition and conservation, would be required. in those cases more than 10% of the area with long-term conservation value would be required, mitigation credits shall be established and preserved. Plans to acquire habitat in mitigation and restoring plant shall be submitted for City of Colton for review by a qualified biologist and approved prior to ground disturbance to occupied habitat. Upon approval, the plan will be implemented by the applicant. Agency-approved Habitat mitigation credits or occupied replacement lands shall be purchased replacement enhancement of a minimum 3 ± 1 ratio (unweeded areas mitigation and mitigation areas shall be fenced to avoid indirect impacts. If on-site avoided and/or conservation occurs, non-native plant species listed on the most recent California Invasive Plant Council Inventory (https://www.cal-ipc.org/plants/inventory/) with a rating of moderate or high shall not be included in landscaping.</p>
<p>A2-8</p>	<p>A2-7 Cont.</p> <p>A2-8</p> <p>A2-9</p>
<p>The comment states that MM-BIO-1a, which suggests transplanting and preservation of special-status plants, is not recommended by the CDFW and suggests the consideration of purchasing credits or acquiring and conserving land with the targeted resources in perpetuity. The Final EIR Chapter 3, Errata, was revised with the suggested text edits to MM-BIO-1a as specified in comment A2-8 through A2-10. Refer to the Final EIR Chapter 3, Errata.</p> <p>The comment provides bold and strikethrough text revision for MM-BIO-1a. The suggested revisions have been incorporated into the Final EIR Chapter 3, Errata.</p> <p>The comment provides bold and strikethrough text revision for MM-BIO-1a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-1a, which suggests transplanting and preservation of special-status plants, is not recommended by the CDFW and suggests the consideration of purchasing credits or acquiring and conserving land with the targeted resources in perpetuity. The Final EIR Chapter 3, Errata, was revised with the suggested text edits to MM-BIO-1a as specified in comment A2-8 through A2-10. Refer to the Final EIR Chapter 3, Errata.</p> <p>The comment provides bold and strikethrough text revision for MM-BIO-1a. The suggested revisions have been incorporated into the Final EIR Chapter 3, Errata.</p> <p>The comment provides bold and strikethrough text revision for MM-BIO-1a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>

<p>A2-10</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-1a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>
<p>A2-11</p>	<p>The comment noted that focused surveys were not conducted to identify special-status small mammals in the Specific Plan Area (SPA). The comment states that because trappings were not conducted prior to the preparation of the EIR, the level of impacts cannot be disclosed and the analysis is incomplete.</p> <p>Refer to response to Comment A2-6. In summary, the project is a programmatic document and future project-level analysis would be provided as required to demonstrate compliance with applicable regulations, including California Fish and Game Code, and CESA.</p> <p>In order to address this comment, the Draft EIR was revised with the suggested text edits to MM-BIO-5a as specified in comment A2-12 through A2-14. Refer to the Final EIR Chapter 3, Errata.</p>
<p>A2-12</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-5a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>

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The mitigation and monitoring plan for the translocated special-status plants will describe habitat improvement and protection measures to be completed prior to introducing translocated special-status plants. Habitat improvement and protection will be based on special-status plant-occupied habitat. The plan will specify (1) the location of mitigation sites; (2) site preparation measures such as forest treatment, soil decompaction, erosion control, temporary irrigation systems, or other measures as appropriate; (3) the source of all plant propagules, food, pollen, and/or seeds, etc.; the quality and species of seed or pollen stock of all plants to be collected or planted; (4) the methods used to collect and plant the special-status plants; (5) maintenance and monitoring of the special-status plants; (6) site-specific monitoring for erosion, tree mortality, and other site degradation due to erosion; (7) appropriate monitoring for a period no less than 3 years; (8) measures to avoid long-term indirect effects; and (9) contingency measures such as replanting, weed control, or erosion control to be implemented if habitat improvement and protection efforts are not successful in the long term. The plan will specify methods to select special-status plants and introduce them into the mitigation site.

Special-Status Small Mammals

The DEIR identified the potential for San Bernardino kangaroo rat (SBKR), Los Angeles pocket mouse, and Stephen's kangaroo rat to occur. However, the determination was based on data and literature review, and focused surveys (i.e., trapping) were not conducted. Because trapping was not conducted prior to the preparation of the DEIR, the level of impacts to SBKR, Los Angeles pocket mouse, and Stephen's kangaroo rat cannot be disclosed. CDFW is concerned that without this information, the analysis in the DEIR is incomplete and the significance of these impacts cannot be determined. For adequate mitigation identified, as required under CEQA, therefore, CDFW recommends that the City revise MM-BIO-5a and condition the measure to incorporate permanent conservation of habitat as follows (edits are in bold and strikethrough):

MM-BIO-5a: Prior to ~~beginning~~ **ground disturbing activities** for Northside Specific Plan areas outside of the MSHCP on undeveloped lands, a ~~habitat assessment for San Bernardino kangaroo rat or Stephen's kangaroo rat~~ **shall be required. CDFW-approved qualified biologist shall conduct pre-construction trapping surveys within suitable habitat to determine presence of SBKR, Los Angeles pocket mouse, and Stephen's kangaroo rat, following trapping protocols acceptable to California Department of Fish and Wildlife. If Los Angeles pocket mouse is present, mitigation of no less than 2:1 will be required.**

<p>A2-13</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-5a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>
<p>A2-14</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-5a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>

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Additionally, the City shall prepare and implement a set of avoidance and minimization measures aimed at protecting special-status small mammals from project-related impacts. The proposed avoidance and minimization measures shall be provided to CDPW for review and approval no fewer than 30 days prior to the initiation of project activities. If suitable habitat for San Bernardino kangaroo rat or Stephens' kangaroo rat is located on the site, a focused, elevated trapping effort should be initiated at an incidental take permit and mitigation at no less than a 3:1 (replacement to impact) ratio for loss of habitat would be required, or as determined in the appropriate CESA authorization for listed species. Construction will not proceed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained. Because there is no official survey protocol for San Bernardino kangaroo rat or Stephens' kangaroo rat, the survey protocol developed by the MSH-CD Biological Monitoring Program shall be used as a guide to for survey methodology (refer to San Bernardino kangaroo rat or Stephens' kangaroo rat survey reports at the MSH-CD website: <http://www.mshcd.com/conservation/conservation-surveys/>). If presence of San Bernardino kangaroo rat or Stephens' kangaroo rat is known or assumed to occur on the project site located outside of the MSH-CD, the following measures shall be noted on the grading plans prior to grading permit issuance and required to be implemented by the applicant:

Based on the qualified biologist assessment and surveys for San Bernardino kangaroo rat and Stephens' kangaroo rat, 40% of those portions of the site that provide for long-term conservation value for the species shall be avoided. If 80% of the portion of the site that provides long-term conservation value for San Bernardino kangaroo rat or Stephens' kangaroo rat cannot be avoided, additional suitable habitat for the species must be conserved at a minimum of 2:1, depending on the quality of habitat impacted and the quality of habitat conserved. Additionally, 30 days prior to construction activities within the proposed construction disturbance zone and within 200 feet of the disturbance zone for the relevant species, if either species is detected, trapping and relocation will occur in all areas of soil disturbance and construction. Preparation of soil material relocation plan would be required and subject to the review and approval by the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) prior to any site disturbance. If San Bernardino kangaroo rat or Stephens' kangaroo



A2-15

The comment notes that because no surveys were taken to determine the presence/absence of burrowing owls, the analysis is incomplete. The comment recommends a habitat assessment before the start of project activities. The Northside Neighborhood and Pellissier Ranch Specific Plan is a programmatic document and no project level activities such as, ground disturbance, grading or construction are proposed at this time (see response to Comments A2-4 and A2-6). As noted in this comment, habitat assessments dated more than one year to the construction date are unacceptable. As the buildout of the Specific Plan Development is expected to occur over a period of time via multiple future projects with impact footprints that are unknown at this time, it is not appropriate to conduct such habitat assessments at this time. Thus, the potential for impacts to this species was evaluated at the program-level based on if suitable habitat is present and known occurrences of this species, as discussed in Table 3.3-3, Non-listed Species with a Moderate or High Potential to Occur in the SPA. As projects come forward, they would be required to complete the habitat assessments, as required in **MM-BIO-8a** and **MM-BIO-8b**. As such, the habitat assessments identified in this comment would be completed in accordance with the Appendix C of the Staff Report on Burrowing Owl Mitigation (CDFG 2012) and MSHCP (RCA 2006) as appropriate based on the location of the future project. In order to address this comment, the Draft EIR was revised with the suggested text edits to **MM-BIO-8a** and **MM-BIO-8b** as specified in comments A2-18 through A2-21. Refer to the Final EIR Chapter 3, Errata.

A2-16

The comment states that if the recommended habitat assessment determines that space is suitable for burrowing owls, protocol surveys should be conducted prior to the commencement of project activities. Refer to response A2-15

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[Redacted text]

Burrowing Owl Mitigation

The DEIR recognizes the potential to impact burrowing owl individuals; however, no surveys were undertaken to determine presence/absence and the extent of impacts to the species. CDFW is concerned that without protocol burrowing owl surveys, CDFW cannot determine if the DEIR has adequately disclosed and mitigated impacts. Including with the incorporation of MM-BIO-8a, CDFW recommends that a habitat assessment be conducted prior to the start of project activities as outlined in Appendix C of the Staff Report on Burrowing Owl Mitigation (Department of Fish and Game, March 2012). Please note that habitat assessments dated more than one year to the construction date are unacceptable.

If the habitat assessment determined suitable habitat for burrowing owl, protocol surveys should be conducted prior to commencement of project activities. Surveys should be consistent with the Staff Report on Burrowing Owl Mitigation or other similarly accepted protocol. If burrowing owls are identified on the site, the Applicant should contact CDFW and conduct an impact assessment, in accordance with Staff Report on Burrowing Owl Mitigation prior to commencing project activities, to assist in the development of avoidance, minimization, and mitigation measures. Depending on the level of impacts, CDFW would likely recommend permanent conservation, enhancement, and management of existing, occupied burrowing owl habitat and measures to minimize impacts to burrowing owls on the Project site.

Mitigation Measure BIO-8a considers implementation of a passive relocation program. CDFW does not recommend the exclusion of owls using passive relocation unless there are suitable burrows available within 100 meters of the closed burrows (Tulio 1995; CDFG 2012) and the relocation area is protected through a long-term conservation mechanism (e.g., conservation easement). CDFW recommends that the City notify CDFW if owls are found to be present onsite and develop a conservation strategy in cooperation with CDFW, in accordance with CDFW's Staff Report on Burrowing Owl Mitigation.

CDFW offers the following revisions to MM-BIO-8a (edits are in **italics/underline and bold**):

MM-BIO-8a: Prior to ~~initiation of~~ **grading/paving ground disturbing activities** on undeveloped sites outside of the MSHCP within the Northside Specific Plan, a habitat assessment for the potential for burrowing owl to occur shall be conducted by a Qualified Biologist. If there is suitable habitat for burrowing owl ~~and the applicant would like to~~

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above. **MM-BIO-8a** has been revised to address potential burrowing owl impacts outside of the MSHCP and MM-BIO-8b addresses potential burrowing owl impacts within the MSHCP. **MM-BIO-8a** is intended to provide compliance with the CDFG Code and associated protocol requirements and includes the burrowing owl measures identified in this comment. As take of burrowing owl is covered by the MSHCP, **MM-BIO-8b** requires implementation of burrowing owl measures in accordance with the MSHCP. It is acknowledged that avoidance of impacts to burrowing owl and burrowing owl conservation is preferred, and future project would need to minimize impacts to burrowing owls. It is noted that all recommended revisions in the comments below were incorporated into the Final EIR Chapter 3, Errata. More specifically, as stated in **MM-BIO-8a**, "if there is suitable habitat for burrowing owl, then breeding seasons surveys as described in the Staff Report on Burrowing Owl Mitigation (CDFW 2012) shall be conducted by a Qualified Biologist." This measure continues on to indicate that if burrowing owls are detected, then an avoidance buffer may be established or a passive relocation program would be required in accordance with the with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012). The measure also requires coordination with CDFW if burrowing owls are identified on the site. Refer to the updated MM-BIO-8a for additional details.

A2-17

The comment does not recommend the exclusion of owls using passive relocation unless burrows are established nearby where owls can move to. The Draft EIR was revised with the suggested text edits to **MM-BIO-8a** as specified in response to Comments A2-18 through A2-21. All recommended revisions in

Response to Comments

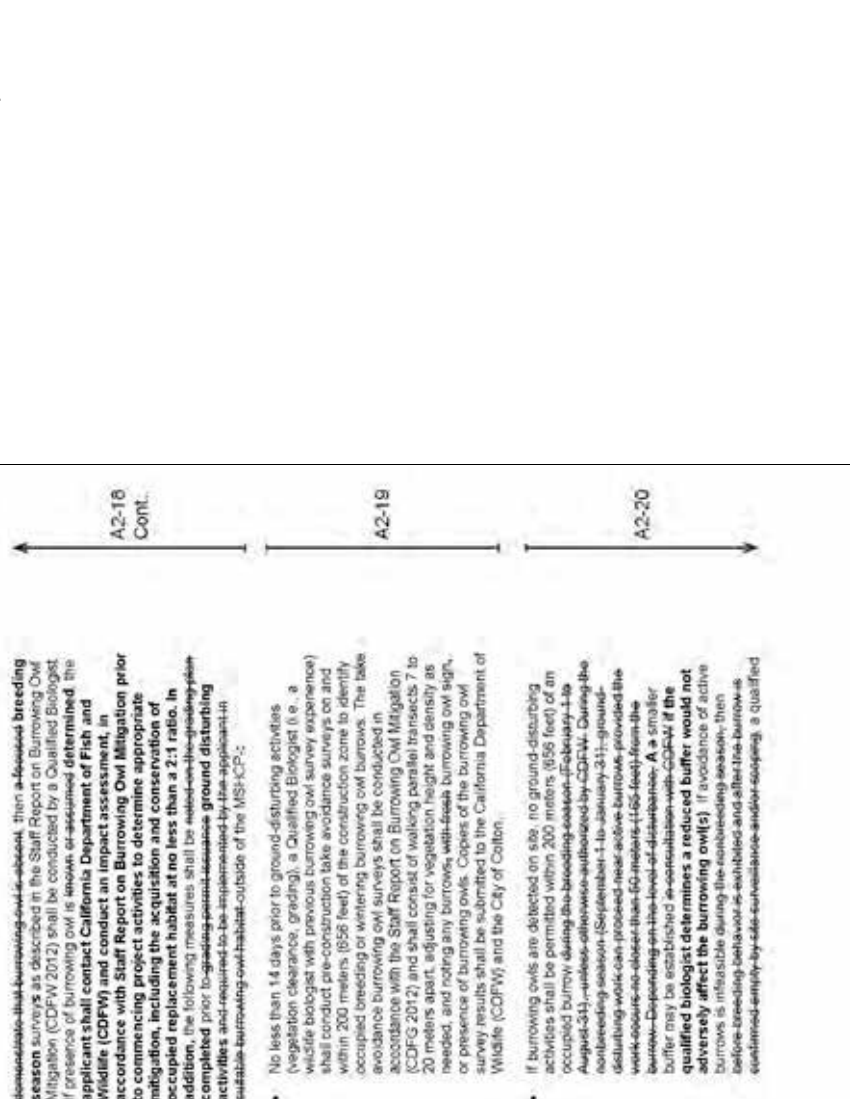
the comments below were incorporated into the Final EIR Chapter 3, Errata.

A2-18

The comment provides bold and strikethrough text revision for **MM-BIO-8a**. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.

<p>A2-19</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-8a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>
<p>A2-20</p>	<p>The comment provides bold and strikethrough text revision for MM-BIO-8a. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.</p>

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~~documented that burrowing owl activity, then a focused breeding season surveys as described in the Staff Report on Burrowing Owl Mitigation (CDFW 2012) shall be conducted by a Qualified Biologist. If presence of burrowing owl is known or assumed determined, the applicant shall contact California Department of Fish and Wildlife (CDFW) and conduct an impact assessment, in accordance with Staff Report on Burrowing Owl Mitigation prior to commencing project activities to determine appropriate mitigation, including the acquisition and conservation of occupied replacement habitat at no less than a 2:1 ratio. In addition, the following measures shall be submitted to the planning commission prior to grading permit issuance ground disturbing activities and required to be implemented by the applicant in suitable burrowing owl habitat outside of the MS-SCP:~~

- No less than 14 days prior to ground-disturbing activities (vegetation clearance, grading), a Qualified Biologist (i.e. a wildlife biologist with previous burrowing owl survey experience) shall conduct pre-construction take avoidance surveys on and within 200 meters (656 feet) of the construction zone to identify occupied breeding or wintering burrowing owl burrows. The take avoidance burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW 2012) and shall consist of walking parallel transects 7 to 20 meters apart, adjusting for vegetation height and density as needed, and noting any burrows, with fresh burrowing owl sign, or presence of burrowing owls. Copies of the burrowing owl survey results shall be submitted to the California Department of Wildlife (CDFW) and the City of Colton.
- If burrowing owls are detected on site, no ground-disturbing activities shall be permitted within 200 meters (656 feet) of an occupied burrow during the breeding season (February 1 to August 31), unless otherwise authorized by CDFW. During the nonbreeding season (September 1 to January 31), ground-disturbing work can proceed near active burrows, provided the burrow occurs no deeper than 60 meters (165 feet) from the buffer. Depending on the level of disturbance, a smaller buffer may be established in consultation with CDFW if the qualified biologist determines a reduced buffer would not adversely affect the burrowing owl(s). If avoidance of active burrows is infeasible during the nonbreeding season, then before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance and/or trapping, a qualified

A2-21 The comment provides bold and strikethrough text revision for **MM-BIO-8a**. The language suggested has been incorporated in the Final EIR Chapter 3, Errata.

A2-22 The comment states that information developed in the Draft EIRs and Negative Declarations should be incorporated into a database, linked in the comment letter. Project-specific surveys were not completed as a part of this program Draft EIR. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

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project biologist shall **implement, prepare and submit** a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) **to the CDFW for review and approval prior to the commencement of disturbance activities on-site.**

- Passive relocation consists of excluding burrowing owls from occupied burrows and providing suitable artificial burrows nearby for the excluded burrowing owls. **Prior to disturbance of the occupied burrows, suitable replacement burrows shall be provided at a ratio of 2:1 and permanent conservation and management of burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owl impacts are replaced consistent with the Staff Report on Burrowing Owl Mitigation including its Appendix A within designated adjacent conserved lands identified through coordination with CDFW. A qualified biologist shall confirm the natural or artificial burrow on the conservation lands are suitable for use by the owls. Monitoring and management of the replacement burrow site(s) shall be conducted and a reporting plan shall be prepared. The objective shall be to manage the replacement burrow sites for the benefit of burrowing owls (e.g., minimizing weed cover), with the specific goal of maintaining the functionality of the burrows for a minimum of 2 years.**

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/SubmitForm>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

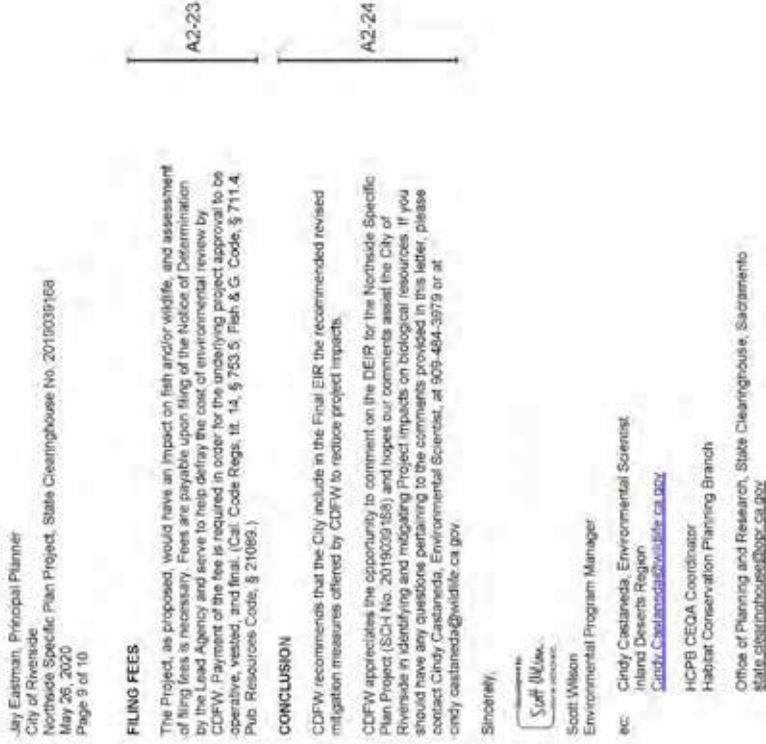


A2-23

The comment states that filing fees would be necessary. The City acknowledges this comment and the requirement to provide NOD filing fees. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

A2-24

The comment concludes the letter. Refer to response comments A2-1 through A2-23 above. CDFW recommendations have been included in the Final EIR for review and consideration by the City.



Jay Eisenman, Principal Planner
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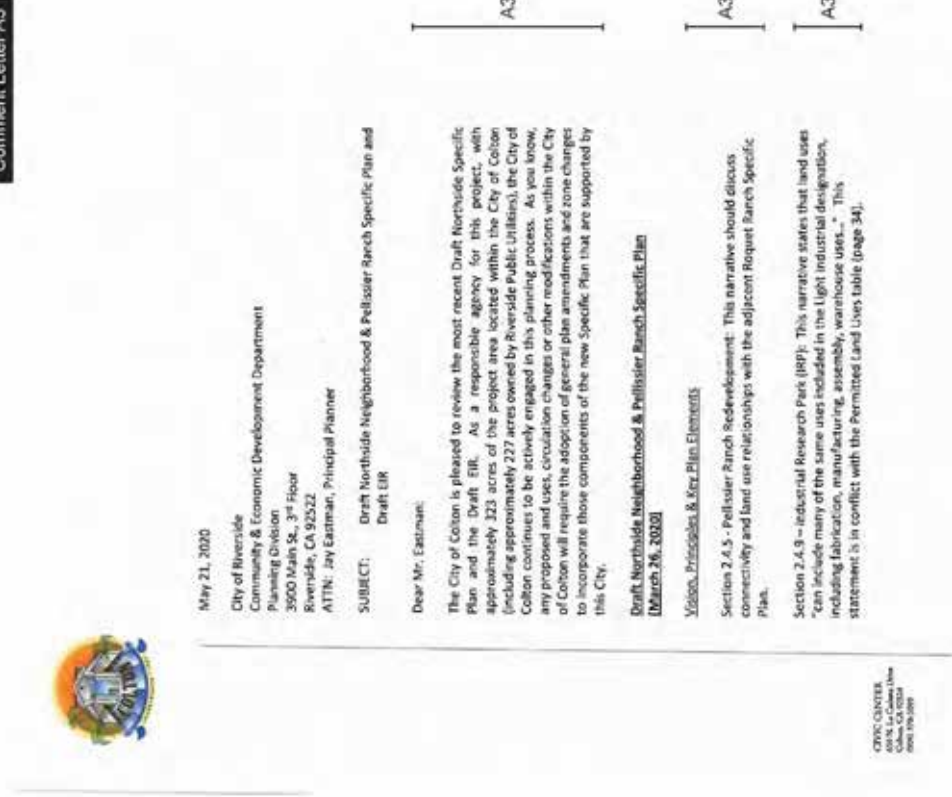
REFERENCES

California Department of Fish and Game (CDFG). 2012. Staff report on burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: http://www.dfg.ca.gov/wildlife/conservation/survey_monitor.html

Tullio, L.A. 1995. Passive Relocation: A Method to Preserve Burrowing Owls on Disturbed Sites. *Journal of Field Ornithology* 66:99-108.

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Response to Comment Letter A3



Mark R. Tomich, AICP, Development Services Director
 City of Colton
 May 21, 2020

A3-1

The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. It is acknowledged that proposed land use, zoning or circulation element changes in the City of Colton will require discretionary approval by the City of Colton (refer to Draft EIR Section 2.5.2). The comment has been included in the Final EIR for review and consideration by the City.

A3-2

The comment states that Section 2.4.5 of the Northside Specific Plan should discuss connectivity and land use relationships with the adjacent Roquet Ranch Specific Plan. Additional language has been added to the Pellissier Ranch discussion in the Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, (see Section 2.4.2, Circulation, Mobility and Trails) that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic.

A3-3

The comment states that a statement made in Section 2.4.9 of the Northside Specific Plan should be revised as it is in conflict with the Permitted Land Uses table. Adjustments have been made as necessary to the Permitted Uses table in the in the Specific Plan to confirm consistency.

A3-4 The comment states that a statement made in Section 2.4.10 of the Northside Specific Plan should be revised for clarification as it is in conflict with the Permitted Land Uses table. Revisions have been made to the Permitted Land Use table in the Specific Plan (See Specific Plan Chapter 3) to allow light manufacturing and custom manufacturing uses in the IRP. Additionally, a footnote to the Colton Permitted Uses Table has been added to clarify that the TZO allows the continuation of the zone in effect at the time the Northside Specific Plan is adopted (currently M-1 – Light Industrial). The underlying zones per the NSP include HDR and IRP. Once a property is developed consistent with the underlying zone, however, the TZO will be permanently removed. Refer to Chapter 3 of the Specific Plan for the updated language.

A3-5 The comment asks for clarification on how Transition Zone Overlay (TZO) is described (page 31 of the Northside Specific Plan), as site development standards for the TZO refers to “standards in the City of Colton Zoning Code”. The comment indicates that the TZO applies to RPU property (Pellissier Ranch), which has zones not included in the City of Colton’s Zoning Code. When the property wishes to transition to the Northside Specific Plan land use, the property must follow the Site Development Standards provided in the Northside Specific Plan. For existing uses, the Site Development Standards remain as currently adopted in the City of Colton’s Ordinances.

A3-6 The comment states that the Draft EIR maintains that the TZO allows up to 4.0 million square feet of Light Industrial uses within up to 50,000 square feet buildings (Draft EIR, page 2-16). Comment would like this standard included in the Specific Plan and to clarify if the City is proposing a maximum building size for the area. This standard is currently included on the

A3-4

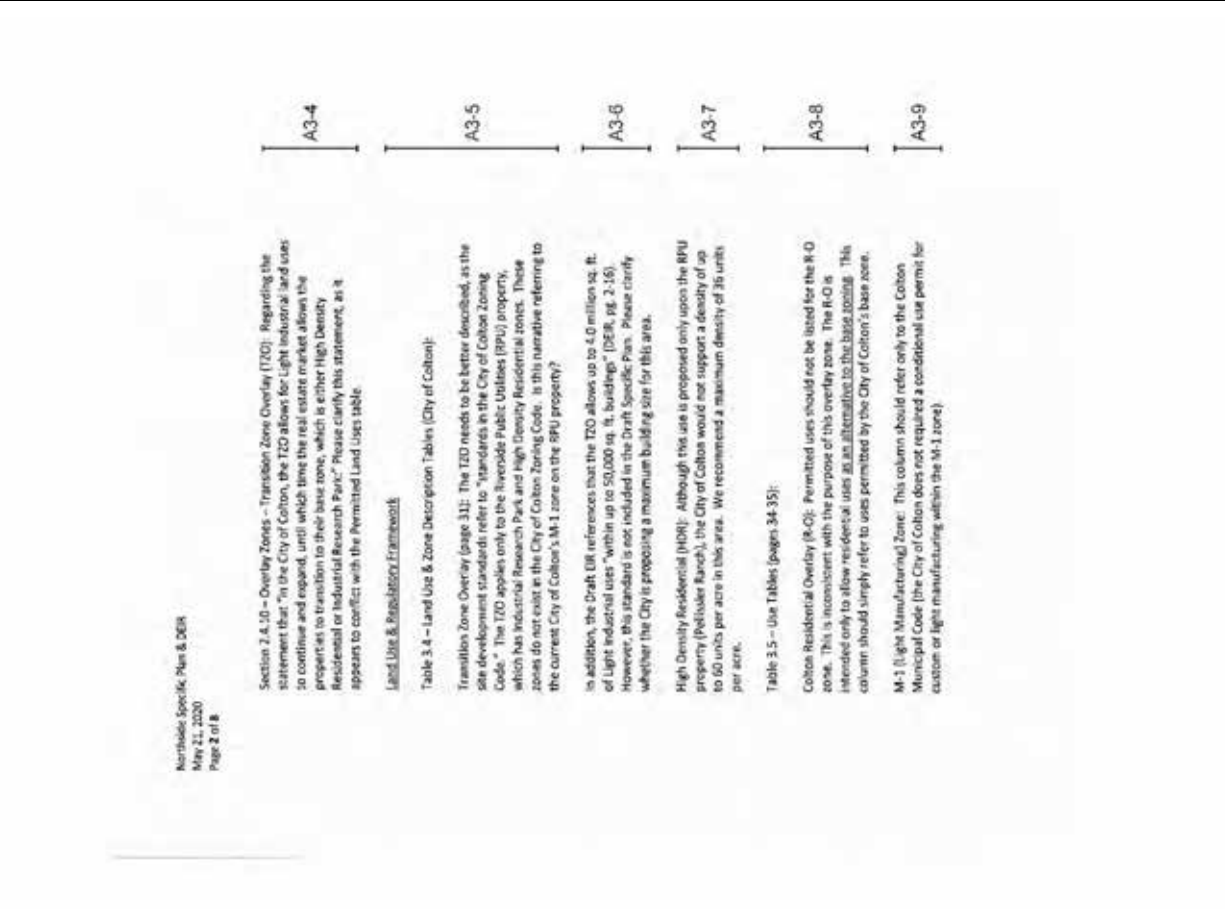
A3-5

A3-6

A3-7

A3-8

A3-9



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Land Use & Zone Description Table – City of Colton in section 3.4 of the Specific Plan.

A3-7

The comment does not support a density of up to 60 units per acre in the Pellissier Ranch area. The comment recommends a maximum density of 36 units per acre. The density has been updated to 36 residential units per acre per this comment. The maximum residential dwelling unit yield for Pellissier Ranch is approximately 1,120. These updates have been incorporated into the Specific Plan and EIR (see Section 3.4 in Chapter 3 of the Specific Plan and Final EIR Chapter 3, Errata).

A3-8

The comment maintains that permitted uses should not be listed for Residential Overlay (R-O) zones, as it is inconsistent with the purpose of the overlay zone. The R-O column in the Permitted Land Uses Table – City of Colton (Specific Plan page 34-35) should only refer to uses permitted by the City of Colton's base zone. The Permitted Land Uses Table has been updated to remove the R-O column and reference the City of Colton Municipal Code. Refer to Specific Plan Section 3.5 in Chapter 3 and Final EIR Chapter 3, Errata.

A3-9

The comment states that the M-1 Zone column in Section 3.5 should only refer to the Colton Municipal Code. The Northside Specific Plan is intended to be the regulating document for the M-1 Zone column and the other City of Colton uses. The Land Use and Zone Description Table has been updated to revised to reference the City of Colton Municipal Code. Refer to Specific Plan Section 3.4 in Chapter 3 and Final EIR Chapter 3, Errata.

A3-10 The comment states that the C-2 column in Section 3.5, should refer to only the Colton Municipal Code for permitted uses. Additionally, the OCR zone consists of RPU property and the permitted uses column does not permit "Recreational Facilities - Commercial", which is consistent with the OCR zone. The Permitted Uses table has been updated to remove the C-2 column and reference the City of Colton Municipal Code in Chapter 3 of the Specific Plan.

A3-11 The comment states in Section 3.7 the Industrial Edge Development Standards and Residential Edge Development Standards (pages 40-41) should clarify that these standards shall apply to RPU property only. The Industrial Edge Development standards and Residential Edge Development Standards are applicable to parts of the City and County of Riverside and City of Colton, not just the RPU property.

A3-12 The comment states that the City of Colton does not support the closure of Orange Street and Center Street and that the City of Riverside did not provide a compelling reason for the closure of this roadway. It is acknowledged that the future Roquet Ranch development would be required to provide access in accordance with the applicable state and local regulations. Additional language has been added to the Pellissier Ranch discussion in the Northside Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, regarding east-west travel throughout the Northside Specific Plan. More specifically, the Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic. Refer to response to Comment A3-2.

A3-10

A3-11

A3-12

A3-13

A3-14

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C-2 (General Commercial) Zone: This column should refer only to the Colton Municipal Code for permitted uses (the list of permitted uses is inconsistent with the City of Colton's permitted uses for the C-2 zone).
OCR (Outdoor Commercial Recreation): This zone consists of a very small part of the RPU property. The permitted uses column does not appear to permit "Recreational Facilities - Commercial." This appears to be inconsistent with the intent of the OCR zone.

Section 3.7 - Design Standards for Development Edges:

Industrial Edge Development Standards and Residential Edge Development Standards (pages 40-41): Please clarify that these standards shall apply only to the RPU property (i.e., Pellissier Ranch).

Circulation, Mobility, & Trails

Please refer to attached comment from the City of Colton's contract traffic engineer, Manager & Associates.

Figure 4.1, Roadway Network Map (page 47): As stated in previous correspondence, the City of Colton does not support the closure of Orange St. at Center St. The approved Roquet Ranch Specific Plan land uses (particularly Planning Area 9) are dependent upon access to this roadway. In addition, pursuant to Cal Fire SRA & LRA Fire Safe Regulations, Public Response Code Section 4290, and adopted City of Colton Ordinances for Fire Department Access & Water Requirements, two means of ingress and egress are required for the Planned Roquet Ranch project. The City of Riverside still has not provided compelling reasons, technical or otherwise, or a roadway development phasing plan, for the closure of this roadway.

Figure 4-4, Complete Streets Map (page 50): The proposed connection from Center St. to Placeritas Lane should be clarified with a more detailed exhibit. Although we understand that the proposed roadway alignments are conceptual, by intent, this proposed alignment may impact industrial properties in the City of Colton.

The Circulation, Mobility, & Trails chapter should include a separate discussion of truck routes (e.g., how trucks coming from the north (Colton and Buho) will continue to access I-215 and SR-60). Although the City of Colton supports traffic calming measures, the proposal to ban all 3-axle or greater trucks on Main St. south of Center St. and redirect them to Center St., (east) may create significant

Response to Comments

A3-13

The comment states in Figure 4-4 (page 50), the proposed connection from Center street to Placentia Lane should be clarified with a more detailed exhibit. Page 52, Section 4.5.2 of the Draft Specific Plan discusses the design guidelines for Center Street. There is also a corresponding figure for reference on Specific Plan page 53. Comment noted. Additionally, the Traffic Impact Analysis prepared for the EIR displays the number of lanes, including turning lanes at intersections, assumed for each analysis scenario.

A3-14

The comment states that the Circulation, Mobility & Trails chapter should include a separate discussion of truck routes. A discussion of semi-trucks is included in the Specific Plan Arterial Streets Section of Chapter 4. Refer to that section for additional information. The Traffic Impact Analysis prepared for the EIR assessed the potential restriction along Main Street south of Center Street including both intersection and roadway level analyses of Center Street which account for the anticipated increase in heavy vehicle volumes. The City of Riverside does not currently adopt formal truck routes.

<p>A3-15</p>	<p>impacts on this 48-foot wide roadway, as well as adjacent residential neighborhoods. Likewise, traffic calming measures intended to discourage semi-trucks from traveling south on Main St. (from the City of Colton boundary at Center St.) to Columbia Ave to access I-215 may create unintended traffic and noise impacts, as well as potentially increasing VMT.</p>	<p>The comment indicates that traffic calming measures encouraged to discourage semi-trucks from traveling on Main Street to Columbia Avenue may create traffic and noise impacts. The traffic study has identified potential impacts in association with the proposed traffic calming measures and has also identified an additional east-west corridor and north-south corridor that will accommodate a portion of the truck traffic in the future.</p>
<p>A3-16</p>	<p>Draft Northside Specific Plan Environmental Impact Report</p> <p>Project Description, Chapter 2</p> <p>Please confirm that the following statistics contained in the Project Description are accurate:</p> <ul style="list-style-type: none"> The TZO will allow up to 4.0 million additional sq. ft. of industrial uses in the City of Colton. The R-O will provide an opportunity to develop up to 2,430 dwelling units (at up to 30 du/ac) in the City of Colton. This assumes that 75% of the land underlying the R-O will be developed as residential. Up to 3,620 dwelling units may be developed on the RPU property in Colton (assuming densities of 29-45 du/ac). 	<p>The comment asks that statistics specified in the comment letter be confirmed as accurate. Per the Draft Specific Plan, the TZO allows up to 4.0 million square feet in the City of Colton. Up to 1,120 dwelling units may be developed on the RPU property in Colton (assuming densities of 29-36 du/ac, per Comment A3-7).</p>
<p>A3-17</p>	<p>Circulation, Mobility and Trails, page 2-20: This part of the Project Description includes the statement that "at this time, it is unknown if Orange St. would be connected north through the City of Colton. At such, two scenarios are considered; one with Orange St. connected north to the City of Colton and one with Orange St. terminating at the Tujillo Adobe Historic Village (TAHV). The Transportation Chapter of the DEIR and supporting Traffic Impact Analysis (Appendix H) include parallel analyses with and without the Orange St. extension. However, the Specific Plan clearly proposes to terminate Orange St. at Center St. The Project Description should clarify the project's intent regarding Orange St.</p>	<p>The comment states that the Project Description in the Draft EIR should clarify the project's intent regarding Orange Street Refer to response to Comment A3-12.</p>
<p>A3-18</p>	<p>Table 2-6 – Compliance Measures:</p> <ul style="list-style-type: none"> Under "Utilities & Service Systems," a reference should be inserted regarding the requirement for payment of City of Colton's Water & Wastewater Capacity Fees. Wildfire: CM-WDF-3a (City of Riverside) and CM-WDF-3b (City of Colton) are listed in the incorrect column. 	<p>The comment states that in Table 2-6 of the EIR, under "utilities and service systems" a reference should be inserted regarding the requirement for payment of City of Colton's Water & Wastewater Capacity Fees. The Draft EIR has been updated per the comment. See Final EIR Chapter 3, Errata</p>
<p>A3-19</p>	<p>Aesthetics, Chapter 3.1</p> <p>Subarea 1 & 2 Impact Analysis, page 3.1-15: As requested by the City of Colton in our MCP comment letter, the visual and light & glare impacts on the approved</p>	<p>The comment states that in Table 2-6 of the Draft EIR, there needs to be corrections to text placement in the Wildfire section. The Final EIR Chapter 3, Errata, has been updated per the comment.</p>
<p>A3-20</p>	<p></p>	<p>The comment requests that visual and light & glare impacts on the Roquet Ranch Specific Plan residential development be analyzed. Light and glare impacts of the SPA are addressed in</p>

Response to Comments

Draft EIR Section 3.1.4, pages 3.1-27 to 28. The cumulative aesthetic impacts are analyzed in Draft EIR Section 4.4.1. As discussed in those sections, "all new development within the City of Colton would be required to comply with City of Colton Zoning Code Chapter 18.42, Performance Standards, Section 18.42.090, Light, and Section 18.42.100, Glare, that regulate lighting and glare (CM-AES-3)." In addition, any future solar energy generation facilities in Subareas 1 and 2 would also be required to comply with the City of Colton's existing regulations (CM-AES-4). As no project-specific development is proposed, a light and glare analysis for the development of the RPU property is not possible to complete at this time. Once a project is proposed for that area, it would undergo review in accordance with regulations and the required approval process with the City of Colton.

<p>A3-21</p>	<p>Northside Specific Plan & OEIR May 21, 2020 Page 8 of 8</p> <p>Roquet Ranch residential development from development of the RPU property (Subarea 1) should be analyzed. Roquet Ranch is located generally at a higher elevation and residents will look down on the future development. Therefore, viewshed profiles/cross-sections would be very beneficial in determining potential aesthetic impacts from development in this area.</p> <p>A3-21</p>	<p>The comment requests that visual and light & glare impacts on the Roquet Ranch Specific Plan residential development be analyzed. Refer to Draft EIR Section 3.1.5 regarding aesthetic impacts. Private views are not considered significant, per thresholds of significance stated in Draft EIR Section 3.1.3. No further analysis or comment is required.</p>
<p>A3-22</p>	<p>A3-22</p> <p>Air Quality, Chapter 3.2</p> <p>Level of Significance After Mitigation (page 3.2-64): The discussion does not address the effectiveness of the mitigation measures in reducing pollutants in any quantifiable manner. Please include a more complete analysis that provides some level of data to support the effectiveness of the mitigation measures (e.g., pollutant levels for the 6 criteria air pollutants) after mitigation).</p> <p>A3-23</p> <p>Biological Resources, Chapter 3.3</p> <p>Impact Analysis, Sensitive Natural Communities, page 3.3-34: There is no discussion of potential direct or indirect impacts on the California Woolly Star, a California listed species. This plant species is located generally along the Santa Ana River and may have suitable habitat, or exist, in the project area. Therefore, we recommend that the Woolly Star be discussed and any appropriate mitigation measures applied.</p> <p>A3-24</p> <p>Impact Analysis, Jurisdictional Wetlands, pages 3.3-37-38: Please clarify the apparent discrepancy between the statement on page 3.3-37 that impacts are less than significant with Mitigation incorporated and the conclusion under Direct Impacts and Indirect Impacts discussions that impacts would remain potentially significant.</p> <p>A3-25</p> <p>Hazards & Hazardous Materials, Chapter 3.8</p> <p>The reference to the City of Colton's Local Hazard Mitigation Plan (LHMP) on page 3.8-16 should be updated to state that the LHMP was adopted by the City of Colton on August 6, 2019.</p> <p>A3-26</p> <p>Hydrology & Water Quality, Chapter 3.9</p> <p>Please clarify or correct the apparent discrepancy between Figure 3.9-4 (FEMA Flood Map) and Figure 3.9-5 (Hydrology Analysis Flood Map). The FEMA map does not depict any 100-year flood zone north of Center St. (near Orange St.). However, the Hydrology Analysis Flood Map appears to depict a 100-year floodplain in this area under existing conditions.</p>	<p>The comment states that the discussion on page 3.2-64 does not address the effectiveness of the mitigation measures in reducing pollutants. The comment requests that a more complete analysis be provided. The following is stated on Draft EIR page 3.2-64 regarding criteria pollutants:</p> <p>Implementation of mitigation measures MM-AQ-1 through MM-AQ-8 would reduce construction and operational emissions (Impact AQ-1, AQ-2, AQ-3); however, due to the lack of project-specific information, the effectiveness in reducing construction and operational emissions cannot be accurately quantified. Therefore, the potential for the Northside Neighborhood and Pellissier Ranch Specific Plan to conflict with the SCAQMD 2016 AQMP is significant and unavoidable.</p> <p>As stated in the Draft EIR, it is not possible to quantify the emission reduction at the Program level, as there is a lack of project-specific information to quantify the pollutant levels after mitigation. As such, the impact remains significant and unavoidable after mitigation implementation. It is unclear if this comment is on the direct or cumulative impact, therefore it is also noted that the cumulative Impact AQ-4 related to a cumulatively considerable net increase of nonattainment</p>

Response to Comments

criteria air pollutants would similarly remain significant after mitigation.

A3-23

The comment states that on Draft EIR page 3.3-34 there is no discussion of potential direct or indirect impacts to California Woolly Star (CA listed species). The comment recommends the Woolly Star be discussed and appropriately mitigated if needed.

The Santa Ana River woolly star primarily occurs in the Santa Ana River. As described in the Draft EIR Section 3.3, Biological Resources, a portion of the SPA located in the Santa Ana River was removed subsequent to the 2017 baseline analysis preparation. Therefore, the potential for the development in the SPA to impact or affect Santa Ana River woolly star is low. An appendix that describes the potential for relevant sensitive plant species to occur in the SPA, including the Santa Ana River woolly star, has been added to the Final EIR Appendix C for clarification.

A3-24

The comment states that on Draft EIR page 3.3-37 to 38, clarification is needed on the discrepancy between impact statements. The impact statement in Draft EIR Section 3.3.4 is incorrect. This impact statement has been updated in the Final EIR Chapter 3, Errata, to match the conclusion in Section 3.3.6, as well as the Table S-3, Summary of Significant Effects and Mitigation Measures.

A3-25

The comment states that reference to the City of Colton's Local Hazard Mitigation Plan (LHMP) on EIR page 3.8-16 should be updated to indicate that the LHMP was adopted on August 6, 2019. The Final EIR Chapter 3, Errata, has been updated accordingly.

Response to Comments

A3-26

The comment asks for clarification or correction on the discrepancy between Figure 3.9-4 and Figure 3.9-5 where a 100-year flood zone is not depicted in one but not the other. These two maps represent different floodplain mapping. Figure 3.9-4 illustrates the FEMA flood designations and Figure 3.9-5 represents the hydrology analysis completed by Rick Engineering in the Baseline Study (Appendix B). Therefore, no revisions are necessary.

<p>A3-27</p>	<p>The comment states that EIR Table 3.10-1 does not include the City of Colton. To clarify, this table does include the City of Colton but the introduction text incorrectly states that the table is broken down by jurisdiction. Specifically, the VLDR and LI uses represent the theoretical yield in the City of Colton. The Industrial (I) buildout represents the buildout of an area within the City of Riverside (see EIR Figure 2-5, Existing General Plan Land Designations). This introduction text was updated in the Final EIR Chapter 3, Errata, to reflect that the table provides a breakdown of existing land use yields by land use designation, not by jurisdiction.</p>
<p>A3-28</p>	<p>The comment recommends that Draft EIR Table 3.10-2 state that the City of Colton has made progress on implementing their General Plan Goal LU-1 through the adoption of the Roquet Ranch Specific Plan. Draft EIR Table 3.10-2 has been updated accordingly. Refer to Final EIR Chapter 3, Errata.</p>
<p>A3-29</p>	<p>The comment provides text revisions to Draft EIR page 3.12-9. The Draft EIR has been updated per the suggested text revisions in this comment. Refer to Final EIR Chapter 3, Errata.</p>
<p>A3-30</p>	<p>The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>
<p>A3-31</p>	<p>The comment recommends that the discussion on the proposed 0.8-acre fire station site at La Loma Hills region (in part of the RRSF) should be expanded on to state that the Colton Fire Department determined that this site is unsuitable. Draft EIR Section 3.13 has been updated per the suggested</p>

Land Use Planning, Chapter 3.10

Table 3.10-1 – Assumed Maximum Theoretical Yield for Existing Land Uses: The introduction to this table on the preceding page indicates that the breakdown is for each jurisdiction; however, the table does not appear to include the City of Colton. For example, the theoretical yield for industrial (I) land uses is only 78,400 sq. ft. Please correct or clarify the data in this table. **A3-27**

Table 3.10-2 – Project Consistency with Applicable Plans: The consistency discussion for Colton General Plan Goal LU-1 should note that the City of Colton has made progress on implementing this goal through adoption of the Roquet Ranch Specific Plan. **A3-28**

Population & Housing, Chapter 3.12

Existing Conditions, page 3.12-9: The discussion of consistency with the City of Colton General Plan – Land Use Element (2013) should state that the “Planning Focus Area” goals for Pellissier Ranch have been addressed, in part, through adoption of the Roquet Ranch Specific Plan. **A3-29**

Table 3.12-4 – Estimated Population Increase: We note that the Specific Plan would accommodate from 2,951 to 4,696 new residents in the City of Colton. **A3-30**

Public Services, Chapter 3.13

Existing Conditions, Colton Fire Department, page 3.13-4: The discussion states that a 0.8-acre fire station site is proposed in the La Loma Hills region as part of the approval of the Roquet Ranch Specific Plan. The discussion should be expanded to state that the Colton Fire Department has determined that this site is unsuitable for a fire station due to its location and topographical constraints. **A3-31**

Recreation – Chapter 3.14

Table 3.14-4 – City of Colton Park and Recreation Facilities: The narrative associated with George Brown Park should not state that this park is currently not open or accessible to the public. **A3-32**

We note that the Northside Specific Plan will increase parkland from 1 acre per 1,000 residents to 2.17-acres per 1,000 residents in the City of Colton. **A3-33**

Transportation, Chapter 3.15

Comments on behalf of the City of Colton have been prepared by the City’s contract traffic engineer, Minsagr & Associates, and are attached hereto. We wish to emphasize two very pertinent issues. **A3-34**

Response to Comments

clarifications in this comment. Refer to Final EIR Chapter 3, Errata.

A3-32 The comment notes that Draft EIR Table 3.14-4 and any narrative associated with George Brown Park should be corrected as the park is not currently operable or accessible to the public. The Draft EIR Section 3.14 has been updated per the comment. Refer to Final EIR Chapter 3, Errata.

A3-33 The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

A3-34 The comment states that comments on transportation were prepared by the City of Colton's traffic engineer, Minagar & Associates. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

<p>A3-35</p>	<p>The comment highlights Comment Number 7 in the attached memo from Minagar & Associates. The Northside Specific Plan areas within the City of Colton would ultimately access I-215 at the Center Street interchange rather than at South La Cadena Drive. However, in the near term the South La Cadena Drive interchange would also be utilized.</p>
<p>A3-36</p>	<p>The comment highlights Comment Number 20 in the attached memo from Minagar & Associates. Traffic from the portion of the Northside Specific Plan within the City of Colton would access Center Street and I-215 either via from Pellissier Road to South Riverside Avenue, or from Pellissier Road to Orange Street if Orange Street is extended north of Center Street. The EIR traffic study analyzes scenarios both without and with the extension of Orange Street, and recommendations are made based on both scenarios. The EIR traffic study does not recommend the closure of Orange Street, and whether Orange Street is extended or not is to be determined between the Cities of Riverside and Colton when alternate east-west connections are implemented. Orange Street south of Center Street currently restricts heavy vehicles; this portion of Orange Street is intended to remain as a Collector roadway to serve adjacent residential neighborhoods and not as a cut-through route between Arterial roadways</p>
<p>A3-37</p>	<p>The EIR traffic study showed that Center Street built as a 4-lane arterial can adequately accommodate the forecast heavy truck traffic.</p> <p>The comment asks that the discussion is expanded to state that there are no existing water lines within Pellissier Ranch (RPU property) or on industrial properties in Subarea 2. Draft</p>

<p>Northside Specific Plan & DEIR May 21, 2020 Page 7 of 8</p> <ul style="list-style-type: none"> • Comment no. 7 in the attached memo asks why the two most important freeway feeders to the City of Colton's portion of the project are not analyzed in the traffic study (i.e., I-215 northbound on- and off-ramps, and southbound on- and off-ramps at S. La Cadena Drive). • Comment no. 20 discusses the need for direct north-south and east-west connections through the project area to accommodate existing and future truck traffic trying to reach the surrounding freeway systems. This justifies the extension of Orange St. as a north-south connector and an alternate east-west arterial, such as Pellissier Rd., to connect to I-215 ramps. <p>Utilities & Service Systems, Chapter 3.17 Existing Conditions, City of Colton, page 3.17-3: This discussion should be expanded to state that there are no existing water lines within Pellissier Ranch (RPU property) or on industrial properties within Subarea 2.</p> <p>Solid Waste – City of Colton, page 3.17-15: The current solid waste service provider for the City of Colton is CR&R, Inc., not Republic Services.</p> <p>Relevant Plans, Policies, and Ordinances, page 3.17-20: Please include a reference to the City of Colton's water and sewer capacity fee (Ordinance No. 0-020-20).</p> <p>Utilities, Chapter 3.18 Relevant Plans, Policies, and Ordinances, page 3.18-2: Please include a reference to the City of Colton's recently updated Local Hazard Mitigation Plan (adopted August 6, 2019).</p>	<p>A3-35</p> <p>A3-36</p> <p>A3-37</p> <p>A3-38</p> <p>A3-39</p> <p>A3-40</p>
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EIR Section 3.17 has been updated accordingly per this comment. Refer to Final EIR Chapter 3, Errata.

A3-38

The comment provides a correction: The solid waste service provider for the City of Colton is CR&R, Inc. Draft EIR Section 3.17 has been corrected accordingly per this comment. Refer to Final EIR Chapter 3, Errata.

A3-39

The comment asks that a reference to the City of Colton's water and sewer capacity fee (Ordinance No. 0-020-20) be included. This ordinance adopted January 21, 2020 was added to Draft EIR Section 3.17.2. Refer to Final EIR Chapter 3, Errata.

A3-40

The comment asks that a reference to the City of Colton's Local Hazard Mitigation Plan (adopted August 6, 2019) be included. Draft EIR Section 3.18 has been updated accordingly per this comment. Refer to Final EIR Chapter 3, Errata.

A3-41

The comment concludes the City of Colton's comment letter and provides contact information. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

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May 21, 2020
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Thank you for this opportunity to comment on the most recent draft of the Specific Plan and the Draft EIR. We look forward to continued participation in the planning process as the Specific Plan moves forward with the submittal of general plan amendments and rezoning applications to the City of Colton. Please contact me at mitchell@redhatter.com or (909) 370-5185 should you have any questions.

Sincerely,



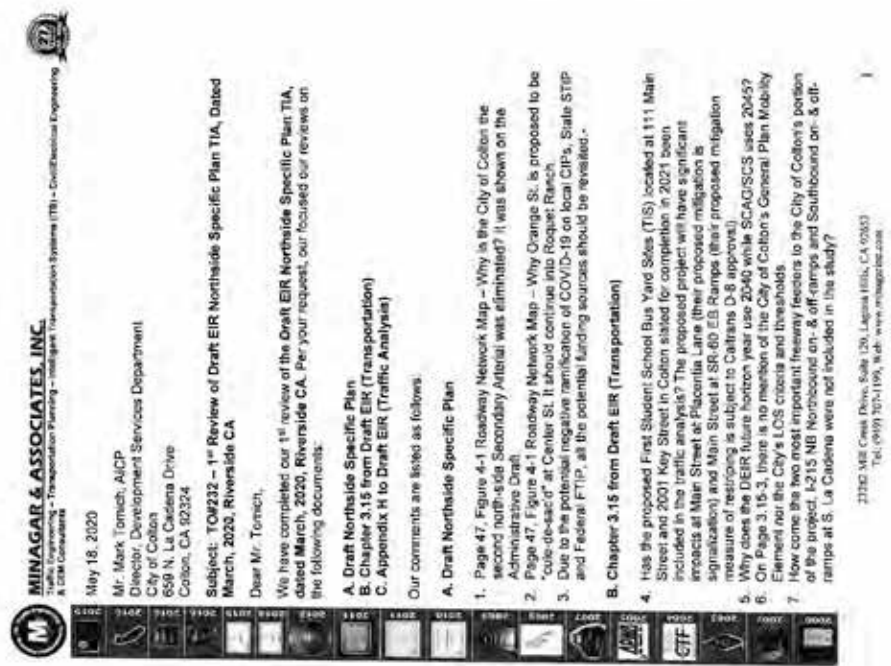
Mark R. Tomich, AICP
Development Services Director

C:

- Bill Smith, City Manager
- Robert DeLoach, Interim Public Works & Utilities Director
- Victor Ortiz, City Engineer
- Tim McHargue, Fire Chief
- Ray Bruno, Fire Marshal
- Ari Morgan, Economic Development Manager

A3-41

<p>A3-42</p>	<p>The comment introduces the comment letter memo prepared by Minagar & Associates. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.</p>
<p>A3-43</p>	<p>The comment asks why the second north-side Secondary Arterial in the City of Colton was eliminated from Figure 4-1 (page 47) of the Draft Northside Specific Plan when it was down on the Administrative Draft. The plan was revised to reflect the City of Colton's Mobility Element.</p>
<p>A3-44</p>	<p>The comment asks why Orange Street is proposed to be a cul-de-sac at Center Street (as seen in Figure 4-1, page 47 of the Northside Specific Plan). The comment recommends Orange Street be continued into Roquet Ranch. The City of Riverside proposed the alternative that would terminate Orange Street as a cul-de-sac to protect a sensitive cultural resource (Trujillo Adobe). The EIR traffic study analyzed scenarios both without and the extension of Orange Street.</p>
<p>A3-45</p>	<p>The comment recommends that all potential funding sources be revisited due to the ramification of COVID-19. At this time it is speculative to make such evaluations, as development and funding is continuing at this time. Comment noted.</p>
<p>A3-46</p>	<p>The comment asks if the proposed First Student School Bus Yard Sites (TIS) located at 111 Main Street and 2001 Key Street in the City of Colton (to be completed in 2021) was included in the traffic analysis. The traffic analysis includes the buildout of the General Plan for the Cities of Riverside and</p>



Response to Comments

Colton, which would encompass all future development projects in both Cities. No further comment is required.

A3-47

The comment asks why the Draft EIR future horizon year uses 2040 whereas SCAG/SCS uses 2045. The future horizon year traffic volumes were obtained from model runs using the RIVTAM model, which uses a horizon year of 2040 and is the model used for Riverside County. The City of Colton is located in San Bernardino County, which uses the SBTAM or SCAG models for horizon year forecasts.

A3-48

The comment states on page 3.15-3 of the Draft EIR, there is no mention of the City of Colton's General Plan Mobility Element nor the City's LOS criteria and thresholds. Table 3 on page 12 of the EIR traffic study shows the City of Colton LOS criteria for roadway segments, and the City of Colton's significance criteria is discussed on page 14 of the EIR traffic study. In addition, the Draft EIR discusses the City of Colton traffic thresholds in Section 3.15.3, Thresholds of Significance. Refer to those discussions for more details.

A3-49

The comment asks why I-215 NB on- and off-ramps and SB on- and off-ramps at South La Cadena Drive were not included in the traffic study. In the long term, Northside Specific Plan areas within the City of Colton would access I-215 at the Center Street interchange rather than at South La Cadena Drive. The I-215 at South La Cadena Drive interchange is located at a much greater distance from the Northside site, and traffic from Northside would have to travel through existing and future residential neighborhoods in order to access the I-215 and South La Cadena Drive interchange. Thus, it is reasonable to assume the traffic distribution included in the traffic study.

A3-50 The comment states that on page 3.15-7 of the Draft EIR the intersection of Main Street/Placentia Lane jurisdiction should be City of Riverside/City of Colton per Table 3.15-1. Table 3.15-1 in the Transportation chapter of the EIR is corrected to show the joint jurisdiction at the intersection, as detailed in the Final EIR Chapter 3, Errata.

A3-51 The comment states that on page 3.15-14 of the Draft EIR, the reference to "City of Colton 2013" should also refer to "General Plan Amendment to Mobility Element - Nov 2016." Draft EIR Section 3.15 has been updated with the corrected reference date per the comment, as detailed in the Final EIR Chapter 3, Errata.

A3-52 The comment asks if on Table 3.15-14 are the RivTAM TAZ# 5175 & 5182 updated from the latest SBTAM for the City of Colton. While it is true that both SBTAM and RivTAM account for land uses outside of their respective counties, TAZs within SBTAM and RivTAM that fall outside the subject county are generally less detailed and geographically different across models. In order to assess the adequacy of the RivTAM model under "No Project" scenarios Average Daily Traffic volumes were compared along critical links between the RivTAM and SBTAM models (using the current version of SBTAM at the time). Based on a favorable comparison of these traffic volumes it was determined that the RivTAM model appropriately accounted for traffic to and from the SBTAM area. For "Project" scenarios, land uses within RivTAM TAZ# 5175 & 5182 were replaced with the proposed land uses for the Pellissier Ranch parcels of the Northside Specific Plan, which are located in the City of Colton.

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8. On Page 3.15-7, the intersection of Main Street/Placentia Lane (Center Street) jurisdiction should be City of Riverside/City of Colton per Table 3.15-1.

9. On Page 3.15-14, City of Colton General Plan Mobility Element, the document refers to "City of Colton 2013", it should also refer to "General Plan Amendment to Mobility Element - Nov. 2016."

10. On Table 3.15-14, 2040 Baseline Trip Generation (Without Project), are the RivTAM TAZ# 5175 & 5182 updated from the latest SBTAM for the City of Colton?

11. On Page 3.15-44, last paragraph, the City of Colton would prefer to extension of Orange St through Center Street for an efficient and safe operation. This can be accomplished via a traffic signal.

12. On Table 3.15-20 for the intersection #9, why does delay go down from over 200 seconds during the 2040 Without Project to 111.4 seconds in PM Peak Hour during the same peak period during the existing condition has a delay exceeding 200 seconds (Table 3.15-12)?

13. Page 3.15-55, Scenario 1 - With Orange Street Extension - The City of Colton prefers a full four-legged intersection at the subject intersection and not to be "sub-division".

14. On Table 3.15-22, why does the delay time for the intersection #9 (existing intersection Colton/Riverside), go down from over 200 seconds for 2040 SP Scenario 1 With Orange Street Extension to 112.7 second for 2040 SP Scenario One during the PM Peak Hour?

15. On Table 3.15-26, the titles shown as "Change in Delay" and "Significant" are misplaced and should be corrected.

16. On Table 3.15-26, for the intersection #9, why does the delay for 2040 SP Scenario Two goes down to 112.2 seconds from over 200 seconds for 2040 Without Project during the PM Peak Hour?

17. On Table 3.15-28, for the intersection #9, under the jurisdiction, City of Colton to be added as well.

18. Why on Figures 3.15-1, 3.15-4, 3.15-7, 3.15-8, 3.15-9, 3.15-10, 3.15-11, 3.15-12, 3.15-13, 3.15-15 the only future roadways shown are Pellissier Road and Orange Street extension while on the Administrative Draft document in addition to the proposed Pellissier Road (serving east-west of Colton's portion), there were also two other proposed north-south roadways as follows: one planned arterial and one planned secondary in the City of Colton?

19. Figure 3.15-11 needs to have a legend for the average resident reader/viewer.

20. From a sub-regional transportation network perspective, the north side of the Northside Specific Plan seem to experience a lot more traffic on S. Riverside Ave. (Main St.), and La Cadenas Dr. due to the obvious lack of any direct North-South connections and also East-West connections. The existing (2017) LOS at the intersection of Main St.-S. Riverside Ave. at Placentia Lane-Center St (Intersection/Node#8) is operating at an LOS of "F" during both the AM & PM peak hours. The same goes with the intersections of I-215 Southbound Ramps

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 Tel: (949) 521-1199, Web: www.minagar.com

Response to Comments

A3-53

The comment states that the City of Colton would prefer to extend Orange street through Center Street. Additional language has been added to the Pellissier Ranch discussion in the Specific Plan (see Section 2.4.5) and Final EIR (see Final EIR Chapter 3, Errata, changes to the Project Description) that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic.

A3-54

The comment asks why on Table 3.15-20 for Intersection #9 the delay goes down from over 200 seconds to 111.4 seconds in PM Peak Hour. The reported decrease in PM peak hour delay at Intersection #9 from the Horizon Year Baseline (no project) scenario to Horizon Year Specific Plan Scenario One is an idiosyncrasy of the Highway Capacity Manual 6th Edition (HCM-6) methodology for unsignalized two-way stop controlled (TWSC) intersections. However, based on a review of the issue the worst movement delay for Intersection #9 for Horizon Year Specific Plan Scenario One during the PM peak hour would read as >200 seconds in the analysis summary table, not as 111.4 seconds. This does not change any of the overall conclusions of the report. This was updated in the Final EIR, as detailed in the Final EIR Chapter 3, Errata.

A3-55

The comment states that the City of Colton would prefer a full four-legged intersection at the subject intersection and not to be a cul-de-sac (page 3.15-55 of the EIR). Comment noted. The Draft EIR addresses both scenarios; with an Orange Street cul-de-sac at this location or extended north through to the City of Colton. Refer to Response A3-53 for further information.

Response to Comments

	<p>A3-56 On Table 3.15-22, the comment asks why the delay time for intersection #9 does down from over 200 seconds to 112.7 seconds during PM Peak Hour. See response to Comment A3-54.</p> <p>A3-57 The comment states that on Table 3.15-26, the “Change in Delay” and “Significant” headings are misplaced and should be corrected. Table 3.15-26 has been corrected accordingly per the comment. This was corrected in the Final EIR, as detailed in the Final EIR Chapter 3, Errata.</p> <p>A3-58 On Table 3.15-26, the comment asks why on Intersection #9 the delay for 2040 SP Scenario Two goes down to 112.2 seconds from over 200 seconds for 2040 Without Project during the PM Peak Hour. See response to Comment A3-54.</p> <p>A3-59 The comment states that the “City of Colton” should be added under the jurisdiction for Intersection #9 on Table 3.15-28. Table 3.15-28 has been corrected in the Final EIR (Final EIR Chapter 3, Errata) accordingly per the comment.</p> <p>A3-60 The comment asks why on multiple figures specified in the comment letter the only future roadways shown are Pellissier Road and Orange Street Extension whereas in the Administrative Draft document there were two other proposed north-south roadways. As discussed earlier, the roadways identified in the City of Colton are the ones identified in the City’s Mobility Element.</p> <p>A3-61 The comment recommends a legend for Figure 3.15-11. Figure 3.15-11 in the EIR is the same as Exhibit 20 of the EIR traffic study. Exhibit 20 provides a legend. This figure was updated in</p>
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Response to Comments

the Final EIR to match the traffic study, as detailed in the Final EIR Chapter 3, Errata.

A3-62

The comment states that the north side of Northside Specific Plan experiences more traffic on South Riverside Avenue (Main Street) and La Cadena Drive due to lack of any direct North-South connections. Traffic from the portion of the Northside Specific Plan within the City of Colton would access Center Street and I-215 either via from Pellissier Road to South Riverside Avenue, or from Pellissier Road to Orange Street if Orange Street is extended north of Center Street. The EIR traffic study analyzes scenarios both without and with the extension of Orange Street, and recommendations are made based on both scenarios. Refer to response to Comment A3-53.

A3-63 The comment recommends that the existing Orange Street do not become a cul-de-sac at Center Street but rather continue into Roquet Ranch and ultimately connect to South Riverside Street. Traffic from the portion of the Northside Specific Plan within the City of Colton would access Center Street and I-215 either via from Pellissier Road to South Riverside Avenue, or from Pellissier Road to Orange Street if Orange Street is extended north of Center Street. The EIR traffic study analyzes scenarios both without and with the extension of Orange Street, and recommendations are made based on both scenarios. Refer to response to Comment A3-53.

A3-64 The comment states that because of the high truck traffic on Center Street, the need for an alternate east-west arterial is justified. Additional language has been added to the Pellissier Ranch discussion in the Northside Specific Plan (see Section 2.4.5) and Final EIR (see Final EIR Chapter 3, Errata) that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic. Refer to response to Comment A3-53.

A3-65 The comment states that because the majority of spaces are designated for Light Industrial, provisions for new east-west truck routes to connect to I-215 freeway is needed. See response to Comment A3-64.

A3-66 The comment recommends that Exhibit 5 in Appendix H of the Draft EIR have a legend. The exhibit includes a legend.

MINAGAR & ASSOCIATES, INC.
TRAFFIC ENGINEERING • TRANSPORTATION PLANNING • TRUCKLIGHT TRANSPORTATION SYSTEMS (TTS) • CIVIL/STRUCTURAL ENGINEERING & COST CONSULTING

A3-63 Since the majority of the distribution centers/waterhousing complexes of the City of Colton are located in an industrial area north and north west area of the subject Specific Plan area, the existing as well as the proposed future truck traffic volumes are very significant. There are only S. Riverside Ave., Main St. and La Cadena Dr. to serve as the truck routes between I-10 Freeway to north, SR 60 to the south and I-215 to the east. It is therefore recommended that due to the lack of any direct North-South connector, the existing Orange Street not be cul-de-sacked at Center St. but rather to continue into Roquet Ranch and ultimately to connect all the way to S. Riverside St.

It goes without saying that the truck ADT traffic happens to be the highest on Center Street, therefore justifying the need for an alternate East-West arterial such as the future Pellissier Rd to connect I-215 ramps to S. Riverside Ave. - Main Street. Under the Existing Plus Project the LOS are "F" for the two intersections of S. Riverside St. Placentia Lane and S. Riverside Ave. Pellissier Rd (two unsignalized intersections). Under the Future 2040 Without Project, the following intersections in the City of Colton will operate at LOS of "F": West La Cadena Dr. at I-215 SB, East La Cadena Dr. at I-215 NB and Main St. at Placentia Lane-Center St., justifying constructing a viable East-West arterial such as the future Pellissier Rd.

C. Appendix H to Draft EIR (Traffic Analysis)

21. A review of Exhibits 2 & 3 Conceptual Maps for Scenarios One & Two reveal that for the City's portion, if the majority of the spaces are designated for Light Industrial (IR 1), therefore, provisions for new east-west truck routes to connect to I-215 Freeway as well as north-south feeders are needed.

22. Exhibit 5, the same comment as #19.

23. According to the Exhibit 10, the Existing Traffic Volumes, the highest ADT of 21,940 occurs on a segment north of the intersection of Main Street/Center Street on Riverside Street in the City of Colton. This fact solidifies the need for future north-south arterials and feeders for the project and the area.

24. According to the Exhibit 11, the Existing Heavy Vehicle Volumes, the highest heavy vehicle volumes occur on a segment north of the intersection of Main Street/Center Street on Riverside Street in the City of Colton. This fact solidifies the need not only for future north-south arterials and feeders for the project and the area but also connections to I-215 Freeway NB 65B On- & Off-ramps and S. La Cadena Ave. in the City of Colton.

25. Does 2040 RV/TAM Model Trip Generation by TAZ for both Scenarios One & Two include numerous approved and planned distribution centers in the City of Colton since this Traffic Study was prepared between Feb 2017 and March 2020? On Page 61, only Roquet Ranch in the City of Colton is listed! Has the City of Colton's Planning Division been contacted for the latest listings?

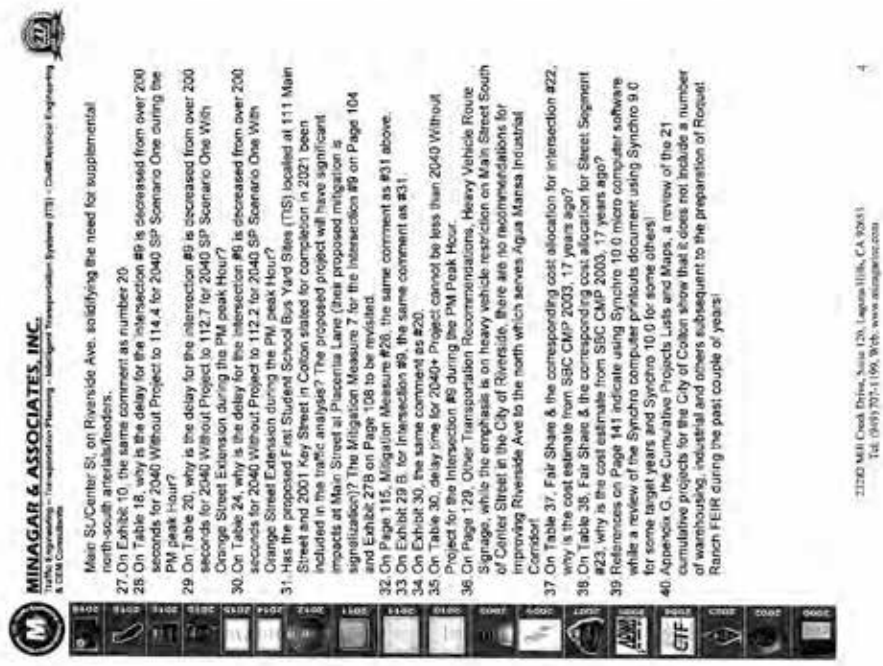
26. On Exhibit 10, the 3rd highest traffic volumes of 26,945 for the Horizon Year 2040 Baseline Without Project occurs on the segment north of the intersection of

2392 Mt. Diab Drive, Suite 120, Laguna Hills, CA 92653
Tel: (949) 791-1199, Web: www.minagar.com

Response to Comments

A3-67	<p>The comment states that there is a need for future north-south arterials and feeders for the project and area. See response to Comment A3-64.</p>
A3-68	<p>The comment states there is a need for future north-south arterials and feeders that also connect to I-215 freeway NB & SB on- & off- ramps and South La Cadena Avenue in the City of Colton. See response to Comment A3-64.</p>
A3-69	<p>The comment asks if the 2040 RIVTAM Model Trip Generation by TAZ for Scenario One & Two includes numerous approved and planned distribution centers in the City of Colton. Only Roquet Ranch is listed in the City of Colton. The comment asks if the City of Colton's Planning Division was contacted for the latest listings. The City of Colton was contacted by the City of Riverside for their cumulative list for the EIR. The request to include Roquet Ranch in the traffic analysis also came from the City of Riverside due to Roquet Ranch not being included in the RIVTAM model and due to the project's location adjacent to the Pellissier Ranch area of the Northside Specific Plan. The Northside TIA is focused on the buildout of the Specific Plan in which the buildout of the General Plans for both the Cities of Riverside and Colton are assumed.</p>
A3-70	<p>The comment states that there is a need for north-south arterials and feeders. See response to Comment A3-64.</p>

<p>A3-71</p>	<p>The comment states that there is a need for north-south arterials and feeders. See response to Comment A3-64</p>
<p>A3-72</p>	<p>See response to Comment A3-62, A3-63, and A3-64.</p>
<p>A3-73</p>	<p>On Table 18 of Appendix H of the EIR, the comment asks why the delay for intersection #9 decreased from over 200 seconds for 2040 Without Project to 112.7 seconds for 2040 SP Scenario One With Orange Street Extension during PM peak hour. See response to Comment A3-54.</p>
<p>A3-74</p>	<p>On Table 20 in Appendix H of the EIR, the comment asks why the delay for intersection #9 decreased from over 200 seconds for 2040 Without Project to 112.7 seconds for 2040 SP Scenario One With Orange Street Extension during the PM Peak hour. See response to Comment A3-54.</p>
<p>A3-75</p>	<p>On Table 24 in Appendix H of the EIR, the comment asks why the delay for intersection #9 decreased from over 200 seconds for 2040 Without Project to 112.2 seconds for 2040 SP Scenario One With Orange Street Extension during the PM Peak Hour. See response to Comment A3-54.</p>
<p>A3-76</p>	<p>The comment asks if the proposed First student School bus Yard Sites (TIS) were included in the traffic analysis, and if not mitigation measure 7 for intersection #9 (page 104) and Exhibit 27B (page 108) should be revisited. See response to Comment A3-46.</p>
<p>A3-77</p>	<p>The comment asks if the proposed First student School bus Yard Sites (TIS) were included in the traffic analysis, and if not mitigation measure 26 and Exhibit 27B (page 108) should be revisited. See response to Comment A3-46.</p>



Response to Comments

	<p>A3-78 The comment asks if the proposed First student School bus Yard Sites (TIS) were included in the traffic analysis, and if not Exhibit 29B should be revisited. See response to Comment A3-46.</p> <p>A3-79 The comment recommends a legend be included with Exhibit 30 in Appendix H of the EIR. See response to Comment A3-62, A3-63, and A3-64 except pertaining to Exhibit 30 in Appendix H of the EIR.</p> <p>A3-80 The comment states that on Table 30 in Appendix H of the EIR the delay time for 2040+ Project cannot be less than 2040 Without Project for Intersection #9 during PM Peak Hour. See response to Comment A3-54.</p> <p>A3-81 The comment states that on page 129 of Appendix H of the EIR, there are no recommendations for improving Riverside Avenue to the north. A significant impact was not identified on South Riverside Avenue; therefore, no mitigation measures were recommended.</p> <p>A3-82 On Table 37 of Appendix H of the EIR, the comment asks why the cost estimate is from SBC CMP 2003, 17 years ago. City of Riverside staff suggested the reference of the 2003 San Bernardino County CMP Update for the preliminary cost estimates. The reference costs will be updated as a part of the mitigation fair-share fee analysis (MM-TR-15) to occur at a later date.</p> <p>A3-83 On Table 38 of Appendix H of the EIR, the comment asks why the cost estimate from SBC CMP 2003 17 years ago. See response to Comment A3-82.</p>
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Response to Comments

A3-84

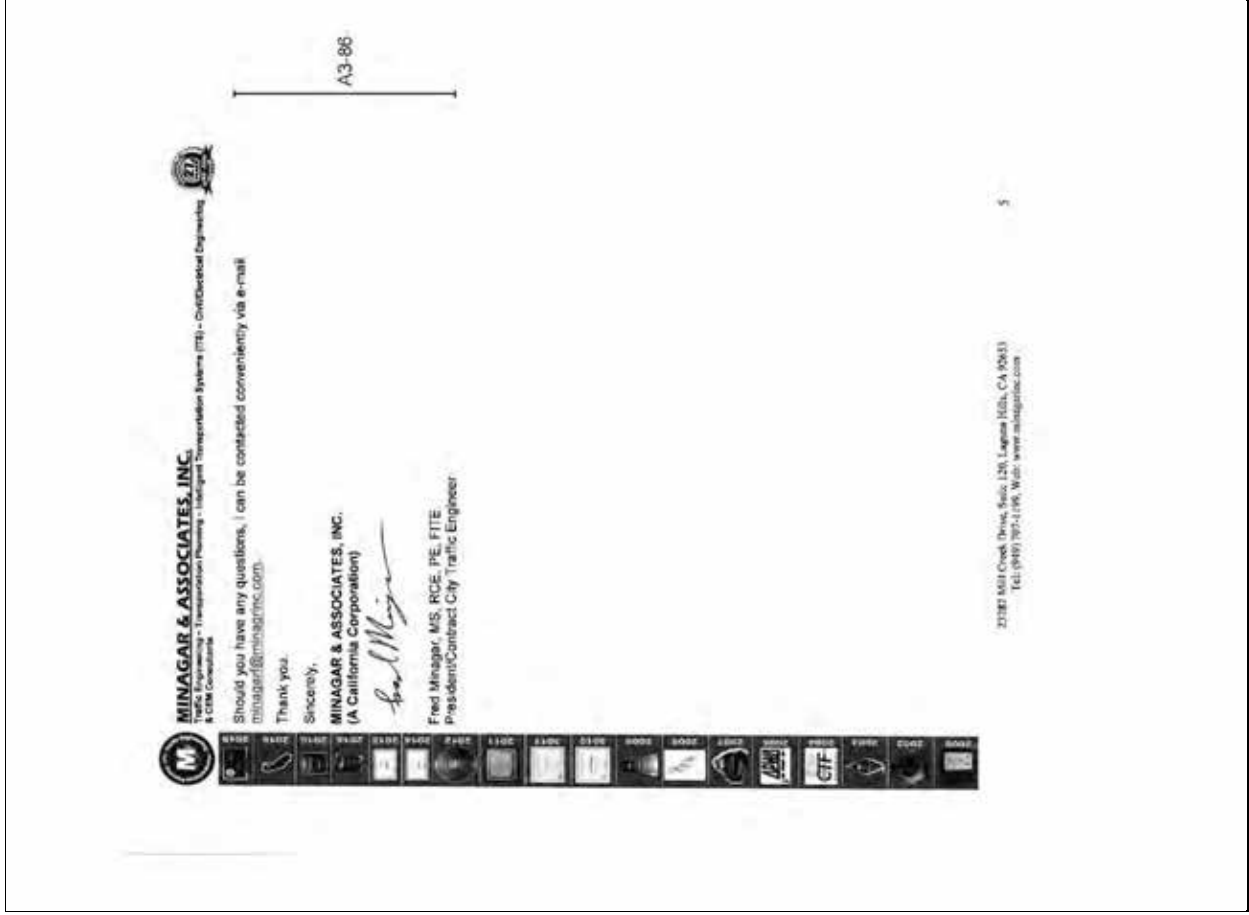
The comment states that reference on page 141 of Appendix H of the EIR lists using Synchro 10.0 whereas review of Synchro computer printouts document using Synchro 9.0 for some target years. The HCM-6 methodology and Synchro 10.0 was used for all intersection analysis in the Northside Specific Plan TIA. The reason that many of the Synchro printouts read “Synchro 9” is because the Synchro model was initially created in 2017 for the Existing Conditions Baseline report, and at that time Synchro 9.0 was used. Back in 2017, the staff person who ran the Synchro output reports had manually entered Synchro 9 in the output report footer instead of using the default footer in the Synchro program. The original Synchro 9.0 files from the 2017 Existing Conditions Baseline Report were copied and updated to Synchro 10.0 to use for all Northside Specific Plan analysis scenarios. However, because the footer in the original Synchro 9.0 files had been manually overwritten, the Synchro program was not able to automatically update to show Synchro 10.0 in the output report footers. The Synchro analysis for the Horizon Year baseline and four Specific Plan scenarios were correctly run using Synchro 10.0, but the footers still showed Synchro 9.0 because of the overwriting error back in 2017. The footer note does not affect the analysis which was done correctly.

A3-85

In Appendix G, Cumulative Projects Lists and Maps, the comment states that the review of the 21 cumulative projects for the City of Colton does not include a number of warehousing, industrial and other subsequent to the preparation of Roquet Ranch FEIR. See response to Comment A3-69.

A3-86

The comment concludes the letter and provides contact information. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.



Response to Comment Letter A4

Greater Riverside Chambers of Commerce
 Brooke Biddle, Business Project Coordinator
 May 26, 2020

The comment provides an introduction and greeting. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

A4-1

A4-2

Comment Letter A4

From: biddle@riverside-chamber.com
Sent: Tuesday, May 26, 2020 6:35 PM
To: Eastman, Iv
Subject: [External] Northside Specific Plan - Chamber

Good afternoon Iv,
 I hope you, your family and all at the City are doing well during this time. As I am sure you know, the entire community grieves the loss of our friend Bob Stobson, the Chamber especially hurts over the loss of this incredible man, advocate, coach and friend to countless in our community. I know you worked very closely with Bob on the Northside Specific Plan, and our hearts continue to be with Bob's family and those closest to him.

Rick Engineering was the lead consultant for the planning effort of the Northside Specific Plan the Chamber, and the Chamber's Murter Park Business Council Board has been actively involved in this for years, from our first formal letter in 2014 to countless updates from Rick Engineering and the City staff, and Rick Engineering's consultant work initiated in January 2017 to the notice of Preparation comment period ending in April 2019, the Chamber has remained engaged in this decision. Many of our Murter Park Business Council Board members attended the workshops and worked to engage on behalf of the business community regarding the significant undertaking of this size of a specific plan. So I cannot express the work you, your team, and Rick Engineering have done to get us to the point we are at today with a Draft Plan to help guide the area's land use, mobility, and environmental decisions to increase the Northside's vitality and future growth. Prior to the Planning Commission review of the Specific Plan and DEIR during public hearing, we will send a formal letter to the Planning Commission.

The Chamber's Murter Park Board's called to convene on Tuesday, June 2, and I seek to collect any final thought from the board then.

I just was aware that the public comment period close was today and wanted to send a quick comment on this item indicating the Chamber's involvement. Thank you again for your time. Appreciate all you and the City team do.

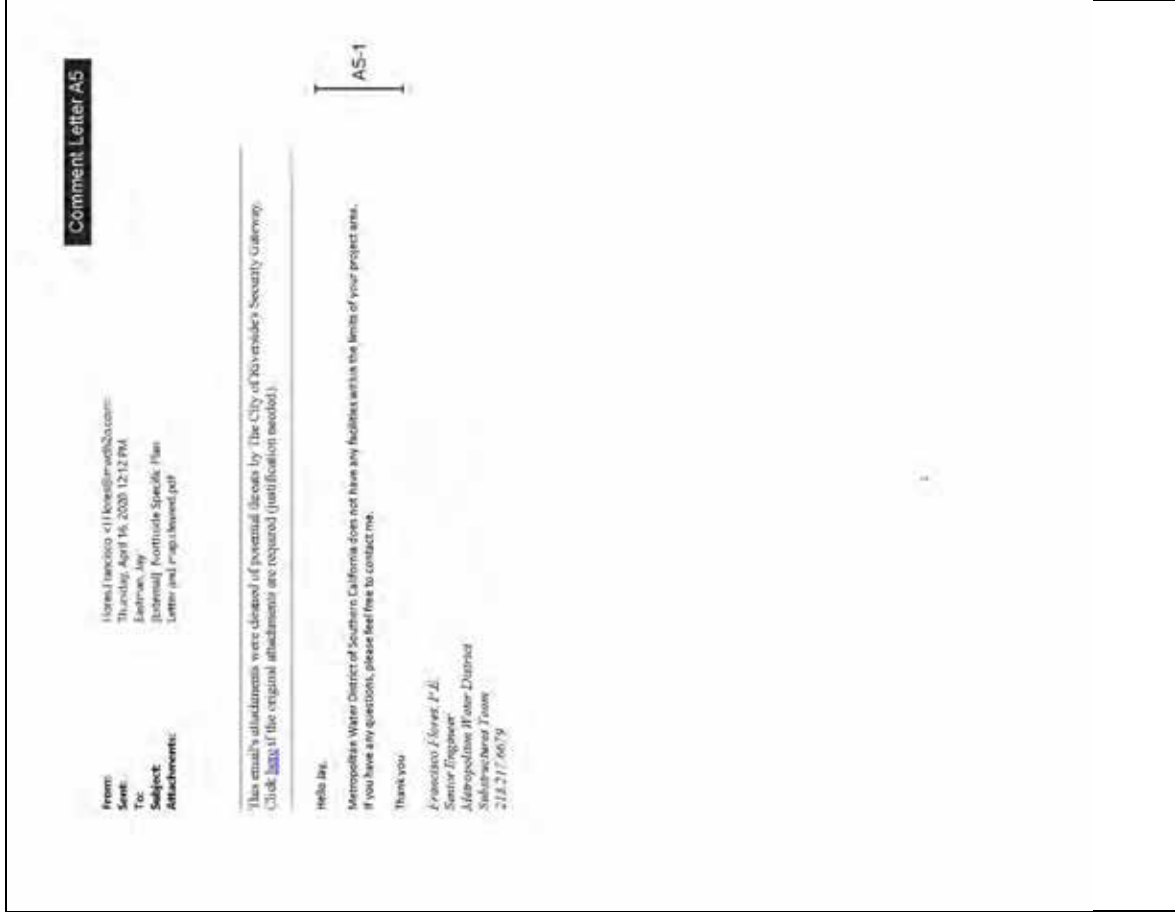
Brooke Biddle
 Business Project Coordinator
 Greater Riverside Chambers of Commerce
 E-mail: bbiddle@riverside-chamber.com
 Phone: 951-683-7100 ext. 210
 Cell: 714-743-0533
 Fax: 951-683-2670
 My location: 247:

COVID-19 RESOURCES
 Tools and Tips to Move Your Business Forward During COVID-19

Response to Comment Letter A5

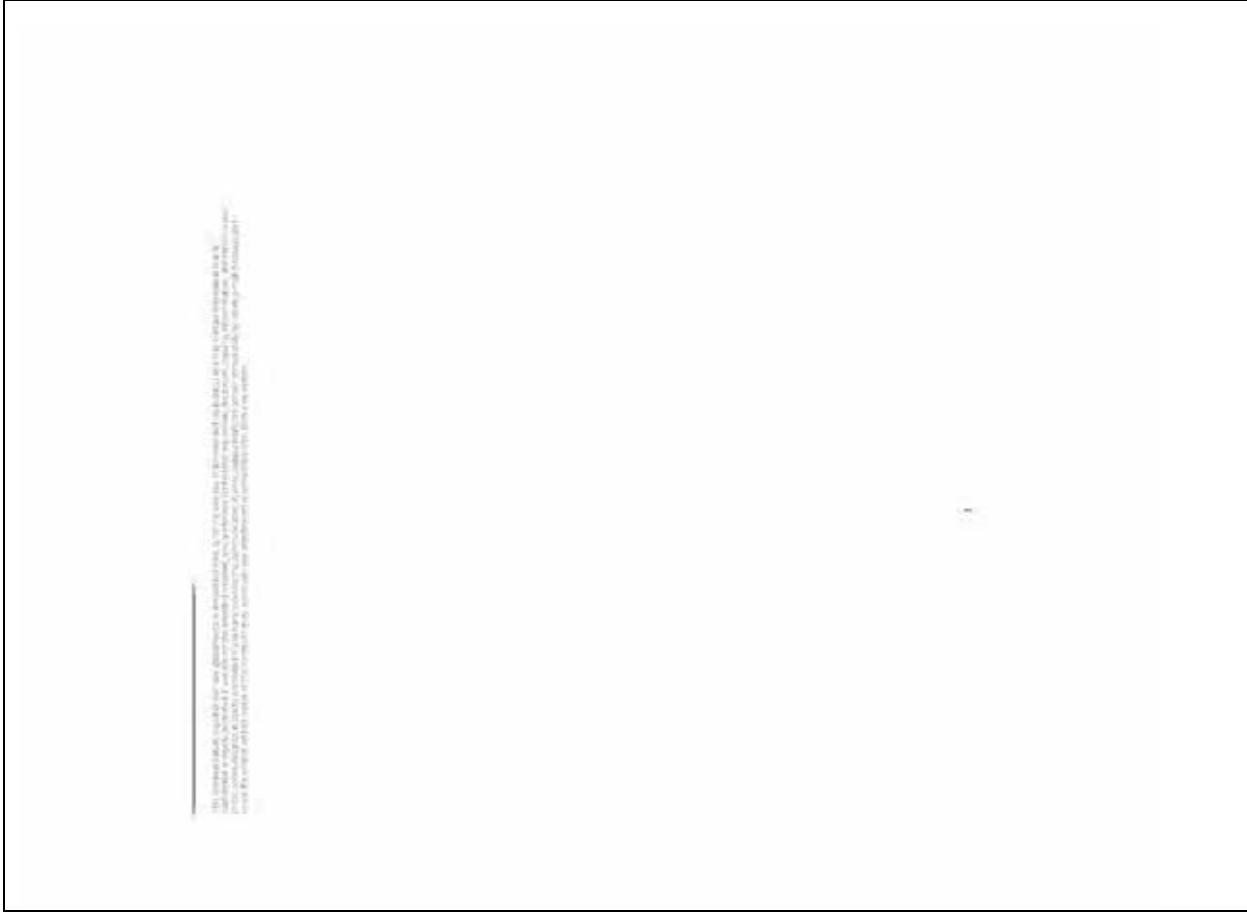
Metropolitan Water District of Southern California (MWD)
Francisco Flores, P.E.
April 16, 2020

A5-1 The comment provides a statement that the project is outside any MWD facility boundaries and therefore the MWD has no comments. For that reason, the City provides no further response to this comment.





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Community & Economic Development Department
3900 Main Street, Riverside, CA 92522 | Phone: (951) 844-5371 | RiversideCA.gov

NOTICE OF AVAILABILITY and NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT

Northside Specific Plan

Comment Review Period – Thursday, March 26, 2020 to Monday, May 25, 2020

State Clearinghouse No. 2019039168

Pursuant to Title 24 of the California Code of Regulations, Chapter 3, Section 15087, this notice is to advise that the City of Riverside, as lead agency, has completed and is issuing notification of the availability of a Draft Environmental Impact Report (EIR), State Clearinghouse No. 2019039168, for the project as described below.

PROJECT TITLE: Northside Specific Plan (P19-0003, P19-0004, P19-0005, P19-0066)

PROJECT LOCATION: The approximately 7,200-acre Northside Specific Plan Area (SPA) is located in the Beverly Hills and Parkside neighborhoods of the City of Riverside within the San Bernardino region (Figure 1). The SPA includes approximately 2,000 acres within the City of Riverside, approximately 236 acres within the City of Colton, and approximately 63 acres within unincorporated County of Riverside. Within the City of Colton area of the SPA, 227 acres (the Pellissier Ranch area) is owned by Riverside Adult Utilities (RAU). Locally, the SPA is southwest of La Loma (66), north of downtown Riverside, west of Hunter Industrial Park, and east of the Santa Ana River. Interstate 215 (I-215) runs north-south along the majority of the eastern SPA boundary, with the exception of the Hunter Park Residential area that is included in the SPA to the east of I-215. State Route 60 (SR-60) traverses generally east-west across the southern area of the SPA. The SPA is located on the U.S. Geological Survey (USGS) 7.5-million square footers, Riverside East, and San Bernardino South quadrangles.

The SPA encompasses land within three distinct neighborhoods within the City of Riverside: the Northside, downtown Riverside, and Hunter Industrial Park. The SPA also includes an area of residential properties within the City of Riverside's Sphere of Influence (SOI), located in unincorporated areas of the County of Riverside to the west of I-215 and north of Center Street.

PROJECT DESCRIPTION: The project consists of the Northside Specific Plan. The Northside Specific Plan documents and implements the City of Riverside's vision for the Northside neighborhood. The Northside Specific Plan is intended to provide guidance for future development within the Northside neighborhood. The Northside Specific Plan establishes land use designations and zones to and meet the vision for the Northside Community. Proposed land uses under the Northside Specific Plan include Medium Density Residential (MDR), Medium-High Density Residential (MHR), High-Density Residential (HDR), Commercial (C), General Commercial (CG), Business/Office Park (B/O/P), Freeway Mixed Use (West J. Collins Drive Corridor) (FMU), Mixed-Use Neighborhood (MU), Northside Village Center (NVC), Open Space, Parks, and Trails (OSP), Public Facilities/Institutional (PF), Trailing Arbores Heritage Village (THV), Outdoor Commercial Recreation (OCR), Light Industrial (LI-1), and Industrial Research Park (IRP). A Residential Overlay (R-O) Zone is proposed to allow additional residential uses in

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...are shown, in addition, the project includes a Transition/Jobs Overlay (TJO) to allow for conditional implementation of the existing zoning until transfer of title has occurred. Based on this typical implementation of the TJO, the project will be in compliance with the TJO requirements for the project area for the following periods: 11,330 and 13,112 residential units and 16,058,792 square feet of employment/office uses within the Northside Community.

Implementation of the proposed project will require the following discretionary approvals from the City of Riverside: a Conditional Use Permit (CUP) for the proposed project, a Conditional Use Permit (CUP) for the proposed project, a Conditional Use Permit (CUP) for the proposed project, and a Conditional Use Permit (CUP) for the proposed project. The project will also require approval from the City of Orange, including Adoption of a General Plan Amendment, Adoption of a Change of Zone, and Adoption of the Northside Specific Plan.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The Draft EIR determined that even with feasible mitigation measures, the Northside Specific Plan could result in significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazardous and Unhazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, and Tribal Cultural Resources that cannot be mitigated to below a level of significance. As a result, adoption of a Statement of Overriding Considerations will be required in order for the Project to be approved.

PUBLIC REVIEW PERIOD: The Draft EIR is available for public review and comment beginning Thursday, March 26, 2020 and ending Monday, May 23, 2020. A copy of the Draft EIR and associated documents are available for public review on the following website: https://projects.arb.ca.gov/airquality/air_quality/development/20190326/.

Due to current COVID-19 guidance from the California Departments of Public Health, and the current closure of government facilities, the public review period is 60 days. Copies of the Draft EIR will be made available for public viewing at the following City facilities when they return to normal hours of operation: (1) Riverside City Hall, Community & Economic Development Department, Planning Division, 7900 Main Street, Third Floor, Riverside, CA 92522; (2) the Riverside Main Public Library, 3344 Mission Inn Avenue, Riverside, CA 92501; (3) Riverside Public Library, Arlington Branch, 3556 Arlington Avenue, Riverside, CA 92503. Questions related to Draft EIR availability should be directed to the project contact. Responses to the Draft EIR must be sent to Judy.Kutner@cityofriverside.org in writing no later than Monday, May 23, 2020, by e-mail or post at the following address:

MAIL ADDRESS:
City of Riverside
Community & Economic Development Department
Planning Division
3500 University of California Ave
Riverside, California 92522
Attn: Judy Kutner, Principal Planner
(951)316-5264
Judy.Kutner@cityofriverside.org

PUBLIC HEARING: Notification of the date, time and place of future public hearings will be provided in compliance with City and California Environmental Quality Act (CEQA) requirements.

HAZARDOUS MATERIALS STATUTING: There are no areas within the Specific Plan Area that are in the Chronic EIR pursuant to Government Code Section 65962.5, Acute Hazard Chronic (2779) Main Street and Sander Trust Property (5211 Northland Street). It is also noted that an approximately 2.8 miles of an 11.33 mile-long gas/water main product (non-high volatile liquid) pipeline crosses through the northern portion of the SPA.

NOTES: It should be noted that this project will be reviewed by the Riverside County Airport Land Use Commission for a determination of compatibility with the Riverside Municipal Airport Land Use Compatibility Plan. In addition, Title I Consultations have been conducted, and in some circumstances are ongoing.

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Response to Comment Letter A6

Riverside County Flood Control and Water Conservation District
 Deborah De Chambeau, Engineering Project Manager
 April 8, 2020

A6-1 The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

A6-2 The comment states that the District did not review the proposed project in detail and that the comments do not imply District approval or endorsement of the project. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.


Comment Letter A6

JAMONE UHLIFY
District Manager/Chief Engineer

City of Riverside
Planning Department
3600 Main Street
Riverside, CA 92522

Attentive: Jay Esauiman

1995 MARKET STREET
RIVERSIDE, CA 92501
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FAX: 951.343.0905
www.riflood.org
210526



**RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT**

April 8, 2020

Re: Northside Specific Plan
P19-0003, 19-0064, 19-0065, 19-0066

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Road Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above referenced project transmittal, received March 24, 2020. The District has not reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely, Springbrook Drainage Channel, University MDP, Jira, RC, 80, 9, 9A, 9B, 10, 12, 12A, 14, 14A, 15 and 16, located throughout the proposed project site. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.

A6-1

A6-2

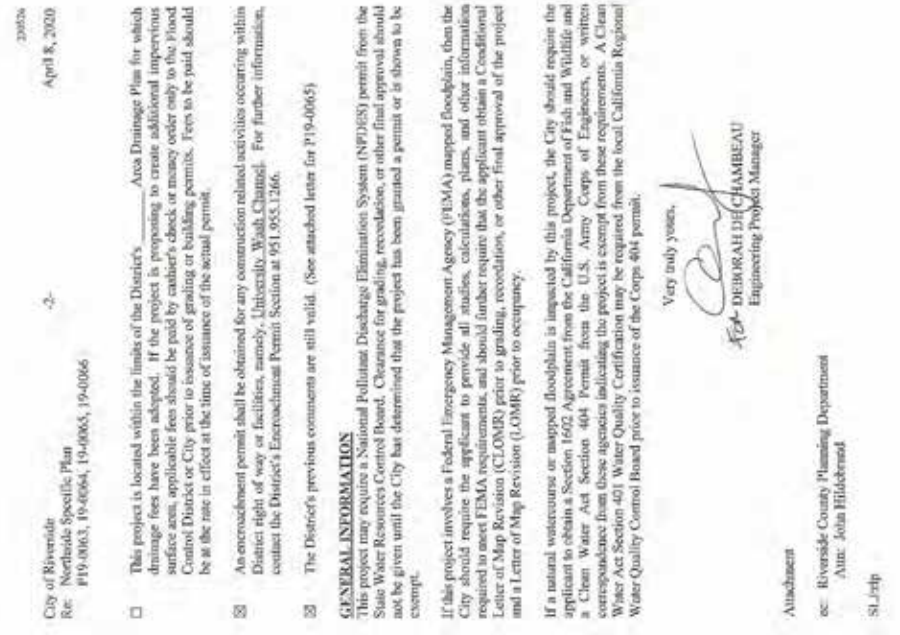
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RTC-55

Northside Neighborhood and Pellissier Ranch Specific Plan Program EIR

October 2020

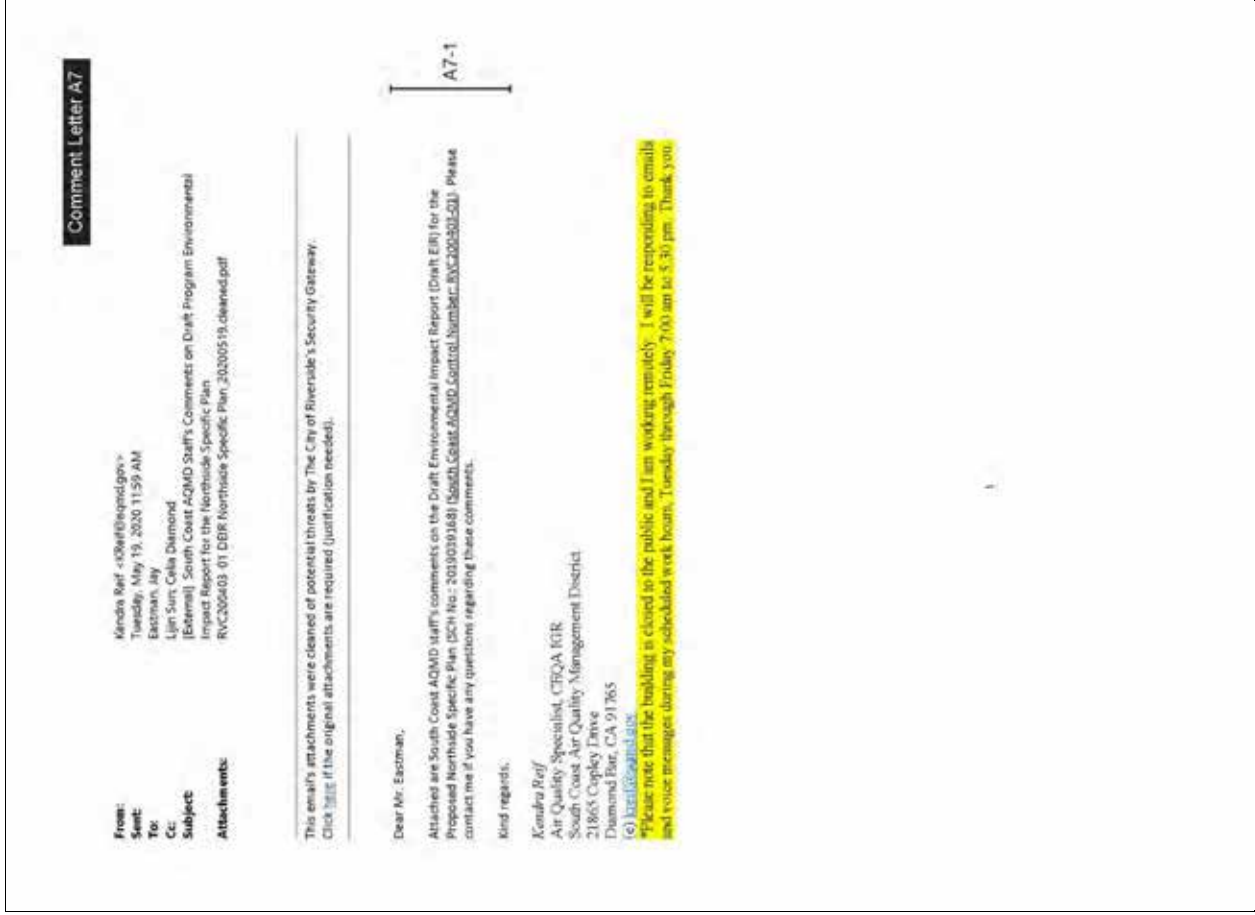
<p>A6-3</p>	<p>The comment states that the project may require a National Pollution Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. The NPDES permit is listed in Draft EIR Section 2.5.3 as a potentially required approval for future projects in the SPA.</p>
<p>A6-4</p>	<p>The comment states that if the project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all information required to meet FEMA requirements. FEMA approvals are listed in Draft EIR Section 2.5.3 as potentially required approvals for future projects in the SPA.</p>
<p>A6-5</p>	<p>The comment states that the applicant should obtain a Section 1602 Agreement from California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers. These approvals are listed in Draft EIR Section 2.5.3 as potentially required approvals for future projects in the SPA.</p>



Response to Comment Letter A7

South Coast Air Quality Management District (SCAQMD)
Kendra Reif, Air Quality Specialist
May 19, 2020

A7-1
Comment provides an introduction to the letter. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR.



A7-2 The comment provides a summary of the project. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR.

A7-3 The comment provides a summary of the Draft EIR's Air Quality analysis. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR.



May 19, 2020

SENT VIA E-MAIL:
jfandreas@reversideca.gov

Jay Feinstein, Principal Planner
 City of Revere, Planning Department
 3900 Main Street, Third Floor
 Revere, CA 92522

Draft Program Environmental Impact Report (EIR) for the Northside Specific Plan (SCH No. 2019030168)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Program EIR.

South Coast AQMD Staff's Summary of Project Description
 The Lead Agency is developing land use designations and zones, development standards, and design guidelines to implement a community vision for the Northside Neighborhood with a planning horizon of 2040 (Proposed Project). The Proposed Project encompasses 1,600 acres in the City of Revere, 336 acres in the City of Colton, and 83 acres in the unincorporated areas of County of Revere. Interstate 215 (I-215) runs north-south along the majority of the Proposed Project area. State Route 67 (SR-67) runs east-west across the southern portion of the Proposed Project area. The projected land uses include, but are not limited to, Medium Density Residential, Medium-High Density Residential, High Density Residential, General Commercial/ Commercial, and Business/Office Park. At full buildout, the Proposed Project would allow between 11,260 and 13,112 residential units and 16,559,700 square feet of employment uses.¹

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment
 Based on reviews of the Draft Program EIR, the Proposed Project's construction activities will take place over a 20-year period. The Lead Agency estimated construction emissions based on the first year of construction activities as it represents the worst-case construction impact scenario due to fleet vehicle emission improvements in future years² and compared those emissions to South Coast AQMD's recommended regional air quality CEQA significance thresholds for construction. The Lead Agency found that the Proposed Project's construction air quality impacts before mitigation would be significant for volatile organic compounds (VOCs), nitrogen oxides (NOx), carbon monoxide (CO), particulate matter (PM)10, and PM2.5 at 1,583.49 pounds per day (lb/day), 1,174.37 lb/day, 998.31 lb/day, 2,16.64 lb/day, and 107.82 lb/day, respectively.³ Additionally, the Lead Agency quantified the Proposed Project's operational emissions and found that the Proposed Project will result in significant air quality impacts during operation before mitigation for VOCs, NOx, CO, PM10, and PM2.5 at 2,338.84 lb/day, 247.31 lb/day, 5,377.52 lb/day, 801.16 lb/day, and 751.67 lb/day, respectively.

In the Draft Program EIR, the Lead Agency is committed to reducing the Proposed Project's construction emissions, such as requiring the use of construction equipment with engines rated at 75 horsepower or greater that meet or exceed U.S. Environmental Protection Agency (EPA) Tier 4 off-road emissions

¹ Draft Program EIR, Table 2-3, Page 2-9;
² Draft Page 3-2-89;
³ Draft Page 3-3-16;
⁴ Draft Page 3-3-52.

A7-2

A7-3

A7-4 The comment states that the South Coast AQMD staff recommends a strengthening of air quality MMs presented in the Draft EIR. The staff recommendations are detailed further in the letter. Refer to responses A7-6 to A7-15 below.

A7-5 The comment provides a conclusion to the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

A7-3 Cont.

A7-4

A7-5

May 19, 2020

Jay Eastman

The Lead Agency found that the Proposed Project's construction air quality impacts from VOCs, NOx, CO, PM10, and PM2.5 would remain significant and unavoidable after mitigation. The Lead Agency has developed mitigation measures to reduce the operational air quality impacts of the Proposed Project. These measures include, but are not limited to, vehicle miles traveled reduction strategies, the encouragement of electric vehicles, and idling restrictions. However, the Proposed Project's operation air quality impacts from VOCs, NOx, CO, PM10, and PM2.5 would remain significant and unavoidable after mitigation measures. The Lead Agency is also committed to requiring the completion of Health Risk Assessments for future development of distribution centers, gasoline dispensing facilities, dry cleaners, or other sources of toxic air contaminants implementing the Proposed Project.


Summary of South Coast AQMD Staff's Comments

The Proposed Project air quality impacts, particularly VOCs, NOx, CO, PM10, and PM2.5 emissions, would be significant and unavoidable during construction. To further reduce the Proposed Project's construction emissions, South Coast AQMD staff recommends that the Lead Agency strengthen the existing air quality mitigation measure for construction equipment by requiring the use of Tier 4 construction off-road equipment with engines rated at 50 horsepower and incorporate new air quality mitigation measures to require the use of electric or alternative-fueled construction equipment and clean trucks during construction in the Final Program EIR. Please see the attachment for more information. The attachment also includes a discussion of compliance with South Coast AQMD Rule 403(e) requirements that the Lead Agency should include in the Final Program EIR.

Conclusion

Pursuant to California Public Resources Code Section 21097.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final Program EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(e)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the findings that the recommended revisions to the existing air quality mitigation measure and additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final Program EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Kemba Bent, Air Quality Specialist, at kent@scaqmd.gov, should you have any questions or would like to discuss the comments.

Sincerely,

 Lijun Sun, JD
 Program Supervisor, CEQA IGR
 Planning, Rate Development & Area Sources

Attachment
 LS KR
 RY/20200519
 Comment Number

<p>A7-6</p>	<p>May 19, 2020</p> <p>ATTACHMENT</p> <p>1. Recommended Revisions to Existing Air Quality Mitigation Measure MM-AIR-1 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. Since the Proposed Project's construction air quality impacts would be potentially significant and unavoidable, South Coast AQMD staff recommends that the Lead Agency strengthen MM-AIR-1 to require the use of Tier 4 construction off-road equipment with engines rated at 50 horsepower or greater, and include information on monitoring and reporting to ensure compliance with MM-AQ-1. The recommended revisions to MM-AIR-1 in strikethrough and underline are provided as follows:</p> <p>MM-AQ-1 Construction Equipment Emissions Reductions. The following measures shall be incorporated into the Northside Specific Plan to reduce construction criteria air pollutant emissions, including VOC, NOx, CO, PM10, and PM2.5, generated by construction equipment used for future development projects implemented under the proposed Specific Plan. Prior to the issuance of a grading permit within the Northside Specific Plan, the following shall be incorporated into the grading plan and/or grading permit conditions:</p> <p>a) For off-road equipment with engines rated at 50 <u>50</u> horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. (For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.) Before an exemption may be considered, the applicant shall be required to demonstrate that two construction fleet owners/operators in the region were contacted and that those owners/operators confirmed Tier 4 Interim or better equipment could not be located in the region. <u>In situations that Tier 4 construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractors must demonstrate the ability to supply the additional construction equipment for one year to any annual bid timeline and construction activities. A score of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or South Coast AQMD operating permit tier qualifications shall be available upon request in the form of mobilization of such available unit of equipment. Additionally, the Lead Agency should require periodic reporting and revision of unit status information documented by construction contractors to acquire, maintain, and comply with the maximum extent feasible to ensure compliance.</u></p>
<p>A7-7</p>	<p>1. 1</p>
<p>A7-8</p>	<p>2. Additional Recommended Air Quality Mitigation Measures CEQA requires that the Lead Agency consider mitigation measures to minimize potentially significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any potentially significant adverse air quality impacts. Since the Proposed Project will be implemented over a 20-year period, the Lead Agency should require that the following mitigation measures be implemented over the 20-year period:</p>

The comment suggests revisions to MM-AQ-1 to strengthen the measure. MM-AQ-1 in the Draft EIR has been updated to change the engine horsepower criteria from 75 down to 50 per the suggested revisions in this comment. As indicated in the first paragraph of MM-AQ-1, this measure would be enforced by the applicable jurisdiction via the grading permit issuance, not bid documents, purchase orders, and contract with contractors. The Specific Plan is a programmatic document and the Lead Agency or Responsible Agencies would not be in control of all the future bid documents, purchase orders, or contract with contractors during future development of the Northside Specific Plan. To provide reliable enforceability, the grading permit issuance is the appropriate mechanism for this mitigation measure.

The comment provides strikethrough and underline revisions to MM-AQ-1. Refer to response to Comment A7-6.

The comment recommends that the Lead Agency require the use of electric or alternative -fueled construction equipment and cleaner trucks during construction in the Final EIR. Refer to response A7-6, and the associated incorporation of the additional requirements pertaining to lower emission construction equipment into MM-AQ-1 in the Final EIR Chapter 3, Errata. It is noted that all future development within the Northside Specific Plan would continue to be required to comply with the applicable air quality regulations in place at that time, including any regulations enforced by the South Coast Air Quality Management District.

<p>A7-9</p>	<p>The comment recommends that construction equipment be electric or alternative-fueled (i.e., non-diesel). The comment provided a link on companies and electric powered equipment. MM-AQ-1 has been revised to incorporate AQMD's recommendation. Refer to the Final EIR, Chapter 3, Errata.</p>
<p>A7-10</p>	<p>The comment recommends the use of zero-emissions (ZE) or near-zero emissions (NZE) on-road vehicles during construction, and trucks with natural gas engines. These measures have been incorporated into MM-AQ-1. However, it is noted that the future implementation may not always be the responsibility of the Lead Agency, as the Northside Specific Plan includes areas within other jurisdictions such as the County of Riverside and City of Colton. As such, the language was modified. Refer to the Final EIR, Chapter 3, Errata. Refer to EIR Section 3.2.5.</p>
<p>A7-11</p>	<p>The comment states that NZE heavy-duty truck engines are commercially available and provide options the Lead Agency could use. The comment provides example of available NZE heavy-duty truck that are currently available. MM-AQ-1 has been revised to include AQMD's recommendation regarding NZE heavy trucks. Refer to the Final EIR, Chapter 3, Errata. Refer to response to Comment A7-10.</p>
<p>A7-12</p>	<p>The comment explains the adoption of the 2016 Air Quality Management Plan and what it entails. The comment indicates that using ZE heavy-duty trucks would fulfill the Lead Agency's obligation to mitigate projects' impacts. The comment recommends projects use cleaner trucks during construction. MM-AQ-1 has been revised to include AQMD's</p>

Response to Comments

recommendation regarding cleaner trucks. Refer to response to Comment A7-10.

A7-13

The comment states that if cleaner trucks are not commercially available today, they will become feasible in the near future. As the proposed project would take place over a 20-year period, the Lead Agency acknowledges that cleaner trucks are increasingly more feasible and commercially available as technology advances over the life of the project period. However, it is not feasible to identify or predict future technology advances for the next 20 years. It would be speculative to address future technology or the associated reduction in emissions, nor could the Lead Agency (City of Riverside) enforce this within the City of Colton or County of Riverside. As such, it would not be possible to show that the future technology changes in emissions would be roughly proportional to the impact. As indicated in response to Comment A7-6, this is a programmatic document and the City is not in control of future construction bid packages or requests for proposals for individual projects to be implemented, nor can the City predict the projects that will be forthcoming. Overall, the suggested measures may not be practical or appropriate depending on the project. However, the City commits to continually ensure that projects in the Specific Plan area are using the new technology as such changes and evolves to reduce air quality. It is also noted that all future development within the Northside Specific Plan would continue to be required to comply with the applicable air quality regulations in place at that time, including any regulations enforced by the South Coast Air Quality Management District.

As projects are developed over the 20-year plan, future project proponents/owners would submit applications for approval from the applicable jurisdiction. Applicable Conditions of approval would be required by the jurisdiction prior to grading permit issuance to minimize air quality impacts from

May 19, 2020

Jay Fishman:

Implementation of the Proposed Project contributes to Basin-wide NOx emissions. Requiring the use of ZE heavy-duty trucks supports South Coast AQMD's efforts to attain state and federal air quality standards as outlined in the 2016 AQMP, specifically for NOx emissions reductions. Requiring the use of ZE heavy-duty trucks also fulfills the Lead Agency's legal obligation to mitigate the Proposed Project's significant construction air quality impacts and complies with CEQA's requirements for mitigation measures. Therefore, South Coast AQMD staff recommends that the Lead Agency commit to the use of cleaner trucks during construction (e.g., material delivery trucks and soil import/export).

Technology is transforming the environmental sector and land use planning at a rapid pace. Cleaner trucks are increasingly more feasible and commercially available as technology advances. If using cleaner trucks as a mitigation measure to reduce the Proposed Project's construction air quality impacts is not feasible today, cleaner trucks could become feasible in a reasonable period of time within the lifetime of the Proposed Project (CEQA Guidelines Section 15364). Since the Proposed Project will be implemented over a 20-year period, the Lead Agency should take this opportunity to develop a process with performance standards to assess the feasibility of and deploy the lowest emission technologies for use at the Proposed Project and incentivize the use of ZE heavy-duty trucks throughout the life of the Proposed Project (CEQA Guidelines Section 15126-4(a)). The Lead Agency can and should develop performance standards as follows or any other comparable standards in the Final Program EIR.

- Develop a minimum amount of ZE heavy-duty trucks that the Proposed Project must use each year to ensure adequate progress. Include this requirement in the Construction Bid Package.
- Establish a contractor/truck operator(s) selection policy that prefers owner/operator(s)/truck operators who can supply ZE heavy-duty trucks at the Proposed Project. Include this policy in the Request for Proposal for selecting contractor(s)/truck operator(s).
- Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks during construction.
- Develop a project-specific review and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks during construction.

3. South Coast AQMD Rule 403(e)
 The Lead Agency included a discussion of general compliance with South Coast AQMD Rule 403 – Fugitive Dust in the Draft Program EIR. Since the Proposed Project is a large operation of approximately 2,000 acres¹¹, 50-acre sites or more of disturbed surface area, or daily earth-moving operations of 3,850 cubic yards or more on three days in any year in the South Coast Air Basin, the Lead Agency is required to comply with Rule 403(e) – Additional Requirements for Large Operations¹². Additional requirements may include, but are not limited to, Large Operator Notification (Form 403-N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class¹³. Therefore, South Coast AQMD staff recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 403(e) in the Final Program EIR. Compliance with South Coast Rule 403(e) will further reduce regional and localized emissions from particulate matters during construction.

¹¹ Draft Page 33-39
¹² Draft Page 15-21
¹³ South Coast AQMD Rule 403-N, Large Operator Notification, accessed at <http://www.scaqmd.gov/docucenter/403n.pdf>
¹⁴ South Coast AQMD Compliance and Enforcement Staff's comment information for Rule 403(e) Large Operations in 1997 (Sca-2008-06-by-e-mail) @ discuss@scaqmd.gov.

A7-12 Cont.

A7-13

A7-14

A7-15

Response to Comments

construction activities, as indicated in MM-AQ-1. As required by CARB and SCAQMD regulations, it is noted that future individual projects will be required to meet the applicable CARB and SCAQMD requirements in effect at that time for construction activities but not less than the mitigation measure contained herein.

A7-14

As discussed previously, the Lead Agency or Responsible Agency would not issue bid documents, purchase orders or contracts for the various individual projects that may occur in the future within the Northside Specific Plan. Applicable Conditions of approval would be required by the jurisdiction prior to grading permit issuance to minimize air quality impacts from construction activities, as already indicated in MM-AQ-1. Future individual projects would continue to be required to meet the applicable CARB and SCAQMD requirements for construction activities and vehicles at the time of construction but not less than the mitigation measure contained herein.

A7-15

The comment states that the Lead Agency is required to comply with Rule 403(e) – Additional Requirements for Large operations. The comment recommends that the Final EIR include a discussion that demonstrates compliance with the aforementioned rule.

To clarify, the Specific Plan is a programmatic document that covers about 2,000 acres but does not propose grading 2,000 acres as a single project. As individual projects come forward within the SPA, each project would be subject to the South Coast AQMD Rule 403. As defined by AQMD Rule 403, Large Operations means any active operation on property which contains 50 or more acres of disturbed surface area; or any earth-moving operations with a daily earth-moving throughput

Response to Comments

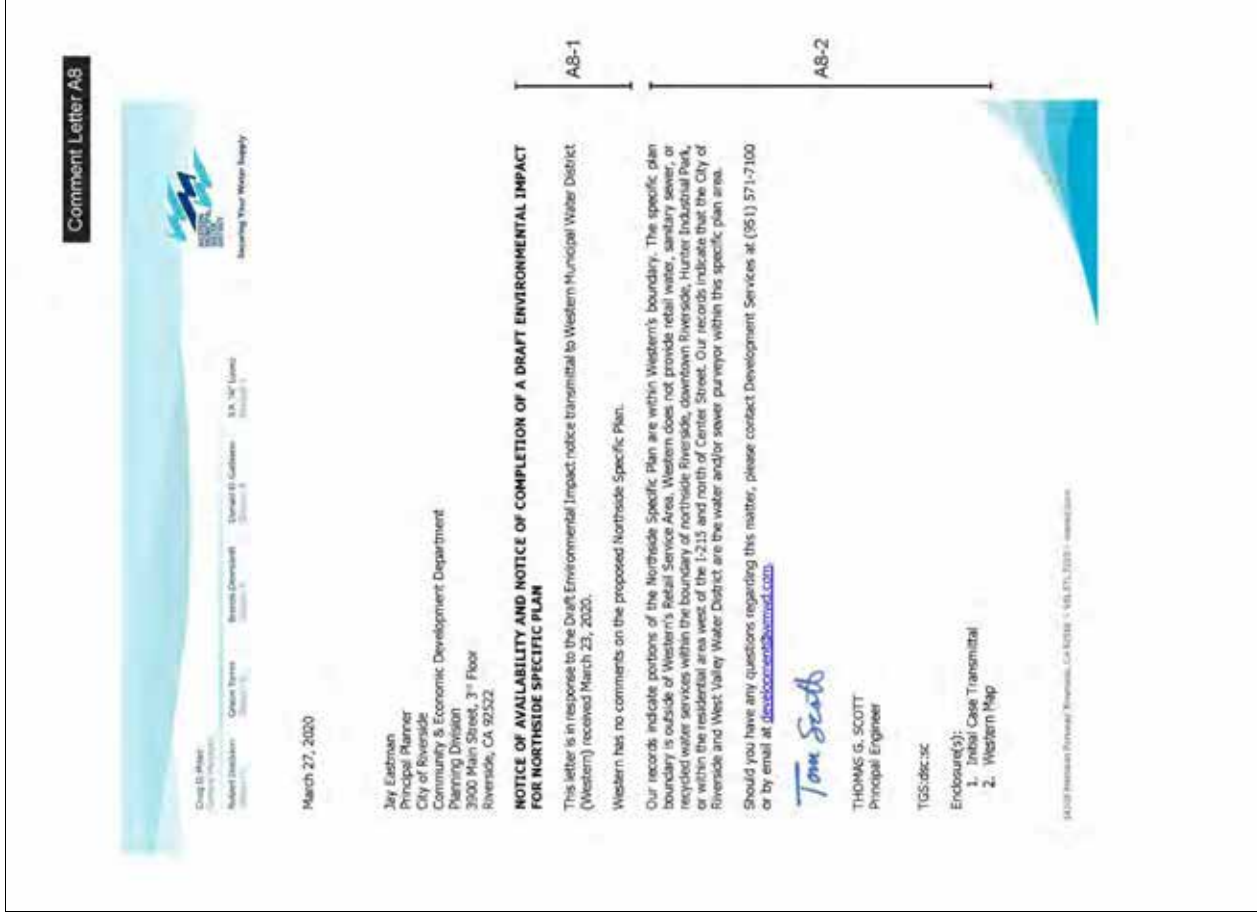
volume of 3,850 cubic meters (5,000 cubic yards) or more three times during the most recent 365-day period.

Response to Comment Letter A8

**Western Municipal Water District (WMWD)
Thomas G. Scott, Principal Engineer
March 27, 2020**

A8-1 The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

A8-2 The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.





NOTICE OF AVAILABILITY and NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT

Northside Specific Plan

Comment Review Period – Thursday, March 26, 2020 to Monday, May 25, 2020

State Clearinghouse No. 2019039168

Pursuant to Title 84 of the California Code of Regulations, Chapter 2, Section 15097, the notice is to advise that the project has been approved for funding, modifications or availability of a Draft Environmental Impact Report (EIR). State Clearinghouse No. 2019039168, for the project as described below.

PROJECT TITLE: Riverside Specific Plan (SP) (SP) 18, located in the Northside

The approximately 2,000-acre Northside Specific Plan Area (SPA) is located in the Northside area of Riverside, California (the "Project"). The SPA is bounded by the Orange River to the north, the California State Route 78 to the east, and approximately 1,000 acres within the City of Riverside, approximately 335 acres within the City of Colton, and approximately 63 acres within unincorporated County of Riverside. Within the City of Colton area of the SPA, 227 acres (the "Pellissier Ranch tract") are owned by Riverside Public Utilities (RPU). Locally, the SPA is southwest of La Brea and east of downtown Riverside, west of Peacor Industrial Park, and east of the Santa Ana River. The SPA includes approximately 1,200 acres of residential, commercial, and industrial uses. The SPA is generally east-west across the southern area of the SPA. The SPA is located on the S.S. Geographical Survey (07090) 7.5-minute bars Fremont, Riverside East, and San Bernardino South quadrangles.

The SPA encompasses land within three distinct neighborhoods within the City of Riverside: the Northside, downtown Riverside, and North Industrial Park. The SPA also includes an area of residential properties within the City of Riverside's Sphere of Influence (SOI). Located in unincorporated areas of the County of Riverside to the west of 121st and north of Center Street.

PROJECT DESCRIPTION: The project consists of the Northside Specific Plan, the Northside Specific Plan document (including an introduction, planning context, planning framework, land use, mobility, and infrastructure strategies). The Northside Specific Plan is intended to provide guidance for future development of the Northside Neighborhood. The Northside Specific Plan includes land use designations and aims to and meet the vision for the Northside. Major elements of the Northside Specific Plan include: Northside Specific Plan (NSP), Northside Specific Plan (NSP) 18, Northside Specific Plan (NSP) 19, Northside Specific Plan (NSP) 20, Northside Specific Plan (NSP) 21, Northside Specific Plan (NSP) 22, Northside Specific Plan (NSP) 23, Northside Specific Plan (NSP) 24, Northside Specific Plan (NSP) 25, Northside Specific Plan (NSP) 26, Northside Specific Plan (NSP) 27, Northside Specific Plan (NSP) 28, Northside Specific Plan (NSP) 29, Northside Specific Plan (NSP) 30, Northside Specific Plan (NSP) 31, Northside Specific Plan (NSP) 32, Northside Specific Plan (NSP) 33, Northside Specific Plan (NSP) 34, Northside Specific Plan (NSP) 35, Northside Specific Plan (NSP) 36, Northside Specific Plan (NSP) 37, Northside Specific Plan (NSP) 38, Northside Specific Plan (NSP) 39, Northside Specific Plan (NSP) 40, Northside Specific Plan (NSP) 41, Northside Specific Plan (NSP) 42, Northside Specific Plan (NSP) 43, Northside Specific Plan (NSP) 44, Northside Specific Plan (NSP) 45, Northside Specific Plan (NSP) 46, Northside Specific Plan (NSP) 47, Northside Specific Plan (NSP) 48, Northside Specific Plan (NSP) 49, Northside Specific Plan (NSP) 50, Northside Specific Plan (NSP) 51, Northside Specific Plan (NSP) 52, Northside Specific Plan (NSP) 53, Northside Specific Plan (NSP) 54, Northside Specific Plan (NSP) 55, Northside Specific Plan (NSP) 56, Northside Specific Plan (NSP) 57, Northside Specific Plan (NSP) 58, Northside Specific Plan (NSP) 59, Northside Specific Plan (NSP) 60, Northside Specific Plan (NSP) 61, Northside Specific Plan (NSP) 62, Northside Specific Plan (NSP) 63, Northside Specific Plan (NSP) 64, Northside Specific Plan (NSP) 65, Northside Specific Plan (NSP) 66, Northside Specific Plan (NSP) 67, Northside Specific Plan (NSP) 68, Northside Specific Plan (NSP) 69, Northside Specific Plan (NSP) 70, Northside Specific Plan (NSP) 71, Northside Specific Plan (NSP) 72, Northside Specific Plan (NSP) 73, Northside Specific Plan (NSP) 74, Northside Specific Plan (NSP) 75, Northside Specific Plan (NSP) 76, Northside Specific Plan (NSP) 77, Northside Specific Plan (NSP) 78, Northside Specific Plan (NSP) 79, Northside Specific Plan (NSP) 80, Northside Specific Plan (NSP) 81, Northside Specific Plan (NSP) 82, Northside Specific Plan (NSP) 83, Northside Specific Plan (NSP) 84, Northside Specific Plan (NSP) 85, Northside Specific Plan (NSP) 86, Northside Specific Plan (NSP) 87, Northside Specific Plan (NSP) 88, Northside Specific Plan (NSP) 89, Northside Specific Plan (NSP) 90, Northside Specific Plan (NSP) 91, Northside Specific Plan (NSP) 92, Northside Specific Plan (NSP) 93, Northside Specific Plan (NSP) 94, Northside Specific Plan (NSP) 95, Northside Specific Plan (NSP) 96, Northside Specific Plan (NSP) 97, Northside Specific Plan (NSP) 98, Northside Specific Plan (NSP) 99, Northside Specific Plan (NSP) 100.

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Use of this project is subject to the project's compliance with the California Environmental Quality Act (CEQA) to allow for continued implementation of the existing project with the proposed changes. The project is subject to the CEQA process and the project is subject to the CEQA process and the project is subject to the CEQA process.

ENVIRONMENTAL FACTORS SUBSTANTIALLY AFFECTED: The Draft EIR addressed that even with feasible mitigation measures, the Riverside Specific Plan would result in significant impacts to Air Quality, Biological Resources, Cultural Resources, Geology and Seismicity, Noise and Vibration, Public Utilities, and Visual Quality. Impacts to Air Quality, Biological Resources, Cultural Resources, Geology and Seismicity, Noise and Vibration, and Visual Quality would be significant and would require mitigation measures. As a result, adoption of a Subsequent Environmental Impact Statement will be required in order for the Project to be approved.

PUBLIC REVIEW PERIOD: The Draft EIR is available for public review and comment beginning Thursday, March 25, 2021 and ending Monday, May 24, 2021. A copy of the Draft EIR and executive summaries are available for public review on the following website: <https://www.ci.riverside.ca.gov/ceqa/20210325/20210524>.

Due to current Covid-19 guidelines from the California Department of Public Health, and the current status of government facilities, the public review period is 60 days. Copies of the Draft EIR will be made available for public viewing at the following City facilities when they return to normal hours of operation: (1) Riverside City Hall, Community & Economic Development Department, 3000 Main Street, Riverside, CA 92503; (2) Riverside Public Library, Arlington Branch, 4556 Magnolia Avenue, Riverside, CA 92503. Questions related to Draft EIR availability should be directed to the project contact. Responses to this Draft EIR will be given to the Air Quality Management Plan in writing on or after Thursday, May 25, 2021, by e-mail or post at the following address:

LEAD AGENCY:
 City of Riverside
 Community & Economic Development Department
 3000 Main Street, 3rd Floor
 Riverside, California 92502
 Aisha Jay Mathman, Project Planner
 951.338.5584
 mathman@ci.riverside.ca.gov

PUBLIC HEARING: Notification of the date, time and place of future public hearings will be provided in compliance with City and California Environmental Quality Act (CEQA) requirements.

INDIVIDUALS WITH DISABILITIES: There are two sites within the project's Plan Area that are on the County List of Impaired Areas. The project is subject to the CEQA process and the project is subject to the CEQA process. The project is subject to the CEQA process and the project is subject to the CEQA process. The project is subject to the CEQA process and the project is subject to the CEQA process.

NOTES: It should be noted that the project will be reviewed by the Riverside County Airport Land Use Commission for a determination of consistency with the Riverside Municipal Airport Land Use Compatibility Plan. In addition, Project Construction has been submitted, and its own environmental impact report is being prepared.

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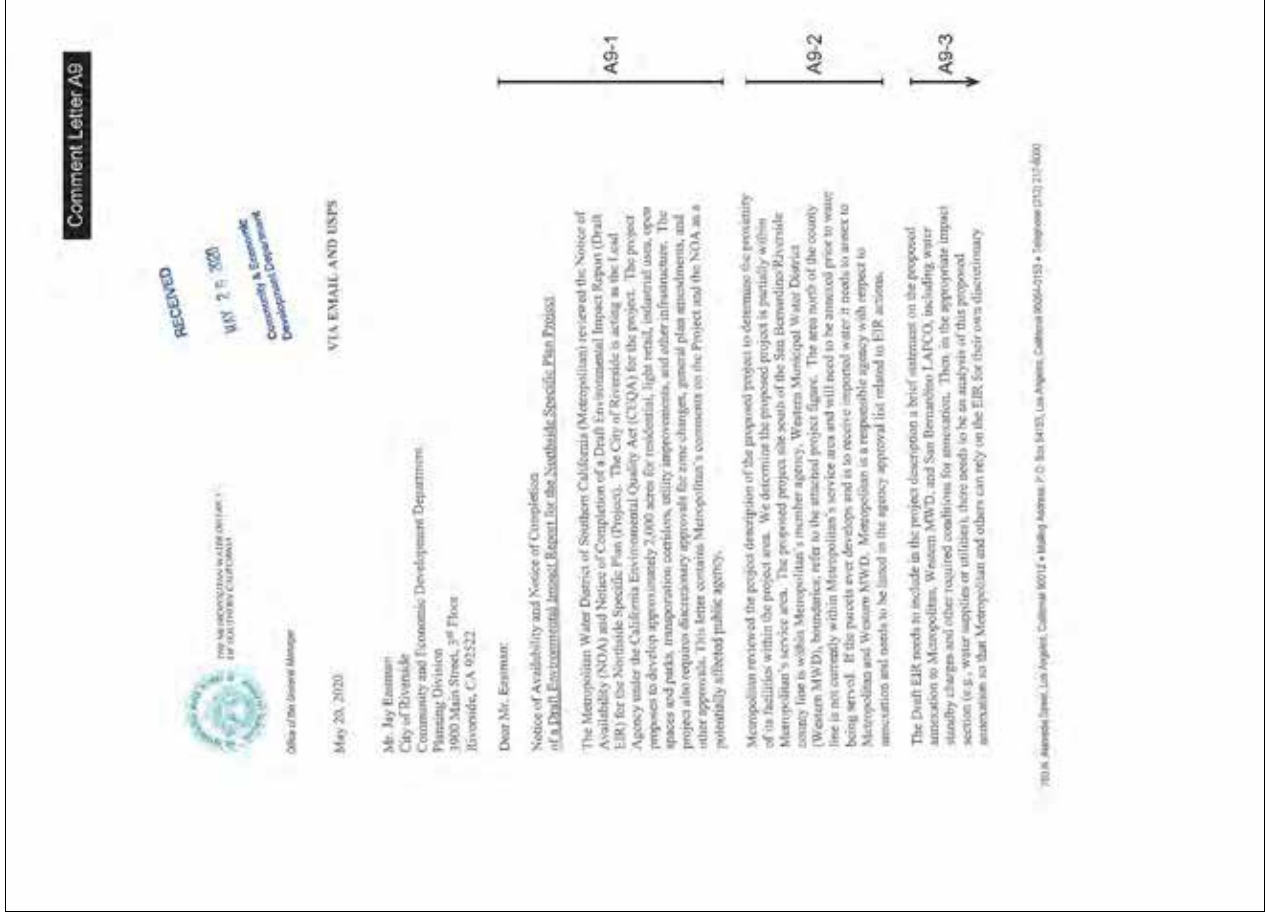
Response to Comment Letter A9

Municipal Water District (MWD)
 Sean Carlson, Team Manager – Environmental Planning Section
 May 26, 2020

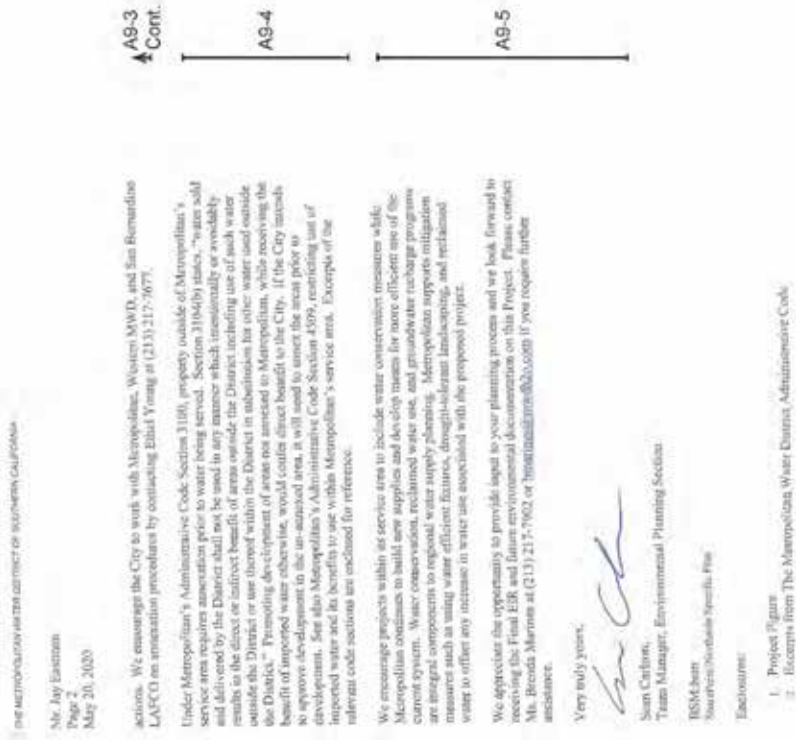
A9-1 The comment provides an introduction to the comment letter and a brief description of the Northside Neighborhood and Pellissier Ranch Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

A9-2 The comment states that the project is partially within MWD's service area and that the area north of the county line is not currently within the MWD's service area and would need to be annexed. Additionally, if parcels are developed and are to receive imported water they need to be annexed to MWD and WMWD. MWD states that they need to be listed in the agency approval list related to EIR actions. The area in question is within the City of Colton, and the City of Colton is anticipated to provide water service to that area. Refer to Draft EIR Section 3.17, Utilities and Service Systems, for additional details.

A9-3 The comment states that the EIR needs to include in the project description a statement on the proposed annexation to MWD, WMWD, and San Bernardino LACFO. As indicated above, the area suggested for annexation by MWD would be served by the City of Colton; therefore, no annexation into MWD is necessary.



<p>A9-4</p>	<p>The comment states that under MWD's Administrative Code Section 3100, properties outside service areas requires annexation prior to water being served. The comment recommends annexation of areas not already annexed to MWD. Refer to response A9-3.</p>
<p>A9-5</p>	<p>The comment recommends including water conservation measures, such as water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset increased water use associated with the Specific Plan. The City of Riverside Municipal Code and City of Colton Municipal Code require water conservation measures, as detailed in Draft EIR Section 3.17.2. Future projects implemented under the Specific Plan would be required to comply with these existing regulations, as well as Title 24 and Building Code regulations in effect at the time pertaining to water conservation (see CM-AQ-3). The comment does not raise any issue concerning the adequacy of the Draft EIR, and for that reason, provides no further response to this comment.</p>



THE METROPOLITAN WATER DISTRICT OF CALIFORNIA (MWD)

Mr. Jay Eastman
Page 3
May 20, 2020

cc: Samuel Morales
Executive Officer
San Bernardino LAPCO
smorales@sbapco.org
Military Gardens
Water Resources Specialist
Western Municipal Water District
mwd@wmd.com

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Exempts from The Metropolitan Water District Administrative Code

§ 3104. Mandatory Terms and Conditions.

All terms and conditions of association shall contain the following provisions:
(b) The sale and delivery of all water by the District, regardless of the nature and time of use of such water, shall be subject to regulations promulgated from time to time by the District.

(b) Except upon terms and conditions specifically approved by the Board, water sold and delivered by the District shall not be used in a manner which is injurious or avoidably outside of the direct or indirect benefit of areas within the District (including use of such water outside the District or use thereof within the District in substitution for other water used outside the District).

(c) No District water shall be sold or delivered to any member public agency for use, directly or indirectly, for agricultural purposes as defined in Section 4104 within the irrigating area.

(d) The District shall not be obligated to provide additional works or facilities, reconstructed by the irrigating area, for the delivery of water from works owned and operated by the District.

(e) The association shall be completed by the date established pursuant to

Section 3108(b).

147 West Center Street, Suite 1000, Westborough, MA 01581

§ 4309. Water Restricted to Use Within the District.

In order to assure that water served by the District is not used for the direct or indirect benefit of areas outside the District, the amount of water served by the District's facilities that shall be made available to any member public agency shall be limited to an amount equal to that required for uses within the area of the District lying within, or served by or through, such member public agency. No area lying outside the boundaries of the District shall be served with water from the District's facilities, except as service to such area may, when found to be such by the Board, be a reasonably unavoidable incident to the service of such water within the District, and under such circumstances the amount of water served by the District that shall be made available to any member public agency shall be limited to an amount equal to that required for uses within the area of the District lying within, or served by or through, such member public agency. Any question of fact involved in the application of this Section 4309 shall be finally determined by the Board after giving the member public agency concerned adequate opportunity to present pertinent factual evidence and the views of such member public agency.

Revised 11/21/04 and 04/04, 7/04 - 04/04, 12/07/07 amended by M.A. 05/04/07, March 04, 2004. Section 3221a amended and Section 4309 adopted by M.A. 03/04 - January 25, 1997. Effective April 1, 1997.

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Response to Comment Letter T1

Rincon Band of Luiseno Indians
Cheryl Madrigal, Cultural Resources Manager
April 22, 2020

T1-1 The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; thus, no revisions to the Draft EIR are required.

Comment Letter T

Dear J&J,
Please see attached response letters above mentioned project. If you have any questions or comments, please contact us.
Thank you for the opportunity to protect our cultural assets.



T-1



Cheryl Madrigal
Cultural Resources Manager
 Tribal Historic Preservation Officer
 Cultural Resources Department
 Rincon Band of Luiseno Indians
 10165 Torres Road | Valley Center, CA 93582
 Office: 762-237-2635 ext 1131 | Cell: 762-707-6485-3000
 Email: cmadrigal@rindocs.net



This message is limited only for the use of the individual or entity to which it is addressed. If the sender of this message is not the intended recipient, or the message is sent in error, the recipient should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake.

<p>T1-2</p>	 <p>Rincon Band of Luiseño Indians CULTURAL RESOURCES DEPARTMENT One Environmental Center Lane, Valley Center, CA 92082 (760) 749-1831 Fax: (760) 749-8001 rincon-son.gov</p> <p>April 22, 2020</p> <p>Sent via email: JLairman@riversidca.gov City of Riverside Jay Lairstein 3000 Main Street Riverside, CA 92522</p> <p>Re: Northside Neighborhood Specific Plan, State Clearinghouse No. 2019039168</p> <p>Dear Mr. Eastman,</p> <p>This letter is written on behalf of Rincon Band of Luiseño Indians, ("Rincon Band" or "Band"), a federally recognized Indian Tribe and sovereign government. Thank you for providing us with the Notice of Availability and Notice of Completion of a Draft Environmental Impact Report (DEIR) for the above referenced project. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic Interest.</p> <p>From the provided documents and today's phone consultation, the Band understands that the Mitigation Measures in the DEIR will serve as guidance and that throughout project-based consultation further mitigation measures can be implemented to protect Tribal Cultural Resources (TCR). We have no further comments or concerns regarding this project and can conclude consultation at this time.</p> <p>The Rincon Band reserves its right to continue to fully participate in the environmental review process. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2035 or via electronic mail at cmadrigal@rincon-son.gov.</p> <p>Thank you for the opportunity to protect and preserve our cultural assets.</p> <p>Sincerely,</p>  <p>Cheryl Madrigal Tribal Historic Preservation Officer Cultural Resources Manager</p> <p>Bo Mazzoni, Chairman Talmall Turner, Vice Chair Laorne E. Gonzalez, Council Member Alfonso Kells, Sr., Council Member John Constantino, Council Member</p>
<p>T1-3</p>	<p>T-2</p> <p>T-3</p> <p>T-4</p>
<p>T1-4</p>	

The comment introduces the Rincon Band of Luiseño Indians. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR; thus, no revisions to the Draft EIR are required. The comment has been included in the Final EIR for review and consideration by the City.

The letter indicates that there are no comments to be made at this time. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; thus, no revisions to the Draft EIR are required. The comment has been included in the Final EIR for review and consideration by the City.

The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; thus, no revisions to the Draft EIR are required. The comment has been included in the Final EIR for review and consideration by the City.

Response to Comment Letter O1

Citizens United for Resources and the Environment (CURE)

Malissa Hathaway McKeith

May 26, 2020


O1-1 The comment introduces what CURE is and their involvement in the public review process of the project. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

O1-2 The comment states that their comments will not trigger recirculation of the Draft EIR, and suggested Mitigation Measures (MMs) (details on MMs presented further in the comment letter). The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project. This is an introductory comment, and the detailed responses to each comment are provided below.

O1-3 The comment states that the project should be used to promote a sustainable, healthier community. This is not a comment on the adequacy of the environmental document; however, key elements addressed in the Draft Specific Plan include developing healthy communities by creating amenities such as parks, open space, and trails. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the Specific Plan.

O1-4 The comment recommends the Riverside Public Utilities (RPU) use City land for renewable energy production. Comment

Comment Letter O1



Citizens United for Resources and the Environment

May 26, 2020
COMMENTS ON RIVERSIDE NORTHSIDE SPECIFIC PLAN

O1-1

O1-2

O1-3

O1-4

To Whom This May Concern:

Citizens United for Resources and the Environment (CURE) is a public non-profit whose mission involves ensuring accountability by government officials making long term decisions affecting natural resources and land use. CURE appreciates the opportunity to comment on the draft Environmental Impact Report (DIR) for the North Side Specific Plan ("Specific Plan" or "Plan"). CURE has watched several of the public meetings concerning the Specific Plan and more recently commented at a hearing supporting a moratorium against large warehouse and distribution projects generating more traffic and air quality impacts in an area already burdened by high rates of poverty and pollution. CURE supports that moratorium and urges council as part of this Plan to permanently accept such restrictions.

CURE's comments will not trigger recirculation of the DIR as the proposed ideas and mitigation measures proposed (DIR) aimed at reducing increased negative impacts from accidental development (particularly industrial or manufacturing development) to be either short term, generic or aspirational at best and thus really would not benefit the public.

Providing greater resilience and improving the health and quality of life of the residents of the Northside is long overdue. The Plan and City should promote projects and goals that reduce the already unhealthy burdens caused by the proximity of this area to industries I1 and 60 as well as Riverside's inability to control industrial land use of Colton. The current Specific Plan and DIR fall far short of improving the health of the community. Rather, it mostly focuses on mitigating increased pollution from new developments and traffic and, in fact, acknowledges that many affects cannot be fully mitigated thus necessitating the adoption of a statement of overriding consideration.

The goal of the City - on this plan and other future land use decisions - should be to improve the environment, health and quality of life. The recent COVID-19 pandemic highlights how health outcomes in minority and lower income areas are substantially worse relative to wealthier areas, and that these outcomes can be linked directly to pollution. COVID is a wakeup call that affirmative steps should be adopted to reverse those negative trends. The Northside Specific Plan should be utilized as a vehicle to promote a more sustainable, healthier community.

A Utilization of Public Lands for Renewable Energy Production

The Riverside Public Utilities (RPU) owns assets within the Northside Specific Plan area that should be utilized to meet the City's renewable energy requirements growing locally produced and

curegroup.org (213) 300-3550 malissac@rpsu@gmail.com 2873 Rumsey Dr, Riverside CA 92506

Response to Comments

suggests Pellissier Ranch property is suitable for solar production. The comment provides links and information on the benefit of renewable energy. The Specific Plan does not alter the ability to implement future solar energy developments. The Draft EIR addresses energy usage in Section 3.5, Energy, and no significant impact related to energy was identified. As such, no energy-related mitigation is warranted. This is not a comment on the adequacy of the environmental document. The comment has been included in the Final EIR for review and consideration by City.

O1-5

The comment recommends that the City includes zoning that prohibits large warehouses and distribution in the SPA. The comment provides links and information on the disadvantages of warehouses within a community. The environmental document discusses health and environmental impacts of the Specific Plan, including vehicle emissions mentioned in this comment (see Draft EIR Section 3.2, Air Quality, and Draft EIR Section 3.8, Hazards and Hazardous Materials). In order to ensure industrial development is compatible with and sensitive to the surrounding land uses, the Northside Specific Plan has been revised to allow warehouses in industrial zones as follows: warehouses up to 10,000 square feet are permitted as a matter of right or with a Minor Conditional ; warehouses between 10,000 and 100,000 square feet require a Minor Conditional Use Permit; and warehouses larger than 100,000 square feet require a Conditional Use Permit. The Minor Conditional Use Permit and Conditional Use Permit are discretionary processes and require approval by the Development Review Committee and Planning Commission, respectively. This is not a comment on the adequacy of the environmental document. None-the-less, the opinion of the commenter is noted. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the Specific Plan.



hence more resilient production. Renewable energy production results in virtually no additional admissions and minor impacts during construction that can be integrated to non-significance. A properly designed solar project also can include agriculture can be integrated into solar projects.

The benefits and appropriateness of renewable development are indisputable. In addition to the regulatory mandates, building renewables locally minimizes reliance on large scale transmission and provides backup in the event of emergencies on the SCE distribution line. Forecasted increases in the frequency and the intensity of fires, extreme high temperature events will lead to more intense usage of air conditioning during hotter months. Moreover, customer demands will be further exacerbated by predicted growth as well as global warming. First world electric supporting the viability of these conditions has already begun to appear. For example, in 2015 the weather adjusted system peak load within the Los Angeles Department of Water and Power service territory was 3,674 MW. On August 3, 2017, however, a new record peak load was established at 6,302 MW, an increase of 72% over a period of just two years.

<https://www.enr.com/resources/slideshows/2018/11/08/water-2018-report-3-3055146-ccc048-2018>
<https://www.foxnews.com/energy/2018/08/03/los-angeles-water-usage/>

The Pellissier Ranch property is ideally suited for solar production. Such a project would not result in additional truck traffic or emissions, would provide the City with more reliable energy, and would generate energy savings for IRU since it would not be required to purchase energy from further distances.

b. Adding Warehouses to Poor Communities is Inequitable and Counterproductive

In contrast, proposed ideas like building warehouses or small research and development businesses have adverse environmental and health impacts and uncertain economic benefits. Minority and economically disadvantaged neighborhoods significantly more warehouses than white neighborhoods, after controlling for household income, land rent and many other variables.

<https://theupside.usf.edu/newsroom/blogger/warehouses-as-an-environmental-justice-issue>

Though warehouses increase some jobs, the cost is too high and the erosion of those jobs questionable. First, Moreno Valley has permitted millions of square feet of warehouses as competition. Second, the mechanization of warehousing means that jobs today are not guaranteed tomorrow. A study from Oxford University in 2013 estimated that 47% of US jobs are at risk due to automation, many of which being associated with warehousing. Third, communities like the Northside already are negatively impacted by truck and diesel emissions. Households earning less than \$20,000 a year and people who don't own cars suffer from vehicle pollution levels at a rate about 20% higher than the California average, with African Americans and Latinos breathing about 40% more particulate matter from cars, trucks, and buses than white Californians. Additionally, San Bernardino already has the 2nd highest population-weighted particulate matter exposure, after Los Angeles, with just under 340% of the state average, with Riverside trailing closely behind in 8th.

<https://www.information.org.uk/downloads/academic/future-of-employment.pdf>

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O1-4 Cont.

O1-5

O1-6

The comment recommends that the Specific Plan implement measures to limit truck traffic on City of Riverside streets and implementing freeway and roadside vegetation barriers. The comment provides links and information on particle pollution in cities. Consistent with this recommendation, it is a project objective to “Eliminate or minimize truck traffic through residential and commercial neighborhoods” (see Draft EIR page 2-7). The Specific Plan was designed to include traffic calming measures to meet this objective, as discussed on Draft EIR pages 2-13 and 2-17. Such traffic calming measures include landscaped parkways along Main Street and Center Street, between the roadway and sidewalks. These landscaped parkways would serve as a buffer between pedestrians/bicyclists and vehicles, as well as to sequester carbon emissions from vehicles. The environmental document discusses health and environmental impacts of the Specific Plan, including ozone and particulate matter pollutants mentioned in this comment (see Draft EIR Section 3.2, Air Quality, and Draft EIR Section 3.8, Hazards and Hazardous Materials). This is not a comment on the adequacy of the environmental document. None-the-less, the opinion of the commenter is noted. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the Specific Plan.

O1-7

The comment states that the EIR did not analyze how warehouse developments correlates with high pollution and the amount of severe cases of COVID-19. The comment states that persons living within 500 meters of a highway have higher risks of developing multiple adverse health conditions.

While each potential strain of virus (such as COVID-19) was not addressed in the Draft EIR, the EIR adequately disclosed the

CARE Citizens United for Resources and the Environment

https://www.uscra.org/sites/default/files/attachment/2015/02/05/air_poll_top_CA_web.pdf

The City should include zoning that prohibits large warehouse and distribution in the Northside.

c. The North Side Specific Plan should implement traffic mitigation measures in order to limit the effects of traffic, by limiting to the extent legal truck traffic on City streets and implementing freeway and roadside vegetation barriers.

The American Lung Association, in its State of the Air 2019 report, found that too many cities across the nation increase the number of days when particle pollution soared to either record-breaking levels. More cities suffered from higher numbers of days when ground-level ozone reached unhealthy levels, and many cities saw their year-round levels of particle pollution increase as well. Notably, Riverside County was found to be the 15th most polluted by short-term particle pollution in the nation with 13.2 days in the unhealthy range between 2015-2017, receiving an F from the ALC.

<https://www.aqla.org/state-air-quality-report-2019>

One issue not analyzed in the DEIR relating to potential warehouse developments is the recognized correlation between areas with high pollution and the amount of severe cases of COVID-19. In England, studies have emerged concluding that the levels of some air pollutants are linked to COVID-19 cases and mortality. Even without a global pandemic, adding to the death toll, polluted air already kills at least 7 million a year with an estimated 3,500 in California from diesel alone, with an estimated cost of \$16 billion a year and an additional \$3.5 billion associated with hospitalizations, treatments of illnesses, and lost workdays each year. The irony of locating the headquarters of the California Air Resources Board in Riverside and yet not promoting CARB's own recommendations should not be overlooked.

https://www.zamanzama.com/uploads/2020/04/04/15/air_poll_top_making_the_coronavirus_pandemic_sense_020520.pdf

Of particular relevance to the Northside, persons living within 500 meters of a highway risk developing COVID-19, pneumonia, death, heart attack, emphysema, lung function, poor cognition, and even dementia. The following residences outline both the impacts and the types of mitigation that should be adopted in the Specific Plan EIR.

https://www.uscra.org/sites/default/files/attachment/2015/02/05/air_poll_top_CA_web.pdf

d. The City should accelerate the planting of trees using reduced cost water.

Though the BPU recognizes that tree planting reduces temperature and improves air quality, its programs to promote these mitigation measures are nascent and must be expanded. BPU admittedly has excess water that must be "reasonably or beneficially used" or risk it being appropriated. Maintaining trees is a reasonable and beneficial use within Article X of the Constitution and is a policy advanced by

<https://www.ncb.com/about-us/andrew-phillips-373451>

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Response to Comments

potential health effects of the Specific Plan. As discussed in Draft Section 3.2, Air Quality, page 3.2-56, and EIR Appendix D, Northside Specific Plan Project – Health Effects from Criteria Air Pollutants, the EIR discloses that future development may result in a potentially significant health risk impact related to future operations of non-residential land uses near sensitive receptors (Impact AQ-8). In addition, criteria pollutants were identified as exceeding the significance thresholds that could result in health effects (see Draft EIR pages 3.2-55 to -57; Impact AQ-9). According to the Center for Disease Control (CDC), COVID-19 is a new disease and there is limited information regarding risk factors for severe disease, <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html>. Based on currently available information and clinical expertise, the CDC identifies the following population with higher risk of severe illness from COVID-19:

- People 65 years and older
- People who live in a nursing home or long-term care facility
- People of all ages with underlying medical conditions, particularly if not well controlled, including:
 - People with chronic lung disease or moderate to severe asthma
 - People who have serious heart conditions
 - People who are immunocompromised
 - Many conditions can cause a person to be immunocompromised, including cancer treatment,

Response to Comments

smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications

- People with severe obesity (body mass index [BMI] of 40 or higher)
- People with diabetes
- People with chronic kidney disease undergoing dialysis
- People with liver disease

While COVID-19 was not specifically analyzed within the AQ analysis, the Draft EIR includes analysis for health effects of criteria air pollutants and provides analysis of potential impacts that may lead to conditions leading to higher risk of server illness from COVID-19 as related to air quality. As discussed on Draft EIR pages 3.2-62 to 63, the Draft EIR identifies mitigation measures to reduce these impacts, including health risk siting, toxic air contaminant reduction, and health risk assessment requirements. Refer to Section 3.2, Air Quality, for additional details.

To clarify, the California Air Resources Board (CARB) recommended in its 2005 Air Quality and Land Use Handbook that residences, schools, and other sensitive land uses be sited at least 500 feet from freeways due to the association between traffic pollution and health. CEQA requires an assessment of the project impacts on the environment, and not the impacts of the environment to the project. The CARB recommendation of a 500-foot buffer from freeways is to avoid an impact of the environment on a project, not a project impact on the

Response to Comments

environment. The Draft EIR need not address an impact of the environment on the project, as suggested by this comment. The Draft EIR assess potential health effects of the project consistent with CEQA Guidelines. None-the-less, MM-AQ-11 has been revised to identify the need for a health risk assessment for future projects proposing a sensitive receptor within 500 feet of a high-volume (over 100,000 average daily trips) roadway consistent with the CARB recommendation.

Ultimately, this document was prepared before and presented for public comment at the beginning of the COVID-19 outbreak. The COVID outbreak was not a part of the baseline for this document, as it occurred after the NOD was issued.

01-8

The comment recommends that the City accelerate the planting of trees using reduced cost water. The comment provides links and information on the benefit of trees in a neighborhood.

As detailed in Section 3.2, page 3.2-29, the County of Riverside goal AQ 2.4 states "Consider creating a program to plant urban trees on an Area Plan basis that removes pollutants from the air, provides shade and decreases the negative impacts of heat on the air. (AI 114)" In addition, the City of Riverside General Plan 2025 includes Policy AQ-8.28, which states "Plant at least 1,000 trees in City parks and right-of-ways and encourage the planting of at least 3,000 shade trees on private property annually." Proposed mitigation also includes planting of trees, as shown in MM-AQ-1 and MM-AQ-7. Additional landscaping details are included in the Draft Specific Plan Land Use & Zone Description Table - City of Colton and Section 3.7 Design Standards for Development Edges Within the Northside Neighborhood. Thus, this comment does not

Response to Comments

present any new measures that could further reduce the air quality and energy consumption impact of future development allowed under the Specific Plan's.

O1-9

The comment provides more information on the benefit of trees. As detailed in Section 3.5, Energy, the Specific Plan would result in a less than significant impact related to energy. However, as presented in Section 3.2, Air Quality, it is noted that implementation of mitigation measure **MM-AQ-1** would reduce construction-related energy consumption. Implementation of the following air quality mitigation measures would reduce operational-related energy consumption: **MM-AQ-4**, **MM-AQ-5**, and **MM-AQ-6**.

The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

O1-10

The comment provides more information on the benefit of trees with regards to emission reduction. As detailed in Draft EIR Section 3.5, Energy, the Specific Plan would result in a less than significant impact related to energy. The use of shade trees is already included in **MM-AQ-6**. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.



the State of California. According to The Nature Conservancy (TNC) the average reduction of particulate matter (PM) near a tree is between 7% and 24%.
https://thouaia.hackensacknj.gov/~/media/2016/10/28/2017/25006513289-26af-448f-8024-8819c582726f205169945_00A_Report_FINAL.pdf

Tree planting also improves air quality by reducing temperatures and removing air pollutants. Trees further help to decrease energy consumption by lowering temperatures and shading buildings during summer. More recently, research has revealed how greenery in the form of trees and urban gardens help improve the mental health of individuals and how poorer communities disproportionately suffer because of the lack of greenery in many cities.
<https://www.nps.gov/subjects/urbanforest/resources/urbanforest.htm> *Tree Air Quality*

In the Inland Empire, trees and other green space may lower air temperatures 5-9 degrees with estimates of savings upwards of \$57 per every home with at least three 25ft trees providing shade. Trees planted throughout urban environments, and specifically the Inland Empire, provide a multitude of social benefits, including:

- Boost residential property values by 3-7%
- Abate noise by absorbing high-frequency noise
- Create wildlife habitat
- Reduce exposure to ultraviolet light, lowering risks of skin cancer and cataracts
- Encourage walking and more active lifestyles

https://www.fs.fed.us/news/urban_forestry/urban_forestry_topolinks/2/14tr_52.pdf

One modeling study estimated that the direct energy savings from shading alone by trees and vegetation could reduce carbon emissions in various U.S. metropolitan areas by roughly 1.5 to 5 percent. The study assumed that eight shade trees would be placed strategically around residential and office buildings and four around retail stores. As urban forests also contribute to air temperature reductions, the study found that there would be additional reductions in energy use and carbon emissions from those indirect effects as well. Similarly, a 2005 study found that about 15,000 levermoored street trees in Charlotte, North Carolina were responsible for an annual net reduction of over 1,500 tons of CO2. These benefits will worth about \$1.50 per tree, based on average carbon credit prices. Another study predicted that increasing the urban canopy of New York City by 10 percent could lower ground-level ozone by about 3 percent, which is significant, particularly in places needing to decrease emissions to meet air quality standards for the pollutant. In the summertime, generally 20 to 30 percent of the sun's energy reaches the area below a tree, with the remainder being absorbed by leaves and used for photosynthesis, and some being reflected back into the atmosphere. In winter, the range of sunlight transmitted through a tree is much wider—20 to 80 percent—because evergreen and deciduous trees have different wintertime foliage, with deciduous trees losing their leaves and allowing more sunlight through.

cuegroup.org (213) 300-3550 mallescurepro@gmail.com 2873 Rumsey Dr Riverside CA 92506

01-11

The comment recommends that the City implement the previous recommendations. Responses to such recommendations are provided in the responses above. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

CURE Citizens United for Resources and the Environment
https://www.curegroup.org/production/files/2012-05/06comments/responses_to_public_comments_04_2.pdf

E. The Adoption of CURE's Proposals are Innovative Ideas the City should consider

With the societal "reset" necessitated by COVID-19, now is the time to adopt some truly innovative ideas to adapt in a neighborhood long overlooked by the City. The Northside area includes adequate land to incorporate solar and RPUs is well situated to integrate existing commercial uses and improve health outputs by the City adopting mitigation that promotes trees, additional gardening, and more green spaces. These ideas are not contrary to building more affordable housing and a desirable location for the Trujillo Adobe area and instead compliment the less intensive land uses for this area.

Thank you for the opportunity to comment.
Very truly yours,
Malisa Hathaway Mckeeh /S/

Cc: See Drop Box Link for Enclosures.

curegroup.org (213) 300-3550 malissacurepne@gmail.com 2873 Rumsby Dr. Riverside CA 92506

↑ 01-10 Cont.
01-11

Response to Comment Letter O2

Northside Improvement Association
 Leonard Mercier, President
 May 26, 2020

O2-1 The comment introduces the letter and praises the Specific Plan and EIR. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

O2-2 The comment states that the Specific Plan and the EIR addresses most of the issues brought forth during the public during various public participation engagements conducted for the project, and offers support for certain aspects of the Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained in the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

O2-3 The comment is concerned about soils near the Santa Ana river identified as having medium to high potential for liquefaction resulting from seismic activity. The comment states that the use of stabilizing gels prior to construction is not clearly discussed in the Draft EIR and based on his research the application of gels is not recommended for this area.

Pursuant to the California Building Code (CBC), the Draft EIR identifies CM-GEO-1 (see EIR Table 2-6, Compliance Measures) that requires future development to complete the required soils investigations and structural stability analysis prior to the issuance of any building permit. The Draft EIR identifies

Comment Letter O2

Northside Improvement Association
 P.O. Box 244
 Riverside, CA 92502



Organized 1912 • Oldest Community Organization in Riverside

Jay Eastman, Principle Planner
 City of Riverside, Community Development Department
 Planning Division
 Re: Northside Specific Plan

This response addresses the concerns of the Northside Improvement Association regarding the proposed development associated with the Northside Specific Plan and PEIR.

The Plan and the PEIR are well-written and well-illustrated. They are very comprehensive and cover just about every contingency. The vision is wonderful and shows what the Northside Neighborhood could become with the proper guidance and direction. We very much appreciate the time and energy that went into producing these documents.

The Plan and the PEIR address most of the issues brought forward by people during the various engagements. The Northside Village will hopefully include the retail needs of the local residents, while the Trujillo Adobe Historic Village will spark a revival in local history with commercial spin-offs. While we would like to see more open space, the Central Park concept with an enhanced Springbrook Arroyo flowing through it sounds great.

There are a few areas of concern, however.

- The PEIR identifies soils near the Santa Ana River as having a medium to high potential of liquefaction in the event of seismic activity. Although there is tangential reference for the use of stabilizing gels prior to construction, the practice of using these gels is never

O2-1

O2-2

O2-3

Response to Comments

potential measures to address liquefaction, which includes stabilizing gels. Many other proven methods are available to address liquefaction. Please see the bottom of page 3 of the following link, which indicates that colloidal silica gel is nontoxic, chemically and biologically inert, and environmentally friendly: <https://www.mdpi.com/2076-3417/10/1/15>. While potential ways to address liquefaction are identified in the Draft EIR, the appropriate method shall be addressed through a site-specific geotechnical study. Due to the unique nature of each site and associated unknown development design, the liquefaction measures cannot be designed at the programmatic level.

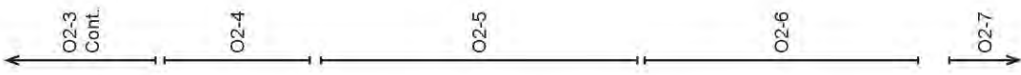
In addition to compliance with the CBC (CM-GEO-1), the County of Riverside (CM-GEO-2c), City of Riverside (CM-GEO-2a), and City of Colton (CM-GEO-2b), future projects would be required to complete geotechnical studies to address any geologic hazards associated with liquefaction and seismic-related ground failure (City of Colton 2013; County of Riverside 2015b; City of Riverside 2018). Such reports would be reviewed and evaluated at that time.

O2-4

The comment is concerned about the proposed high-density housing adjacent to the central park in the SPA because of it “becoming an attractive nuisance for the fringe populations and homeless after hours.” This comment does not raise a concern regarding the adequacy of the environmental document. None-the-less, it is noted that the City of Riverside participates with the Office of Homeless Solutions to provide outreach to homeless and provide housing solutions as possible. Additionally, building housing near a park would not attract the homeless. It would have the opposite effect, as there would be more eyes on the park and more residents utilizing and activating the park. When there are areas that are seeing an increase of homelessness, the City of Riverside has a Public Safety Engagement Team, consisting of Outreach Workers and law enforcement, that engages with the homeless, identifies their needs and connects them to services to help them exit from the streets. While trespassing is unlawful (California Penal Code Section 602K) and encampments are subject to the City of Riverside Municipal Code Section 6.15.020 (A to F), homeless do have the same constitutional rights as anyone else and would have access to public parks. The City of Riverside does provide an online tool to report unlawful activity. See <https://www.riversideca.gov/homelessolutions/> for additional details.

O2-5

The comment is concerned about flooding within the SPA as the SPA is identified to be within the 100-year flood zone for both the Highgrove Channel and Springbrook Arroyo. The Draft EIR analyzes this flood zone issue in Section 3.9, Hydrology and Water Quality. This comment accurately summarizes the significant impacts disclosed on the EIR regarding the Highgrove Overflow Channel (see Draft EIR page 3.9-21) and Springbrook Wash (see Draft EIR page 3.9-22). Mitigation is



- spelled out and we have read that some of these gels are produced from toxic materials; not what you would want in a high groundwater situation. Plus if the gels don't work, any building whether commercial or residential would be at risk from unstable ground, putting the City at risk for potential lawsuits.
- We question the wisdom of building high-density housing adjacent to the Central Park. While it would provide open space recreation to these high-density residents (who arguably need it the most), we can see it becoming an attractive nuisance for the fringe populations and the homeless after hours.
- The PEIR clearly identifies the area of the Northside Highgrove Channel and Springbrook Arroyo. Enhancements are suggested for containing the waters of the Highgrove Channel which is in a concrete waterway, but the natural-bottom Springbrook Arroyo is only to be widened and redirected into the Central Park area. The inundation maps on page 571 of the PEIR show the potential for flooding in the worst-case scenario across the area of the Northside Specific Plan. Any building in that zone, whether residential or commercial, would be at risk, exposing the City to massive legal action. This seems extremely short-sighted.
- We are concerned with the continued use of the Northside Neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main Street, Center Avenue, and Columbia Avenue have all been named as 'Complete Streets' with all the enhancements that accompany that designation. However, if these circulation improvements only foster even more heavy truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks? A more comprehensive solution must be sought.

These concerns overlook numerous minor issues such as the statement on Page 4 of the Plan that notes that 'Orange Street turns and becomes Center Street'. Or the map on Page 147 of

Response to Comments

identified to reduce these potential impacts (see Draft EIR Section 3.9.5 and Final EIR Chapter 3, Errata). Future development project would be required to demonstrate it would be located outside of the flood plain or it would be above flood elevations. FEMA would continue to implement their regulations if the Specific Plan were approved. To clarify, future development allowed within the Specific Plan would be required to comply with FEMA regulations.

Additionally, development projects would be required to construct street improvements to the ultimate width along their project frontages as well as improve any Flood Control Lines which run through or along any frontage of the proposed development consistent with the Master Drainage Plan. A project specific Hydrology study would be required to assess on and off-site drainage and recommend necessary mitigations to protect the proposed development as well as properties downstream.

02-6

The comment is concerned about heavy truck traffic on neighborhood streets. It is a project objective to “Eliminate or minimize truck traffic through residential and commercial neighborhoods” (see Draft EIR page 2-7). The Specific Plan was designed to include traffic calming measures to meet this objective, as discussed on Draft EIR pages 2-13 and 2-17. Page 47 of the Draft Northside Specific Plan provides additional detail. Refer to the Northside Specific Plan for this information.

02-7

The comment notes minor issues on the Northside Specific Plan, such as “Orange Street turns and becomes Center Street” (page 4) and the EIR map showing Springbrook Arroyo flowing down from the north from Highgrove Channel (page 147). The comment notes minor issues on the Northside Specific Plan,

Response to Comments

such as "Orange Street turns and becomes Center Street" (page 4) and the EIR map showing Springbrook Arroyo flowing down from the north from Highgrove Channel (page 147). The text on page 4 has been revised to accurately note that Orange and Center streets "intersect." The waterway shown from the Santa Ana River to the Highgrove Channel and the central park area represents a potential enhancement to serve as both a visual amenity and a way to recharge the water supply to the remainder of the Springbrook Arroyo through the central park area.

02-8

The comment concludes the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

↑ O2-7
Cont.

the PEIR that shows Springbrook Arroyo flowing down from the north from the Highgrove Channel.

Thank you for your attention to these concerns. Addressing these issues will only improve the overall quality of the Northside Specific Plan.

Leonard Mercier
President, Northside Improvement Association

O2-8

Response to Comment Letter O3

The Raincross Group
 Douglas Shackelfton, President
 May 12, 2020

03-1 The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

03-2 The comment recommends that the 84 acres in the County of Riverside be annexed to the City of Riverside. The City of Riverside is not pursuing annexation of the 84 acres at this time. There is no obligation or requirement that forces the City to annex properties within a sphere of influence at any precise date or ever. To ensure consistencies in land uses envisioned within the Northside Specific Plan, the General Plan land use designations are recommended to be amended as part of this project. At such time annexation is proposed, the City will apply all applicable regulations.

03-3 The comment recommends that the Trujillo Adobe (currently owned by the County of Riverside) be transferred to the City of Riverside for increased maintenance and easier implementation of the Specific Plan. Annexation of the Trujillo Adobe is not part of this project and the City is not anticipating annexing this property in the near future. Ultimately, this comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.



Response to Comments

03-4

The comment recommends that 25 to 50 acres of Pellissier Ranch (owned by RPU) be designated for development of a passive 12.5 to 25 megawatt array. The Northside Specific Plan does not specifically propose a photovoltaic system on that property; however, such development is not precluded by the Northside Specific Plan. Ultimately, this comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

03-5

The comment is concerned about truck traffic going through the Northside Neighborhood. It is a project objective to “Eliminate or minimize truck traffic through residential and commercial neighborhoods” (see Draft EIR page 2-7). The Northside Specific Plan was designed to include traffic calming measures to meet this objective, as discussed on EIR pages 2-13 and 2-17. Additional language has been added to the Pellissier Ranch discussion in the Northside Specific Plan (see Section 2.4.5) and Final EIR (see Final Chapter 3, Errata) that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic

03-6

The comment concludes the letter. The comment has been included in the Final EIR for review and consideration by the City.



d. It need not be permanent (perhaps only 20 years)
 e. It would provide a buffer between the Northside neighborhood and industrial development in Colton.

4. TRAFFIC CIRCULATION
 The plan prohibits truck traffic from going south on Main Street to Columbia Ave. As a result of this, trucks will be required to use Center Street. Center Street crosses a Northside neighborhood, crosses in front the Tupillo Adobe and will eventually require the construction of a new Freeway interchange at Center Street and HWY 215. We recommend an alternative which would allow trucks to travel south on Main Street and then east on Columbia Ave. to the existing HWY 215 which will eventually require only an upgrade. Main Street is already improved for use by trucks and it allows for trucks to reach HWY 60 at Main Street without having to go thru the 60/91/215 interchange

We respectfully recommend that the City Council approve the Plan as submitted making the four changes outlined above. Please advise if there are any questions about our recommendations.

THE RAINCROSS GROUP

Douglas Shackleton, President

Response to Comment Letter O4

Spanish Town Heritage Foundation
 Nancy Melendez, President
 May 26, 2020

04-1 The comment recommends deletion or amending sections in the Draft EIR Section 4.2, Transportation, stating that all truck traffic from Colton via Main Street will make a left on Center Street to access the 215 freeway. The comment states that truck traffic would travel on Center Street in front of Trujillo Adobe which the current infrastructure cannot handle. The Northside Specific Plan does identify a long-term use of Center Street for truck traffic but also identifies a long-term alternative route in the City of Colton. Refer to the Northside Specific Plan Chapter 2 for additional details.

04-2 The comment suggests truck traffic should access the 215 freeway and/or 10 freeway through the City of Colton to minimize truck traffic on Center Street and Columbia Avenue. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor which would accommodate some of the traffic.

04-3 The comment states that truck traffic levels should remain at current or below current levels on Center Street from Main Street to the 215 freeway. Center Street has previously been and continues to remain designated as a four-lane arterial roadway. The Specific Plan additionally calls for improvements to key intersections along Center Street to add concrete pads at intersection to limit impacts of heavy vehicles to the

Comment Letter O4

Received on 05-25-2020 at 9:10 AM, Revision Received 05-26-2020 at 12:08 AM
 From: Nancy Melendez <Nancy.melendez@icloud.com>, President - Spanish Town Heritage Foundation

Good Morning,

After reviewing the draft Northside Specific Plan, the Spanish Town Heritage Foundation Board and myself recommend that section 4.2 Transportation **delete or amend** the sections stating that ALL TRUCK TRAFFIC FROM COLTON VIA MAIN STREET WILL MAKE A LEFT ON CENTER STREET TO ACCESS THE 215.

This forces all truck traffic to traverse Center Street in front of the Trujillo Adobe, doubling if not tripling current truck traffic in front of an already fragile structure! This is not acceptable.

Truck traffic should access the 215 and/or 10 through Colton (Agua Mansa Road/Rancho/La Cadena) as the majority of the traffic comes from Colton's warehouses. This would minimize truck traffic on Center Street and Columbia Avenues.

Truck traffic levels should remain at current levels or below current levels on Center Street from Main Street to the 215.

Thanks,

Nancy Melendez, President
 Spanish Town Heritage Foundation

O4-1

O4-2

O4-3

Response to Comments

pavement. A re-routing of truck traffic would not occur until such improvements have been put in place along Center Street.

Response to Comment Letter O5

Springbrook Heritage Alliance
Karen Renfro, Chair
May 25, 2020

05-1 The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

Comment Letter O5

Springbrook Heritage Alliance
Saving the Treasures of the Springbrook-Arroyo Watershed communities of
RIVERSIDE - COLTOON - HIGHGROVE - GRAND TERRACE

May 25, 2020

Jay Eastman, Principal Planner
Community and Economic Development Department
City of Riverside
3900 Main Street
Riverside, California 92522
CC: Northside Specific Plan Team

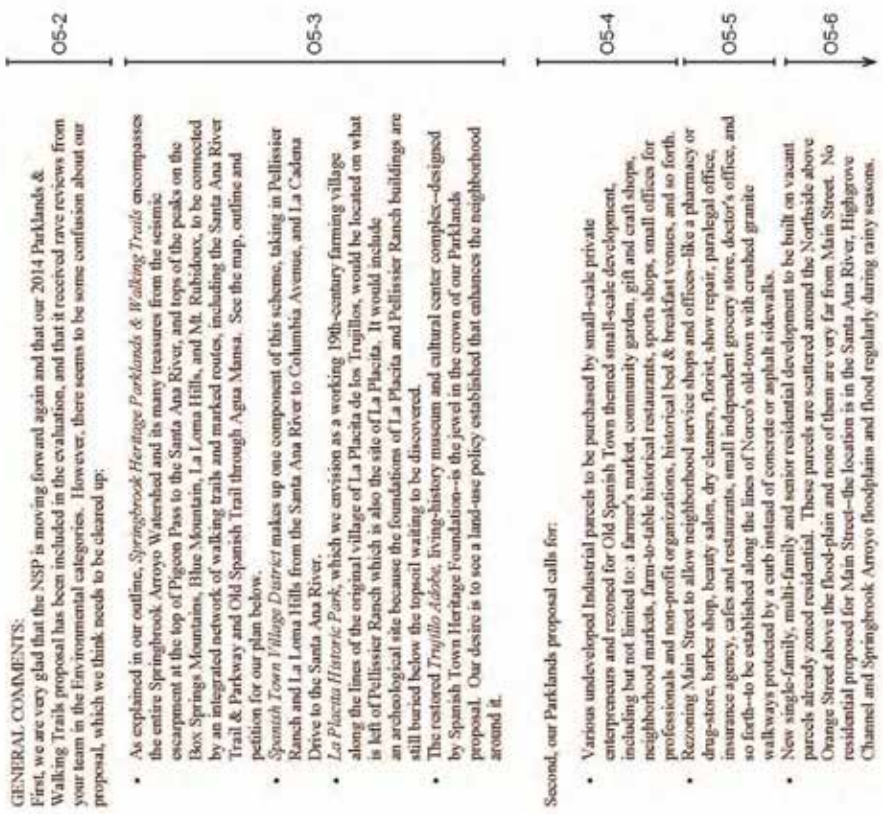
NORTHSIDE SPECIFIC PLAN REVIEW PERIOD

Dear Mr. Eastman:

Springbrook Heritage Alliance is pleased to submit our comments on the 78-page Draft Northside Specific Plan, 1,056-page EIR, and several thousand-page CEQA Studies for your consideration. Because of conflicts with work schedules, family obligations, Coronavirus constraint including the inability to hold our meetings, illness, and so forth these past two months, we have not been able to study these documents in as much detail as we would like. We apologize for this and hope you will accept this letter despite the fact we missed yesterday's deadline.

05-1

<p>05-2</p>	<p>This is an introduction to the following comments. Refer to response to Comments 05-3 to 05-6 below.</p>
<p>05-3</p>	<p>The comment specifies that 1) the Springbrook Heritage Parklands & Walking Trails encompasses the entire Springbrook Arroyo, 2) the Spanish Town Village District is one component, 3) the La Placita Historic Park would be located left of Pellissier Ranch, and 4) the land use policy in the neighborhood surrounding the Trujillo Adobe should enhance the surrounding areas. The Old Spanish Town Village District is one of three Alternatives analyzed in the DEIR (DEIR Section 6.6). As this Old Spanish Town Village District Alternative included in Draft EIR Section 6.6 was intended to represent the Springbrook Heritage Alliance suggested project alternative submitted on the NOP (see Appendix A), the suggested revision was incorporated into the alternative. Refer to EIR Chapter 3, Errata.</p>
<p>05-4</p>	<p>The comment suggests having the undeveloped Industrial parcels be purchased by small-scale private entrepreneurs and rezoned for Old Spanish Town themed small-scale development. As this Old Spanish Town Village District Alternative included in the Draft EIR Section 6.6 was intended to represent the Springbrook Heritage Alliance suggested project submitted on the NOP (see Appendix A), the suggested revision envisioning undeveloped Industrial parcels being purchased by small-scale private entrepreneurs and rezoned for Old Spanish Town themed small-scale development, such as a farmers market, community garden, gift and craft shops, neighborhood markets, farm-to-table historical restaurants, sports shops, small offices, or bed and breakfast venues was</p>



Response to Comments

incorporated into the alternative. Refer to EIR Chapter 3, Errata.

05-5

The comment suggests rezoning Main Street to allow neighborhood service shops and offices to be established. As this Old Spanish Town Village District Alternative included in Draft EIR Section 6.6 was intended to represent the Springbrook Heritage Alliance suggested project submitted on the NOP (see Appendix A), the suggested revision was incorporated into the alternative. Furthermore, it is the intent of the Draft Northside Specific Plan to provide neighborhood service shops and offices--like a pharmacy or drug-store, barber shop, beauty salon, dry cleaners, florist, show repair, paralegal office, insurance agency, cafes and restaurants, small independent grocery store, doctor's office, etc. in the Northside Village Center.

05-6

The comment suggests new residential development be built on vacant parcels already zoned as residential. The comment also states that there should be residential zones proposed along Main Street because the Santa Ana River, Highgrove Channel, and Springbrook Arroyo floods regularly. As this Old Spanish Town Village District Alternative included in Draft EIR Section 6.6 was intended to represent the Springbrook Heritage Alliance suggested project submitted on the NOP (see Appendix A), the suggested revision was incorporated into the alternative, in that no new mixed-use areas or residential development along Main Street would be provided, so as to avoid development within the flood zone. Residential development would be restricted to areas already zoned residential, scattered throughout the area north of Orange Street. Refer to EIR Chapter 3, Errata.

<p>05-7</p>	<p>↑ 05-6 Cont.</p>	<p>The comment introduces how the Spanish Town Village District does not meet the project Objectives 1 and 9. Refer to response to Comments 05-8 and 05-9 for specific comment on Objectives 1 and 9 in relation to the Spanish Town Village District.</p>
<p>05-8</p>	<p>05-7</p>	<p>The commenter claims the Spanish Town Village District does not meet objective 1 of the EIR. As discussed in Draft EIR Section 6.6.2, the Spanish Town Village District would not meet Objective 1 as it would separate land uses and reduce the intensification of housing near commercial and employment uses.</p>
<p>05-9</p>	<p>05-8</p>	<p>The commenter is unsure how the Spanish Town Village District does not meet Objective 9 of the EIR. As discussed in Draft EIR Section 6.6.2, the Spanish Town Village District would not meet Objective 9 as it eliminates much of the areas intended for future commercial and industrial uses and would not achieve additional economic growth beyond that of the existing applicable plans.</p>
<p>05-10</p>	<p>05-9</p> <p>05-10</p>	<p>The comment cites multiple corrections that need to be addressed in the Section 3.4 (Cultural Resources) of the Draft EIR. The information presented in the Draft EIR Section 3.4 with regards to cultural accuracy are aligned with the details included in the comment provided. The Draft EIR accurately reflects and describes in detail the origin of the La Placita.</p>

• Allowing new development to grow organically according to the mutual needs of the neighborhood and the business investors.

Third, we do not understand how, in light of the above considerations, in Table 6.3 "Comparison of Alternatives Relative to Project Objectives" the NSP can claim our Spanish Town Village District proposal "does not meet objective" for the following:

- "1. Develop a sustainable community through the integration of a mix of land uses, including a diversity of affordable residential uses, a vertical mix of uses within key districts, and the location of residential in proximity of commercial and employment uses." Existing residential development already is located close to Main Street, La Cadena, Placencia, and Center Street employment, and if our Spanish Town Village District plan is followed, there will be many more businesses that will need people to work there. New affordable residential uses and a vertical mix of uses within key districts do not need to be laid out in advance to be viable.
- "9. Maintain or improve employment and business opportunities within the SPA, including commercial, industrial and agricultural-related opportunities." Residents of the Northside do not want new industrial, or heavy commercial development in their neighborhood, and these kind of uses do not need to be here. Our Parklands proposal, especially the Spanish Town Village District and its major features, will, if allowed to go forward, would stimulate an economic boom based on the neighborhood's heritage. The neighborhood is not suited for large-scale development of any kind. The agricultural development we envision would be very small-scale (boutique-style specialty farms & gardens, 19th-century living history farming, etc.), not commercial farming with its attendant nuisances. We do not envision hydroponics, greenhouses or other indoor farming, but traditional outdoor venues with as little modern equipment as possible. This would attract tourists, school field trips, shoppers, neighbors within walking distance, and so forth.

We do not have time to pursue these issues now, but there are a few more problems that need to be addressed; the numerous factual errors contained in the Cultural section of the Draft NSP EIR. Because time is running short, we will mention only a few misrepresentations:

- that La Placita de Los Trujillos was "developed by" Lorenzo Trujillo. This is incorrect. La Placita was founded by Lorenzo Trujillo and his family, and each head of household received title to a strip of land that ran from the top of the alluvial fan at La Loma Hills to the Santa Ana River. Each title-holder developed their own land which must have included an adobe house and an adobe barn for their own livestock & stores. They were the first native Americans in California to own their own real estate according to the Spanish-Mexican custom. It elevated them to the social level of minor gentry.
- that the original village of La Placita was located somewhere other than present-day Pellissier Ranch. This is incorrect. The foundations of the 1844 village (pre-flood) and the foundations of the 1862 village of La Placita are located on the alluvial fan below La Loma Hills, and the foundations of both are buried under the topsoil waiting to be discovered. The 1862 Trujillo Adobe is located at the original southern border of La Placita. As the years

<p>05-11</p>	<p>↑ 05-10 Cont.</p> <p>↑ 05-11</p> <p>↑ 05-12</p> <p>↑ 05-13</p> <p>↑ 05-14</p>	<p>The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been adequately addressed in the Cultural Resources Section of the Draft EIR for review and consideration by the City.</p> <p>The commenter is concerned about the potential for seismic-related ground failure including liquefaction. The comment would like to know more about the gelling agent to be used during construction, such as what it is made of, how stable it is, etc.</p> <p>The commenter has misinterpreted Section 3.6.4.c (Impacts Analysis) of the Draft EIR. This section states that the SPA is susceptible to liquefaction. The reference to the gelling agent was used as an example of methods that may be used to address liquefaction. Many other proven methods are available to address liquefaction. Please see the bottom of page 3 of the following link, which indicates that colloidal silica gel is nontoxic, chemically and biologically inert, and environmentally friendly: https://www.mdpi.com/2076-3417/10/1/15.</p> <p>While potential ways to address liquefaction are identified in the EIR, the ultimate method shall be addressed through a site-specific geotechnical study. Due to the unique nature of each site and associated unknown development design, the liquefaction measures cannot be designed at the programmatic level. As detailed in Draft EIR Section 3.6, Geology and Soils, compliance with the CBC (CM-GEO-1), the County of Riverside (CM-GEO-2c), City of Riverside (CM-GEO-2a), and City of Colton (CM-GEO-2b) regulations would require completion of geotechnical studies to address any geologic hazards associated with liquefaction and seismic-related</p>
<p>progressed, the Southern boundaries of La Placita moved toward the city limits of Riverside, and the Eastern boundaries moved toward present-day Highgrove. In fact, Highgrove was settled by residents of La Placita after the Flood of 1862, and it was called "La Placita II".</p> <p>These errors may seem insignificant, however, along with the other errors not listed, they give the impression that Riverside's oldest neighborhood is of less historical importance than the Mission Inn, or the Parent Naval Orange Tree.</p> <p>This impression is bolstered by a comment in the NSP Program EIR in Section 3.6, Geology and Soils, question c. Seismic-related ground failure, including liquefaction? The area in question, located in the Santa Ana River, Highgrove Channel and Springbrook Arroyo's flood plains, has been identified by the City of Riverside in its General Plan as being a high-risk zone for liquefaction and seismic-related ground failure. Nevertheless, the NSP EIR rates future development as having a less-than-significant risk of loss, injury, or death, and the risks could be mitigated by use of a gelling agent during construction. The gelling agent referred to is not named, but apparently is compounded from industrial waste. This raises several questions of importance to the neighborhood:</p> <ol style="list-style-type: none"> 1. What is it made of? 2. How stable is it? 3. What is its life-span? 4. What are the costs of the material and using it? 5. What examples are there of structures where it has been used? 6. Is it toxic to the soil, to groundwater, to air, to people, to animals, to plants? 7. Has it been approved for use in the United States or California? <p>We are unhappy that the Riverside Championship Cross Country Course, formerly Riverside Golf Course, is to be chopped up for high-density residential, commercial and office development at the southern end. The RPU has wells and underground water on this site and should not be developed at all. The NSP also calls for rerouting the Springbrook Arroyo so that it no longer follows its current channel from La Cadena Drive to Orange near Garner, and around Reid Park but is to be connected to the Highgrove Channel north of the Trujillo Adobe and come through the middle of the Cross Country Course. The expense of this undertaking would be enormous, to no discernible purpose, and violate the whole principle of preserving an ancient heritage. Our Parklands proposal calls for an urban forest, native botanical garden, cross country course, unimproved park for use by groups who do not want the usual amenities and by the public when it is not being used for events.</p> <p>The lack of concern about flooding below Orange, which occurs to some degree even in a moderate rainstorm, is concerning. If the open space area below Orange is developed with large-scale residential, commercial or retail projects, the amount of run-off water will be increased and not only the river and arroyos will become polluted, but so will the land. The fact that the NSP Team has not consulted the Santa Ana Watershed Project Authority for their expertise seems senseless. But we know that they do not recommend large development projects in the flood plain</p>	<p>05-11</p>	

Response to Comments

ground failure (refer to **CM-GEO-1**) (City of Colton 2013; County of Riverside 2015b; City of Riverside 2018).

05-13

The comment expresses unhappiness with the former Riverside Golf Course plan to be developed into high density residential, commercial and office space in the southern end. The comment recommends following their Parklands proposal which calls for an urban forest, native botanical garden, cross country course, etc. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; thus, no response is required. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project

05-14

The comment expresses concern about flooding below Orange Avenue. Flooding is addressed in Draft EIR Section 3.9, Hydrology and Water Quality. As detailed in that section, the EIR identifies an existing flooding issue and discloses that the future development allowed under the Specific Plan would contribute to that flooding issue, resulting in significant impacts related to flooding. As such, flooding is an identified concern of the City and mitigation measures are recommended in the Draft EIR Section 3.9.5. Water quality is also addressed in Draft EIR Section 3.9. As detailed in that EIR section, future projects allowed under the Specific Plan would be required to implement water quality measures in accordance with regulations during construction (**CM-HYD-1**; **CM-HYD-3a** and **CM-HYD-3b**; **CM-GEO-1**) and operations (**CM-HYD-2a** and **CM-HYD-2b**) to control water pollution. Refer to EIR Section 3.9.4 for additional details regarding hydrology and water quality.

05-15

The comment concludes the letter by stating that the Draft EIR does not address the value of archaeological heritage versus industrial development. The focus of the EIR is to disclose the environmental impacts of the Northside Specific Plan and to identify mitigation to reduce those impacts, as feasible. None-the-less, the decisionmakers will decide whether to approve or deny the project considering the potential environmental impacts, as well as other social factors and project benefits. It is noted that the City of Colton does not govern the entire SPA; and several agencies are involved (see Draft EIR Section 2.5, Permits and Approvals). The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; thus, no response is required. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

A05-14
Cont.

05-15

because the water resources are too valuable to waste with development that could located somewhere else.

Conclusions cited elsewhere in the NSP and EIR indicate that however valuable the archeological heritage of the neighborhood may be, it is not as valuable as industrial development. The fact that the City of Colton governs the site and is amxious for more revenue muddies the issue here. If we continue in the direction that the NSP indicates, we will lose irreplaceable community treasures whose value cannot be measured in dollars and cents, but in connections to our heritage, our identity as a diverse and unique community, and the land we live on.

We thank you for this opportunity to contribute to the public review, and for your consideration of our concerns.

Yours respectfully,

Karen Renfro, Chair
Springbrook Heritage Alliance
(951)787-0617
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info@springbrookheritagealliance.org
springbrookheritagealliance.org
https://www.facebook.com





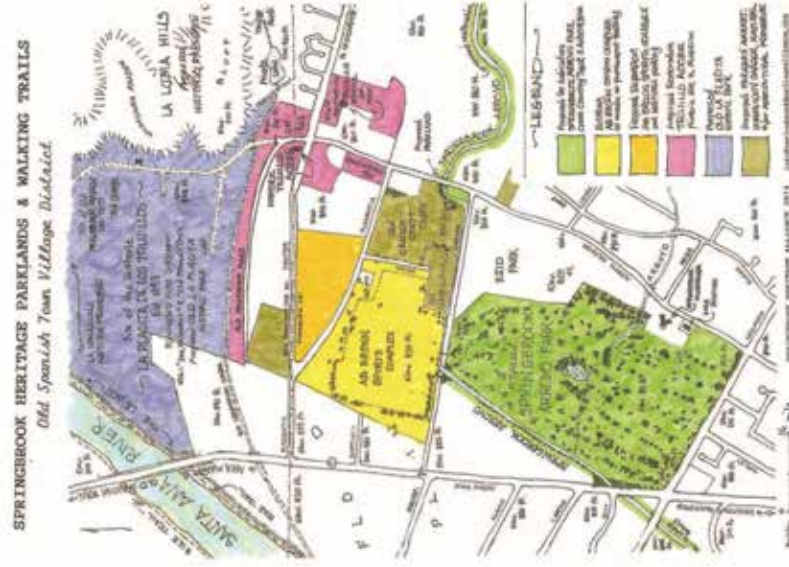
Photo by Sherry Mulvaney

Springbrook Arroyo at Orange & Garner, looking north toward the flood plain with the Trujillo Adobe, site of La Placita, La Loma Hills and Agua Mansa in the background.

ATTACHMENTS:



Visit the www.sba.org



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Old Spanish Town Village District
**SPRINGBROOK HERITAGE PARKLANDS
 & WALKING TRAILS**

Riverside – Calaveras-Big Rivers – Grand Terrace
 California, USA

OLD SPANISH TOWN VILLAGE DISTRICT
Pellissier Ranch and La Loma Hills in Colton to Columbia Avenue in Riverside, La Cidena Drive to the Santa Ana River in Corona del Mar
Heritage Parklands and Walking Trails Use Policy on the neighborhood's diverse heritage for protection of its irreplaceable community treasures

- Created by native people in pre-hispanic times. Mission San Gabriel Bacchos (1771), Juan José Rivera, 1838; Bandini Dominion 1843; La Rectoría de los Trujillos in 1843; Spanish Town 1870; Northside Improvement Association 1912.
- Several historic landmarks have already been made at La Loma Hills, El Estero Hills Springs and other locations, high potential for more.
- Reformed for industrial-BHP by local Redevelopment agencies 1990.
- Old Spanish Town Village District was designated as a historic landmark site.
- Old Spanish Town Village District calls for restoration of Springbrook Arroyo, Rialto Park, Ab Brown Manufacturing Park, properties to use compatible with preservation of Springbrook Arroyo, Rialto Park, Ab Brown Manufacturing Park, properties to use compatible with preservation of Springbrook Arroyo, Rialto Park, Ab Brown existing residential streets (see data) below.
- OSTVD is consistent with the goals of Northside Improvement Association, Spanish Town Heritage Foundation and the City of Riverside. OSTVD is consistent with the goals of the City of Riverside and the County of Riverside. OSTVD is consistent with the goals of the City of Riverside and the County of Riverside.
- No eminent domain to acquire private property for public or private Village District uses.
- No eminent domain to acquire private property for purchase of private properties if current owners do not wish to participate in OSTVD development.
- All walking trails would be created-greenie on new walkways and streets, without sidewalks or marked with a sign on streets with sidewalks. Trails would connect SVA venues to one another and the Santa Ana River Parkway.

SPRINGBROOK ARROYO & CHAMPIONSHIP CROSS COUNTRY COURSE
Former Riverside Golf Course currently under contract with NUSD for use as CIF Championship Cross Country Course

- 129 acres owned by City of Riverside, under RPU oversight and maintained by Parks Department; wells in use.
- Components of several parcels zoned for public recreational facility, commercial and residential.
- Our proposal calls for dedication of the entire 129 acres as a permanent public open-space recreational facility to be called *Springbrook Arroyo Adaptation & Championship Cross Country Course*.
- Proposal calls for no improvements except for created-granite cross-country courses, parking, pedestrian walkways and vehicle access. Ponds and arroyos to be restored to attract waterfowl and wildlife.
- Existing fence to be replaced with heavy duty 18th-century style wrought-iron or steel fencing using funds raised from private donors.
- Existing fences, footpaths, picnic tables, benches, electrical or water hook-ups, night lighting, concession stands, BBQs, or other modern amenities.
- Prohibitions to include no amplified music, no loudspeakers, no RV or camper parking, no fishing, no fireworks, no model planes or drones, no vagrancy, no sleds/donkeys, no stoves, no smoking, etc.
- Our proposal calls for dedication of site as a permanent public open-space recreational facility under contract with the City of Riverside.
- When not in use by CIF, park would be available only to groups that do not want amenities; fee-scale to be pro-rated.
- Open to the public during daylight hours when not in use by CIF or contractor groups.

AB BROWN SPORTS COMPLEX
Maintained and operated by AVSO-Region 47 since 1980 under contract with the City of Riverside

- 55 acres owned by City of Riverside, under RPU oversight; one well in operation.
- Our proposal calls for dedication of site as a permanent public open-space recreational facility.
- Proposal supports long-term or indefinite extension of lease to AVSO-Region 47 with option to buy.

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EXHIBITS OF AN BEHNSH BOWERS COMPLEX
Currently under private ownership and zoned for BHP, currently proposed for a 42-ft, high 204,000 sq. ft. warehouse

- Our proposal calls for acquisition of the site by the City of Riverside for dedication as permanent public recreational facility for additional 400,000 sq. ft. of open space playing fields and parking.
- ATFD to be advised the right of first refusal for lease or purchase of the site for permanent open space recreational uses.

TRIBULLO ADORSE RESTAURATION, LEVING HISTORY MUSEUM & CULTURAL CENTER
Adjacent city, currently under state site lease in 2012, under non-renter residence in Riverside County

- Currently owned by Riverside County Parks Department.
- Our proposal calls for acquisition of the Tribull Ador and establishment of related living-history museum and cultural center by Spanish Town Heritage Foundation. <https://www.facebook.com/STHF2018>
- Proposal includes purchase of nearby privately-owned parcels with funds from private sources for reconstruction of "Hillside School" (1875), Trujillo Casita (1905), chapel, and other ruins in adjacent area.
- The school, museum and cultural center will complement the proposed Old La Placita Historical Park and serve as a floor plan for new 150+ primary themed-development in the OSTVD.

OLD LA PLACITA HISTORIC PARK
Historic site, currently under state site lease until Spanish colonial period (1771) original site of La Placita de San Francisco (1842), Antebellum Ranch (1905-1940s)

- Currently owned by City of Riverside, managed by BPA, with an underground water reservoir.
- Our proposal calls for acquisition of the 227-acre parcel as a historic site to be called Old La Placita Historic Park.
- La Placita village, the subject of this proposal, is located in Riverside County, within the boundaries of the National Historic Landmark, the San Bernardino Valley, the south of Cajon Pass, and the San Bernardino Mountains.
- La Placita and La Loma Hills have potential as a destination point for Old Spanish National Trail enthusiasts.
- Old La Placita Historic Park to include a reconstructed La Placita Village square, white houses and La Loma School with a living-history working farm based on archaeological survey to locate original foundations.
- The site will be developed with a private historical foundation according to the standards of the profession.
- Funds for acquisition and development would be raised privately from private sources.

FARRIS' MARKET, COMMUNITY GARDEN, SHOP, NATURAL & AGRICULTURAL PREMISES
Historic site, currently under state site lease until 2020, currently proposed for private investors and zoned for OSTVD (General Development)

- Building designs to be people-friendly and consistent with La Placita and Spanish Town area architectural styles (1845-1905) - adobe-washed adobe or wash-brime with unadorned adobe roofing.
- On-site parking and walkways to be crushed granite or other permeable surface, outdoor utility facilities to appear rustic.
- Venues would also include historical arts & crafts shops, neighborhood markets, farm-to-table restaurants, gift shops, native arts & crafts, small businesses, Community trading post, job-your-own seasonal produce, non-profit vendors.
- Development would be investor-driven, subject to land use and design review standards for the district.

Reviewed by:
 Spanish Heritage Alliance
 Spanish Heritage Foundation
 Spanish Town Heritage Foundation
 Spanish Town Heritage Foundation
 Friends of Permanent Park
 University Neighborhood Association
 Academy of Living History Publishing, Inc.

For more information:
<https://www.facebook.com/southcoasthistory>

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TO
THE JURISDICTIONS OF
RIVERSIDE, COLTON, HIGHGROVE & GRAND TERRACE:

We, the undersigned, support the Springbrook Parklands & Walking Trails proposal to protect and connect the irreplaceable treasures of the Springbrook Arroyo Watershed for the benefit of the communities of Riverside, Colton, Highgrove and Grand Terrace. We support the following comments on the Springbrook Parklands & Walking Trails proposal:

1. **TRAILHEADS:** Trailheads should be located at the intersection of La Brea and La Brea Hills, Trujillo Adobe, site of the Trujillo School, Riverside Championship Cross Country Course (site of former Riverside Golf Club), AB Brown Sports Complex, site of Champagne Dairy, Savelly Dairy and other farming operations, Steek Bear Trucking Co. Building, Lake Duch century Southwestern-style working-class housing, Wolf Park, undeveloped open spaces, and other areas.

2. **TRAIL TYPES:** All these places are threatened by industrial zoning and new development projects that are incompatible with the area's existing rural-residential character, currently from thousands of families and much wildlife habitat. Trails should be developed to support the community's recreational and cultural activities that are part of the community tradition. We support property rights, but we believe that like liberty they are reciprocal and any development should benefit the people who are already here, not harm them or their neighbors.

3. **TRAIL NETWORK:** The Springbrook Parklands & Walking Trails plan, which includes the following destinations:

- a) **OLD SANJUAN TOWN VILLAGE DISTRICT:** Creation of a cultural heritage district from La Loma Hills (near Pioneer in Colton to Columbia Avenue in Riverside) to provide a link between the historic San Juan and Riverside.
- b) **SPRINGBROOK ARROYO PARK, CROSS COUNTRY COURSE & TRAILHEADS:** Protection of the Springbrook Arroyo Park, Cross Country Course, and Trailheads from residential development projects, and residential neighborhood prohibitions, industrial and large-scale development projects, and other incompatible uses.
- c) **AB BROWN SPORTS COMPLEX WITH POTENTIAL EXHIBITION AREAS:** PROTECT AND IMPROVE THE COMPLEX AND POTENTIAL EXHIBITION AREAS.
- d) **TRUJILLO ADOBE RESTAURATION, MUSEUM & LIVING HISTORY CENTER:** CONSERVE AND RESTORE THE TRUJILLO ADOBE RESTAURATION, MUSEUM & LIVING HISTORY CENTER.
- e) **OLD LA PLACITA HISTORIC PARK:** CONSERVE AND RESTORE THE HISTORIC PARK AND SURROUNDING AREA.
- f) **COMMUNITY GARDENS, OUTDOOR FOOD-ONLY FARMERS' MARKET, VILLAGE MARKETS, CAMPUS & CITY CENTER:** PROMOTE TRADITIONAL RESPONSIBILITY AND COMMUNITY SERVICE AND EDUCATION THROUGH COMMUNITY GARDENS, OUTDOOR FOOD-ONLY FARMERS' MARKET, VILLAGE MARKETS, CAMPUS & CITY CENTER.

Industrial parcels to be purchased from owners by private parties, no eminent domain.

PLEASE adopt Springbrook Parklands & Walking Trails for inclusion in the Riverside-Colton Northside Specific Plan. In this way, future land use for the La Loma Hills-old La Placita area of the Northside and Grand Terrace communities will be based on the community's history, and be a benefit to the community at large and for generations to come.

Item	Requester Name	Address	City	Zip Code	Telephone #/or e-mail	Signature
1	Springbrook Alliance	1234 Main St	Riverside	92501	951-789-0123	[Signature]
2	Springbrook Alliance	1234 Main St	Riverside	92501	951-789-0123	[Signature]

Please submit to:
SPRINGBROOK HERITAGE ALLIANCE
P.O. Box 1234
Riverside, CA 92501
(951) 789-0123

Response to Comment Letter O6

Springbrook Heritage Alliance
 Karen Renfro, Chair
 May 15, 2020

06-1 The comment requests the deadline for public comment to be extended to June 30, 2020. CEQA requires that public comment lasts at least 45 days. The City of Riverside already extended the public commenting period from 45 days to 60 days, and provided the document for public review from March 26, 2020 to May 26, 2020. The City is not extending the public review period an additional 30 days.

06-2 The Executive Department of the State of California and Governor Gavin Newsom issued Executive Order N-54-20 on April 22, 2020 that included guidance on the CEQA process during the pandemic. The Executive Order identifies that certain posting, filing and notice requirements under the California Environmental Quality Act (CEQA) should be satisfied through electronic means to allow public access and involvement consistent with COVID-19 public health concerns. Specifically, it states “In the event that any lead agency, responsible agency, or Project applicant is operating under any of these suspensions, and the lead agency, responsible agency, or Project applicant would otherwise have been required to publicly post or file materials concerning the Project with any county clerk, or otherwise make such materials available to the public, the lead agency, responsible agency, or Project applicant (as applicable) shall do any of the following:

Comment Letter O6

From: Karen Renfro <ka.renfro@gmail.com>
 Sent: Friday, May 15, 2020 4:57 PM
 To: Eastman, Jay
 Cc: Edwards, Eric; Erin Edwards; Welch, David; Kyzanski-Brown, Mary; Peter Wohlgenant; eric.smith@nrcs.ca.gov
 Subject: [EXTERNAL] NORTHSIDE SPECIFIC PLAN PEIR REVIEW PERIOD

SPRINGBROOK HERITAGE ALLIANCE

May 15, 2020

Jay Eastman, Principal Planner
 Community and Economic Development Department
 City of Riverside
 3900 Main Street
 Riverside, California 92522

NORTHSIDE SPECIFIC PLAN PEIR PUBLIC REVIEW PERIOD

Dear Mr. Eastman:

On behalf of Springbrook Heritage Alliance whose membership either lives or works in the Northside, or has strong ties to the neighborhood, I am writing to ask that the deadline for public comment on the Northside Specific Plan PEIR be extended to June 30, 2020 to allow sufficient time for us to finish reading the documents and respond in an intelligent manner.

One reason is that not all the residents and business owners in the Study Area know even now that the Draft NSP is in its final review period and we have no way to make sure they do. Another reason is because of the complications caused by the COVID-19 shutdown, many of our members are working from home or are otherwise preoccupied by the increased load of responsibility they bear at home. The fact that we can't hold meetings to help people with the process is an even bigger obstacle than we anticipated. Even if the Community Center is reopened, most people



Response to Comments

- a) Post the notices listed above on the lead or responsible agency's website for the same length of time that would be required for physical posting,
- b) Submit all notices listed above to the State Clearinghouse's CEQAnet web portal, and
- c) Engage in outreach to any individuals and entities known by the lead agency, responsible agency, or Project applicant to be parties interested in the Project in the manner contemplated by the Public Resources Code sections 21100 et seq. and California Code of Regulations, Title 14, sections 15000 et seq.

Deadlines for public review and comment periods for CEQA documents, such as for draft EIRs and negative declarations, have not been suspended and those deadlines remain unchanged.

The City noticed a public review period for the Draft EIR to run from March 26, 2020 to May 26, 2020, running for 15 additional days beyond the required 45-day period under CEQA Guidelines Section 15105 to allow commenters to have additional time under the current circumstances. The City also posted the documents online and submitted to the CEQAnet web portal consistent with the Executive Order. In addition, mailings were completed to reach out to individuals and entities known to be interested in the project. The City acknowledges the commenters request; however, the regulatory requirements of CEQA and Executive Order N-54-20 have been fulfilled.

Response to Comments

O6-3

See response to Comment O6-1. Due to the importance of proceeding with a decision on the project as well as the fact that the public review period was already extended 15 days, the City declines the request to add an additional 30 days to the public review period. None-the-less, the City will continue to coordinate with the Springbrook Heritage Alliance outside of the CEQA process to address questions and concerns as possible.

A06-2
Cont.

will probably not want to risk coming to a meeting even with proper precautions. In addition, it is more difficult than we expected to review the more than 3,000 pages involved and we wish to give it our best attention. We already have questions that need answering before we get much farther, and these will have to come in a separate email. As our progress depends in part on your answers, we are truly at a loss to know what else to do but ask for an extension to the review period. We did not expect to have this much trouble, but hope you will understand that the outcome of this Specific Plan means everything to us.

We hope that whoever is charged with the decision will understand our anxiety over this issue, as well as our appreciation for their time and attention to our request.

Respectfully yours,
Karen Renfro, Chair
Springbrook Heritage Alliance
(951) 787-0617 voice only, no text
k.a.renfro7@gmail.com



O6-3



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Response to Comment Letter 07

From: William Lo - wlo@hillsconsulting.com
Sent: Thursday, May 21, 2020 2:22 PM
To: Eastman, Jay
CC: Mark Tonich
Subject: [External] DRAFT NORTHSIDE SPECIFIC PLAN EIR AND NORTHSIDE SPECIFIC PLAN DOCUMENTS

Comment Letter 07

Dear Mr. Eastman:
 Sunmeadows, LLC is disappointed with the need to submit this letter summarizing our concerns with the Draft Northside Specific Plan EIR and Northside Specific Plan documents. Sunmeadows, LLC is the developer of the adopted Roquet Ranch Specific Plan located adjacent to the Pellissier Ranch portion of the proposed project within the City of Colton. We have substantial concerns with the content of the proposed Specific Plan and with the analysis contained in the Draft EIR related to the closure of Orange Street, north of West Central Avenue ("Orange Street Extension").

BACKGROUND:

On May 15, 2018, the Colton City Council Amended the Land Use Plan of the Land Use Element of the City General Plan (R-037-18), and Certified the Final Environmental Impact Report (R-38-18) for the Roquet Ranch Specific Plan (RRSP). On June 5, 2018, the City of Colton adopted Ordinance 0-07-18 which amended Section 18.3A.050 City Municipal Code, thereby adopting the Roquet Ranch Specific Plan. The approved RRSP consists of 754 single-family residential units, 244 townhomes, 52 active-adult attached units, 6,000 square feet of commercial retail use, a 1,500 square foot coffee shop with drive-through window, a 4,000 square foot fast-food restaurant with drive-through window, an 11.3-acre community park, and 8.4 acres of passive parks.

Access to the RRSP site is provided via a segment of the future alignment of Pellissier Road, a General Plan Secondary Highway, from La Cudena Drive at existing W. Maryknoll Drive, to a proposed northerly extension of Orange Street, from West Center Street in the City of Riverside. The proposed Orange Street Extension provides the RRSP with secondary access, and provides primary access to Planning Area 20, located along the proposed "Orange Street Extension".

The design of the approved RRSP and the analysis contained in the RRSP Certified EIR anticipated full use of both access locations, and included mitigation measures to address identified project impacts to traffic, air quality, Greenhouse Gases, and Noise. The RRSP relies on both of these access points to provide balanced and efficient access to the site, to ensure that the circulation system does not experience an unacceptable level of Service (LOS) at analyzed intersections and roadway segments. Additionally, both of these access points are required to minimize emergency service response times, and to ensure efficient evacuation of the site's homes, businesses and recreation areas during an emergency.

On March 29, 2019, approximately 9 months after adoption of the Roquet Ranch Specific Plan and Certification of the FEIR, the City of Riverside published the Notice of Preparation for the Northside Neighborhood & Pellissier Ranch Specific Plan (Northside Specific Plan-NSSP) and the associated Draft Program Environmental Impact Report (DPEIR). On March 26, 2020, the City of Riverside released the Northside Specific Plan Draft Program Environmental Impact Report (NSP-DPEIR) for the required Public Review process.

The proposed Northside Specific Plan Land Use Plan eliminates the extension of Orange Street, from West Center Street to Pellissier Road, a road segment which is a key component of the approved Roquet Ranch Specific Plan. The NSP-DPEIR analyzes two Horizon Year 2040 land use scenarios, both with and without the Orange Street Extension. "Scenario One" analyzes the Land Use Plan contained in the Northside Specific Plan document, and "Scenario Two", analyzes a Land Use Plan which is not contained in the Northside Specific Plan.

The Land Use Plans for both Horizon Year 2040 "Scenario One" and "Scenario Two", do not include the "Orange Street Extension" between West Center Street and Pellissier Road. According to the DPEIR, the "without Orange Street

- 07-1 The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.
- 07-2 The comment gives a brief summary of the approved Roquet Ranch Specific Plan (RRSP) and the Orange Street Extension approved under th RRSP. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.
- 07-3 The comment states that the Northside Specific Plan eliminates the extension of Orange Street (from Center Street to the future alignment of Pellissier Road), which is a key component of the approved RRSP. To clarify, the Specific Plan addresses two scenarios for Orange Street; one with the extension of Orange Street north of Center Street, and one without the extension. As mentioned in this comment, the Roquet Ranch Specific Plan Project recently approved by the City of Colton included this extension for site access; however, the City of Riverside has not yet approved this roadway extension. As such, it is uncertain if this roadway extension would occur and therefore both potential scenarios were addressed. The City of Riverside has coordinated with the City of Colton further, and the Specific Plan and Final EIR (see Final EIR Chapter 3, Errata) have been updated to reflect that the Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which

Response to Comments

time another east-west corridor is built that would accommodate a portion of the traffic.

Two land use buildout scenarios of the Specific Plan were also included due to the Specific Plan's inclusion of the TZO. The TZO allows for the continued implementation of the existing land uses until the transition to the Specific Plan proposed land uses can occur. As the application of the TZO allows for varying buildout of the SPA, two scenarios were addressed; one with a greater transition to the proposed Specific Plan uses and one that assumes property owners utilize the TZO. Refer to Draft EIR Section 2.4.1, EIR page 2-11 to 2-12 for additional details. Ultimately both scenarios represent potential buildout of land uses per the Northside Specific Plan.

07-4

The comment states that the Land Use Plans for Scenario One and Two of the Northside Specific Plan don't include the Orange Street Extension in the analysis; the Draft EIR and Traffic Study do not adequately evaluate potential impacts of eliminating the Orange Street extension to Pellissier Road and La Cadena Drive; and the alignment of future Pellissier Road to South Riverside is unclear.

It is unclear what this comment is referencing on page 2-20 of the Draft EIR, as the page 2-20 of the EIR states "At this time it is unknown if Orange Street would be connected north through to the City of Colton. As such, two scenarios are considered; one with Orange Street connected north to the City of Colton (and future Roquet Ranch Specific Plan) and one with Orange Street terminating at the TAHV." Both scenarios are under consideration and addressed appropriately in the Draft EIR.

Response to Comments

Additional language has been added to the Pellissier Ranch discussion in the Northside Specific Plan (see Section 2.4.5) and Final EIR (see Final EIR, Chapter 3, Errata) that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic.

As the Buildout Year is 2040, the improvements would be anticipated to be completed by 2040.

Pellissier Road was analyzed and associated recommendations were identified in TIA (Appendix H), as summarized in Draft EIR Section 3.15. La Cadena Drive south of Center was analyzed; however, the segment of La Cadena in Colton was not analyzed since traffic from the Northside Specific Plan would be nominal.

The air quality and greenhouse gas (GHG) analysis presented in the Draft EIR includes evaluation of 2040 Baseline (Without Specific Plan Buildout) and Buildout Scenarios 1 and 2 as described in EIR Section 2. Emissions from the 2040 Baseline land uses (Existing Scenario) and Scenarios 1 and 2 were estimated using CalEEMod to present the net change in criteria air pollutant emissions. All three operational scenarios assume year 2040 buildout (see Draft EIR Section 3.2.3 Approach and Methodology and Section 3.7.2 Thresholds of Significance).

07-5 The comment addresses the inconsistencies in referencing east-west streets within the Pellissier Ranch area in text and in figures (i.e. Old Pellissier Road, W. Pellissier road, Pellissier Road, Old Pellissier Road). To clarify, all these roadways listed by this comment are in reference to Pellissier Road. Although there are inconsistent references to roads, this does not relate to the analysis for this road.

07-6 The comment states that without the Orange Street Extension, the Northside Specific Plan would no longer be consistent with City of Colton General Plan Goal M-3, S-5, LU-3.4, LU-14.1, and Resolution NO. R-37-18. The Draft EIR analyzed two scenarios with and without the Orange Street extension. For clarification purpose, the Northside Specific Plan and Draft EIR have been revised to include a provision that at such time Pellissier Road is connected to South Riverside Drive, along the existing Key Street alignment to the west of the Roque Ranch Specific Plan area, the City may consider elimination of the Orange Street extension. Refer to response to Comments O7-3 and O7-4.

← **07-4** Cont. | **07-5** | **07-6** →

Extension" was evaluated because the construction of the planned future extension could not be guaranteed (Page 2-20). Despite the fact that the adopted Roque Ranch Specific Plan requires the extension for secondary access. The DPER states, without supporting evidence, that evaluation of the removal of the extension of Orange Street is considered a "conservative approach".

The NISP-DPER does suggest that the construction of the segment of Pellissier Road from the western boundary of the Roque Ranch Specific Plan to Riverside Drive proposed by the NISP, would provide necessary secondary access to the BESP. However, neither the NISP nor the NISP-DPER address the timing of construction of this future segment of Pellissier Road, nor discuss the effect the elimination of the Orange Street Extension would have on the provision of emergency services and safe evacuation on the BESP, until the future segment of Pellissier Road is constructed.

Further, based on information contained in the DPER Traffic Study, the "without Orange Street Extension" assumes traffic from the BESP would use future Pellissier Road to access the I-215 Freeway via La Cadena Drive to the east or South Riverside Avenue to the west. The DPER and Traffic Study fail to evaluate potential impacts to intersection operations and required lane geometrics at Pellissier Road and La Cadena Drive, which were not previously contemplated during the environmental review of the BESP, which could result from the change in travel patterns associated with the elimination of the Orange Street Extension. Further, the BESP EIR included a full analysis of the potential impacts to Air Quality, Greenhouse Gases and Noise resulting from the travel patterns and traffic distribution analyzed in the BESP EIR. The Northside DPER does not include analysis of the potential changes to impacts to Air Quality, Greenhouse Gases or Noise which could result from the redistribution of trips resulting from the elimination of the Orange Street extension. Therefore, the potential impacts at the intersection of Pellissier Road and La Cadena Drive is unknown, and additional analysis of Traffic, Air Quality, Greenhouse Gases and Noise at this location should be included in the DPER.

The alignment of future Pellissier Road, west of Orange Street, is unclear and must be consistently identified in the DPER. It appears future Pellissier Road (Figure 3-1, page 28 of the NISP) will be realigned to connect with Pellissier Road identified in the BESP. However, exhibits 2 and 3 of the NISP Traffic Study show a different alignment.

Additionally, there are numerous inconsistent and confusing references in both the text and DPER Figures to one or more east-west streets within the Pellissier Ranch portion of the proposed Project, which are variously and interchangeably referred to as "Old Pellissier Road", "W. Pellissier Road", "Pellissier Road", "Old Pellissier Road" (one "Y"), and "New Pellissier Road" and "Pellissier Road", without clarification or clear differentiation, which makes the traffic study analysis difficult to decipher. The "Pellissier Road" name is first introduced as "Old Pellissier Road" in the text on page E5-24, and then as "W. Pellissier Road" in the text on Page 2-1. At this point the reader has no way of knowing if these are the same roadway or different roadways. Subsequently, the roadway is referred to as "W. Pellissier Road" (one "Y") in Figures 2-4, 2-5, and 2-6. Then in Figure 2-7, later the same roadway appears to now be called "Pellissier Road" (one "Y"), and the future Planned Secondary is inconsistently referred to as both "Pellissier Road" and "New Pellissier Road". The name changes back to "W. Pellissier Road" for Figures 2-8 and 2-9, and to "Pellissier Road" in Figure 2-11. On page 3-4-34 the street is again called "Old Pellissier Road". Inconsistent references to these two (7) roadways occur throughout the DPER and cause confusion for the reader.

The DPER states that the proposed Project is consistent with Colton General Plan Goals M-3 and S-5, as well as Policies LU3.4 and LU 14.1. However, because the proposed Project would result in the elimination of the "Orange Street Extension", the proposed Project would not be consistent with:

1. Colton General Plan Goal M-3, because elimination of the required secondary access (Orange Street Extension) necessary for the development of the Roque Ranch Specific Plan, would in turn affect the development of the BESP, and as a consequence, would delay or prevent the construction of Pellissier Road (a planned Secondary Highway identified in the City of Colton General Plan Circulation Element), from La Cadena Drive to the proposed Project eastern boundary.
2. Colton General Plan Goal S-5, because the proposed Project would eliminate the secondary access (via the Orange Street Extension) and increase emergency vehicle response times to, and emergency evacuations from, the Roque Ranch Specific Plan.
3. Policy LU-3.4 and Policy LU-14.1 of the Colton General Plan because the proposed Project would eliminate secondary access (Orange Street Extension) and thereby impact the implementation of the City of Colton

<p>07-7</p>	<p>Resolution NO. 18-37-15, which amended the General Plan to incorporate the Request Ranch Specific Plan Land Use Plan into the City of Colton General Plan Land Use Element.</p> <p>Summary of Deficiencies of the Northside Specific Plan DPERR</p> <ol style="list-style-type: none"> 1. The DPERR is deficient because the analysis contained in the DPERR fails to fully disclose and analyze all of the potential impacts resulting from the elimination of the Orange Street Extension. 2. The DPERR is deficient and should be revised because it fails to adequately address the potential impacts to the intersection of Pellissier Road and La Cadena Drive, which would result from the change in traffic patterns caused by the elimination of the Orange Street Extension. 3. The DPERR is deficient and should be revised because it fails to address the potential impacts to Air Quality and Greenhouse Gases which would change as a result of the changes in traffic patterns at future Pellissier Road and La Cadena Drive caused by the elimination of the Orange Street Extension. 4. The DPERR is deficient and should be revised because it fails to address the potential noise impacts at future Pellissier Road and La Cadena Drive, which would change as a result of the change in traffic patterns caused by the elimination of the Orange Street Extension. 5. The DPERR is deficient and should be revised because it fails to adequately address the potential impacts resulting from impaired access for emergency services to the approved RSCP, resulting from the elimination of the Orange Street Extension. 6. The DPERR is deficient and should be revised because it fails to adequately address the potential impacts to the safety of RSCP residents in an emergency, due to the impaired access, resulting from the loss of secondary access caused by the elimination of the Orange Street Extension. 7. The DPERR is deficient and should be revised because it fails to adequately address the potential impacts to access to Planning Area 10 of the approved RSCP, caused by the elimination of the Orange Street Extension. 8. The DPERR is deficient and should be revised because it fails to adequately address the timing of the construction of Pellissier Road within the NSSP, which is needed to provide secondary access to the approved RSCP, in the context of the elimination of the Orange Street Extension. 9. The DPERR is deficient and should be revised because it fails to consistently and clearly depict the names, locations, alignments and spelling of Old, West and New Pellissier Road. 10. The DPERR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Goal M-3. 11. The DPERR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Goal S-5. 12. The DPERR is deficient in its analysis of consistency with City of Colton General Plan Policies LU-3.4 and LU-14.1. <p>Recommendation:</p> <p>An environmentally superior Project could be adopted which would cure a majority of the 12 deficiencies identified above. If the proposed Project (or any of the alternatives identified in the DPERR) was modified to include language which required the construction of the full segment of Pellissier Road within the Project, prior to the elimination of the "Orange Street Extension", from West Center Street to Pellissier Road. Therefore, we respectfully recommend that the City of Riverside adopt a proposed Project which preserves the "Orange Street Extension" until such time as the segment of Pellissier Road within the Project boundaries is constructed to a minimum width acceptable to the Colton Fire Department for use as secondary access to the RSCP.</p>
<p>The comment states that the Draft EIR is deficient because the analysis does not fully disclose and analyze all potential impacts from eliminating the Orange Street Extension and does not adequately address potential impacts to the interaction of Pellissier Road and La Cadena Drive. Refer to response to Comment O7-4.</p>	<p>07-6 Cont.</p> <p>07-7</p> <p>07-8</p> <p>07-9</p>
<p>The comment states that the EIR fails to address potential impacts to Air Quality and GHG resulting from the elimination of the Orange Street Extension. Refer to response to Comment O7-4.</p>	<p>07-10</p>
<p>The comment states that the EIR is deficient and should be revised because it fails to address potential Noise impacts resulting from the elimination of the Orange Street Extension. Refer to response to Comment O7-4.</p>	<p>07-11</p> <p>07-12</p>
<p>The comment states that the EIR is deficient and should be revised as it does not discuss impacts of impaired access, potential safety impacts, and potential access impacts resulting from the elimination of the Orange Street Extension. Refer to response to Comment O7-4.</p>	<p>07-13</p>
<p>The comment states that the EIR is deficient and should be revised because it fails to adequately address the timing and construction of Pellissier Road within the Northside Specific Plan. Refer to response to Comment O7-4.</p>	<p>07-14</p>
<p>The comment states that the EIR is deficient and should be revised because it fails to consistently and clearly depict names, locations, alignments and spelling of Old, West and new Pellissier Road. Refer to response to Comment O7-5.</p>	<p>3</p>

Response to Comments

07-13

The comment states that EIR is deficient in its analysis of consistency with the Colton General Plan Goal M-3, Goal S-5, and Policies LU-3.4 and LU-14.1. Refer to response to Comment 07-6.

07-14

The letter recommends the City adopt a plan which preserves the Orange Street Extension. Additional language has been added to the Pellissier Ranch discussion in the Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic.

We appreciate the opportunity to comment on these documents and look forward to modification of the proposed Project and the associated documents, to address these concerns.

Sincerely,

William Lo,
Managing Partner, Sunmeadows, LLC.

07-14
Cont.

Response to Comment Letter O8

Sunmeadows
 William Lo, Managing Partner
 May 26, 2020

- 08-1 The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.
- 08-2 The comment gives a brief summary of the approved Roquet Ranch Specific Plan (RRSP) and the proposed Orange Street Extension. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.
- 08-3 The comment notes that the RRSP site accessed via a segment of the future alignment of Pellissier Road, a General Plan Secondary Highway, from La Cadena Drive at exiting W Maryknoll Drive. The proposed Orange Street Extension would provide secondary access. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.
- 08-4 The comment emphasizes that the RRSP relies on both access points for balanced and efficient access to the site, to ensure the circulation system doesn't experience an unacceptable Level of Service (LOS), and to minimize emergency response times. The EIR transportation analysis in Draft EIR Section 3.15 addresses both scenarios; with the extension of Orange Street and without the extension. The project would not result in an environmental impact related to emergency response (see EIR Section 3.13.4). Refer to response to Comment 07-4.

Comment Letter O8

RECEIVED
 Planning & Economic Development Dept.
 May 26 2020

Sunmeadows, LLC
 77127 Calle Arroyo, Suite 1010
 San Juan Capistrano, CA 92675

May 21, 2020
 Mr. Jay Eastman
 Principal Planner
 Community & Economic Development Dept., Planning Division
 3900 Main Street
 Riverside, CA 92522

Subject: DRAFT NORTHSIDE SPECIFIC PLAN EIR AND NORTHSIDE SPECIFIC PLAN DOCUMENTS

Dear Mr. Eastman:

Sunmeadows, LLC is disappointed with the need to submit this letter summarizing our concerns with the [Title], Sunmeadows, LLC is the developer of the adopted Roquet Ranch Specific Plan located adjacent to the Pellissier Ranch portion of the proposed Project within the City of Coblen. We have substantial concerns with the content of the proposed Specific Plan and with the analysis contained in the Draft EIR related to the closure of Orange Street, north of West Central Avenue ("Orange Street Extension").

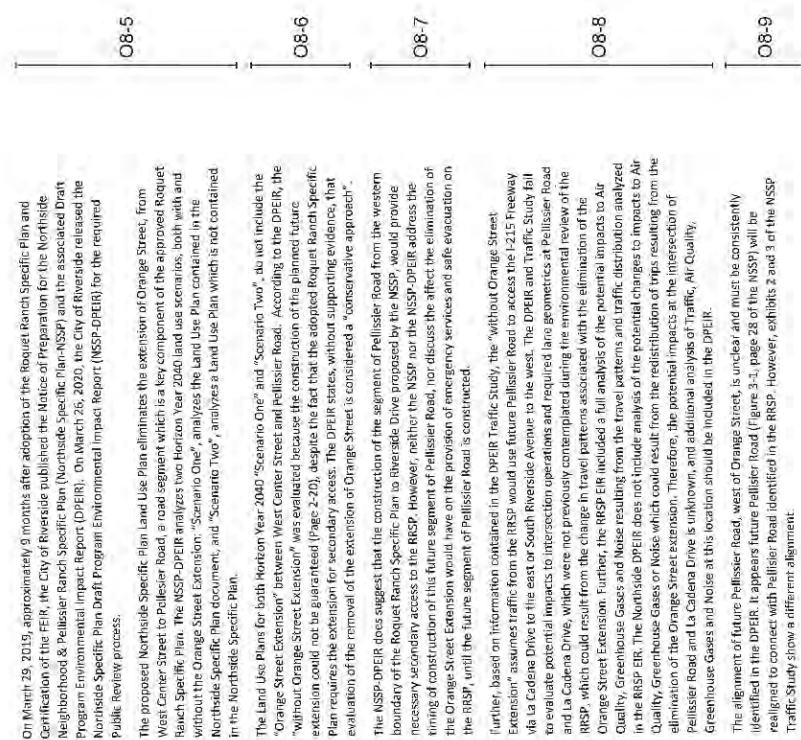
BACKGROUND

On May 15, 2018, the Coblen City Council Amended the Land Use Plan of the Land Use Element of the City General Plan (R-037-18), and Certified the Final Environmental Impact Report (R-38-18) for the Roquet Ranch Specific Plan (RRSP). On June 5, 2018, the City of Coblen adopted Ordinance 18-07-18 which amended Section 18.34.050 City Municipal Code, thereby adopting the Roquet Ranch Specific Plan. The approved RRSP consists of 754 single-family residential units, 244 townhomes, 52 active-adult attached units, 6,500 square feet of commercial retail use, a 1,500 square foot coffee shop with drive-through window, a 4,000 square foot fast-food restaurant with drive-through window, an 11.3-acre community park, and 8.4 acres of passive parks.

Access to the RRSP site is provided via a segment of the future alignment of Pellissier Road, a General Plan Secondary Highway, from La Cadena Drive at exiting W. Maryknoll Drive, to a proposed northbound extension of Orange Street, from West Center Street in the City of Baverode. The proposed Orange Street Extension provides the RRSP with secondary access, and provides primary access to Planning Area 10, located along the proposed "Orange Street Extension".

The design of the approved RRSP and the analysis contained in the RRSP Certified EIR anticipated full use of both access locations, and included mitigation measures to address identified project impacts to traffic, air quality, greenhouse gases, and noise. The RRSP relies on both of these access points to provide balanced and efficient access to the site, to ensure that the circulation system does not experience an unacceptable level of service (LOS) at analyzed intersections and roadway segments. Additionally, both of these access points are required to minimize emergency service response times, and to ensure efficient evacuation of the site's homes, businesses and recreation areas during an emergency.

<p>08-5</p>	<p>The comment states that the Northside Specific Plan Land Use Plan eliminates the Orange Street Extension from West center Street to Pellissier Road. The EIR addresses both scenarios; one with and one without the Orange Street extension. Refer to response to Comments 07-3 and 07-4.</p>
<p>08-6</p>	<p>The comment states that the land use plans for Horizon Year 2040 Scenario One and Scenario Two do not include the Orange Street Extension despite the extension being adopted in part of the RRSP. The comment claims the City removed the Orange Street extension without supporting evidence. The EIR addresses both Orange Street extension scenarios, as appropriate. EIR Page 2-20 in fact states: "At this time it is unknown if Orange Street would be connected north through to the City of Colton. As such, two scenarios are considered; one with Orange Street connected north to the City of Colton (and future Roquet Ranch Specific Plan) and one with Orange Street terminating at the TAHV." The claim that the EIR removes the Orange Street connection is incorrect.</p>
<p>08-7</p>	<p>Additional language has been added to the Pellissier Ranch discussion in the Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic. Ultimately, the analysis presented in the Draft EIR addresses both Orange Street scenarios for full disclosure of the associated environmental impacts.</p> <p>The comment states that the EIR does not address the timing of construction for a future segment of Pellissier Road and does</p>



Response to Comments

not discuss impacts related to emergency service and evacuation routes resulting from the elimination of the Orange Street Extension. To clarify, the Orange Street extension does not currently exist, and the project is not eliminating this roadway extension. Refer to response to Comment O7-4.

O8-8

The comment states the EIR and Traffic Study fail to evaluate potential impacts to intersections, air quality, GHG emissions, or Noise resulting from the elimination of Orange Street Extension. The Draft EIR addressed both scenarios; with Orange Avenue extended and one without Orange Avenue extended. Refer to response to Comment O7-4.

O8-9

The comment states that the alignment of future Pellissier Road is unclear in the EIR and needs to be corrected in figures. Refer to response to Comment O7-4.

The comment notes that there are numerous inconsistent references in the SP and DPEIR in reference to Pellissier Road (Old Pellissier Road, W. Pellissier Road, Pellissier Road, Old Pellissier Road, etc.). To clarify, these roadway names are in reference to Pellissier Road. Refer to response to Comment O7-5.

The comment states that the EIR would not be consistent with Colton General Plan Goal M-3, Goal S-5, Policy LU-3.4, and Policy LU-14.1 due to the elimination of the Orange Street Extension. Refer to response to Comment O7-6.

This comment claims the EIR is deficient and should be revised because it fails analyze potential impacts resulting from the elimination of the Orange Street Extension. The Draft EIR addressed both scenarios; with Orange Avenue extended and one without Orange Avenue extended. Refer to response to Comment O7-4.

08-10

08-11

08-12

08-10

08-11

08-12

Additionally, there are numerous inconsistent and confusing references in both the text and DPEIR figures to one or more east-west streets within the Pellissier Ranch portion of the proposed Project, which are variously and interchangeably referred to as "Old Pellissier Road", "W. Pellissier Road", "Pellissier Road", "Old Pellissier Road" (one "s"), and "New Pellissier Road", and "Pellissier Road", without clarification or clear differentiation, which makes the traffic study analysis difficult to decipher. The "Pellissier Road" name is first introduced as "Old Pellissier Road" in the text on page ES-24, and then as "W. Pellissier Road" in the text on Page 2-1. At this point the reader has no way of knowing if these are the same roadway or different roadways. Subsequently, the roadway is referred to as "W. Pellissier Road" (one "s") in Figures 2-4, 2-5, and 2-6. Then in Figure 2-7, later the same roadway appears to now be called "Pellissier Road" (one "s"), and the future Planned Secondary is inconsistently referred to as both "Pellissier Road" and "New Pellissier Road". The name changes back to "W. Pellissier Road" for Figures 2-8 and 2-9, and to "Pellissier Road" in Figure 2-11. On page 3-4-24 the street is again called "Old Pellissier Road". Inconsistent references to these two (?) roadways occur throughout the DPEIR and cause confusion for the reader.

The DPEIR states that the proposed Project is consistent with Colton General Plan Goals M-3 and S-5, as well as Policies LU3.4 and LU 14.1. However, because the proposed Project would result in the elimination of the "Orange Street Extension", the proposed Project would not be consistent with:

1. Colton General Plan Goal M-3, because elimination of the required secondary access (Orange Street Extension) necessary for the development of the Roquet Ranch Specific Plan, would in turn affect the development of the RRPSP, and as a consequence, would delay or prevent the construction of Pellissier Road (a planned Secondary Highway identified in the City of Colton General Plan Circulation Element), from La Cadena Drive to the proposed Projects eastern boundary.
2. Colton General Plan Goal S-5, because the proposed Project would eliminate the secondary access (via the Orange Street Extension) and increase emergency vehicle response times to, and emergency evacuations from, the Roquet Ranch Specific Plan.
3. Policy LU-3.4 and Policy LU-14.1 of the Colton General Plan because the proposed Project would eliminate secondary access (Orange Street Extension) and thereby impact the implementation of the City of Colton Resolution NO. R-37-18, which amended the General Plan to incorporate the Roquet Ranch Specific Plan Land Use Plan into the City of Colton General Plan Land Use Element.

Summary of Deficiencies of the Northside Specific Plan DPEIR:

1. The DPEIR is deficient because the analysis contained in the DPEIR fails to fully disclose and analyze all of the potential impacts resulting from the elimination of the Orange Street Extension.
2. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts to the intersection of Pellissier Road and La Cadena Drive, which would result from the change in traffic patterns caused by the elimination of the Orange Street Extension.
3. The DPEIR is deficient and should be revised because it fails to address the potential impacts to Air Quality and Greenhouse Gases which would change as a result of the changes in traffic patterns at future Pellissier Road and La Cadena Drive caused by the elimination of the Orange Street Extension.

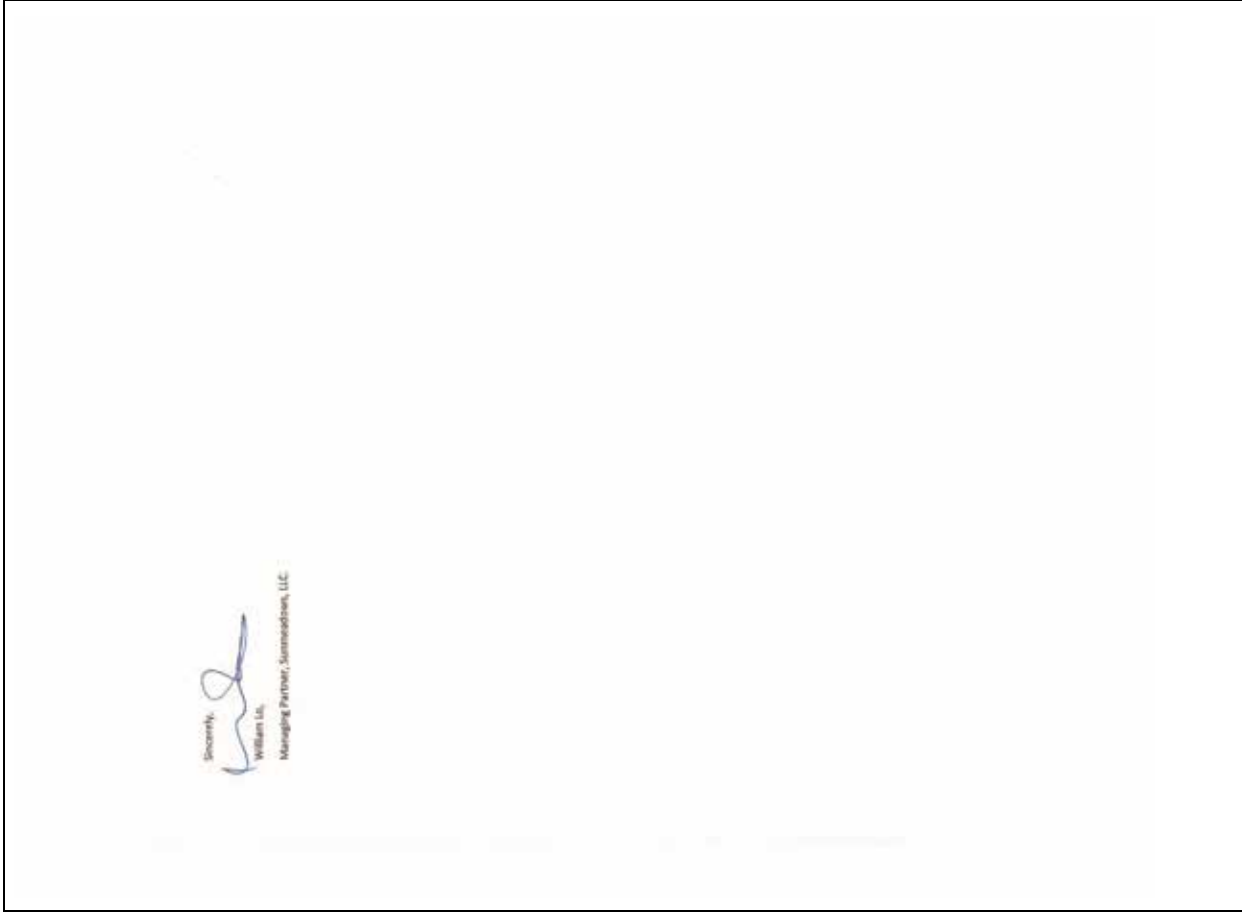
<p>08-13</p>	<p>Refer to response to Comment 07-9.</p>
<p>08-14</p>	<p>Refer to response to Comment 07-10.</p>
<p>08-15</p>	<p>Refer to response to Comment 07-11.</p>
<p>08-16</p>	<p>Refer to response to Comment 07-12.</p>
<p>08-17</p>	<p>Refer to response to Comment 07-13.</p>
<p>08-18</p>	<p>Refer to response to Comment 07-13.</p>
<p>08-19</p>	<p>The comment provides a concluding remark regarding the above comments, and recommends the City adopt a plan which preserves the Orange Street Extension. Refer to response to Comment 07-14.</p>

- 4. The DPEIR is deficient and should be revised because it fails to address the potential noise impacts at future Pellissier Road and La Carona Drive, which would change as a result of the changes in traffic patterns caused by the elimination of the Orange Street Extension.
- 5. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts resulting from impaired access for emergency services to the approved RISP, resulting from the elimination of the Orange Street Extension.
- 6. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts to the safety of RISP residents in an emergency, due to the impaired access, resulting from the loss of secondary access caused by the elimination of the Orange Street Extension.
- 7. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts to access to Planning Area 10 of the approved RISP, caused by the elimination of the Orange Street Extension.
- 8. The DPEIR is deficient and should be revised because it fails to adequately address the timing of the construction of Pellissier Road within the NSP, which is needed to provide secondary access to the approved RISP, in the context of the elimination of the Orange Street Extension.
- 9. The DPEIR is deficient and should be revised because it fails to consistently and clearly depict the names, locations, alignments and spacing of Old, West and New Pellissier Road.
- 10. The DPEIR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Goal M-3.
- 11. The DPEIR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Goal S-5.
- 12. The DPEIR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Policies LU 3.4 and LU-14.1.

Recommendation:

An environmentally superior Project could be adopted which would cure a majority of the 12 deficiencies identified above, if the proposed Project (or any of the alternatives identified in the DPEIR) was modified to include language which required the construction of the full segment of Pellissier Road within the Project, prior to the elimination of the "Orange Street Extension", from West Center Street to Pellissier Road. Therefore, we respectfully recommend that the City of Riverside adopt a proposed Project which preserves the "Orange Street Extension" until such time as the segment of Pellissier Road within the Project boundaries is constructed to a minimum width acceptable to the Colton Fire Department for use as secondary access to the RISP.

We appreciate the opportunity to comment on these documents and look forward to modification of the proposed Project and the assembled documents, to address these concerns.



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Response to Comment Letter I14

Center for Community Action and Environmental Justice

Ricardo J. Olea
May 26, 2020

From: Ricardo Olea <ricardo@ceaj.org>
Sent: Tuesday, May 26, 2020 3:15 PM
To: Murray, David <DMurray@northsidepa.org>
Cc: Andrea Vidaurte <andrea.v@ceaj.org>; Ivette Torres <ivette@ceaj.org>
Subject: [External] Northside Specific Plan DEIR Comments

Dear David,

I hope you are safe and well. We have been in brief contact in the past in regards to the Northside Specific Plan. I am reaching out with our organization's support along with some comments and suggestions for the Northside Specific Plan Draft Environmental Impact Report (DEIR).

First, given the time and resources that have gone into creating the Northside Specific Plan, we strongly suggest that the objectives and goals set by this plan are not ignored when updating the General Plan. In fact, we encourage the planning department to use these objectives and goals to inform the new environmental justice (EJ) policies that will be included in the General Plan update.

We are supportive of the proposed plans for the retention of open space. We are eager to see the plan's proposal of a "restoration and enhancement of the Springbrook Arroyo, which would become one of the main features of the Northside neighborhood." We believe this is an important feature to the plan that encourages community interactions. We bring your attention to the Outdoor Commercial Recreation (OCR) land use designation in the proposed plan. This would provide approximately 75 acres of greenbelt around the Pellissier Ranch subarea development that would offer recreational and open space to the residents of the Northside SPA. While we are always open to the encouragement of outdoor recreation activities, this designation is adjacent to an Industrial Research Park transitional overlay within the City of Colton. We encourage the department to work with the City of Colton to negotiate a different transitional overlay, one more sensitive to human health that would align with outdoor recreational activities.

Additionally, we ask the department to amend and support the following policy. Consistent with the California Air Resources Board's recommendations on siting new sensitive land uses, a formal health risk assessment shall be performed under the following conditions: a) Distribution Centers For any distribution center that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week, located within 1,000 feet of a sensitive receptor.

Thank you so much for the constant communication. We look forward to continuing working with you and your department.

Best,

Ricardo J. Olea
Center for Community Action and Environmental Justice
3840 Sunnival Dr., Juampa Valley, CA 92509
Office: (951)360-8451

Comment Letter: 09

09-1
The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

09-2
The comment indicates the objectives and goals set by the Northside Specific Plan should be considered during the General Plan Update. Comment noted. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. This comment is included in the Final EIR for the decision makers to consider.

09-3
This comment expresses support for the open space included in the Northside Specific Plan, but does not support the location of open space next to an Industrial Research Park within the City of Colton. To clarify, the OCR area consists of 2.80 acres at the very northern tip of the Northside Specific Plan and the referenced 75-acre area referenced in this comment is not designated as OCR. The OCR area is intended to potentially allow for a "Recreation Vehicle Park or Camp Ground", as discussed in the Draft EIR Section 2.4.1. The 75-acre area referenced in this comment is designated for industrial research park uses. Refer to Draft EIR Figure 2-11 and the Final EIR Errata Chapter 3. The purpose of identifying this area as a "green area" in EIR Figure 2-11 is to recognize the potential need to buffer future uses within this area with and the adjacent area, not to provide active open space uses. The Transition Zone Overlay is intended to allow for the transition

09-1

09-2

09-3

09-4

09-5

Response to Comments

from the currently designation (M-1 for the 75 acres mentioned here) into the proposed designation (Industrial Research Park for the 75 acres mentioned in this comment). Refer to the Draft EIR Section 2.4.1, Proposed Land Uses, for details. This comment is included in the Final EIR for the decision makers to consider.

09-4

This comment provides recommendations to adopt CARB's policies regarding the need to complete Health Risk Assessments (HRAs). As indicated in Draft EIR Section 3.2, Air Quality, a potential for significant air quality impacts related to the siting of sensitive receptors near potential TAC emitters was identified and the CARB measures suggested in this comment is included in MM-AQ-11 (see part "a"). It is noted that this mitigation measure also includes the requirement for HRAs related to the location of sensitive receptors near gasoline dispensing facilities, drycleaners using perchloroethylene, and other sources of toxic air contaminants. See Draft EIR page 3.2-63 and the Final EIR Chapter 3, Errata, for additional details. This comment is included in the Final EIR for the decision makers to consider.

09-5

The closing remark is noted. This remark does not address the adequacy of the environmental document, and no further response is necessary.

response to Comment Letter I1

Cynthia L. Eldred, Esq.
May 7, 2020

The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

The comment states that their client owns 12.88 acres of vacant land at Center Street in the City of Riverside. The City of Riverside approved a Zoning Code Amendment, Conditional Use Permit, and Design Review to develop a 99-unit manufactured home park at the Property. The Land Use Map of the Northside Specific Plan has been revised to include the Mobile Home Overlay Zone on the property. Additional language has been added to the Specific Plan that allows for this approved use (see Chapter 3 of the Specific Plan). The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

The comment provides more details on the manufactured home park project. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

The comment is concerned that in the Specific Plan there is no discussion of allowable density above 8 units/acre for manufactured or mobile home park use, with or without a CUP. The proposed Specific Plan would not remove the existing mobile-home park overlay, and that overlay would continue to apply to the property identified in this comment letter. The Northside Specific Plan has been revised to include Mobile

I1-1

I1-2

I1-3

I1-4

Comment Letter I1

From: Cynthia L. Eldred, Esq. (celdred@eldred.com)
 To: Planning (May 1, 2020 3:52 PM)
 Subject: Riverside - I1-0040210 - Comments on the Draft Northside Specific Plan (Draft Plan) and Draft Program Environmental Impact Report (PEIR)

Mr./Ms./Estimado:

Thank you for the reminder on the availability of the draft specific plan and its draft EIR for public comment.

Our client is Kings Co. LLC ("Kings"). Kings owns 12.88 acres of vacant land located at 3444 Center Street in the City of Riverside (the "Property"). In December 2019, the City Council unanimously approved a zoning amendment, conditional use permit, and Design Review to King to develop a 99-unit manufactured home park on the Property (the "Project").

The General Plan land use designation was and continues to be MDS-Medium Density Residential. The project did not include an amendment to the General Plan.

The zoning amendment that was part of the project added the Mobile Home Park Overlay Zone to the base zone of R-1-7000 applicable to the Property. Allowable density with the overlay zone is 30 units/acre. The approved project has a density of 7.68 units/acre.

We see in the draft Specific Plan that, if the Specific Plan is adopted in its current form, the Property would continue to be designated for medium density residential ("MDR") use. From Table 3.4 of the draft Specific Plan, we see that maximum density for the MDR land use designation/type is 8 units/acre. We also see that we are referred to the City of Riverside Zoning Code for applicable site development standards. There is no discussion in the draft Specific Plan of an allowable density above 8 units/acre for manufactured or mobile home park use, with or without a conditional use permit ("CUP").

Table 3.5 tells us that only single-family detached residential use, as opposed to multiple-family dwelling and single-family attached residential use, is allowed in the MDR land use designation/zoning. That would be consistent with the Property's existing R-1-7000 zone, absent the mobile-home park overlay zone that applies to allow manufactured or mobile home use with a CUP. Table 3.5 does not expressly allow a manufactured or mobile home park use, with or without a CUP.

Finally, we see in Sections 3.1 and 3.2 of the draft Specific Plan that the regulations of the Specific Plan, if adopted, would prevail over conflicts between the Specific Plan and the City of Riverside's Zoning Code. Ambiguities related to development standards would be resolved by provisions of the Zoning Code.

We need to know whether the Project as unanimously approved by the City Council in December 2019 would be an allowable use under the Specific Plan, if adopted in its current form. It would be a disservice to King if the Project would be rendered a legal non-conforming use by adoption of the Specific Plan, after King has incurred substantial expense in obtaining approvals to continue use in every way with the City of Riverside's current, applicable regulations.

Please do not hesitate to call me if you feel that our discussion could help King and I to obtain clarity on the City of Riverside's position on these issues. If you do not feel the need to call, please respond at your earliest convenience. We will want to timely submit comments to your draft documents if we have any continuing concerns after receiving your responses.

Response to Comments

Home Park to the Permitted Land Use Table as a conditionally permitted use to allow previously approved Mobile Home Parks to be in compliance with the Northside Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

I1-5

The comment states that in Section 3.1 and 3.2 of the draft Northside Specific Plan that regulations of the Specific Plan would prevail over conflict between Northside Specific Plan and City of Riverside Zoning Code. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. Refer to Comment I-5 above.

I1-6

The comment asks if the project to develop a manufactured home park on the 12.88-acre property would be a permitted use under the Northside Specific Plan. As indicated in response I1-4, the Specific Plan would not remove the existing Mobile Home Park Overlay or otherwise rescind the previous approval for development for the property identified in this comment letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

I1-7

The comment concludes the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

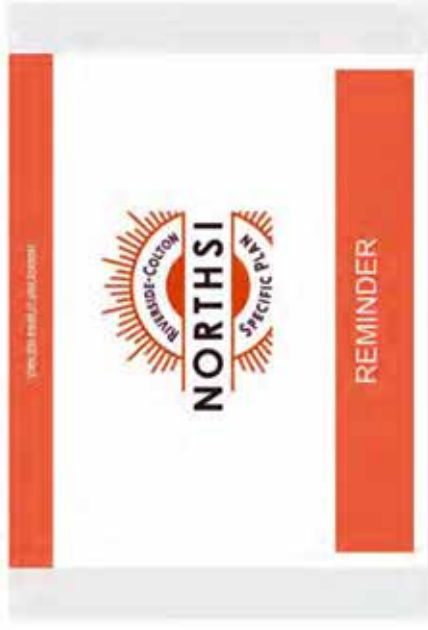
Thank you in advance for your time and consideration.

Cindy Eldred

Cynthia L. Eldred, Esq.
The Law Office of Cynthia L. Eldred, APC
4323 Alhambra Way
San Diego, CA 92103
Main: (619) 233-7366
Direct: (619) 233-7388
Cell: (619) 277-1388
cl@cl-eldred.com

This transmission is intended for the party to whom it is addressed and may contain privileged and confidential information. If you are not the intended recipient, any use, dissemination, or copying of this transmission is prohibited. Thank you.

From: Northside Specific Plan casasas@northsideca.gov
Sent: Monday, May 4, 2020 8:30 AM
To: Cynthia L. Eldred, Esq. <Cindy@cl-eldred.com>
Subject: REMINDER: Comments on the Draft Northside Specific Plan (Draft Plan) and Draft Program Environmental Impact Report (EIR)



11-7
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Response to Comment Letter I2

Sharon Kasner
May 25, 2020

I2-1

The comment suggests deletion or amendments to all sections stating that all truck traffic from the City of Colton via Main Street will make a left on Center Street to access the 215 freeway because the infrastructure near and around the Trujillo Adobe cannot maintain the additional truck traffic.

The Draft EIR discloses the potential impacts associated with two scenarios; Orange Street connecting northward and Orange Street terminating near the adobe. Both scenarios were included due in order to address the environmental consequences of each. Additional language has been added to the Pellissier Ranch discussion in the Northside Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic.

I2-2

The comment states that the trucks would have to travel less efficiently due to the lack of an on-ramp to the 215 freeway at Center Street. Refer to response to Comment I2-1. Potential impacts associated with alternative routing configurations were assessed as part of the Traffic Impact Analysis prepared for the EIR. Additionally, the Center Street Interchange provides access to the southbound freeway system. Trucks currently traveling southbound to Columbia to access the northbound freeway system would already be diverting to a less efficient access

Comment Letter I2

From: Sharon Kasner <shonkasner@gmail.com>
 Sent: Monday, May 25, 2020 9:58 PM
 To: Eastman, Jay
 Subject: [External] Northside-Specific Plan Comments

Good morning,

After reviewing the draft Northside Specific Plan, I agree with the Spanish Town Heritage Foundation Board to recommend section 4.2 Transportation be **deleted or amended** the sections stating that ALL TRUCK TRAFFIC FROM COLTON VIA MAIN STREET WILL MAKE A LEFT ON CENTER STREET TO ACCESS THE 215

This would force all truck traffic to travel on Center Street in front of the Trujillo Adobe, adding hundreds of additional trucks to the current excessive truck traffic in front of an already fragile structure! This is not acceptable.

To make matters even worse... If trucks can negotiate the intersection of Center and Stephens Streets - there is no northbound 215 on-ramp at Center Street! They would have to travel north on Iowa Avenue or double back south on Columbia Avenue along West La Colton Drive.

The streets on the northside of Riverside are not made for truck traffic; most are only one lane each direction, have no curbs and were built for residential car traffic only. The surfaces are not constructed to carry those heavy trucks. The intersections are not made for trucks to make tight right-hand turns and when attempting left-hand turns cut off all traffic. It is just not the right solution in this situation!

Truck traffic should access the 215 and/or 10 through Colton (Agua Mansa Road/Rancho/La Colton) as the majority of the traffic comes from Colton's warehouses. This would minimize truck traffic on both Center Street and Columbia Avenue.

Colton warehouse traffic needs to be handled by Colton, in Colton, and not impose on Riverside residential streets!

Thanks,

Sharon Trujillo-Kasner, Secretary
 Spanish Town Heritage Foundation

I2-1

I2-2

I2-3

I2-4

Response to Comments

point when compared to using existing access points to the northbound freeway system within Colton. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR

I2-3

The comment indicates that the northern side of Riverside is not made for truck traffic. Refer to response to Comment I2-1. Center Street has previously been and continues to remain designated as a four-lane arterial roadway. The Specific Plan additionally calls for improvements to key intersections along Center Street to add concrete pads at intersection to limit impacts of heavy vehicles to the pavement. A re-routing of truck traffic would not occur until such improvements have been put in place along Center Street. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR

I2-4

The comment suggests that truck traffic should access the 215 freeway and/or the 10 freeway through the City of Colton, and that warehouse traffic originating from the City of Colton should not impose of City of Riverside residential streets. Refer to response to Comment I2-1.

Response to Comment Letter I3

John Krick
May 26, 2020

I3-1

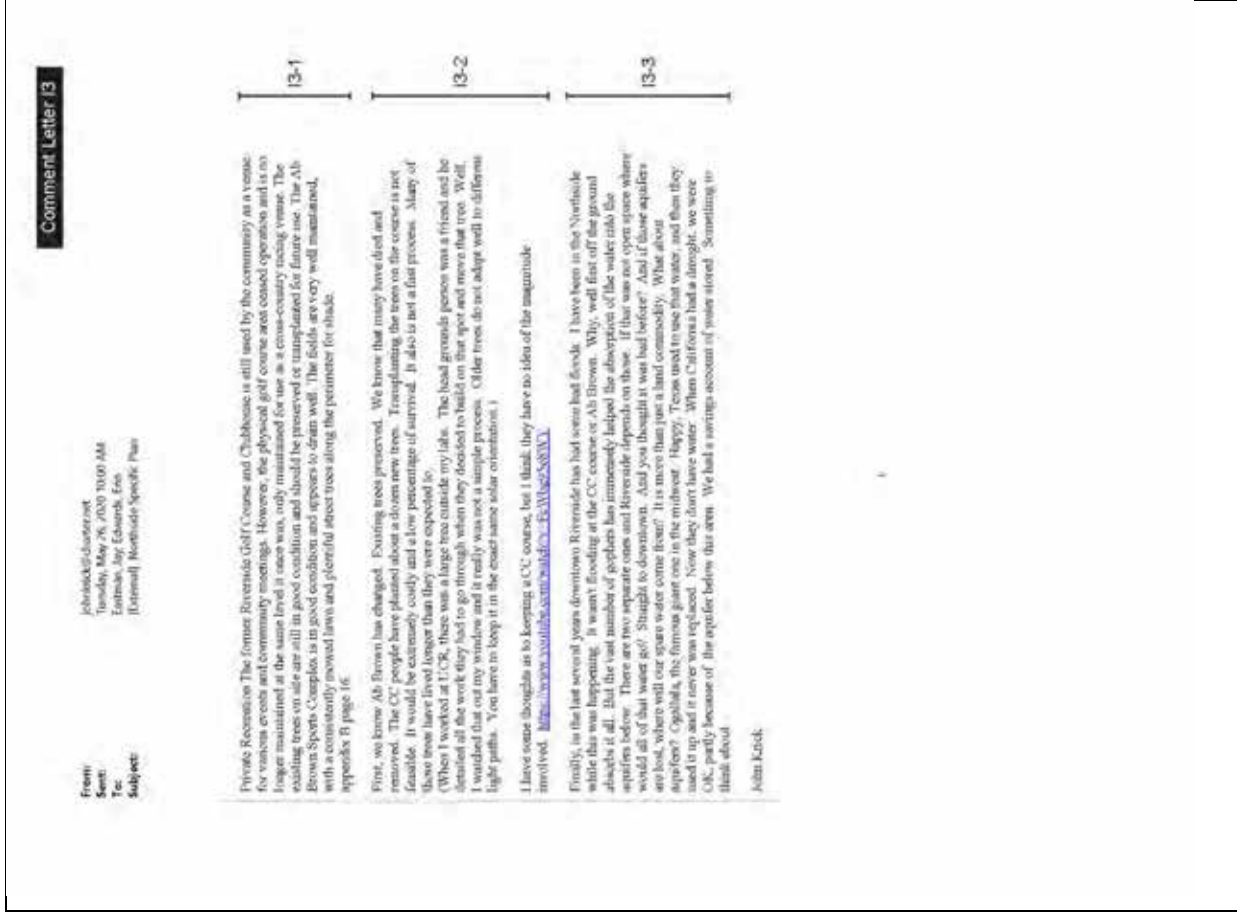
The comment provides information on the condition of the former Riverside Golf Course and the Ab Brown Sports Complex. The conditions and suggestions disclosed in this comment are noted. Refer to Draft EIR Section 3.9, Hydrology and Water Quality, and Final EIR Chapter 3, Errata, regarding drainage conditions. The Northside Specific Plan is a program-level document, and no project-level specific designs are included such as the relocation of trees. The comments provided are noted. No comment is provided on the environmental document. None-the-less, this comment will be included in the Final EIR for the decision makers to consider prior to approving or denying the project.

I3-2

The comment provides information on the condition of the Ab Brown Sports Complex and associated trees. The conditions disclosed in this comment are noted. The Northside Specific Plan would not preclude the use of the park for cross country running. No comment is provided on the environmental document. None-the-less, this comment will be included in the Final EIR for the decision makers to consider prior to approving or denying the project.

I3-3

The comment provides background information on the flooding conditions in the area and expresses concerns regarding runoff and aquifer water level under the proposed Specific Plan conditions. Refer to Draft EIR Section 3.9, Hydrology and Water Quality, regarding drainage conditions. An existing flooding issue is identified in the EIR, and impacts are



Response to Comments

appropriately disclosed. The EIR also states that the SPA us a zone of recharge for the river and underlying aquifers (see Draft EIR page 3.9-18) and determined the future allowed development under the Specific Plan would have a less than significant impact to groundwater (see Draft EIR page 3.9-24). As discussed in Draft EIR Section 3.17, Utilities and Service Systems, adequate water supply would be available to serve the Specific Plan (see Draft EIR page 3.17-29). No comment is provided on the environmental document. This comment will be included in the Final EIR for consideration by the City.

Response to Comment Letter I4

Mary Hamilton Trust
 Brent R. McManigal, Attorney for Gresham Savage Nolan & Tilden
 May 26, 2020

I4-1 The comment introduces Mary Hamilton Trust and states that they own 22 acres of land at Orange Street. The property is currently zoned for Business/Office Park, and the property would be rezoned under the Specific Plan as Multi-Family Residential. The comment is concerned about hardship to the property owner resulting from these zone changes. This comment does not address the adequacy of the environmental document, and no response is necessary. None-the-less, this comment will be included in the Final EIR for the decision makers to consider prior to approving or denying the project.

I4-2 The comment states that the Northside Specific Plan would create significant conflicts between existing and approved industrial uses and proposed multifamily zoning, and that the Draft EIR is flawed and not compliant with CEQA. This is an introduction to the following comments. Thus, refer below for responses to each comment provided.

Comment Letter I4

GRESHAM SAVAGE
 10000 15th St, Suite 1000, San Diego, CA 92161
 Phone: 619.444.8888 • Fax: 619.444.8889 • Email: info@greshamsavage.com

May 26, 2020

VIA Email: brmcmanigal@greshamsavage.com and city_clock@rivensideca.gov

City of Riverside
 Community & Economic Development Department
 Attn: Jay Eastman, Principal Planner
 Planning Division
 2900 Main Street, 3rd Floor
 Riverside, California 92522

Re: Northside Specific Plan EIR

Dear Mr. Eastman,

This Firm represents the Mary Hamilton Trust ("Trust") which owns 22 acres of land (the "Property") at 375 N. Orange Street, Riverside within the proposed Northside Specific Plan ("Specific Plan") area. The Property is located at the northwest corner of Orange Street and Garner Road. Under the existing City of Riverside zoning, the property is zoned Business/Office Park. Pursuant to the Specific Plan, the Property would be rezoned to Multi-Family Residential. This rezoning will result in significant hardship to the property owner due to the existing lack of demand for multi-family residential in this area, lack of jobs in the area to support housing, and conflicts between existing and planned industrial development on adjacent properties.

Implementation of the Northside Specific Plan will create significant conflicts between the existing and approved industrial uses and proposed multi-family zoning. The Northside Specific Plan creates and promotes antagonistic land uses on the same and adjacent properties. In addition, the City's Draft Environmental Impact Report ("EIR") is flawed and does not comply with the California Environmental Quality Act for the reasons outlined below in this letter.

I4-1

I4-2

14-3

This comment provides the commenter's opinion on industrial development and does not provide a comment on the environmental analysis. This comment will be included in the Final EIR for the decision makers to consider prior to approving or denying the project.

14-4

The comment states that their property is not within the TZO, and the TZO would allow industrial uses adjacent to residential uses. The comment notes that the Northside Specific Plan is lacking in details and buffers to prevent a situation in which industrial buildings are built close to residential development. The comment recommends the existing business park zone district along Orange Street remains to act as a buffer. In the Specific Plan, Section 3.7 Design Standards for Development Edges Within the Northside Neighborhood discusses the edge condition standards required to ensure that development or redevelopment addresses the interface with adjacent corridors and existing neighborhoods appropriately.

14-5

The comment states that the Northside Specific Plan is promoting a large area of incompatible land uses which would increase noise and traffic. The comment recommends the Specific Plan focus on developing areas with buffer zones and adequate planning concepts to create a more "harmonious" area. No comment is provided on the environmental document. The Northside Specific Plan provides a diverse mix of land uses development standards, and design guidelines that ensure compatibility of uses. A key concept of the Northside Specific Plan is the creation of edge condition standards designed to ensure development or redevelopment addresses the interface with adjacent corridors and existing neighborhoods appropriately. In addition, the proposed interconnected circulation system will help balance cars, pedestrians, and

Jay Eastman
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May 26, 2020
Page 2

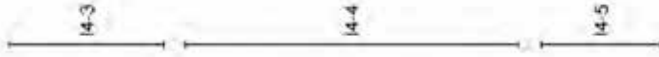
Background

As the City is aware, this area has been utilized for industrial development for years and the demand for industrial uses remains strong. Pursuant to our Client's April 23, 2019 letter in response to the Notice of Preparation for the EIR, the Property has been actively pursued by industrial developers consistent with the demand in the area. The Northside area has been allowed to develop in a hodge-podge manner, and while the Specific Plan is an attempt to stop prior practices, it will only exacerbate those past practices and further expand incompatible land uses.

The Northside Specific Plan Promotes Incompatible Land Uses.

The City applied the Transitway Zoning Overlay (TZO) to adjacent properties. The TZO allows certain property to develop pursuant to the existing zoning code (i.e. industrial), even if that property is zoned to residential. The Specific Plan, as proposed, will create inconsistent land use and is the epitome of bad planning. While there is no easy method to create an appropriate buffer zone between residential and commercial/industrial uses, there are good planning methods that can be designed into projects that act as incompatible land use. Due to the layout of the Property, industrial can be designed and developed with a buffer between the residential across Orange. The adoption of the Specific Plan with the TZO set applied to the Property will promote and allow industrial uses immediately adjacent to residential uses in direct conflict with each other. The Northside Specific Plan lack details and buffers necessary to prevent another "Sycamore Canyon" situation where industrial buildings are built close to and overpower the adjacent residential development. Good planning requires a single zone district on all properties within a block and incompatible zone districts to be separated by streets. The existing business park zone district along Orange Street, with Orange Street acting as the buffer, is good planning and should be allowed to remain.

The Northside Specific Plan should account for and accommodate the local and regional real estate markets. The proposed Specific Plan is providing a large area of incompatible land uses where there will be increased noise and traffic interface between the existing and proposed industrial uses and residential. The Specific Plan should focus on developing the area with buffer zones and sound planning concepts to build a more harmonious section of the City and not continuing the existing incompatibilities.



Response to Comments

bicyclists with the proposed Northside Village Center, Industrial Research Park, and recreation amenities. The creation of additional housing density around important services such as workplaces, food access, and recreation would reduce the need of residents traversing through the community via car because many would be able to walk or ride a bike. This comment will be included in the Final EIR for the decision makers to consider prior to approving or denying the project.

14-6

The comment states that the EIR Project Description is unclear especially with regards to the proposed zone changes or design criteria. Additionally, the Draft EIR does not describe or analyze the loss of Business Park area compared to the increase in housing units in Subarea 7. The comment recommends the DPEIR clearly identify where and how the land uses are being changed and analyze how those changes will impact the environment. As this is a programmatic document, the project description in Chapter 2 is intended to provide information regarding the approximately 2,000-acre area at a program level. Refer to Draft EIR Table 2-3 and the Final EIR Chapter 3, Errata, for details regarding the estimated residential units that would be allowed per the Specific Plan in Subarea 7. As detailed in that table, the 39-acre Subarea 7 would be designated as medium density residential and would expect to yield between 234 and 293 residential units.

14-7

The comment states that the EIR includes brief descriptions of the TZO but fails to analyze the impacts of having incompatible land uses adjacent to future "compatible" land uses. The comment recommends every section of the Draft EIR include an analysis of incompatible land uses resulting from the Specific Plan. The Draft EIR considers that the TZO has potential to result in a mix of land uses (see Draft EIR page 2-16), as indicated by this comment. This consideration is addressed throughout the EIR, as applicable. For example, the air quality analysis (Draft EIR page 3.2-56) considers that non-residential land uses may be developed adjacent to residential land uses, and there is potential for toxic air contaminants to be generated near sensitive receptors (Impact AQ-8). Similarly, the noise analysis also considers a wide range of potential noise-generating uses that could be intermixed with noise-sensitive receivers, but all future development would be

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Project Description:

The Draft EIR contains a fluid and confusing Project Description. The Project Description does not provide a clear concise description of the proposed zone changes or design criteria of the Specific Plan. In addition, the analysis of sections of the DPEIR uses variations and sub-variations of the project description such that it is unclear what is being analyzed in each section. Specifically, the DEIR identifies the Property as being located within Subarea 7; however, there is no description or analysis that shows the loss of Business Park compared to the increase in housing units. The DEIR should clearly identify where and how the land uses are being changed and must analyze those changes will impact the environment. The Courts have criticized that "an accurate, stable, and usable project description is the sine qua non of an informative and legally sufficient EIR" (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 105). The DEIR blurs the analysis such that the reader cannot determine what land uses are being studied and as a result, the analysis and DEIR is flawed.

Analysis of Transitional Zoning

The Specific Plan and DEIR include a Transitional Overlay zone that allows a property to be developed and operated in accordance with its existing zone designation. In most cases, the TZO will allow industrial uses to continue to exist or be built on land that the Specific Plan rezones to multi-family residential. As previously discussed, the Specific Plan promotes and allows an incompatible land use for the foreseeable future. The DEIR includes a few tables and brief description of the TZO, but fails to analyze the impacts of having incompatible land uses adjacent to future "compatible" land uses. Every Section of the DEIR should include an analysis of the incompatible land uses which will result. The City of Riverside has approved an industrial project for sub-unit 4, and that project has not yet been built. The DEIR assumes land uses built pursuant to the TZO will be present only in the near-term (DEIR Page 2-11). This assumption is flawed and incorrect. The DEIR is required to analyze all foreseeable impacts that arise from the Project and must consider and discuss all environmental impacts. (CEQA Guidelines §15126). The "floating" nature of the transitional zoning and potential land uses do not provide a stable description from which the DEIR can analyze the impacts (Wesley Meadows Community v. Department of Parks and Recreation (2017) 17 Cal.App.5th 277). The DEIR should look at the blend of potential uses to analyze compatibility and environmental impacts related to the blend of uses that is sure to exist.

Response to Comments

required to comply with the applicable noise ordinances that would ensure noise impacts would be less than significant at the programmatic level (see Draft EIR Section 3.1.1, Noise). As no specific comment is provided on the environmental analysis in this comment, a specific response cannot be provided.

14-8

The comment is unsure how or why the city of Riverside chose the two scenarios analyzed for Transportation, Air Quality, and GHG emissions. The comment recommends the EIR provide background and justification for the use of two development scenarios. The reason for analyzing two scenarios with Orange Street open or Orange Street closed is because the City of Riverside determined that keeping Orange Street open would potentially result in differing impacts; however, the City of Colton previously approved a residential development that takes access through Orange Street and prefers to keep Orange Street open. The analysis needed to review both scenarios to assess the impact of traffic movement. This dual analysis allows the understanding of the consequences of either action. Refer to Comment 14-5.

14-9

The comment states that the EIR failed to analyze the correct baseline and account for approved projects within the SPA. This comment incorrectly assumes that a CEQA document analysis has to utilize a cumulative project list approach. For clarification, refer to the introduction to Draft EIR Section 4.3, Cumulative Forecasting Methodology:

CEQA Guidelines Section 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis: "1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency [the list of projects approach], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions

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Transportation, Air Quality and Greenhouse Gas Emissions Underestimated

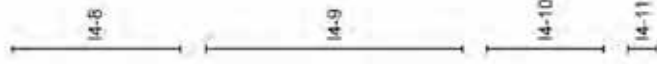
The DEIR arbitrarily identifies two build-out scenarios from which the transportation, air quality and greenhouse gas emissions are based on (DEIR Page 2-31). While the DEIR provides a justification for the two scenarios, there is no analysis on how or why the City chose those two scenarios. Similar to an alternatives analysis, the DEIR must provide background and justification for the use of two divergent development scenarios. As a result, the DEIR does not analyze the true project emissions impacts completely as required by CEQA and the Courts (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 302).

The Baseline and Cumulative Projects are Inaccurate

The Draft EIR failed to analyze the correct baseline and account for those projects that are approved and not yet built within the Specific Plan boundaries. For example, the Center Street Warehouse Project is ignored throughout the document although it is an approved project. Currently, the failure of the City to analyze adjacent warehouses in Colton with respect to the Center Street Warehouse in the cumulative impact analysis is being questioned by the Riverside Superior Court who has ordered additional briefing on the issue. Moreover, the Draft EIR glosses over Colton's clear mandate for industrial uses on the border of Riverside and the City's failure to analyze the anticipated uses liberally across the street does not comply with CEQA. (See March 15, 2018 Letter from Colton to Riverside stating Colton "has chosen to move ahead with Concept D [156 acres of light industrial and no residential] independently.") The City cannot simply ignore the existing and planned uses which will undeniably be located next to land the City proposes to zone as multi-family industrial.

In addition, the City (as required by law), has identified certain property within the Northside Specific Plan area as surplus property, which if purchased by a state entity would allow that entity to build any use the entity desired to be built irrespective of the zoning, which again could result in incompatible uses. (*Report of Lisa of California v. City of Santa Monica* (1978) 77 Cal.App.3d 139 holding that in view of the virtually plenary power state entities, state entities are exempt from local zoning regulations).

The City should analyze the potential for a state entity to purchase the surplus property and to analyze the potential uses.



Response to Comments

contributing to the cumulative impact [the summary of projections approach].” The summary of projections approach is used in this EIR.

As the Specific Plan is a community-wide programmatic planning document, the EIR utilized a programmatic cumulative environmental analysis approach. This analysis method does not include the list approach suggested by this comment, and instead considers the general buildout of regional planning document land uses in conjunction with the proposed programmatic Specific Plan development. As the area along the border of the City of Colton and City of Riverside referenced in this comment is within the SPA, the cumulative impact analysis considered the buildout of that area in accordance with the proposed Specific Plan.

The City of Riverside has been in ongoing coordination with the City of Colton regarding land uses within their jurisdiction. Ultimately, the City of Colton will decide to adopt or deny the Northside Specific Plan proposed land uses. See Draft EIR Section 1.2.2, Responsible and Trustee Agencies, for additional information.

I4-10

The comment states that the City identified property within the SPA as surplus property which if purchased by a state entity would allow that entity to build any use regardless of the zoning, which could result in incompatible uses. Comment noted. It is speculative to determine that the State will acquire this property; thus, no further discussion is provided herein.

I4-11

The comment recommends the City analyze potential for a state entity to purchase the surplus property and to analyze potential uses. Comment noted. It is speculative to determine

Response to Comments

that the State will acquire this property; thus, no further discussion is provided herein.

14-12

The comment states that the City needs to know the uses in which the State of California may build on purchased surplus property. The comment notes that without this information the analysis is incomplete. The State has not expressed any serious interest in the City of Riverside's surplus property. It is speculative to identify any information related to this; thus, no further discussion is provided herein.

14-13

The comment states that the EIR did not analyze a reasonable range of alternatives required by CEQA. While the fully analyzed alternatives list identified in this comment is correct, it is noted that the City of Riverside and the No Project Alternatives are not the same. To clarify, the City of Riverside Alternative would involve redeveloping the sites under the control of the City of Riverside as identified in the Northside Specific Plan and the remainder of the SPA would be developed in accordance with existing zoning. Refer to Draft EIR Section 6.7.1, City of Riverside Alternative Description and Setting, for additional details.

CEQA Guidelines Section 15126.6(a), requires an EIR consider a "reasonable range" of potentially feasible alternatives that will foster informed decision-making and public participation. The purpose of an EIR's alternatives discussion is to focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any of the significant effects of the Project (CEQA Guidelines, § 15126.6(a), (b)).

A reduced intensity analysis is already provided via the other alternatives presented, as the No Project Alternative Old Spanish Town Village Alternative, and the City of Riverside

14-12
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14-14

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14-14

14-12

The Alternatives in the DEIR do not reflect a reasonable range of alternatives required by CEQA (CEQA Guidelines 15126.6). The DEIR analyzed three alternatives, 1) No Project, 2) Old Spanish Town Districts and 3) City of Riverside. The No Project and City of Riverside Alternatives are essentially identical in that they both analyze the existing zoning. Under the No Project alternative, the current zoning for the project area is analyzed; however, under the City of Riverside Alternative, the existing zoning on all properties would remain the existing zoning, and the only change would be to those properties owned by the City of Riverside. Initially, the City of Riverside owned property is currently zoned private open space, so there is really no change as a more market appropriate industrial alternative consistent with the approved projects and real estate in the area. A reasonable range of alternatives is lacking in violation of CEQA.

14-13

Based on the following, we request the City revise the Northside Specific Plan to allow for the existing business/office zoning designations to remain and the City focus its efforts on supporting and promoting the growth of job-producing suburban and appropriate residential development. The Northside Specific Plan should be a document that focuses on good urban design that utilizes site layout to create adequate buffers between the residential/industrial interface. At a minimum, we respectfully request the City adopt the TZO over our Client's property so that it may be developed with a use that is in high demand in the area and not left vacant due to a zoning designation that is unlikely to be available to be utilized neither in the short-term, nor in the long-term.

Response to Comments

Alternative all include reduced intensity development relative to the proposed Northside Specific Plan.

Considering the No Project Alternative would assume buildout in accordance with the current plan that allows for additional industrial, and the project already includes a TZO that would allow for the continuation of industrial in certain area as the market allows, the EIR already analyzes an industrial alternative.

I4-14

The comment requests that the City revise the Northside Specific Plan to allow for existing business/office zoning designations to remain in the City while focusing on supporting and promoting growth of job-producing industries in appropriate locations. The comment also requests that the City allow the TZO to apply to the property on Orange Street. This comment provides input on the Northside Specific Plan proposed uses and does not provide a comment on the adequacy of the EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Jay Hartman
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May 26, 2020
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Please contact me with any questions.

Very truly yours,



Brent R. McManis, Attorney for
GRESHAM GAVAGE
NOLAN & TILDEN,
A Professional Corporation

CC: David Welch, DWelch@wmniskc.com

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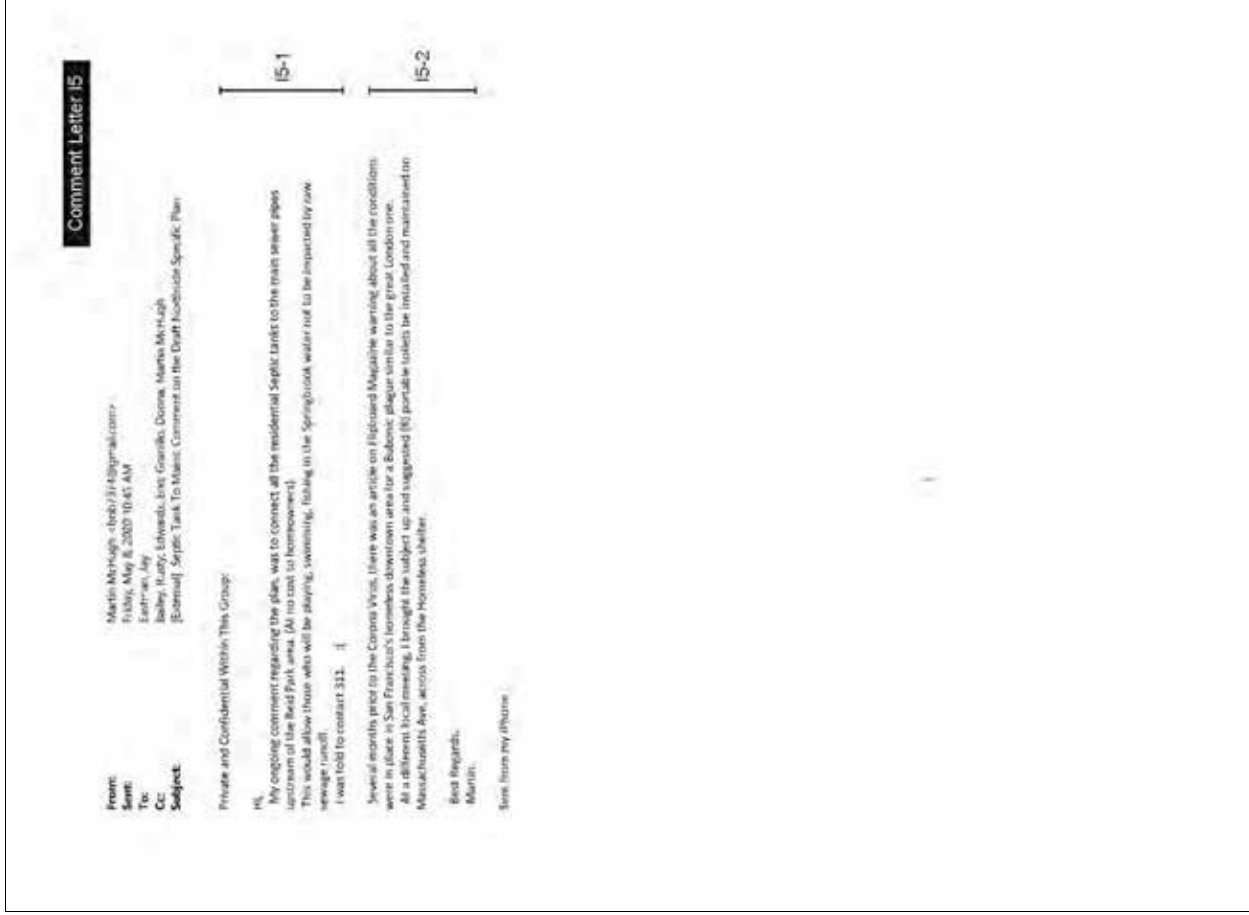
Response to Comment Letter I5

Martin McHugh
May 8, 2020

I5-1

The comment suggests connecting all residential septic tanks to the main sewer pipes upstream of Reid Park. The existing conditions of residents utilizing septic systems is not a result of the Northside Specific Plan. Existing septic systems are required to comply with wastewater regulations, including the Riverside County Department of Environmental Health regulations and the City of Riverside Chapter 14.16, Private Dumping and Disposal of Sewage. The City of Riverside Municipal Code Section 14.08.030 requires all new residences to connect to the City's public sewer system, and existing residences on septic systems "will not be required [to connect to the City's public sewer system] until the septic system for such house or other structure fails". It is the responsibility of each property owner to provide for such improvements and comply with applicable wastewater discharge requirements. If a septic system is not properly handling sewage and resulting in unlawful discharge of sewage, such instances are recommended to be reported to the City of Riverside Code Compliance Department.

The Springbrook Wash currently conveys runoff from the surrounding area, and the Northside Specific Plan would allow for the continued conveyance of water through the area. As such, this conveyance of runoff through the area is not a change in condition that is a result of the project. The channel improvements identified as a part of the Northside Specific Plan (including associated mitigation) are intended to improve the conveyance of water and reduce flooding, as well as provide



Response to Comments

an improved visual appearance and biological resource value. The proposed channel improvements are not intended to increase fishing, swimming or playing in the drainage. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

15-2

The comment suggests installing eight portable toilets on Massachusetts Avenue, across from the homeless shelter. The City of Riverside notes the suggestion provided in this comment. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project. As noted in your comment, you may also request this additional service be provided via 311. In addition to calling on the phone, it is noted you may submit a request for City services online at <https://crmweb.riversideca.gov/>. The City also provides other information related to homeless concerns at this website: <https://www.riversideca.gov/homelessolutions/>.

Response to Comment Letter I6

Nancy Melendez
May 25, 2020

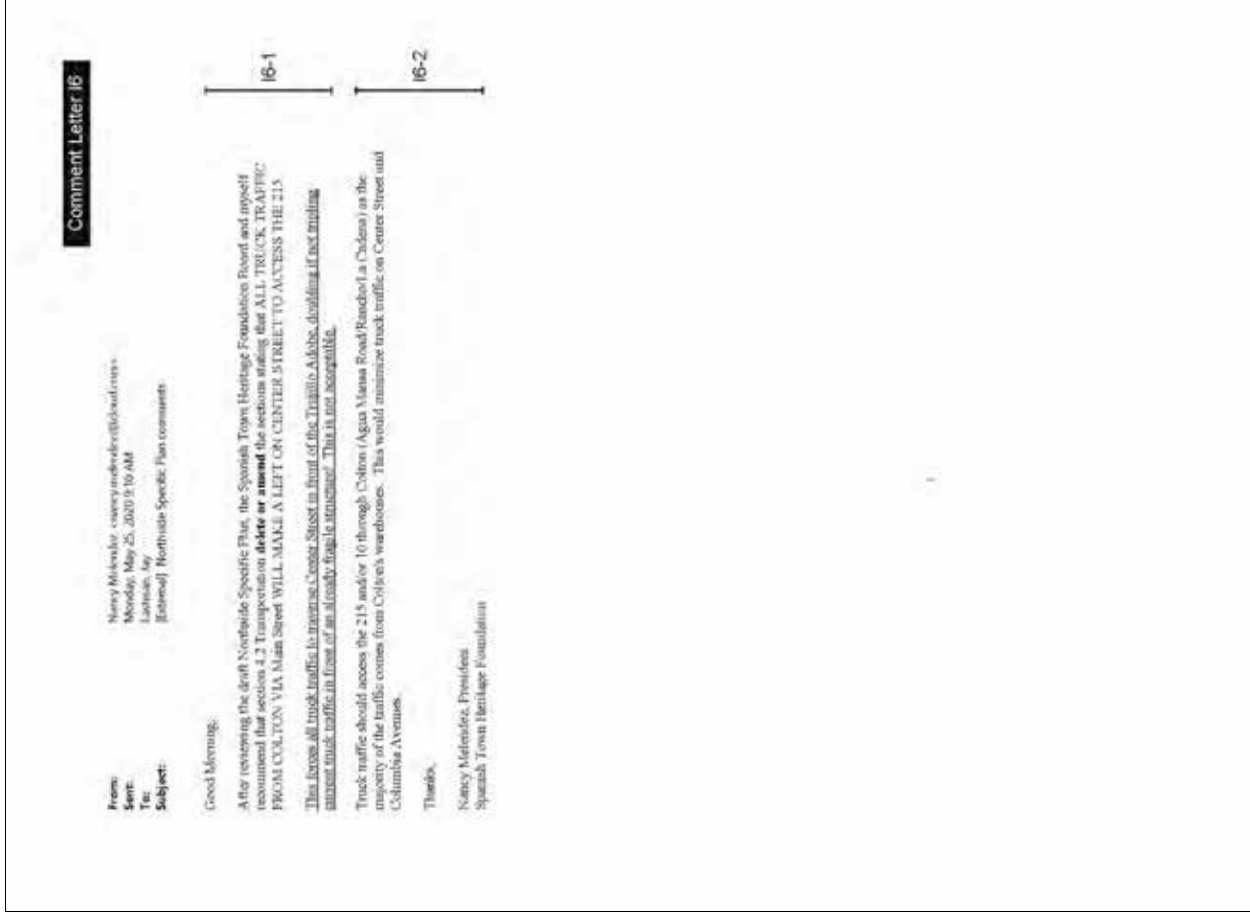
I6-1

The comment suggests deletion or amendments to all sections stating that all truck traffic from the City of Colton via Main Street will make a left on Center Street to access the 215 freeway because the infrastructure near and around the Trujillo Adobe cannot maintain the additional truck traffic.

Additional language has been added to the Pellissier Ranch discussion in the Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor is built that would accommodate a portion of the traffic. The Draft EIR discloses the potential impacts of both Orange Street scenarios throughout. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

I6-2

The comment suggests having truck traffic access the 215 freeway or the 10 freeway through the City of Colton to minimize truck traffic on Center street and Columbia Avenue. Refer to response to Comment I6-1 above. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.



Response to Comment Letter 17

Sala Ponnech
May 26, 2020

The comment is concerned that the EIR doesn't say much on carbon sequestration measures. As discussed in Draft EIR Section 3.7, Greenhouse Gas Emissions, the Specific Plan would have a less than significant impact related to GHG emissions and mitigation related to carbon sequestration, is not warranted.

The comment states that the biology section of the Draft EIR only addresses the unbuild areas of the Northside Specific Plan and the Draft EIR GHG section only mentions shade trees to mitigate for impacts, and states tree removal in other areas should be considered concerning tree removal. To clarify, the Northside Specific Plan does not result in a significant GHG impact and the measure referenced in this comment is from MM-AQ-7 (see EIR page 3.2-62) that is intended to reduce air quality impacts.

To clarify, Draft EIR Section 3.7.2 is intended to describe relevant plans, policies and ordinances, and is not providing any analysis of the project. The referenced Measure E-2 is from the City of Riverside Climate Action Plan (City of Riverside 2016) and the Northside Specific Plan is not intending to alter the City of Riverside CAP. The General Plan quotation is similarly projecting background on the existing policies in place.

To clarify, Table 3.7-12 provides an analysis of the project consistency with the City of Colton Climate Action Plan.

17-1

17-2

Comment Letter 17

Received on 05-26-2020 at 9:25 AM
From: Sala Ponnech <ponnech@att.net>, 3878 Pine Street, Riverside, CA 92508

COMMENTS ON NORTHSIDE NEIGHBORHOOD & PELLISSIER RANCH SPECIFIC PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT.

My comments combine the Specific Plan and the Draft EIR because I could not figure out how to comment on them separately without repeating much of the same information.

I agree that the best way to deal with greenhouse gases is not to generate them in the first place, but we should not ignore carbon sequestration measures. Unfortunately, the EIR says little about them.

Section 3.3. "Biology" deals only with the natural environment although there is a large amount of artificial vegetation in the southern part of the plan area. That is pretty much what I mean by "golf course". Section 3.7 "Greenhouse Gas Emissions" provides a little more information. For example, on page 3.7-23, Measure E-2 mentions planting shade trees in residential developments as a way to mitigate GHG. Table 3.7-10 on page 3.7-59 quotes the County of Riverside General Plan Policy language: "Preserve and promote forest lands and other suitable natural and artificial vegetation areas to maintain and increase the carbon sequestration..." These are just general recommendations without suggestions for implementation. Only in Table 3.7-12 is there a specific suggestion that the City find a method to account for tree removal.

Regarding that last comment, there is a way to do such accounting. "Quantifying Greenhouse Gases Mitigation Measures" (cited in the EIR's bibliography) gives a formula: the total sequestration capacity of converted land, newly vegetated land, and trees MINUS the combined capacity of vegetated land and trees that were removed (pp. 46-47). Table E-3 shows how many tons per acre/per year of carbon dioxide is accumulated by grass, forest, and cropland. These calculations need to be part of the report.

17-1

17-2

17-3

Response to Comments

The comment has been included in the Final EIR for review and consideration by the City.

17-3

The comment states that the GHG calculations should be incorporated into the EIR. Draft EIR Section 3.7 is intended to provide GHG analysis in laymen terms. GHG calculations were completed for the project utilizing California Emissions Estimator Model (CalEEMod), but are included in the detailed technical information provided in Appendix D. The CalEEMod analysis does not include carbon sequestration mitigation, as the GHG analysis identified no significant impacts and therefore no mitigation is warranted. Nevertheless, it is important to note that a majority of the specific plan area is developed or previously designated for development, and that changes in areas of vegetation are most readily compared through a comparison of the changes in land use category of Open Space/Natural Resources (OS). Air quality and GHG analysis presented in the Draft EIR includes evaluation of 2040 Baseline (Without Specific Plan Buildout) and Buildout Scenarios 1 and 2 as described in EIR Section 2. Emissions from the 2040 Baseline land uses (Existing Scenario) and Scenarios 1 and 2 were estimated using CalEEMod to present the net change in criteria air pollutant emissions. The Baseline GHG analysis included 214 acres of OS and the Specific Plan Buildout Scenarios included 232 acres and 190 acres for Scenarios 1 and 2, respectively. Resulting in an increase in OS areas from the Baseline scenario of 18 acres for Scenario 1 and a decrease of 24 acres for Scenario 2.

As described in the EIR, the Open Space, Parks, and Trails (OS) Zone would encompass area north of the proposed Northside Village Center in Subarea 8, within the former Riverside Golf Course and the Ab Brown soccer complex property. The current

Response to Comments

land use designations include Public Park (P), Public Facilities/Institutions (PF/I), Private Recreation (PR) and Medium Density Residential (MDR).

In addition, the Northside Specific Plan proposes restoration and enhancement of the Springbrook Arroyo, which would become one of the main features of the Northside Neighborhood. This Arroyo would vary in width for 100-200 feet for the entire length and would include habitat restoration to receive flood water. The arroyo would flow along its existing course, and some adjustments would be made to the course where it traverses the Northside's central park. From the Village Center, the Springbrook Arroyo would flow south of Columbia Avenue in the existing improved channel, to connect with Lake Evans in Fairmount Park. A backbone trail system would extend north from the Northside Village Center, following the existing course of the Springbrook Arroyo to Orange Street. The trail system would continue north along Orange Street, running north to the Trujillo Adobe Heritage Village, and continuing through Pellissier Ranch along the Open Space/Agriculture buffer area, and connect to the Santa Ana River. Additional trails would be developed throughout the SPA, providing connection throughout the neighborhood via active transportation methods.

In addition, the Northside Specific Plan includes a citrus garden within the Trujillo Adobe Heritage Village designation and encourages development of community gardens and agriculture as part of new development in the community

Although Scenario 2 results in a decrease of OS area of 24 acres, the restoration and enhancement of the Springbrook Arroyo, citrus garden, community garden encouragement and

Response to Comments

landscape requirements of all new projects will offset a portion of the vegetation loss for this scenario. Conservatively, if all 24 acres were assumed to be trees with a density of 100 trees per acre, then based on CO₂ sequestration factor of 0.0354 MT CO₂/tree/year, (2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 4) for miscellaneous trees, it is estimated that there could be potential loss of carbon sequestration of 85 MT per year of CO₂. However, as shown in EIR Table 3.7.6, there is an estimated reduction of 27,866 MT per year of CO_{2e} as a result of Scenario 2. Therefore, potential change in GHG as a result of vegetation loss is insignificant and offset by planned OS improvements and required landscape requirements.

17-4

The comment states that the EIR incorrectly claims that CEQA contains no required method for assessing GHG impacts. To clarify, the Draft EIR page 3.7-41 states the “CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures.” Draft EIR Section 3.7.3 goes on to explain the methodology utilized in the EIR analysis and the supporting explanation on why that analysis is appropriate. This section as well as Draft EIR Section 3.7.2 also discusses the Technical Advisory referred to in this comment. Ultimately, the GHG analysis identified no significant impacts and therefore no mitigation is warranted. Refer to Draft EIR Section 3.7.4 for additional details.

17-5

The comment expresses that more details regarding landscaping and tree preservation should be included in the EIR. The Northside Specific Plan is a programmatic document and is intended to provide planning at the program level. Project-specific details regarding landscaping design and specific tree information would be provided at the project level when specific development plans are proposed.

As indicated in Draft EIR Section 3.7, GHG Emissions, the project would have a less than significant GHG impact and no GHG reduction measures are required as mitigation. Section 3.8 of the Specific Plan requires mature trees at the former Riverside Golf Course to be saved in place or relocated, although there is no indication of how many mature trees (over 24 inches in diameter) are on the golf course or would be ultimately affected by future development within the Village area. The comment states that it will be difficult to run calculations on GHG emissions without the number of mature trees. As noted above, the Draft EIR provides a programmatic



Response to Comments

impact analysis and future analysis at the project level would be required when development plans are available. Refer to response 17-3 regarding sequestration for a conservative estimation of potential loss of vegetation carbon sequestration.

17-6

It is noted that this commenter is in favor of the Old Spanish Town Village District alternative since it retains trees and increases sequestration. It is noted that the GHG impacts of the project were determined to be less than significant and the inclusion of alternatives to reduce GHG emissions is not warranted (see Draft EIR Section 3.7, GHG Emissions). The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

response to Comment Letter I8

Diana Ruiz
May 26, 2020

The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

The comment states that page 3.6-2 of the EIR does not include all of the soils covered by the Specific Plan and suggests that soils present have potential to support agriculture. As discussed in Draft EIR Section 5.1.1 (Agriculture and Forestry Resources), the Northside Specific Plan would have no impact to a significant agricultural resource. While soils are a factor in determining if an area could be used for agricultural production, the determination of agricultural resource impacts within the environmental document was based on the CEQA Appendix G questions. These criteria include the California Department of Conservation's Farmland Mapping & Monitoring Program (FMMP) designation of the property, as indicated in this comment. As stated on Draft EIR page 5-1, "No area within the SPA is designated as, adjacent to, or in close proximity to any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2016a, 2016b)." As such, no impact to such resources would occur with the implementation of the Northside Specific Plan. Refer to Draft EIR Section 5.1.1 for additional details.

The comment identified Grangeville fine sandy loam as Class I-1 and indicated that soil is important to consider in land use planning. Refer to response I8-2 above. The comment has been

<p>Comment Letter I8</p> <p>From: Diana Ruiz <ruiz@erccolorado.com> Sent: Tuesday, May 26, 2020, 5:16 PM To: Eastman, Jay Cc: Shell Lamb Subject: [Internal] Comments on the Northside Specific Plan and Draft IIR.</p> <p>Follow Up Flag: Follow up Flag Status: Flagged</p> <p>Dear Mr. Eastman</p> <p>Thank you for a comprehensive Northside Specific Plan that includes community input and addresses many aspects of sustainability, including complete streets, expanded urban forests, and restoring Springbrook Arroyo. A sustainable community also includes land uses that create resilience and food security, and the draft plan omits the opportunity for agriculture on some of the best remaining undeveloped soils in the city.</p> <p>In the Draft EIR the soils were only evaluated for drainage and engineering use, not for agriculture. Page 3.6-2 of the Draft EIR does not include all of the soils covered by the specific plan. I saw no soils map (See page 4 of the Soil Survey of Western Riverside County) that delineates soils that have exceptional potential for ag production. These soils are not listed in the State's Important Farmlands Maps ONLY because they have not been in production for the past four years. Some are of the highest quality for agriculture: deep 0-2% slopes with low erosion potential, high water holding capacities and with no limitations for high production row crops. For example, San Emigdio Fine Sandy Loam (SFA) has a Capability Unit of Class II that would rate as a prime soil had it been farmed within the past four years. (The Class scale is from I being the best to Class VIII having the most limitations for ag.)</p> <p>Grangeville fine sandy loam is a Class I-1, with the highest Capability Unit and would also rate as a prime soil. Although these soils are not required to be mitigated for because they are not on the State's Important Farmlands map, they are an important, planning consideration and a missed opportunity.</p> <p>The city council adopted the "Food and Agriculture Policy Action Plan" in Spring of 2015 that includes the High Priority to preserve ag lands (page 27): "Develop an improved multi-faceted policy for long-term preservation of land most suitable for agriculture, including zoning, entitlement processes, and purchasing land that is at risk to keep or parcel in agricultural production." In this case, some of the land is already owned by the city, and the high quality soil resources should be evaluated for their potential best use.</p> <p>From a community benefit and sustainability analysis I ask: Why is agriculture not a priority, as are other types of businesses? We would be much more resilient and prepared for health emergencies, earthquakes, and climate change if Riverside could feed its populace utilizing some of its highest quality soils for agriculture. Once those soils are covered with development that opportunity is lost forever. Why has Riverside not incentivized successful ag businesses, such as growers from the central coast, to locate to our City, especially in place of unimproved warehouses? I'm told that PRU has a \$500,000 fund for use in agriculture and am wondering how that has been used to make our city more resilient. Could this money be used as an alternative in the Specific Plan and be more aligned with the City's "Food and Agriculture Policy Action Plan"?</p> <p>The Specific Plan does designate a very small area of erosive, marginal soil for a "buffer" of agriculture instead of prioritizing the use of the higher quality agricultural soils that produce higher yields with less inputs and at lower costs.</p>	<p>I8-1</p> <p>I8-2</p> <p>I8-3</p> <p>I8-4</p> <p>I8-5</p>
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Response to Comments

included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

18-4

The comment asks why agriculture and other types of businesses were not a priority over warehouses. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The intent of the Draft EIR is to analyze environmental impacts of the proposed Northside Specific Plan. Refer to the Draft EIR Section 2.3, Project Objectives, for a summarized list of the project objectives. Refer to the Northside Specific Plan for additional description of the project design. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

18-5

The comment notes that the Specific Plan designates a small area of erosive, marginal soils for an agricultural buffer instead of using higher quality agricultural soil that produce more with less input. The buffer area is intended to be a physical buffer between the Specific Plan uses and the area to the northeast.

18-6

The comment recommends requiring a more in-depth review of soil resources, potential agricultural land uses, incentives for farm businesses and opportunities for more sustainable actions. As identified in Draft EIR Section 2.3, it is an objective to “Maintain or improve employment and business opportunities within the SPA, including commercial, industrial and agricultural-related opportunities.” Additionally, the Northside Specific Plan permits agricultural uses in the Commercial Zone. It also recognizes the importance of Sustainable Development by providing goals and policies that promote sustainable best practices to achieve economic, environmental and aesthetic enhancements; and preservation of high-quality open space. Comment noted. Refer to Draft EIR Section 5.1.1 for additional details regarding agricultural resource impacts.



Response to Comment Letter I9

Erin Snyder
May 25, 2020

Received on 05-25-2020 at 11:51 AM
From: Erin Snyder snyderer@juris.com

Erin Snyder's comment on Northside Specific Plan

- Overall I appreciate the time and effort of the plan and attention to the neighborhood including retention of open space, reduction of Northside Village driveways off Columbia and the emphasis on sports as a community focus. (2.4.2 Northside Village, 2.4.3 Open Space)
- The presented Northside Specific Plan historical inaccuracies support the need for a cultural historical interpretive center to truly tell the story of the area. The proposed Trujillo Adobe Heritage Village is definitely a step in the right direction but the rendering in Figure 2-2 (2.4.4 p.19) has some proposed uses where there a current or approved development is probably not very realistic.
- Pellissier Ranch is where I have the most concerns. First, I appreciate the recognition in section 1.3 that identifies "preservation and groundwater recharge as potential strategies" and in my opinion this is the past/current and future value of the RPU owned properties in the Northside. 85% of the NSRP, and owned by us, the neighbors. Additionally, an industrial Research Park? That was tried already further up Springbrook Wash (contributing to the PEIR description of Springbrook Wash as "degraded". It didn't work, it didn't bring the desired business and much of it is now Sandella Church. (I'd love more to say about Air Quality and the proposed uses on Pellissier Ranch but I'll get back to it.)
- A great deal of the NSRP including the proposed residential development is in the floodplains of Springbrook Wash and the Santa Ana River. I've seen these areas underwater 3 times since 1998. While this is considered in the PEIR, I don't think the NSRP has addressed this concern adequately. (2.4.6)
- One of my biggest concerns is with the Transition Overlays. Main St. should include mixed use development. Business owners in this area have been restricted by changed zoning since the 1960s, most recently those associated with the Northside Redevelopment Zone. Many of the businesses along North Main St. have been there for years and are the extent of Northside business. Allowing them development options available in mixed use designations that are not allowed in the current zoning or the transition overlay would do more to support revitalized economic development in this area than anything else. All of Main St. should be a mixed use and commercial corridor, it's all the business we have and because of arbitrary map designation previously enacted, south Main St. is now considered Downtown, although we do appreciate its inclusion in this plan. (2.4.7)
- The proposed mixed use designation for the Northside Village Center should be considered for other areas, particularly North Main St. and Pellissier Ranch. (2.4.3)

Comment Letter I9

19-1

The comment praises the use of open space, reduction of driveways, and emphasis on sports. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

19-2

The comment notes that there are historical inaccuracies within the Northside Specific Plan (historical inaccuracies are not specified in this section of the comment letter). The comment supports the proposed Trujillo Adobe Heritage Village. As no specific historical inaccuracy has been specifically identified, no specific response can be provided. Figure 2-2 within the Specific Plan has been relabeled as a conceptual plan and is intended to provide a graphical representation of the type of development that would be supported by the TAHV zoning. The TAHV zoning would allow for the development of a cultural interpretive center as well as supporting retail and dining uses. Existing, permitted uses would be allowed to continue as legal, nonconforming uses. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-3

The commenter supports groundwater recharge strategies, but does not support the development of an Industrial Research Park in Pellissier Ranch. As indicated in the Draft EIR Table 2.3, this area is covered by a Transition Overlay Zone (TZO) that allows it to be developed with light industrial uses until the

Response to Comments

market allows for the development of industrial research park in this area. This flexibility is intended to address the market situation identified in this comment. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

19-4

The comment is concerned about potential flooding within the SPA as residential developments are proposed within the 100-year floodplain zone. As acknowledged in this comment, the flooding issue is disclosed in Draft EIR Section 3.9, Hydrology and Water Quality. The design of Springbrook Arroyo is intended to alleviate flooding issues throughout the Northside. Refer to the Final EIR Chapter 3, Errata, for additional information. Additionally, development projects would be required to construct street improvements to the ultimate width along their project frontages as well as improve any Flood Control Lines which run through or along any frontage of the proposed development consistent with the Master Drainage Plan. A project specific Hydrology study would be required to assess on and off-site drainage and recommend necessary mitigations to protect the proposed development as well as properties downstream. Projects would be required by the City to detain the 100-year storm runoff differential created by the increase in impervious surface.

19-5

The comment suggests having mixed-use development on Main Street to revitalize the area. The market analysis conducted for the Northside Specific Plan project in August 2017, "Baseline Opportunities & Constraints Analysis," along with community member, property owner, and City staff input, led the project team to propose the Transition Zone Overlay (TZO) and site the mixed-use Northside Village Center along

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Main Street. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-6

The comment suggests planning for mixed-use development not only in the Northside Village Center but along Main Street and Pellissier Ranch. The market analysis conducted for the Northside Specific Plan project in August 2017, "Baseline Opportunities & Constraints Analysis," along with community member, property owner, and City staff input, led the project team to propose the Transition Zone Overlay (TZO) and site the mixed-use Northside Village Center along Main Street. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-7

The comment does not support industrial uses, particularly warehouses. The market analysis conducted for the Northside Specific Plan project in August 2017, "Baseline Opportunities & Constraints Analysis," along with community member, property owner, and City staff input, led the project team to propose the Industrial Research Park use for Pellissier Ranch. The comment incorrectly states that industrial uses were not modeled in the Greenhouse Gas models. The EIR GHG modeling included light industrial land use in both Scenario 1 and Scenario 2, see Table 3.2-7 and Appendix D. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-8

The comment suggests that the TZO allows mixed use development. The Transition Zone Overlay (TZO) allows existing industrial uses to operate and transition over time to residential uses based on the real estate market. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-9

The comment asks if the public facility space at Orange Avenue and Columbia Avenue still considered for a proposed Police Department. The Northside Village Center area in Subarea 9 is still under consideration as a future police facility location (see EIR page 2-14, Northside Village Center). The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-7

19-8

19-9

19-10

19-11

19-12

19-13

- Section (2.4.8) addresses industrial uses which do not support, especially warehouse. An industrial Research Park has been unsuccessfully tried and particularly with the Riverside Innovation District is probably not a viable idea. Additionally, this use was not modeled in the Green House Gas models and would result in a much greater air quality impact. This designation should be changed to mixed use.
- Again, the transition zones should be mixed use including high residential but not limited to. (2.4.10)
- Public Facility space at orange and Columbia still being considered for Police Department.7 (2.4.11)
- Section 3.1 address land use and regulations. I had some questions in section 3.3 Use Tables.
- Agricultural uses are identified in the TANV and within established residential (Northside Heritage Meadows) and is supported in the NSP narrative in a number of places but is not designated in the table so I guess it's really not very supported.
- Are the sites identified in the TZO the only allowable uses?

Section 3.1 address circulation mobility and trails

- (2.2) The NSP proposes an arterial road east from Main St. to La Cadenia Dr. and the 215 interchange. Also proposed is the upgrade of Center St. to a 4 lane arterial. (5.1.47)
- Additionally proposed is a truck restriction on North Main St. for southbound trucks.
- This restriction will require trucks to turn east on Center St. to the freeway. (5.1.48)
- North Center St. upgrades are completed fits is not a viable alternative.
- The southbound Main St. truck restrictions should not be implemented until Center St. upgrades are complete and should be extended to the proposed Cotton lateral as soon as it is completed.

Appendix B

Identifies a number of other concerns not addressed in the NSP including sewer and storm drains. These are areas of concern and need to be addressed, hopefully in the final.

Comments on Northside Neighborhood & Pellissier Ranch Specific Plan Draft Program Environmental Impact Report

Section 3 Project Description (I did 2.2 Air Quality, 3.3 Biological and 3.7 Green House Gas)

- 3.2 Air Quality
 - One concern is that Table 3.2-2 Ambient Air Quality Standards and Table 3.2-3 Local Ambient Air Quality Data are not comparable and unhelpful.

Response to Comments

	<p>19-10 The comment asks if the uses identified on the Use Tables in Section 3.5 (Uses Table) of the Specific Plan are the only allowable uses for the TZO and the lack of inclusion of agricultural uses is questioned. The uses listed in the TZO are the only ones allowed. In addition to the agriculture in the Trujillo Adobe Heritage Village, approximately 41 acres of Pellissier Ranch is proposed as a buffer that may be developed with agricultural uses, as shown on page 32 in the “Land Use & Zone Description Table – City of Colton” section of the Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>19-11 The comment suggests that SB Main Street truck restrictions should not be implemented until Center Street upgrades are complete and extended to the proposed City of Colton lateral. Additional language has been added to the Pellissier Ranch discussion in the Specific Plan (see Section 2.4.5) and Final EIR Chapter 3, Errata, (see Section 2.4.2, Circulation, Mobility and Trails) that allows for east-west travel throughout the Northside Specific Plan. The Center Street corridor would continue to provide a connection to the neighboring Roquet Ranch via Orange Street until which time another east-west corridor which would accommodate some of the traffic. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>19-12 Appendix B in the Specific Plan identified concerns not addressed in the Specific Plan, including sewer and storm drain</p>
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Response to Comments

issues. The EIR addresses these utilities at a programmatic level in Draft EIR Section 3.17, Utilities and Service Systems.

19-13

In the EIR, the comment states that Draft EIR Table 3.2-1 and Table 3.2-3 are not comparable and are unhelpful. For clarification, Table 3.2-3 includes a column that provides the relevant ambient air quality standards from Table 3.2-1 for comparison with local ambient air quality data. Table 3.2-8 through 3.2-10 do not show recreational trips. The remainder of this comment accurately indicates significant air quality impacts would occur, including increase in emissions of nonattainment pollutants, and, even with mitigation, the air quality impacts would remain significant and unavoidable.

<p>19-14</p>	<p>3.2.3 Approach and Methodology and Table 3.2-4 Construction Scenario Assumptions. Identify their cumulative effects will impact non-attainment.</p> <p>3.2.4 Tables 3.2-8 through 3.2-10 Trip Rate Assumptions shows no recreational trips which does not consider sports and recreational focus.</p> <p>3.2.5 Section 3.2.6 Impact Analysis</p> <p>3.2.6 Identifies 10 Air Quality Impacts of potential significance and</p> <p>3.2.7 Section 3.2.5 Mitigation measures – identifies mitigations for impacts.</p> <p>3.2.8 Section 3.2.5 Levels of Significance After Mitigation – all impacts even after mitigation are considered significant and unavoidable.</p> <p>3.3 Biological</p> <p>3.4 Other jurisdictional requirements if met, along with any identified mitigations could result in less than significant impact.</p> <p>3.5 My concern is who hires the required Certified Biologist?</p> <p>3.7 Green House Gases</p> <p>3.8 Section 3.7.3 Thresholds of Significance again recognizes that projects could have additional cumulative impacts.</p> <p>3.9 Section 3.7.4 Impact Analysis p. 3.7.4.1 identifies Tiered approach to evaluate potential GHG impacts. Tier 3 figures for Mixed Use were used to generate emission Tables 3.7-4 through 3.7-6. However, according to NSP Table 3.4 Land Use and Zoning Description Tables the majority of the proposed use is 21,200,000 sq. ft. Industrial/Manufacturing/etc., 2,729,700 sq. ft. commercial (which I am assuming would be the mixed use?) and 15,803 housing units (no sq. ft. given but assuming at least 3000 ea. Could be approximately 15,803,000). Industrial figures should be used the difference is the 3000 MT CO2 for mixed use and 30,000 MT CO2 for industrial therefore skewing the findings of less than significant impact to Green House Gas emissions.</p> <p>Section 4 Cumulative Effects</p> <p>All environmental impacts identified are significant if taken cumulative. Findings are significant and unavoidable in all areas except energy, population, recreation, public facilities, recreation, utilities and wildlife.</p> <p>Section 5 Other CEQA considerations</p> <p>5.1.1 addresses Agriculture and farmland and while these lands are not currently identified as prime farmland they have been in the past and could be again if currently undeveloped, much of it having previously been agricultural farmland. The potential for reestablishing farmland and agriculture should have been explored further and supported in land use designations.</p> <p>5.2 addresses Growth-inducing effects, and include the statement "it must not be assumed that growth in any area is necessary/warranted of little significance to the environment."</p>
<p>19-15</p>	<p>The comment asks who will hire the certified biologist. As future projects are proposed, the applicants will be required in situations identified in the mitigation measures to retain certified biologists. Project specific technical reports, prepared by the Biologist, are required to be reviewed and accepted by the City.</p> <p>The comment is concerned that the GHG impact findings are skewed to be “less than significant.”</p> <p>To clarify, Draft EIR Section 3.7.3 describes the methodology and thresholds to be utilized in the analysis. The referenced “project” in that text refers to a general project, and is not intended to infer that the proposed Northside Specific Plan would result in a GHG impact.</p> <p>The commenter is correct in that Draft EIR Section 3.7.4 identifies a tiered approach to evaluate potential GHG impacts. The commenter is also correct that Tier 3 for mixed use was used for the GHG threshold of 3,000 MT of CO₂e. However, the Tier 3 3,000MT CO₂e value was used as the threshold to compare GHG emissions for significant impact. This value was not used to estimate GHG emissions from the various land uses of the plan scenarios. GHG emissions were modeling for specific land uses through CalEEMod, see Draft EIR Section 3.7.3. Additionally, since the value of 3,000 MT CO₂e for mixed use is less than the 10,000 MT CO₂e for industrial use, it is more restrictive for determination of significant impact and therefore more conservative.</p>
<p>19-16</p>	<p>This comment reiterates the findings of the cumulative analysis. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The</p>

Response to Comments

comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

19-17

The comment recommends exploring the possibility of reestablishing farmland and agriculture. Refer to responses 18-2 to 18-6.

19-18

The comment offers a quote of EIR Section 5.2, however it does not provide a complete quote. To clarify, EIR page 5-4 states "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

19-19

The comment states that the Old Spanish Town District is the best alternative. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

19-20

The comment is concerned that not all relevant local entities were consulted, such as the NSPA Colton Wildlands Conservancy, Rivers and Lands Conservancy, and Santa Ana River Conservancy of the California Coastal Conservancy. The City notified stakeholders throughout the process. The Rivers & Lands Conservancy, California Department of Fish and Game, Conservation Resource District – Riverside Corona, and the Western Riverside County Regional Conservation Authority have indicated interest in the project and have been notified of all aspects of the project. Although the Northside Specific Plan (NSP) does not specifically reference the PACT initiative, the City Traffic Engineer, who is managing the project, has been instrumental in developing the NSP. The City's Trail Planner provided the City's Trails Master Plan that has been incorporated in the Northside Specific Plan. Consistency with on-going City efforts and documents has resulted.



Response to Comment Letter I10

Judy Tanner
May 4, 2020

I10-1

The comment praises the Northside Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

Comment Letter I10

From: Judy Tanner <judy.tanner@northside.com>
Sent: Monday, May 4, 2020 12:21 PM
To: [External] Comment on the Draft Northside Specific Plan
Subject:

Thank you for all the work done on the Northside Specific plan. I am very happy with the results and feel that you and your team addressed all of the concerns and have put together a plan that will enhance and greatly improve life in our area. Good job!

Judy Tanner
Resident

I10-1

Response to Comment Letter I11

Transition Properties, LP (Andrew Lee, Allen Matkins Leck Gamble Mallory & Natsis LLP)
 & Natsis LLP
 May 25, 2020

111-1 The comment introduces the commenter and states that the letter suggests revisions to the Specific Plan. As no specific details are raised in this section of the letter, the City provides no further response to this comment.

111-2 The comment states that the Specific Plan's residential rezoning would impair existing uses and businesses as it would eliminate over 100 acres of industrial zoning and cause property devaluation. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project. The Transition Zone Overlay (TZO) allows existing industrial uses to operate and transition over time to residential uses based on the real estate market. The planning program has worked carefully to identify areas for more compatible uses. Recommendations for multi-family and single-family fit the character of the neighborhood and the market analysis conducted for the area identifies Medium Density Residential (MDR) as a preferred land use.

111-3 The comment states the Transitional Zone Overlay (TZO) would still cause the Transition's Center Street Warehouse to become legally nonconforming and devalue the property as a result of the zone changes. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and

Comment Letter I11

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Allen Matkins

Via Email/U.S. Mail

May 25, 2020

Jay Eastman, Principal Planner
 City of Riverside, Planning Division
 3900 Main Street, Third Floor
 Riverside, CA 92522
 E-mail: jeastman@rivsideca.gov

Re: Comments and Proposed Revisions to the Draft Northside Neighborhood & Pellissier Ranch Specific Plan and Draft Environmental Impact Report

Dear Mr. Eastman:

This firm represents Transition Properties, LP, ("Transition") the developer of the Center Street Commercial Building ("Center Street Warehouse" or "Project"), which the City of Riverside's ("City") City Council approved on December 11, 2018. We submit this letter to comment on the draft Northside Neighborhood & Pellissier Ranch Specific Plan ("Specific Plan") and its supporting Draft Program Environmental Impact Report (State Clearing House No. 20190303168, "DEIR").

As discussed below, Transition suggests slight revisions to the Specific Plan to ensure that the Project will be able to be developed and operated as a legally conforming use and to prevent Transition from suffering millions of dollars in losses, which could result if the Specific Plan is adopted in its present form.

In previous comment letters, Transition expressed concern that the Specific Plan's proposed residential rezoning would dramatically impair the existing uses and businesses, including the Center Street Warehouse, located along east-side Main Street and south-side Center Street. In 2018, we explained how the then-proposed conceptual Specific Plan would (1) conflict with the General Plan by eliminating over 100 acres of industrial zoning and (2) cause millions of dollars' worth of property devaluation by forcing these businesses to become legally nonconforming uses. (See Enclosure 1 [comment letter of August 21, 2018].)

In 2019, after the City released more details about the Specific Plan, Transition supported the City's inclusion of the Transition Zone Overlay ("TZO"), which allowed existing uses along east Main Street and south Center Street to continue as legally conforming uses until such time the real

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consideration by the decision makers prior to making a final decision on the project. The concept behind the TZO is to ensure that the uses legally established or permitted (entitled) prior to the effective date of the Northside Specific Plan will be considered legal conforming uses (Figure 2-6 of the Draft EIR Section 2). The TZO will be removed from a site when uses consistent with the Specific Plan's base zones are developed. In response to the community input during the outreach workshops, the City has set the 10,000 square-foot limit to prohibit large-scale warehousing and associated truck trips. Larger scale warehouses may be considered with the approval of a use permit. If a project is already entitled, the project may move forward in accordance with the entitlement documents.

<p>111-4</p>	<p>The comment introduces the next section of the letter. No further response is needed.</p>
<p>111-5</p>	<p>The comment details how the TZO, although would “allow the existing land uses to transition to new zones”, would still result in downzoning of Transition’s Center Street Warehouse as it is a 400,000 square feet building and the TZO, as currently drafted, restricts all warehousing to “buildings limited to 50,000 square feet.” The concept behind the TZO is to ensure that the existing uses would be considered in conformance with the Northside Specific Plan. Where applied, the Transition Zone Overlay authorizes existing land uses to transition to new uses as established by the Specific Plan’s base zoning designations. In the City of Riverside, the TZO authorizes existing and entitled land uses to continue and expand, until which time the real estate market allows the properties to transition to their base zone, which is multi-family residential. In the City of Colton, the TZO authorizes the existing and entitled uses to continue and expand, until which time the real estate market allows the properties to transition to their base zone, which is either High Density Residential or Industrial Research Park. Such existing and entitled uses are authorized to continue as legally conforming uses, without being required to obtain additional discretionary approvals, and to expand until such time the use is replaced by a base-zoning use. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>

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estate market allowed owners to convert their properties to the Specific Plan’s base-zoning uses. (See Enclosure 2 [comment letter of April 15, 2019].) But Transition noted at the time that much would depend upon the TZO’s particulars as it was only conceptual. (*Ibid.*)

Now that complete drafts of the Specific Plan and DEIR are available, Transition again has concerns about the Specific Plan’s effect on existing and entitled uses. Although the TZO is still conceptually acceptable, as it is intended to allow existing land uses “to continue and expand, until which time the real estate market allows the properties to transition to their base zone” (Specific Plan, p. 23), as drafted, the TZO would still result in legal nonconformities. Significantly, Transition’s Center Street Warehouse would become legally nonconforming because the TZO would (1) limit warehouse buildings to 50,000 square feet and (2) convert by-right warehouse uses into conditional uses. This would greatly devalue the Center Street Warehouse, at the beginning of its useful life, and would eviscerate Transition’s six-year, multi-million-dollar effort to develop the Project.

Because of our concerns, Transition respectfully submits the following comments regarding the Specific Plan and DEIR’s present shortcomings as well as proposed revisions to mitigate those shortcomings. As detailed below, Transition proposes slight revisions to the Specific Plan in order to clarify that fully-entitled projects, like the Center Street Warehouse, are covered by the TZO and allowed to continue until which time the real estate market allows a transition to the Specific Plan’s base-zoning uses.

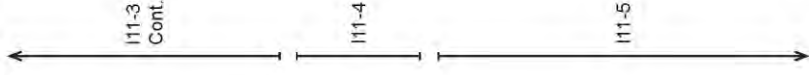
1. Specific Plan Comments and Proposed Revisions

A. Transition Zone Overlay

1. Transition’s Comments

As noted, the City developed the TZO in order to avoid impacting the existing light industrial land uses along east Main Street and south Center Street that are presently zoned Business and Manufacturing Park (“BMP”) under Title 19 of the City’s Municipal Code (“Zoning Code”), which would be severely impacted by the Specific Plan’s rezoning to High Density Residential (along east Main Street) and Medium High Density Residential (along south Center Street) base zoning. (Compare City’s zoning map to Specific Plan, p. 28 [Specific Plan land use map].) The TZO’s stated purpose is to allow “the existing land uses to transition to new zones as established by the Specific Plan,” when “the real estate market allows the properties to transition to their base zone” under the Specific Plan. (Specific Plan, p. 23.)

However, despite its purpose, the TZO, as currently drafted, would inflict a severe downzoning to Transition’s Center Street Warehouse. Presently, warehouses up to 400,000 square feet are authorized by right under the BMP zone. (Zoning Code, § 19.150.020.A.) However, the



111-6 The comment provides strikeout text revision to the TZO language. The general concept of the proposed edits have been included in the Specific Plan.

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TZO (1) makes all warehousing a conditional use (requiring a conditional use permit) and (2) restricts all warehousing to "[b]uildings limited to 50,000 square feet." (Specific Plan, p. 33). Thus, the Center Street Warehouse, which was approved as a by-right use and which exceeds 50,000 square feet, would be inconsistent with the TZO and become a legally non-conforming use.

2. Transition's Proposed Revisions

To avoid the negative impacts that the current draft of the Specific Plan would inflict on the Center Street Warehouse, Transition requests that the City implement several clarifying revisions to the Specific Plan's TZO designation. These suggested revisions better achieve the Specific Plan's goal of preserving and expanding existing and entitled permitted uses (Specific Plan, pp. 8 and 23), while also facilitating a gradual transition to new uses based upon market changes. Transition recommends the below text edits to the following excerpts of the Specific Plan:

- ~~Edit to text on page 23: Where applied, the Transition Zone Overlay allows ~~authorizes~~ ~~the-existing land uses to transition over time to the new uses~~ ~~established by the Specific Plan's base zoning designations. In the City of Riverside, the TZO ~~allows~~ ~~authorizes~~ ~~for-business-office-like~~ existing and entitled land uses to continue and expand, where such uses either (1) were in existence on (2) had received all necessary discretionary approvals for development prior to adoption of this Specific Plan. Such existing and entitled uses are authorized to continue as legally conforming uses, without being required to obtain additional discretionary approvals, and to expand until such, which time the use is replaced by a base zoning ~~use; the real-estate market allows the properties to transition to their base zone~~, which is multi-family residential.~~~~

- Edit to table on page 29, cell corresponding to "Transition Zone Overlay" / "Office, Research, Manufacturing, Industrial":

Total of 4,200,000 SF
Buildings up to
\$350,000 SF
0.5 FAR

- Edits to table on pages 33, the "Warehousing (Buildings limited to 50,000 SF)" cell and its corresponding cell under the "TZO" column:

First edit:	Warehousing (Buildings limited to 50,000 SF)
Second edit:	50

111-5
Cont.

111-6

111-7

The comment states that the suggested revisions to the TZO language would not be substantial enough to necessitate recirculation of the EIR. Comment noted. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

111-8

The comment provides strikeout text revisions to specific pages. The general concept of the proposed edits have been included in the Specific Plan and have been incorporated into the Final EIR, Chapter 3, Errata.

<p>Allen Mathias Leck Gamble Maloney & Natus LLP Attorneys at Law</p> <p>Jay Eastman, Principal Planner City of Riverside, Planning Division May 25, 2020 Page 4</p> <p>The above revisions to the Specific Plan would ensure that the TZO preserves existing uses like the Center Street Warehouse, as it was intended, while not leaving the door open to significant new development, as it would only apply to uses that existed or were fully entitled when the Specific Plan is adopted.</p> <p>2. Draft EIR Comments and Proposed Revisions</p> <p>A. Transition Zone Overlay</p> <p>1. Transition's Comments</p> <p>Any revisions to the TZO designation in the Specific Plan would have to be implemented and addressed throughout the DEIR. But apart from slightly modifying the DEIR's descriptions of the TZO designation, it does not appear that the modified TZO designation would require significant revisions to the DEIR, as the revised TZO would not, as a practical matter, authorize more intense uses. The revised TZO designation would still only allow existing uses to continue, but would simply clarify that the TZO covers fully entitled uses. As such, these revisions to the DEIR would not be significant enough to necessitate recirculation of the DEIR.</p> <p>2. Transition's Proposed Revisions</p> <p>Revisions to the DEIR to incorporate and account for the revisions to the TZO designation in the Specific Plan would have to be made. Transition recommends the below text edits to the following excerpts of the DEIR:</p> <ul style="list-style-type: none"> • Edit to text on page 2-13: The TZO would allow existing High-Capacity and Full-Suitability uses (City of Riverside) and light industrial uses (City of Colton) to continue, and transition to residential uses over time, as market conditions evolve. • Edit to text on page 2-13: The High-Capacity designation would also apply to the east side of Main Street as alternative, short-term uses allowed under the Transition Zone Overlay (TZO). • Edit to text on page 2-16: As previously mentioned, the TZO allows for the existing base designation to be utilized until the Northside Specific Plan designation can be implemented by land owners. This is to allow for a transition over time of uses from the existing base designations towards the ultimate vision and objectives of the Northside Specific Plan. The land use designation allows existing High-Capacity and Full-Suitability uses within the City of Riverside, and M-1 uses within the City of Colton, to continue, and to transition to HDR and BRP uses as market conditions 	<p>111-8 Cont.</p> <p>111-7</p> <p>111-8</p>
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111-9

Comment asks if the arroyo and trail will not run through the Center Street Warehouse site. It is noted the alignment of the trail is conceptual and program level in nature and the specific path has not yet been identified. Future project-level plans would be developed in the future. As the trail is developed, the City will work with property owners to determine the best location to minimize impacts from its development. The Springbrook Arroyo and associated trail system would take effect through public easements. The Springbrook Arroyo would be designed based on most recent flood control studies and would require easements through existing properties. The easements would allow development on most of a parcel's area and would not hinder any entire parcel.

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evolve. Once a property is developed with the Specific Plan's base zone, the TZO designation would be automatically removed.

- Edit to text on page 3.4-46: Subarea 4 would be subject to the Transition Zone Overlay, which would allow for ~~the existing and fully entitled~~ uses to continue to operate ~~under a Business-Office-Park land use designation~~, and would also allow for the expansion of light industrial and office uses similar to the existing developments on the west side of Main Street (Subarea 15).
- Edit to text on page 3.4-47: Subarea 5 would be subject to the Transition Zone Overlay, which would allow ~~the use existing and fully entitled~~ uses to continue to operate ~~under a Business-Office-Park land use designation~~.
- Edit to text on pages 3.4-47 to 3.4-48: Subarea 6 would be subject to the Transition Zone Overlay, which would allow ~~the use existing and fully entitled~~ uses to continue to operate ~~under a Business-Office-Park land use designation~~. Under the Transition Zone Overlay, Subarea 6 would yield a maximum of 718,700 square feet of ~~business-office-park, existing and entitled uses~~. While the change to High Density Residential would be a significant break from the historical use of the area, a change in use will have a less-than-significant impact on historic resources under CEQA. Continuing the use of Subarea 6 as ~~Business-Office-Park~~ also will have a less-than-significant impact for the purposes of CEQA.
- Edit to text on pages 3.10-30 to 3.10-31: A Transition Zone Overlay would apply to Subarea 1 to allow for transition of existing ~~and fully entitled~~ ~~Business-Office-Park~~ ~~and~~ ~~land~~ uses to High Density Residential (HDR) land uses (Policy LU-1.9).

B. Springbrook Arroyo and Walking Trail

1. Transition's Comments

Transition generally supports the Specific Plan's goal to restore and enhance the Springbrook Arroyo and to develop multi-purpose trails to follow the arroyo. However, Transition seeks to confirm that the arroyo and trail will not run through the Center Street Warehouse site, which would make the project a nonconforming use.

As depicted in the Specific Plan, the proposed arroyo and trail does not run through the Center Street Warehouse site. (Specific Plan, pp. 28, 49.) But, maps in the DEIR show the arroyo and trail running through the Center Street Warehouse site. (DEIR, Figures 2-6, 2-11.)

111-8
Cont.

111-9

<p>111-10</p>	<p>Comment requests that Figures 2-6 and 2-11 to be revised to match the Springbrook Arroyo depicted in the Specific Plan. These graphics have been updated, as detailed in the Final EIR Chapter 3, Errata.</p>
<p>111-11</p>	<p>Comment indicates that the single-family residence at 3667 Placentia Lane (site P-33-006973) was mistakenly identified as an “unevaluated, potential historical resource”, however the site was evaluated in a June 2015 site-specific Historical/Archaeological Resources Survey Report by CRM Tech. The commenter requests that the site P-33-006973 to not be identified in the DEIR as a potential historical resource.</p>
<p>111-12</p>	<p>The June 2015 site-specific Historical/Archaeological Resources Survey Report by CRM Tech document and site record update mentioned in this comment was not available from the EIC at the time of the record search request nor was it available in the most recent County of Riverside Built Environment Resource Directory from March 2020, which continues to list the status of 3667 Placentia Lane as “7R (not evaluated)”. Based on this information, it appears the final report has not been submitted to the EIC.</p> <p>The comment provides strikeout text revisions to specific pages regarding site P-33-006973. Each request is addressed below.</p> <p>EIR Page 3.4-24. All evaluated resources from the record search, whether they are eligible as historic resources or not, are to be included in this table to show record search findings. Instead of removing all mention of this site record entirely from this table, an update was completed based on the new information. Specifically, the Table NRHP/CRHR status column to “6Z (Found ineligible for NR, CR or Local designation through</p>

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2. Transition's Proposed Revisions

Transition requests that Figures 2-6 and 2-11 depicted in the DEIR be revised to be consistent with the alignment of the Springbrook Arroyo depicted in the Specific Plan. The depiction should clearly indicate that the Springbrook Arroyo and trail will not run through the Center Street Warehouse site.

C. Potential Historical Resource

1. Transition's Comments

The DEIR mistakenly identifies the abandoned and dilapidated single-family residence located on the Center Street Warehouse site at 3667 Placentia Lane (site P-33-006973) as an unevaluated, potential historical resource. However, site P-33-006973 was evaluated in a June 2015 site-specific Historical/Archaeological Resources Survey Report by CRM Tech as part of the Center Street Warehouse's CEQA studies. In that historical survey report, CRM Tech examined whether the site was associated with any persons or events of recognized historic significance or whether the buildings reflect any unique historic style or method of construction. The report evaluated the site against criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and the City's local designation of historic sites and found that the site did not qualify and, thus, was not a historical resource under CEQA. (Historical/Archaeological Resources Survey Report, p. 15.) The City has a copy of the survey report in its files for the Center Street Warehouse, but we can provide a copy upon request.

Because site P-33-006973 was found not to be an historical resource, which conclusion must “be conclusively presumed valid” for all CEQA purposes as it was never timely challenged (*Lammi Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1130; Pub. Resources Code, §§ 21080.1, 21167.2), Transition requests that site P-33-006973 not be identified in the DEIR as a potential historical resource and that the City not require any further evaluation of the site.

2. Transition's Proposed Revisions

To reflect that site P-33-006973 is not an historical resource, Transition recommends the below text edits to the following excerpts of the DEIR:

- Remove site P-33-006973 from table on page 3.4-24.
- Edits to text on page 3.4-46:

~~The 3667 Placentia Lane site is identified as a potential historical resource in the DEIR.~~

111-10

111-11

111-12

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survey evaluation)” and recorded year/date column to “2015 CRM Tech; 1982 T. Newman”. Refer to Final EIR Chapter 3, Errata.

Page 3.4-46. The comment recommends complete removal of all information on this page pertaining to the resource P-33-006973. The intent of the information is to disclose the results of the record search and potential impacts. Instead of complete removal, this information was updated to reflect the results of the June 2015 site-specific Historical/Archaeological Resources Survey Report by CRM Tech document. It is noted that this includes the conclusion that P-33-006973 is not considered a historic resource under CEQA. Refer to Final EIR Chapter 3, Errata. Specifically, the text was revised to the following:

The CHRIS record search results indicate that there was one (1) previously recorded resource within Subarea 4: a single-family residence located at 3667 Placentia Lane, built in c. 1922 (P-33-006973), which was identified during reconnaissance level survey in 1984 but not evaluated (Status Code 7R). This site record was updated in 2015 and found ineligible for NR, CR or Local designation through survey evaluation (Status Code 6Z). The 3667 Placentia Lane (P-33-006973) property, therefore, was determined not to be a historic resource for the purposes of CEQA. The HRI indicated that there were no additional resources identified in Subarea 4.

The Northside Neighborhood and Pellissier Ranch Specific Plan would redesignate land uses in Subarea 4 to Medium High Density Residential, which would

Response to Comments

yield 432 dwelling units based on a density of 18 du/ac. Subarea 4 would be subject to the Transition Zone Overlay, which would allow for the existing uses to continue to operate under a Business/Office Park land use designation, and would also allow for the expansion of light industrial and office uses similar to the existing developments on the west side of Main Street (Subarea 15). Since 3667 Placentia Lane (P-33-006973) was determined to not be a historic resource for the purposes of CEQA, the change in use will not impact historic resources. No other potential resources were identified in Subarea 4. Thus, no impacts to historical resources are expected within Subarea 4.”

Draft EIR Page 6-9 to 6-10. Updates were completed in the Final EIR Chapter 3, Errata, to reflect the additional information in the June 2015 site-specific Historical/Archaeological Resources Survey Report by CRM Tech document. Suggested changes were made with the exception of “found to be of no historical significance” text was updated with “found to not be a historic resource for the purposes of CEQA.”

EIR Page 6-20. Updates were completed in the Final EIR Chapter 3, Errata, to reflect the additional information in the June 2015 site-specific Historical/Archaeological Resources Survey Report by CRM Tech document. Suggested changes were made with the exception of the phrase “found to be of no historical significance” being updated with “found to not be a historic resource for the purposes of CEQA.”

111-13 The comment concludes the letter. No further response is needed.

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~~reference within Subareas 4 is a single-family residence located at 3667 Placentia Lane, built in c. 1922 (P-33-006973), which was identified during reconnaissance-level survey but not evaluated (Station Code: 7R). The HRI indicated that there were no additional resources. This property is visible in modern aerial photographs from as recent as 2018 and is assumed to still be present in Subarea 4 (2018, 2019, 2020, 2021).~~

~~The change in use would potentially result in a significant impact to the setting of 3667 Placentia Lane (P-33-006973), if the property is reevaluated and found to be an historical resource similar to C-152A. Any future projects that affect Subarea 4 would require the reevaluation of this property. Thus, impact to historical resources would be potentially significant within Subarea 4.~~

- ~~Edit to text on page 6.9 to 6.10~~ 3667 Placentia Lane, built in c. 1922 (P-33-006973) and located in Subarea 4 is an ~~historic~~ historic ~~resource~~ resource within Subarea 4.
- ~~Edit to text on page 6.20~~ 3667 Placentia Lane, built in c. 1922 (P-33-006973) and located in Subarea 4 is an ~~historic~~ historic ~~resource~~ resource within Subarea 4.

3. Conclusion

In the coming weeks, Transition requests that the City refine the draft Specific Plan and DEIR consistent with our recommended revisions to ensure that the Center Street Warehouse is not severely impacted by the Specific Plan's adoption, and Transition reserves the right to supplement these comments before the close of the public hearing on the Specific Plan. (*Graham Property v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal. App.4th 1109, 1121.) If the Specific Plan is adequately revised to allow existing and fully-entitled light industrial uses to continue until such time as market forces allow for existing uses to change to the Specific Plan's future envisioned uses, Transition would support the City's adoption of the Specific Plan.

Very truly yours,


Andrew Lee

AL
cc: Brian Norton, Senior Planner (via e-mail)
Colleen J. Nicol, City Clerk (via e-mail)



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VIA EMAIL

August 21, 2018

Board of Riverside Public Utilities
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City of Riverside
3900 Main Street
Riverside, CA 92522

Rusty Bailey, Mayor
City of Riverside
3900 Main Street
Riverside, CA 92522

Re: Opposition to the "Northside Neighborhood and Pellissier Ranch Inter-Jurisdictional Specific Plan" as Presently Proposed by Conceptual Plans

Ladies and Gentlemen:

This firm represents Transition Properties, LP, the developer of the Center Street Commercial Building ("Project"), which is presently on appeal from the Planning Commission to the City Council and set for hearing on October 9, 2018. We write this letter in opposition to the conceptual plans that the City of Riverside's staff have proposed for the *Northside Neighborhood and Pellissier Ranch Inter-Jurisdictional Specific Plan* ("Specific Plan").

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Enclosure |

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As presently proposed, the Specific Plan would eliminate over 100 acres of industrial zoning surrounding the Ab Brown Sports Complex in the Northside Neighborhood and rezone it to new residential, largely multi-family zoning. See Framework Plan; Land Use Plan; Concept A through C. Beyond poor planning, this proposed Specific Plan design would:

1. Conflict with the City's General Plan policies against eliminating industrial land; and
2. Cause millions of dollars' worth of property devaluation to businesses along the east-Main-Street and south-Center-Street corridors – including Transition Properties' property located at 3705-3667 Placentia Lane ("Property") – by forcing these businesses to become legally nonconforming uses.

If the Specific Plan were adopted as proposed without a concurrent overhaul of the General Plan, the Specific Plan would inevitably subject the City to planning consistency challenges. Further, the Specific Plan would likely subject the City to inverse condemnation lawsuits and the obligation to provide relocation services and pay relocation benefits.

As such, we request the City Council and Public Utilities Board to direct City staff to return to the drawing board and significantly redesign the Specific Plan to avoid causing a massive disruption to planning and business in the Northside Neighborhood.

I. The Proposed Specific Plan Would Conflict With the General Plan

Applicable to the Northside Neighborhood, the General Plan includes policies that aim to create a balance between office/commercial/industrial zoning and the low-intensity, single-family residential zoning historic to the area. See General Plan Policy LU-70. As part of this balance, the General Plan provides that the City should carefully "use [] the existing industrial base" and focus on the "enhancement of the small yet economically successful commercial and industrial sites" of the Northside Neighborhood. See Land Use Element ("LUE"), pp. LU-39, LU-106.

Specifically relevant General Plan policies include the following:

- Policy LU-24.2. This policy states that the City should "**strictly limit any redesignations or rezoning of land from industrial use**" and "**avoid encroachments of incompatible land uses within close proximity of industrial land.**" LUE, p. 40 (emphasis added); see also p. LU-106.
- Policy LU-25. This policy states that the City should "[a]dd to the City's industrial land base where logically and physically possible to do so." LUE, p. 40.

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- **Policy LU-70:** As mentioned above, this policy aims to create a "balanced community with sufficient office, commercial and industrial uses while preserving the *single family residential* preeminence of the community." LU-70, p. 107 (emphasis added).
- **Policy LU-72.8:** This policy states that the City should "[e]ncourage appropriate industrial development opportunities" in the Northside neighborhood. LU-72.8, p. 109.
- **Policy LU-74.5:** This policy states that the City should "[p]reserve and promote the *lower density* charm of the Northside" through the planting of more trees as well as by implementing "special design considerations" where residential and commercial/industrial land uses interface. LU-74.5, p. 110 (emphasis added).

These General Plan policies establish a clear mandate for the City to preserve and enhance industrial land uses and to "strictly limit" rezoning of land from industrial use.

Nevertheless, in one act, the proposed Specific Plan would *eliminate over 100 acres* of industrial zoning in the areas surrounding the Ab Brown Sports Complex (shown in teal below). See Zoning Map (affected industrial areas are the blue areas east of Main Street).



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The proposed Specific Plan would replace the industrial zoning with new multi-family (orange below) and single-family (yellow below) residential uses. See Specific Plan, Land Use Concept.



Significantly, the purpose of the high/medium density multi-family land use designations is not even clear as the staff report itself indicates that "higher density housing was not identified as a community priority" at the public workshops. Staff Report, p. 4. Indeed, the community even expressed concerns about the "impacts higher density housing would have on the community's existing lower density neighborhoods" and with locating "higher density housing along Main Street near existing industry." *Id.* at p. 5.

Regardless, this massive redesignation of land by the proposed Specific Plan would conflict with the General Plan's restriction on the elimination of industrial land uses. The only option to avoid inconsistencies between the General Plan and the proposed Specific Plan would be for the City to make multiple concurrent amendments to the text of the General Plan to eliminate the City's obligation to preserve industrial uses. Notably, there is no indication that a General Plan amendment is planned.

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2. The Proposed Specific Plan Would Damage Multiple Local Businesses, Including Transition Properties

The proposed Specific Plan would immediately cause multiple businesses along Main Street and Center Street, including Transition Properties, to become legally nonconforming uses under the City's Zoning Code. Under this statute, these businesses could be forced to shrink, amortize, or be surrendered over time and would be subject to all of the restrictions attendant to nonconforming uses. See Zoning Code § 19.080.010 et seq.

Transition Properties' Property is an important example of how the proposed Specific Plan will make businesses nonconforming. The below image shows the proposed Specific Plan's concept for a mixed-use residential neighborhood located on top of Transition Properties' Property (circled yellow below). As City staff have recognized, the proposed Specific Plan cannot prohibit Transition Properties' Project, as its entitlements were submitted well over two years before the City started work on the Specific Plan (Project submitted in December 2014 and first work on Specific Plan in January 2017). See Planning Commission Memorandum (Apr. 5, 2018), p. 5. But, the proposed Specific Plan would still make the Project nonconforming – severely diminishing its market value. This is despite the City's promise when annexing the Property that it would be zoned industrial.



Further, in just the blue polygon area depicted above, east of Transition Properties, more than twenty businesses will be made nonconforming, not just by the mixed-use residential project designation but also by the concept plan for Spanish Town (colored dark red). These variously include auto-related businesses (Brothers Towing, Riverside Towing Company, H&N Towing, Center Auto Repair, BAM Auto Services, Inc., M&L Auto Repair, Alberto's Auto Repair, Double

¹ However, it should be noted that the optimal Concept A of the proposed Specific Plan would only resolve the eastern half of the Property. See Concept A.

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City of Riverside City Council
Rusty Bailey, Mayor
August 21, 2018
Page 6

M. Towing; two auto wrecking facilities; and Bejar Trucking), construction-related businesses (Southwest V-Ditch; Prestige Omni; and a construction equipment rental facility), and storage-related businesses (AC Cambell Transport, JL Express, Inc., and Magana Pallet). Multiple other decades-old family businesses along Main Street (red polygon above and elsewhere) will also be impacted. Some of these affected businesses are members of the Northside Business Property Owners Association ("Association"), which separately submitted a letter opposing the proposed Specific Plan on August 22, 2018. (That letter is incorporated by reference here.)

Of course, this massive rezoning that will cause local businesses to become nonconforming will greatly damage their value – a devaluation worth *millions of dollars*. This great cost will inflict an unreasonable injury on these businesses and would likely constitute an illegal taking of property. Thus, if the proposed Specific Plan passed, the City would likely be subjected to massive liability for inverse condemnation suits and for the obligation to pay for relocation services and benefits to affected businesses.

3. The Proposed Specific Plan Is Bad Planning

Apart from its conflicts with the General Plan and its inevitable devastation of property values, the proposed Specific Plan simply is bad planning. Just a few examples include the following:

- **Locating multi-family residences adjacent to industrial businesses.** The proposed Specific Plan would locate high/medium density residences within stone's-throw distances from industrial and business complexes. This makes no sense. As the Association's August 22 letter aptly notes, it is poor planning to locate residences near industrial and business-park uses; this invites crime by isolating residences amid vacant complexes during nighttime hours. Inevitably, this inhospitable planning means that these residentially zoned properties will not actually be developed into residences for decades to come, until a major shift in the market occurs. Thus, these newly zoned properties would be economically wasted.
- **Colton will maintain industrial uses on Pellissier Ranch.** That the proposed Specific Plan would locate multi-family residential zones near industrial zones is further confirmed by the City of Colton's intent to maintain industrial zoning north of Center Street. In this letter directed to Mayor Baily on March 15, 2018, Mayor Richard DeLaRosa explained that the proposed Specific Plan's Concept A through C would be financially too burdensome for Colton and that it intends to support a Concept D. DeLaRosa Letter, p. 2. Under Concept D, all of Pellissier Ranch northeast of Main Street and Center Street would be zoned industrial. *Id.* at p. 1. Consistent with this, Colton recently approved a 236,512 square foot industrial

Enclosure 1

Allen Mathkins Leek Gamble Mallory & Nolasco LLP
Attorneys at Law
Board of Riverside Public Utilities
City of Riverside City Council
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warehouse just north of Center Street. Thus, the mixed-use, multi-family project that the proposed Specific Plan would create is the same project that would take property from businesses along Main Street and Center Street – would be located due south of industrial complexes, right across Center Street. Further, Mr. DeLaRosa explained that Colton conducted a Fiscal Impact Analysis that showed Concepts A through C of the proposed Specific Plan to be fiscally infeasible. Critically, based on the analysis, Colton concluded that "If there is still a strong demand for new industrial space within the Inland Empire" and that "in lieu, well designed industrial development will assist the City by paying for the needed infrastructure to serve south Colton's new homes and businesses." *Id.* at p. 2. Again, it is notable that there is no indication that the City has yet prepared a Fiscal Impact Analysis. Presently, there is no analysis to even show that any of the proposed Specific Plan's concepts would be fiscally feasible or responsible.

- **Northside residents desire low-intensity agri-hoods.** As noted by staff, Northside residents have expressed desire for "agri-hoods" (i.e., low-intensity, agriculturally-integrated, single-family neighborhoods) because they represent the history of the area and can support local restaurants, grocery stores, and farming co-ops. Staff Report, p. 5. This is vastly different from high/medium density multi-family residences. Indeed, such higher density residences are incompatible with agricultural uses, which tend to generate moderate air (i.e., odors) and water pollution that would be a nuisance to multi-family and commercial developments. The General Plan even contains Policy OS-4, which states that the City should "[e]stablish buffers and/or open space between agriculture and urban uses." General Plan, p. OS-16. Thus, it makes no sense that the proposed Specific Plan proposes high/medium density residential.

4. Conclusion

We understand the City's need to develop a well-planned and forward-visioning Specific Plan for the Northside Neighborhood. But, this proposed Specific Plan is not it. It is riddled with significant problems and needs reimagining, reworking, and some common due diligence. And it is our hope that the process moving forward will include the input of all Northside Neighborhood constituents – including local businesses.

Enclosure 1

Allen Mathias Leck Gamble Mulhery & Nussli LLP
Attorneys at Law
Board of Riverside Public Utilities
City of Riverside City Council
Randy Blakey, Mayor
August 21, 2018
Page 8

We request that copies of this letter be distributed to all City decision makers and for it to be placed into the record for this matter.

Very truly yours,



Andrew Lee

AL:ylp

cc: K. Erik Friess, Esq.
Colleen J. Niscol, City Clerk (via email)

Enclosure 1

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Allen Matkins | Jack Gumble Malloy & Nabors LLP
Attorneys at Law
1903 Main Street, 4th Floor | Irvine, CA 92614-7321
Tel: 949.251.4000 | Fax: 949.251.4000 | Website: www.allenmatkins.com

Andree Lee
Email: alee@allenmatkins.com
Direct Dial: 949.852.5884 | File Number: 79839-0001/00210486

Allen Matkins

Via Email/U.S. Mail

April 15, 2019

Jay Eastman, AICP, Principal, Planner
3900 Main Street, Third Floor
Riverside, CA 92572

E-mail: jeastman@riversideca.gov

Re: Support for the Transition Zone Overlay Concept in the Proposed
"Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional
Specific Plan"

Dear Mr. Eastman:

This firm represents Transition Properties, LP, the developer of the Center Street Commercial Building ("Project"), which the City of Riverside ("City") City Council approved on December 11, 2018. We write this letter to comment on the City's March 29, 2019 Notice of Preparation of a Program Environmental Impact Report and the associated Project Description for the Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan ("Specific Plan").

On August 21, 2018, we submitted a comment letter to the City for the joint meeting of the City Council and Board of Public Utilities' consideration of the Specific Plan in which we expressed the City's *non-proposed* conceptual Specific Plan. (See Enclosures attached.) Our August 21 letter detailed how the *non-proposed* Specific Plan would (1) comply with the General Plan by eliminating over 100 acres of industrial zoning and (2) cause millions of dollars worth of property devaluation to businesses along the east-Main-Street and south-Center-Street corridors – including Transition Properties – by forcing these businesses to become legally nonconforming uses. (See *ibid*.)

Given our previously-stated concerns, we are pleased to learn that the City has made revisions to the Specific Plan that are beginning to address ours and other local business' concerns. Specifically, we applaud the City's revision of the Specific Plan to include the Transition Zone Overlay ("TZO"), which would cover the east-Main-Street and south-Center-Street corridors discussed in our August 21 letter.

Los Angeles | Orange County | San Diego | Ventura City | San Francisco

Enclosure 2

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Allen Matkins Leck Gamble Mallory & Natiski LLP
Lawyers at Law

Jay Lussier, AICP, Principal Planner
3900 Main Street, Third Floor
April 15, 2019
Page 2

Conceptually, the TZO would allow existing industrial land uses to continue and even expand under the Specific Plan despite the Specific Plan's adoption of uses, mostly residential, base zoning for these areas. (Project Description, pp. 3, 4-5.) As outlined in the Project Description, the TZO would remain inflexibly active, augmenting the land uses authorized under base zoning and contributing to authorized industrial uses, and would be removed only if property covered by the TZO is developed pursuant to base zoning. (*Id.* at p. 3.)

We think the above TZO concept has the potential to fully address our concerns about the Specific Plan. However, we cannot be certain that the TZO will fully address our concerns until the City develops draft TZO provisions that specifically state what land uses will continue to be authorized under the TZO. In other words, the TZO appears to be effective in concept, but we would need to see its draft provisions to be confident of its adequacy.

As the City begins to draft provisions of the TZO, we respectfully request that the TZO include the following language:

- **Continuation of existing base-zone uses.** We ask that the TZO be drafted so as to authorize all of the light industrial land uses that are currently authorized under existing base zones, including the Business and Manufacturing Park ("BMP") zone. The Project, as may be developed and operated in the future, should not be nonconforming in any manner.
- **No phase out requirement.** We ask that the TZO exclude any provisions that would require existing light industrial uses to be phased out over time in favor of residential uses. The TZO should be removed only if the property is developed pursuant to base zoning.

In the coming weeks, we hope to see the City's further development of the TZO. If the TZO adequately ensures that existing and certified light industrial uses, such as the Project, will be authorized under the Specific Plan, we would support the City's adoption of the Specific Plan.

Very truly yours,


Andrew Lee

AL

cc: K. Lilla Friess, Esq.
Codyen J. Nicks, City Clerk (via e-mail)

Enclosure 2

Response to Comment Letter I12

Pete Wohlgemuth
May 26, 2020

Received on 05-26-2020 at 1:39 PM
From: Pete Wohlgemuth <pdn@valoo.com>

Comment Letter I12

I12-1

This is a response to the Northside Specific Plan and the associated PEIR. The Plan itself is very nice. It is easy to follow and paints quite a rosy picture of what the Northside Neighborhood could become. However, the devil is in the details and I wonder about the implementation.

I focus here on the sections of Geology and Soils and Hydrology and Water Quality in the PEIR. In the Geology and Soils section, some soils in the NSP area are identified as having a medium to high potential for liquefaction and subsidence. While the PEIR notes that the Plan itself won't exacerbate this problem, what does this say for any development on these soil types, either commercial or residential? With seismic activity or even the constant weight of any superstructure, these soils could deform and compromise the structural integrity of the building. And given this knowledge, wouldn't the City be liable for allowing any development on these suspect soil types? Although stabilizing gels are mentioned in passing to alleviate the problem, no supporting text is given about projects that have successfully used the gel in situations comparable to the Northside. How do we know they will work here? What are they made of? Are there any serious side-effects we need to know about? Much more information is needed to evaluate the potential use of these gels. Alternatively, perhaps the best use of land underlain by these unstable soils is open space.

I12-2

According to the Hydrology and Water Quality section, most of the area covered by the NSP is located in the 100-year floodplain of both the Highgrove Channel and Springbrook Arroyo. Potential fixes are made for re-constructing the Highgrove Channel to avoid a flood scenario, but, except for channel widening, not for Springbrook Arroyo. This means much of the Northside will be awash in the event of a 100-year flood. The map on Page 517 of the PEIR suggests the extent of the problem. Armed with this knowledge, how could the City authorize development on these lands, knowing that disaster is inevitable? There is not enough money in the City treasury to cover the lawsuits from this flooding. Flooding that will only be exacerbated by the new impervious surfaces created from NSP development. It seems incredible that the City would put itself in this position.

I12-3

No doubt there are engineering solutions to overcome both of these problems. These need to be explored before this Plan and PEIR are finalized. Again the solution may be simple: more open space.
Respectfully,
Pete Wohlgemuth, Hydrologist
Northside Neighborhood

I12-1

The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the City.

I12-2

The comment is concerned about seismic-related failure including liquefaction due to the lack of detail regarding mitigation. The comment would like to know more about stabilizing gels to be used during construction.

As identified on Draft EIR page 3.6-17, there is potential for liquefaction to occur within the SPA. All future development within the Specific Plan would be required to comply with the California Building Code (CM-GEO-1) that includes requirements to address liquefaction potential via soil remediation and design measures. Pursuant to the California Building Code requirements, each of the jurisdictions within the SPA require completion of geotechnical studies to address any geologic hazards associated with liquefaction and seismic-related ground failure (refer to CM-GEO-1, CM-GEO-2a, CM-GEO-2b, and CM-GEO-2c). The preparation of geotechnical reports in accordance with the California Building Code and local requirements would ensure that liquefaction risks would be reduced to below a level of significance.

The reference to the gelling agent was used as an example of methods that may be used to address liquefaction. Many other proven methods are available to address liquefaction. Please

Response to Comments

see the following link, which provides information supportive of this proven technology. In addition, see the bottom of page 3 of this article, which indicates that colloidal silica gel is nontoxic, chemically and biologically inert, and environmentally friendly: <https://www.mdpi.com/2076-3417/10/1/15>. While potential ways to address liquefaction are identified in the Draft EIR, the ultimate method shall be addressed through a site-specific geotechnical study. Due to the unique nature of each site and associated unknown development design, the liquefaction measures cannot be designed at the programmatic level.

112-3

The comment is concerned about flooding in the 100-year flood plain identified within the SPA. Flooding is addressed in Draft EIR Section 3.9, Hydrology and Water Quality. As detailed in that section, the Draft EIR identifies an existing flooding issue and discloses that the development allowed under the Specific Plan would contribute to that flooding issue, resulting in significant impacts related to flooding. A series of mitigation measures are presented in Draft EIR Section 3.9.5. The City of Riverside is in coordination with Riverside Flood Control and Water Conservation District to address flooding issues and the implementation of the needed flood control improvements (MM-HYD-1 to MM-HYD-2c). In addition, the mitigation requires levee accreditation for the Riverside Levee 2 flood protection area (MM-HYD-2), FEMA approval with Physical Map Revision or a Letter of Map Revision (MM-HYD-1d), a hydrology report demonstrating flooding would not be worsened by the project (MM-HYD-4) and verification that the development is above flood elevations (MM-HYD-5). Ultimately, future development within the Specific Plan would continue to be required to comply with FEMA floodplain regulations, including demonstrating it would not exacerbate a flooding issue. It is noted that updates were completed to the Draft EIR Section 3.9

Response to Comments

based on additional coordination with the Riverside County Flood Control and Conservation District. Refer to Final EIR Chapter 3, Errata.

Response to Comment Letter I13

Jim Wood
May 27, 2020

113-1
The commenter reposted Karen Renfro's (Springbrook Heritage Alliance) comment letter as it reflects similar views and concerns. Please see responses to comment letter O5.

Comment Letter I13

From: Jim Wood - jimwood@quentinus.net
Sent: Wednesday, May 27, 2020 9:16 AM
To: Karen Renfro
Cc: Eastman, Jay; Walsh, David; Espinosa-Brown, Mary; Menny, David; Egan-Mossy, Richard; O'Neil, Brian; Stophenson, Ivan; Baucus, Lou; Yalofic, Michelle; Morask, Springbrook Heritage Alliance; Harlicki, @yaleosprings.com
Subject: Revisited Amador@yaleosprings.com; ota.ap@amador@gmail.com
[Internal] Re: SPRINGBROOK HERITAGE ALLIANCE RE: NORTHSIDE SPECIFIC PLAN COMMENTS

May I report Karen's letter, as it reflects most of my views and concerns also. She has worked diligently on behalf of preservation and the Northside for many years. Footnote: The historic Elveta Thengs White Sulphur Springs location on Strong St. is now being developed. Respectfully,
James Wood, resident
951-684-0143
jimwood@quentinus.net

On May 26, 2020, at 4:27 PM, Karen Renfro wrote:
Springbrook Heritage Alliance
Saving the Treasures of the Springbrook Arroyo Watershed communities of RIVERSIDE - COLTON - HIGHGROVE - GRAND TERRACE

May 25, 2020
Jay Eastman, Principal Planner
Community and Economic Development Department
City of Riverside
3900 Main Street
Riverside, California 92522
CC: Northside Specific Plan Team
NORTHSIDE SPECIFIC PLAN REVIEW PERIOD

Dear Mr. Eastman:
Springbrook Heritage Alliance is pleased to submit our comments on the 78-page Draft Northside Specific Plan, 1,056-page EIR, and several thousand-page CEQA Studies for your consideration. Because of conflicts with work schedules, family obligations, Coronavirus constraint including the inability to hold our meetings, illness, and so forth these past two months, we have not been able to study these documents in as much detail as we would like. We apologize for this and hope you will accept this letter despite the fact we missed yesterday's deadline.

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GENERAL COMMENTS

First, we are very glad that the NSP is moving forward again and that our 2014 Parklands & Walking Trails proposal has been included in the evaluation, and that it received rave reviews from your team in the Environmental categories. However, there seems to be some confusion about our proposal, which we think needs to be cleared up.

- As explained in our outline, *Springbrook Heritage Parklands & Walking Trails* encompasses the entire Springbrook Arroyo Watershed and its many treasures from the scenic escarpment at the top of Pigeon Pass to the Santa Ana River, and tops of the peaks on the Box Springs Mountains, Blue Mountain, La Loma Hills, and Mt. Rubidoux, to be connected by an integrated network of walking trails and marked routes, including the Santa Ana River Trail & Parkway and Old Spanish Trail through Agua Mansa. See the map, outline and petition for our plan below.
- Spanish Town Village District* makes up one component of this scheme, taking in Pellissier Ranch and La Loma Hills from the Santa Ana River to Columbia Avenue, and La Cadena Drive to the Santa Ana River.
- La Placita Historic Park*, which we envision as a working, 19th-century farming village along the lines of the original village of La Placita de los Trujillos, would be located on what is left of Pellissier Ranch which is also the site of La Placita. It would include an archeological site because the foundations of La Placita and Pellissier Ranch buildings are still buried below the topsoil waiting to be discovered.
- The restored *Trujillo Adobe*, living history museum and cultural center complex—designed by Spanish Town Heritage Foundation—is the jewel in the crown of our Parklands proposal. Our desire is to see a land-use policy established that enhances the neighborhood around it.

Second, our Parklands proposal calls for

- Various undeveloped industrial parcels to be purchased by small-scale private entrepreneurs and rezoned for Old Spanish Town themed small-scale development, including but not limited to a farmer's market, community garden, gift and craft shops, neighborhood markets, farm-to-table historical restaurants, sports shops, small offices for professionals and non-profit organizations, historical bed & breakfast venues, and so forth.
- Rezoning Main Street to allow neighborhood service shops and offices—like a pharmacy or drug-store, barber shop, beauty salon, dry cleaners, florist, shoe repair, paralegal office, insurance agency, cafes and restaurants, small independent grocery store, doctor's office, and so forth—to be established along the lines of Norcor's old-town with crushed granite walkways protected by a curb instead of concrete or asphalt sidewalks.

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- New single-family, multi-family and senior residential development to be built on vacant parcels already zoned residential. These parcels are scattered around the Northside above Orange Street above the flood-plain and none of them are very far from Main Street. No residential proposed for Main Street--the location is in the Santa Ana River, Highgrove Channel and Springbrook Arroyo floodplains and flood regularly during rainy seasons.
- Allowing new development to grow organically according to the mutual needs of the neighborhood and the business investors.

Third, we do not understand how, in light of the above considerations, in Table 6.3 "Comparison of Alternatives Relative to Project Objectives" the "NSP" can claim our Spanish Town Village District proposal "does not meet objective" for the following:

- "1. Develop a sustainable community through the integration of a mix of land uses, including a diversity of affordable residential uses, a vertical mix of uses within key districts, and the location of residential in proximity of commercial and employment uses" Existing residential development already is located close to Main Street, La Cadena, Placentia, and Center Street employment, and if our Spanish Town Village District plan is followed, there will be many more businesses that will need people to work there. New affordable residential uses and a vertical mix of uses within key districts do not need to be laid out in advance to be viable
- "3. Maintain or improve employment and business opportunities within the SPA, including commercial, industrial and agricultural-related opportunities." Residents of the Northside do not want new industrial, or heavy commercial development in their neighborhood, and these kind of uses do not need to be here. Our Parklands proposal, especially the Spanish Town Village District and its major features, will, if allowed to go forward, would stimulate an economic boom based on the neighborhood's heritage. The neighborhood is not suited for large-scale development of any kind. The agricultural development we envision would be very small-scale (boutique-style specialty farms & gardens, 19th-century living history farming, etc.), not commercial farming with its attendant nuisances. We do not envision hydroponics, greenhouses or other indoor farming, but traditional outdoor venues with as little modern equipment as possible. This would attract tourists, school field trips, shoppers, neighbors within walking distance, and so forth.

We do not have time to pursue these issues now, but there are a few more problems that need to be addressed, the numerous factual errors contained in the Cultural section of the Draft NSP EIR. Because time is running short, we will mention only a few misrepresentations:

- that La Placita de Los Trujillos was "developed by" Lorenzo Trujillo. This is incorrect. La Placita was founded by Lorenzo Trujillo and his family, and each

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head of household received title to a strip of land that ran from the top of the alluvial fan at La Loma Hills to the Santa Ana River. Each title-holder developed their own land which must have included an adobe house and an adobe barn for their own livestock & stores. They were the first native Americans in California to own their own real estate according to the Spanish-Mexican custom. It elevated them to the social level of minor gentry that the original village of La Placita was located somewhere other than present-day Pellissier Ranch. This is incorrect. The foundations of the 1844 village (pre-flood) and the foundations of the 1862 village of La Placita are located on the alluvial fan below La Loma Hills, and the foundations of both are buried under the topsoil waiting to be discovered. The 1862 Trajillo Adobe is located at the original southern border of La Placita. As the years progressed, the Southern boundaries of La Placita moved toward the city limits of Riverside, and the Eastern boundaries moved toward present-day Highgrove. In fact, Highgrove was settled by residents of La Placita after the Flood of 1862, and it was called "La Placita II".

These errors may seem insignificant, however, along with the other errors not listed, they give the impression that Riverside's oldest neighborhood is of less historical importance than the Mission Inn, or the Parent Naval Orange Tree.

This impression is bolstered by a comment in the NSP Program EIR in Section 3.6: Geology and Soils, question c. Seismic-related ground failure, including liquefaction. The area in question, located in the Santa Ana River, Highgrove Channel and Springbrook Arroyo's flood plains, has been identified by the City of Riverside in its General Plan as being a high-risk zone for liquefaction and seismic-related ground failure. Nevertheless, the NSP EIR rates future development as having a less-than-significant risk of loss, injury, or death, and the risks could be mitigated by use of a gelling agent during construction. The gelling agent referred to is not named, but apparently is compounded from industrial waste. This raises several questions of importance to the neighborhood.

1. What is it made of?
2. How stable is it?
3. What is its life-span?
4. What are the costs of the material and using it?
5. What examples are there of structures where it has been used?
6. Is it toxic to the soil, to groundwater, to air, to people, to animals, to plants?
7. Has it been approved for use in the United States or California?

We are unhappy that the Riverside Championship Cross Country Course, formerly Riverside Golf Course, is to be chopped up for high-density residential, commercial and office development at the southern end. The RFD has wells and underground water on this site and should not be developed at all. The NSP also calls for recontouring

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the Springbrook Arroyo so that it no longer follows its current channel from La Cadena Drive to Orange near Garner, and around Red Park but is to be connected to the Highgrove Channel north of the Trujillo Adobe and come through the middle of the Cross Country Course. The expense of this undertaking would be enormous, to no discernible purpose, and violate the whole principle of preserving an ancient heritage. Our Parklands proposal calls for an urban forest, native botanical gardens, cross country course, unimproved park for use by groups who do not want the usual amenities and by the public when it is not being used for events.

The lack of concern about flooding below Orange, which occurs to some degree even in a moderate rainstorm, is concerning. If the open space area below Orange is developed with large-scale residential, commercial or retail projects, the amount of run-off water will be increased and not only the river and arroyos will become polluted, but so will the land. The fact that the NSP Team has not consulted the Santa Ana Watershed Project Authority for their expertise seems senseless. But we know that they do not recommend large development projects in the flood plain because the water resources are too valuable to waste with development that could flocated somewhere else.

Conclusions cited elsewhere in the NSP and EIR indicate that however valuable the archeological heritage of the neighborhood may be, it is not as valuable as industrial development. The fact that the City of Colton governs the site and is anxious for more revenue muddles the issue here. If we continue in the direction that the NSP indicates, we will lose irreplaceable community treasures whose value cannot be measured in dollars and cents, but in connections to our heritage, our identity as a diverse and unique community, and the land we live on.

We thank you for this opportunity to contribute to the public review, and for your consideration of our concerns.

Yours respectfully,

Karen Komfo, Chair
Springbrook Heritage Alliance
(951)787-6617
k.a.komfo2@gmail.com
info@springbrookheritagealliance.org
springbrookheritagealliance.org
HERA/2020/09_Responses_0201

ATTACHMENTS



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Late Letters

Response to Comment Letter A10

Greater Riverside Chambers of Commerce
 Cindy Roth, President/CEO
 September 3, 2020

A10-1 The comment introduces the letter and expresses support for the Northside Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.



August 24, 2020

Chair Kirby
 Members of the City Planning Commission
 3900 Main Street
 Riverside, CA 92501

Planning Commission: September 3, 2020
 Agenda Item 4

RE: Northside Neighborhood & Pellissier Ranch Specific Plan Alternative - SUPPORT

Dear Chair Kirby and Members of the City Planning Commission

On behalf of the Greater Riverside Chambers of Commerce, representing over 1,370 local employers and 110,000 jobs in the Inland Southern California region, we request your **SUPPORT** of the Northside Neighborhood & Pellissier Ranch Specific Plan alternative with the recommendation that the City continue to work with Riverside Public Utilities regarding inclusion of energy distribution at Pellissier Ranch. The Chamber has remained actively engaged since 2015 in the City's community-based planning for the development of a viable and comprehensive land use specific plan for the largest designated specific plan in the City. Of the four alternatives evaluated, the Chamber's Hunter Park Board and Economic Development Council, comprised of key stakeholders, developers and business leaders voted in unanimous support of the Northside Neighborhood & Pellissier Ranch alternative for the Northside Specific Plan.

The Chamber convened key stakeholders to attend and provide feedback at community workshops as the framework was developed and continued to work closely with the City and Rick Engineering Company to provide feedback on the Draft Land Use Plan & Project Description in 2018 as well as the Draft Program Environmental Impact Report between March and April 2019. The Hunter Park Board engaged in the public scoping meetings in 2019 to provide additional insight and voiced support on the benefit of transition zone overlays to provide maximum flexibility and protection for property owner rights to set the City up for success in the future. The Chamber invited representatives from the City and Rick Engineering Company to provide ongoing updates to the Chamber from 2019-2020. The Chamber comments the work the City and Rick Engineering Company have done to champion public-private partnerships, and create a Draft Plan to help guide the Specific Plan Area (SPA) land use, mobility, and environmental decisions to improve the Northside's vitality and future growth.

This proposal will streamline the development process and plan for a mix of uses, resulting in a vibrant community, improved circulation and mobility options to protect the character and image of the Northside Neighborhood. The plan will champion the private sector, capitalizing on the many opportunities of the Northside Neighborhood that will result in a quality of place, vibrant mixed-use districts, high quality parks and open spaces, and unique employment opportunities and more jobs in our region. For these reasons, the Chamber requests your **SUPPORT** for the Northside Neighborhood & Pellissier Ranch alternative for the Northside Specific Plan. Thank you for your consideration.

Respectfully,

Cindy Roth
 President/CEO

(951) 883-5070

3983 University Avenue, Riverside, CA 92501 • Phone: (951) 983-7109 • Fax: (951) 983-5070
 www.riverside-chamber.com

Response to Comment Letter A11

Western Municipal Water District
Thomas G. Scott, P.E.
September 4, 2020

A11-1 The comment states that the Western Municipal Water District has no public comment. No response is needed.



Notice of Public Hearing

Community & Economic Development Department
 Planning Division
 City Hall
 3900 Main Street
 Riverside, CA 92501

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You are invited to attend a virtual public hearing before the City of Riverside Planning Commission for the following project. View virtual meeting live webcast at www.engageriverside.com.

DATE OF NOTICE: August 7, 2020
VIRTUAL MEETING INFORMATION: September 3, 2020, 9:00 a.m.

APPLICANT: City of Riverside

PROJECT LOCATION: Generally bounded by Pellissier Ranch (Colton) to the north, State Route 60 (SR-60) and portions of Main Street in Downtown Riverside to the south, Interstate 215 (I-215) and residences to the east, and the Santa Ana River to the west.

CASE NUMBERS: P19-0064 (General Plan Amendment), P19-0065 (Specific Plan), P19-0063 (Zoning Code Amendment), P20-0443 (Rezoning), P19-0066 (PEIR)

CASE PLANNER: David Murray, Principal Planner, (951) 826-5773 or dmurray@riversideca.gov

Thomas Scott Principal Engineer
 Western Municipal Water District
 14205 Meridian Parkway
 Riverside, CA 92518 9251833045 004

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Notice of Public Hearing

PROPOSAL: To consider the following items in conjunction with the proposed interjurisdictional Northside Neighborhood and Pellissier Ranch Specific Plan (NSP): **1) General Plan Amendment** to amend the Land Use and Urban Design Element of the General Plan to include the Northside Specific Plan into Table LU-2, amend Figure LU-9 – Neighborhoods to adjust neighborhood boundaries, amend Figure LU-10 – Land Use Policy Map to apply the NSP – Northside Specific Plan land use designation to the project area within the City of Riverside and the unincorporated properties within its sphere of influence, amend Table LU-5 – Zoning/General Plan Consistency Matrix, and amend Objectives, Policies for consistency with the NSP; **2) Specific Plan** to create the NSP and amend the Downtown Specific Plan to incorporate the North Main Street District into the NSP boundaries; **3) Zoning Code Amendment** to amend Title 19 (Zoning) of the Riverside Municipal Code to add Chapter 19.146 – Northside Specific Plan (NSP) and amend relevant information in Chapter 19.220; **4) Zoning Code Amendment** to rezone properties to the districts proposed in the NSP; and **5) Program Environmental Impact Report.**

City Hall is closed to the public due to the COVID-19 pandemic. Copies of the Draft Northside Specific Plan and Draft Program Environmental Impact Report can be viewed on the Northside Specific Plan project website: <http://northsidesplan.com/>. The staff report will be available on August 21, 2020 on the City's webpage at <https://riversideca.legistar.com/Calendar.aspx>.

This notice is being mailed to agencies and individuals that have requested such notifications associated with this project. Public comments can be submitted by e-comments until 8:30 a.m., on September 3, 2020, at www.engageriverside.com. Written comments mailed via USPS may be submitted for consideration or email comments to dmurray@riversideca.gov.

Interested parties may contact the Planner between 8:00 a.m. and 5:00 p.m. Monday through Friday: David Murray, Principal Planner, City of Riverside Community & Economic Development Department, Planning Division, 3900 Main Street Riverside, CA 92522 (951) 826-5773 or dmurray@riversideca.gov.

Response to Comment Letter I14

Linda Baker
August 31, 2020

I14-1

The comment states that this commenter agrees with the comment letter by Diana Ruiz. Refer to responses to comment letter 18.

From: Linda Baker <mlmbaker51@gmail.com>
 Sent: Monday, August 31, 2020 2:37:41 PM
 To: Nicol, Colleen <Nicol@northsideca.gov>; Perry, Jim <JPerry@northsideca.gov>; Bailey, Rusty <RBAiley@northsideca.gov>; Melendez, Andy <AMelendez@northsideca.gov>; Conder, Chuck <CConder@northsideca.gov>; Edwards, Erin <EEdwards@northsideca.gov>; Hemenway, Steve <SHemenway@northsideca.gov>; Plascencia, Gabby <GPlascencia@northsideca.gov>; Ferro, Ronaldo <RFerro@northsideca.gov>
 Cc: Erin Snyder - RNP <esnyder@luma.com>
 Subject: [External] Fwd: Northside Specific Plan

I am in complete agreement with Diana Ruiz on this issue, Linda Baker

Sent from my iPhone

Begin forwarded message:

cc: Mayor
 City Council
 City Manager
 City Attorney
 ACMS
 DCM
 C&ED Director

From: Sharon Mateja <smateja@northsideca.gov>
 Date: August 31, 2020 at 1:56:55 PM PDT
 To: Linda Ruiz <lrui@northsideca.gov>
 Cc: council@northsideca.gov
 Subject: Northside Specific Plan

Dear Frances Andrade,
Will you please distribute my following email to all of those on the Planning Commission?
Sharon Mateja

Dear Planning Commissioners,

I do not need to "recreate the wheel" in voicing my opinion regarding the Northside plan. I am in agreement with the letter below authored by Diana Ruiz, and the opinion letter that you have received from Wohlgenuth Family regarding the Northside plan. I support the residents of the Northside in asking for consideration to be made for their quality of life, heritage, and environmental issues...plus all other concerns mentioned by Ms. Ruiz and the Wohlgenuth Family.

I am hopeful with our new council, new ideas and values will help the northside residents achieve the community of their dreams.

Respectfully,

Dr. Sharon B Mateja
Chairperson RRR - Residents for Responsible Representation

114-2

The commenter attached Diana Ruiz's letter, sent on May 26, 2020, as it reflects similar views and concerns. Please see response to comment letter 18.

Member of NBT

PS Colleery, please include this email in the public records.

* Dear Mr. Eastman:

Thank you for a comprehensive Northside Specific Plan that includes community input and addresses many aspects of sustainability, including complete streets, expanded urban forests and restoring Springbrook Arroyo. A sustainable community also includes land uses that create resilience and food security, and the draft plan omits the opportunity for agriculture on some of the best remaining undeveloped soils in the city.

In the Draft EIR the soils were only evaluated for drainage and engineering use, not for agriculture. Page 3 6-2 of the Draft EIR does not include all of the soils covered by the specific plan. I saw no soils map (See page 4 of the Soil Survey of Western Riverside County) that delineates soils that have exceptional potential for ag production. These soils are not listed in the State's Important Farmlands Maps ONLY because they have not been in production for the past four years. Some are of the highest quality for agriculture: deep, 0-2% slopes with low erosion potential, high water holding capacities and with no limitations for high production row crops. For example, San Emigdio Fine Sandy Loam (Sta) has a Capability Unit of Class II that would rate as a prime soil had it been farmed within the past four years. (The Class scale is from I being the best to Class VIII having the most limitations for ag.)

Grangeville fine sandy loam is a Class I-1, with the highest Capability Unit and would also rate as a prime soil. Although these soils are not required to be mitigated for because they are not on the State's Important Farmlands map, they are an important planning consideration and a missed opportunity.

The city council adopted the "Food and Agriculture Policy Action Plan" in Spring of 2015 that includes the High Priority to preserve ag lands (page 27): "Develop an improved multi-faceted policy for long-term preservation of land most suitable for agriculture, including zoning, entitlement processes, and purchasing land that is at risk to keep or place it in agricultural production." In this case, some of the land is already owned by the city, and the high quality soil resources should be evaluated for their potential best use.

From a community benefit and sustainability analysis I ask: Why is agriculture not a priority, as are other types of businesses? We would be much more resilient and prepared for health emergencies, earthquakes, and climate change if Riverside could feed its populace utilizing some of its highest quality soils for agriculture. Once those soils are covered with development that opportunity is lost forever. Why has Riverside not incentivize successful ag businesses, such as growers from the central coast, to locate to our City, especially in place of unwanted warehouses? I'm told that PRU has a \$500,000 fund for use in agriculture and am wondering how it has been used to make our city more resilient. Could this concept be added as an alternative in the Specific Plan and be more aligned with the City's "Food and Agriculture Policy Action Plan"?

The Specific Plan does designate a very small area of erosive, marginal soil for a "buffer" of agriculture, instead of prioritizing the use of the higher quality agricultural soils that produce higher yields with less inputs and at lower costs.

I hope you will consider requiring a more in depth review of the soil resources, potential ag land uses, incentives to bring farm businesses, and opportunities for feeding our people as part of a more sustainable Northside Specific Plan and EIR.

Response to Comments

Thank you for your hard work on an in depth and mostly successful plan."

Diana

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household. [RiversideCA.gov/COVID-19](https://www.riversideca.gov/COVID-19)

Response to Comment Letter I15

Sharon Mateja
September 3, 2020

I15-1 The commenter agrees with the comment letter by Diana Ruiz. Please see response to comment letter I8.

I15-2 The commenter attached Diana Ruiz's letter, sent on May 26, 2020, as it reflects similar views and concerns. Please see response to comment letter I8.

Planning Commission: September 3, 2020
Agenda Item 4

From: Sharon Mateja <smateja@earthlink.net>
Sent: Monday, August 31, 2020 1:57 PM
To: Andrade, Frances <FANDRADE@niversideca.gov>
Cc: Nico, Colleen <CNico@niversideca.gov>
Subject: [External] Northside Specific Plan

Dear Frances Andrade,
Will you please distribute my following email to all of those on the Planning Commission?
Sharon Mateja

Dear Planning Commissioners,

I do not need to "recreate the wheel" in voicing my opinion regarding the Northside plan. I am in agreement with the letter below authored by Diana Ruiz, and the opinion letter that you have received from Wohlgenuth Family regarding the Northside plan. I support the residents of the Northside in asking for consideration to be made for their quality of life, heritage, and environmental issues...plus all other concerns mentioned by Ms. Ruiz and the Wohlgenuth Family.

I am hopeful with our new council, new ideas and values will help the northside residents achieve the community of their dreams.

Respectfully,

Dr. Sharon B Mateja
Chairperson RRR – Residents for Responsible Representation
Member of NBT

PS Colleen, please include this email in the public records

" Dear Mr. Eastman:

Thank you for a comprehensive Northside Specific Plan that includes community input and addresses many aspects of sustainability, including complete streets, expanded urban forests, and restoring Springbrook Arroyo. A sustainable community also includes land uses that create resilience and food security, and the draft plan omits the opportunity for agriculture on some of the best remaining undeveloped soils in the city.

Planning Commission, September 3, 2020
Agenda Item 4

In the Draft EIR the soils were only evaluated for drainage and engineering use, not for agriculture. Page 36-2 of the Draft EIR does not include all of the soils covered by the specific plan. I saw no soils map (See page 4 of the *Soil Survey of Western Riverside County*) that delineates soils that have exceptional potential for ag production. These soils are not listed in the State's Important Farmlands Maps ONLY because they have not been in production for the past four years. Some are of the highest quality for agriculture: deep, 0-2% slopes with low erosion potential, high water holding capacities and with no limitations for high production row crops. For example, San Emigdio Fine Sandy Loam (Sfa) has a Capability Unit of Class II that would rate as a prime soil had it been farmed within the past four years. (The Class scale is from I being the best to Class VIII having the most limitations for ag.)

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The Specific Plan does designate a very small area of erosive, marginal soil for a "buffer" of agriculture, instead of prioritizing the use of the higher quality agricultural soils that produce higher yields with less inputs and at lower costs.

I hope you will consider requiring a more in depth review of the soil resources, potential ag land uses, incentives to bring farm businesses, and opportunities for feeding our people as part of a more sustainable Northside Specific Plan and EIR.

Thank you for your hard work on an in depth and mostly successful plan."

Diana

Planning Commission: September 3, 2020
Agenda Item 4

From: Martin McHugh <bbob2374@gmail.com>
Sent: Sunday, August 30, 2020 10:42 AM
To: Edwards, Erin <EEEdwards@invertpdca.gov>
Cc: Granillo, Danna <DGranillo@invertpdca.gov>; Martin McHugh <bbob2374@gmail.com>
Subject: [External] Martin; Re: North Side Specific Plan, Septic Tank Hookups.

Hi Erin,

Regarding the North Side Improvement Specific Plan, I would once again respectfully suggest that all Northside properties that are on Septic Tanks, be connected to the main sewer lines "prior" to the start of any new construction or street work.

The septic tank hookups could be done street by street at minimal cost as part of the project cost. At the very minimum, install and cap new mains sewer pipes onto each and every of the septic tank properties.

This would also play a large part in reducing the spread of future Pandemics.
(The London Bubonic plague makes interesting reading?)

My best regards to you all.

Martin

Sent from my iPhone
Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people

Response to Comment Letter I16

Martin McHugh
August 30, 2020

I16-1

The comment suggests connecting all residential septic tanks to the main sewer pipes upstream of Reid Park. Please see response to comment letter I5.

Aguilar-Crunk, Nancy

Subject: FW: [External] Martin: Re: North Side Specific Plan, Septic Tank Hookups.

From: Martin McHugh <bob7374@gmail.com>

Sent: Sunday, August 30, 2020 10:42 AM

To: Edwards, Erin <Edwards@nversideca.gov>

Cc: Granillo, Donna <DGranillo@nversideca.gov>; Martin McHugh <bob7374@gmail.com>

Subject: [External] Martin: Re: North Side Specific Plan, Septic Tank Hookups.

Hi Erin,

Regarding the North Side Improvement Specific Plan, I would once again respectfully suggest that all Northside properties that are on Septic Tanks, be connected to the main sewer lines "prior" to the start of any new construction or street work.

The septic tank hookups could be done street by street at minimal cost as part of the project cost.

At the very minimum, install and cap new mains sewer pipes onto each and every of the septic tank properties.

This would also play a large part in reducing the spread of future Pandemics.

(The London Bubonic plague makes interesting reading?)

My best regards to you all.

Martin

cc: Mayor

City Council

City Manager

City Attorney

ACMS

DCM

C&ED Director

Response to Comment Letter I17

**Public Commission Meeting
September 3, 2020**

I17-1

The comment states that there should be no warehouses in the NSP. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.



**Public Comment for September 3, 2020
Planning Commission Meeting
Prepared by the Planning Division at 8:00 a.m. on September 3, 2020**

Name	Neighborhood	Position	Comments
<p>4. PLANNING CASES (PER) 19-054 (SPA) 19-005 (SP) 19-006 (PEIR) 20-043 (PZ) Proposed by the City of Riverside to consider the following items in conjunction with the adoption of the Riverside General Plan: 1) General Plan Amendment to amend the Land Use and Urban Design Element; 2) Table J0.2, and 3) Table J0.3 - Neighborhood to adjust neighborhood boundaries and Form LU -W - Land Use Policy Map to apply the NSP - Northside Specific Plan land use designation to the project area within the City of Riverside and the incorporated communities within it; 4) Specific Plan and General Plan (US - Zoning) General Plan Commission/Minute and several Ordinance; 5) Request for comment with the NSP; 2) Specific Plan to amend the NSP and amend the Downtown Specific Plan to accommodate the North Main Street District into the NSP boundaries; 3) Zoning Code Amendment to amend Title 18.02.00(a) (1) - 3) Riverside Municipal Code to add Chapter 18.05 - Vertical Specific Plan (NSP) and amend relevant information in Chapter 18.05, 4) Zoning Code Amendment to incorporate the status quo property into the NSP; and 5) Project Environmental Impact Report (EIR) and supporting documents, including the Project Description within the City of Riverside, the City of Colton, and the incorporated City of Riverside. It is generally located by Riverside Blvd to the north, State Route 91 (SR-91) and portions of Main Street in Colton to the south. It includes 275 (+/-) and reaches east to the east, and the Santa Ana River to the west. Contact Planner, David Murray, Principal Planner: (951) 836-5773 dmurray@wvsd.org</p>			<p>don't think that there should be any warehouses in the land use plan</p>

117-2

The comment states that the Roquet Family, LLC, is in opposition to the NSP. Refer to responses to comment letters O7, O8, and O14. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Item	Item	Impairment	Factor	Comments
REVISION: CALIFORNIA (CAL) BURNSVILLE (BURNSVILLE) FOR THE BURNSVILLE PLANNING AREA (BURNSVILLE) IN THE CITY OF BURNSVILLE. This is a public comment received by the City of Burnssville. The comment is related to the Burnsville Planning Area. The comment states that the Burnsville Planning Area is a public comment received by the City of Burnssville. The comment states that the Burnsville Planning Area is a public comment received by the City of Burnssville. The comment states that the Burnsville Planning Area is a public comment received by the City of Burnssville. The comment states that the Burnsville Planning Area is a public comment received by the City of Burnssville. The comment states that the Burnsville Planning Area is a public comment received by the City of Burnssville.				

117-3

The comment states that the Roquet Family, LLC, is in opposition to the NSP. Refer to responses to comment letters 07, 08, and 014. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Date	Name	Subject	Comments
<p>Public Comment for September 3, 2020 Prepared by the Planning Division at 9:59 AM, on September 3, 2020</p>	<p>Roquet Family, LLC</p>	<p>Oppose</p>	<p>Refer to responses to comment letters 07, 08, and 014. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>

117-4

The comment states that they are neutral to the NSP. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Public Comment for September 3, 2019
Planning Commission Meeting
Prepared by the Planning Division at 6:00 A.M. on September 3, 2019

Name	Neighborhood	Project	Comments
<p>Name: JOHANNA SWANSON Address: 1720 OAK STREET, SUITE 100, SAN JOSE, CA 95131 Phone: (408) 253-1234 Email: johanna@swanson.com</p> <p>Comments: I am neutral to the NSP. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>			<p>I am neutral to the NSP.</p>

117-5

The comment states that they are in opposition to the NSP. The commenter expresses concern regarding significant and unmitigated air quality, water pollution, aesthetic impacts, and biological resources that are identified in the EIR. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Public Comment for September 3, 2019
Planning Commission Meeting
Prepared by the Planning Division at 6:59 AM, on September 3, 2019

Name	Subject	Comments
<p>John</p> <p>PLANNING DIVISION DIRECTOR (6/26/2019 12:04 PM) I am writing to express my opposition to the NSP. The commenter expresses concern regarding significant and unmitigated air quality, water pollution, aesthetic impacts, and biological resources that are identified in the EIR. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>	<p>Subject</p>	<p>Comments</p>

Response to Comment Letter I18

Jonathan Shardlow
August 26, 2020

I18-1

The comment asks if the FEIR be available prior to the Planning Commission Hearing, as the commenter would like to know if the Hamilton Trust's request to be included within the TZO was fulfilled. The FEIR will be made available on November 5, 2020 prior to the City Council hearing. The Hamilton Trust is not included in the TZO overlay area. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Murray, David

From: Jonathan Shardlow <Jonathan.Shardlow@GreshamSavage.com>
Sent: Wednesday, August 26, 2020 10:52 AM
To: Eastman, Jay; Murray, David
Cc: Welch, David; Kopackie Brown, Mary; Brent, McManigal
Subject: RE: [External] Northside Specific Plan DEIR Comment Letter
Attachments: Hamilton - Northside Specific Plan & DEIR Comment Letter.cleaned.pdf

This email's attachments were cleaned of potential threats by The City of Riverside's Security Gateway.
 Click here if the original attachments are required (qualification needed).

Jay and David,

Good afternoon. Will the Final EIR be available prior to the Planning Commission Hearing? Without being able to analyze the City's response to comments or the City's position on the Hamilton Trust's request to be included in the TZO (and to maintain their existing zoning), it is difficult to address the issue with the Planning Commission. The Hamilton Trust property is located in the small square where the proposed TZO ends and shares property lines of the TZO from the west and north of the property. No additional CEQA analysis would be needed to move the TZO over to complete the natural progression to Orange street as the TZO would maintain the status quo baseline as the property is already zoned Business/Office Park. Please let me know City staff's position.

Jon



From: Jonathan Shordow
Sent: Tuesday, June 02, 2020 12:24 PM
To: 'Eustman, Jay'; Brent McMangul; Nicol, Colleen
Cc: Welch, David; Kopskie-Brown, Mary
Subject: RE: [Internal] Northside Specific Plan DEIR Comment Letter

Thank you Jay. I would note that the TZO was anticipated to be coupled with less restrictive design standards for industrial uses (compared to the current code) in order to entice industrial uses do not over-improve their property and to incentivize a move to residential when and if the market would move that way. (i.e. the City wanted to have green-screen fences as opposed to block walls). I did not see any mention of such in either the Draft Northside Specific Plan or the Draft Programmatic Environmental Impact Report.

Jon

From: Eustman, Jay [mailto:jeustman@northsidehca.gov]
Sent: Tuesday, May 26, 2020 6:03 PM
To: Brent McMangul; Nicol, Colleen

Cc: Weich, David; Jonathan Shardlow; Kopskie-Brown, Mary
Subject: RE: [External] Northside Specific Plan DEIR Comment Letter

Good Evening Brent,

Thank you very much for forwarding comments on the Draft Northside Specific Plan and its Draft Programmatic Environmental Impact Report (DPEIR).

This e-mail is to confirm that the City received the Mary Hamilton Trust comments, and the comment letter has been entered into the project record.

We appreciate your time and effort in reviewing the Northside Specific Plan and DPEIR.

Sincerely,

Joy Eastman, AICP

Principal Planner

City of Riverside

Community & Economic Development Department

Main: 951.826.5371

Direct: 951.826.5264

JEastman@RiversideCA.gov

From: Brent McManigal <Brent.McManigal@GrahamSavage.com>

Sent: Tuesday, May 26, 2020 2:51 PM

To: Eastman, Joy <JEastman@riversideca.gov>; Nicol, Colleen <CNicol@riversideca.gov>

Cc: Weich, David <DWeich@riversideca.gov>; Jonathan Shardlow <Jonathan.Shardlow@GrahamSavage.com>

Subject: [External] Northside Specific Plan DEIR Comment Letter

This email's attachments were cleaned of potential threats by The City of Riverside's Security Gateway. [Click here](#) if the original attachments are required (justification needed).

Mr. Eastman,

On behalf of the Mary Hamilton Trust, attached is our comment letter regarding the City's Northside Specific Plan DEIR.

Please confirm receipt of this email and letter.

Thank you,

Brent

Brent McManigal
Shareholder

Gresham Savage Nolan & Tilden, PC
550 East Hospitality Lane, Suite 300
San Bernardino, CA 92408-4205
Office: (909) 890-4499 Ext. 1807
Fax: (909) 890-0687
www.GreshamSavage.com
jshardlow@gsntiltdns.com

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Our Collective Mission: Ensure the well-being of residents, employees, and visitors in the City of Riverside by limiting the spread of COVID-19 and recovering in alignment with the Governor's orders. Response. RECOVERY. Thrive.

Jonathan Shardlow
Shareholder

Gresham Savage Nolan & Tilden, PC
550 East Hospitality Lane, Suite 300
San Bernardino, CA 92408
Office: (909) 890-4499 Ext. 1770
Fax: (909) 890-9877
www.GreshamSavage.com
jshardlow@gsntiltdns.com

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<p>2. Notice re Tax Advice. Any tax advice contained in this email, including any attachments, is not intended or written to be used, and cannot be used, by you or any other recipient for the purpose of (a) avoiding penalties that may otherwise be imposed by the IRS, or (b) supporting, promoting, marketing, or recommending any transaction or matter to any third party.</p> <p>3. Transmission of Viruses. Although this communication, and any attached documents or files, are believed to be free of any virus or other defect, it is the responsibility of the recipient to ensure that it is virus free, and the sender does not accept any responsibility for any loss or damage arising in any way from its use.</p> <p>4. Security of Email. Electronic mail is sent over the public internet and may not be secure. Thus, we cannot guarantee the privacy or confidentiality of such information.</p>	
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GRESHAM SAVAGE

10000 Northside Blvd, Suite 100, Riverside, CA 92504

May 26, 2020

VIA Email: Eastman@rivernsideca.gov and city_clerk@rivernsideca.gov

City of Riverside
 Community & Economic Development Department
 Attn: Jay Eastman, Principal Planner
 Planning Division
 3900 Main Street, 3rd Floor
 Riverside, California 92522

Re: Northside Specific Plan EIR.

Dear Mr. Eastman,

This firm represents the Mary Hamilton Trust ("Trust") which owns 22 acres of land (the "Property") at 575 N. Orange Street, Riverside within the proposed Northside Specific Plan ("Specific Plan") area. The Property is located at the northwest corner of Orange Street and Garner Road. Under the existing City of Riverside zoning, the property is zoned Business Office Park. Pursuant to the Specific Plan, the Property would be rezoned to Multi-Family Residential. This rezoning will result in significant hardship to the property owner due to the existing lack of demand for multi-family residential in this area, lack of jobs in the area to support housing, and conflicts between existing and planned industrial development on adjacent properties.

Implementation of the Northside Specific Plan will create significant conflicts between the existing and approved industrial uses and proposed multi-family zoning. The Northside Specific Plan creates and promotes antagonistic land uses on the same and adjacent properties. In addition, the City's Draft Environmental Impact Report ("EIR") is flawed and does not comply with the California Environmental Quality Act for the reasons outlined below in this letter.

GRESHAM SAVAGE
 10000 Northside Blvd, Suite 100 • Riverside, California 92504
 Tel: (951) 510-7000 • Fax: (951) 510-7001
 Website: www.greshamsavage.com

Jay Eastman
City of Riverside
May 26, 2020
Page 2

Background

As the City is aware, this area has been utilized for industrial development for years and the demand for industrial uses remains strong. Pursuant to our Client's April 25, 2019 letter in response to the Notice of Preparation for the EIR, the Property has been actively pursued by industrial developers consistent with the demand in the area. The Northside area has been allowed to develop in a hodge-podge manner, and while the Specific Plan is an attempt to stop prior practices, it will only exasperate those past practices and further expand incompatible land uses.

The Northside Specific Plan Promotes Incompatible Land Uses.

The City applied the Transitional Zoning Overlay (TZO) to adjacent properties. The TZO allows certain property to develop pursuant to the existing zoning code (i.e. industrial), even if that property is rezoned to residential. The Specific Plan, as proposed, will create inconsistent land use and is the epitome of bad planning. While there is no easy method to create an appropriate buffer zone between residential and commercial industrial uses, there are good planning methods that can be designed into projects that abut an incompatible land use. Due to the layout of the Property, industrial can be designed and developed with a buffer between the residential across Orange. The adoption of the Specific Plan with the TZO not applied to the Property will promote and allow industrial uses immediately adjacent to residential uses in direct conflict with each other. The Northside Specific Plan lack details and buffers necessary to prevent another "Sycamore Canyon" situation where industrial buildings are built close to and overpower the adjacent residential development. Good planning requires a single zone district on all properties within a block and incompatible zone districts to be separated by streets. The existing business park zone district along Orange Street, with Orange Street acting as the buffer, is good planning, and should be allowed to remain.

The Northside Specific Plan should account for and accommodate the local and regional real estate markets. The proposed Specific Plan is promoting a large area of incompatible land uses where there will be increased noise and traffic interface between the existing and proposed industrial uses and residential. The Specific Plan should focus on developing the area with buffer zones and sound planning concepts to build a more harmonious section of the City and not continuing the existing incompatibilities.

Jay Eastman
City of Riverside
May 26, 2020
Page 3

Project Description

The Draft EIR contains a fluid and confusing Project Description. The Project Description does not provide a clear concise description of the proposed zone changes, or design criteria of the Specific Plan. In addition, the analysis of sections of the DEIR, uses variations and sub-variations of the project description such that it is unclear what is being analyzed in each section. Specifically, the DEIR identifies the Property as being located within Subarea 7; however, there is no description or analysis that shows the loss of Business Park compared to the increase in housing units. The DEIR should clearly identify where and how the land uses are being changed and must analyze those changes will impact the environment. The Courts have confirmed that "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR" (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185). The DEIR blurs the analysis such that the reader cannot determine what land uses are being studied and as a result, the analysis and DEIR is flawed.

Analysis of Transitional Zoning

The Specific Plan and DEIR include a Transitional Overlay zone that allows a property to be developed and operated in accordance with its existing zone designation. In most cases, the TZO will allow industrial uses to continue to exist or be built on land that the Specific Plan rezones to multi-family residential. As previously discussed, the Specific Plan promotes and allows an incompatible land use for the foreseeable future. The DEIR includes a few tables and brief description of the TZO; but fails to analyze the impacts of having incompatible land uses adjacent to future, "compatible" land uses. Every Section of the DEIR should include an analysis of the incompatible land uses which will result. The City of Riverside has approved an industrial project for sub-unit 4, and that project has not yet been built. The DEIR assumes land uses built pursuant to the TZO will be present only in the near-term (DEIR Page 2-11). This assumption is flawed and incorrect. The DEIR is required to analyze all foreseeable impacts that arise from the Project and must consider and discuss all environmental impacts. (CEQA Guidelines §15126). The "floating" nature of the transitional zoning and potential land uses do not provide a stable description from which the DEIR can analyze the impacts (Washoe Meadows Community v. Department of Parks and Recreation (2017) 17 Cal.App.5th 277). The DEIR should look at the blend of potential uses to analyze compatibility and environmental impacts related to the blend of uses that is sure to exist.

Jay Eastman
 City of Riverside
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Transportation, Air Quality and Greenhouse Gas Emissions Understated

The DEIR arbitrarily identifies two build-out scenarios from which the transportation, air quality and greenhouse gas emissions are based on (DEIR, Page 2-11). While the DEIR provides a justification for the two scenarios, there is no analysis on how or why the City chose those two scenarios. Similar to an alternatives analysis, the DEIR must provide background and justification for the use of two divergent development scenarios. As a result, the DEIR does not analyze the true project emissions impacts completely as required by CEQA and the Courts (*Stern Club v. County of Fresno* (2018) 6 Cal.5th 532).

The Baseline and Cumulative Projects are Inaccurate

The Draft EIR failed to analyze the correct baseline and account for those projects that are approved and not yet built within the Specific Plan boundaries. For example, the Center Street Warehouse Project is ignored throughout the document although it is an approved project. Currently, the failure of the City to analyze adjacent warehouses in Colton with respect to the Center Street Warehouse in the cumulative impact analysis is being questioned by the Riverside Superior Court who has ordered additional briefing on the issue. Moreover, the Draft EIR glosses over Colton's clear mandate for industrial uses on the border of Riverside and the City's failure to analyze the anticipated uses literally across the street does not comply with CEQA. (See March 15, 2018 Letter from Colton to Riverside stating Colton "has chosen to move ahead with Concept D [156 acres of light industrial and no residential] independently.") *The City cannot simply ignore the existing and planned uses which will undeniably be located next to land the City proposes to zone as multi-family industrial.*

In addition, the City (as required by law), has identified certain property within the Northside-Specific Plan area as surplus property, which if purchased by a state entity would allow that entity to build any use the entity desired to be built irrespective of the zoning, which again could result in incompatible uses. (*Regents of Univ. of California v. City of Santa Monica* (1978) 77 Cal.App.3d 730 holding that in view of the virtually plenary power state entities, state entities are exempt from local zoning regulations)

The City should analyze the potential for a state entity to purchase the surplus property and to analyze the potential uses.

Jay Eastman
City of Riverside
May 26, 2020
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The City cannot simply disregard the existence of approved uses and uses which the State of California may build. Without this information, it is impossible to analyze the potential impacts of the Specific Plan.

Project Alternatives

The Alternatives in the DEIR do not reflect a reasonable range of alternatives required by CEQA (CEQA Guidelines 15126.6). The DEIR analyzed three alternatives, 1) No Project, 2) Old Spanish Town District and 3) City of Riverside. The No Project and City of Riverside Alternatives are essentially identical in that they both analyze the existing zoning. Under the No Project alternative, the current zoning for the project area is analyzed; however, under the City of Riverside Alternative, the existing zoning on all properties would remain the existing zoning, and the only change would be to those properties owned by the City of Riverside. Ironically, the City of Riverside owned property is currently zoned private open space, so there is really no change analyzed. The Alternatives should have included a reduced intensity analysis as well as a more market appropriate industrial alternative consistent with the approved projects and real estate in the area. A reasonable range of alternatives is lacking in violation of CEQA.

Recommendation

Based on the following, we request the City revise the Northside Specific Plan to allow for the existing business/office zoning designations to remain and the City focus its efforts on supporting and promoting the growth of job-producing industries and appropriate residential development. The Northside Specific Plan should be a document that focuses on good urban design that utilizes site layout to create adequate buffers between the residential/industrial interface. At a minimum, we respectfully request the City adopt the IZO over our Client's property so that it may be developed with a use that is in high demand in the area and not left vacant due to a zoning designation that is unlikely to be available to be utilized neither in the short-term, nor in the long-term.

<p>Jay Eastman City of Riverside May 26, 2020 Page 6</p> <p>Please contact me with any questions.</p> <p>Very truly yours, </p> <p>Brent R. McManis, Attorney for GRESHAM SAVAGE NOLAN & TILDEN, A Professional Corporation</p> <p>Cc: David Welch, DWelch@rivernet.ca.gov</p>	
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Response to Comment Letter I19

Erin Snyder
September 2, 2020

119-1 The comment introduces the letter. The comment indicates that the Northside Specific Plan would not meet the 2025 General Plan goals to emphasize retention of open space. The Northside Specific Plan analysis pertaining to recreation is included in Draft EIR Section 3.14, Recreation. As detailed in that section, the Northside Specific Plan would not result in a significant impact related to recreation. As further noted in Section 3.10, Land Use and Planning, (see specifically Table 3.10-2), the Northside Specific Plan would be consistent with the City of Riverside General Plan 2025 goals pertaining to recreation. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

119-2 The comment asks if the commenter’s previously submitted comment were included in the record for the public meeting. The commenter’s previous comment is included as comment letter I9.

119-3 The comment describes their concern regarding the Transition Overlay Zone. The comment requests that there should be a zoning option that allows flexibility for current and longtime businesses in the area. The TZO is intended to provide for flexibility for the Northside Specific Plan land uses to be phased in over time and as the markets allow. This has been further clarified in the Final EIR Chapter 3, Errata, and the Final Northside Specific Plan. More specifically, the TZO authorizes existing land uses to transition to new uses as established by

September 2, 2020

David Murray
Principal Planner
Community & Economic Development Department
Planning Division
3900 Main Street
Riverside, CA 92522

Dear Planning Commission,

My name is Erin Snyder and I've been a Northside resident for more than forty years. I've been involved in the community's efforts to create the neighborhood of our dreams for most of that time. I was part of the process creating the Northside Community Plan in 1991, I and many others worked very hard for the inclusion of the Northside Amendment to the General Plan 2025. One of the General Plan changes you are recommending today is to remove the section pertaining to the creation of a Northside Specific Plan. This proposed Northside Specific Plan does not meet the intent of the General Plan 2025 and actually represents a step backward of inclusion of the community's ideas and wishes. The GP2025 calls for the Northside Specific Plan to emphasize the retention of open space and recreational resources including the golf course or comparable open space and to consider alternative land uses to optimize compatibility with recreation. The proposed Northside Specific Plan does not go far enough to meet these goals.

I have previously submitted comment regarding the Northside Specific Plan and Draft Program Environmental Impact Report. I know those comments are included in your packets and I want to make sure they are considered a part of the record for this meeting.

Particularly I want to express my concern about the Transition overlay Zone imposed on the current business properties on North Main St. (north of the 60Fwy.) The presentation historical timeline neglected to include the Northside Redevelopment Zone, the last time zoning changes were imposed on this community. There are a number of long time Riverside businesses that were negatively impacted when their commercial and retail zoning was changed to Industrial and Business Manufacturing Park. Some of them stuck around even though they could no longer grow their business the way they hoped and additionally had to pay conditional use permits due to non-zoning compatible uses. Now their zoning is impacted by this overlay zone that will further limit their future growth to high density residential. There are other areas in the NSP with multi-use or mixed use designations. There should be a zoning option that would allow flexibility for the current and long time businesses to develop in a way that meets their and the community's needs. The Village Center concept looks pretty but we know the reality is a grocery store won't come based on the current socio-economics. Additionally, the traffic impacts to Columbia Ave. an already dangerous overcrowded road is just not practical. Allowing the already developed properties to be utilized by businesses and services needed by the neighborhood makes more sense.

the Specific Plan's base zoning designations. In the City of Riverside, the TZO authorizes existing and entitled land uses to continue and expand, until which time the real estate market allows the properties to transition to their base zone, which is multi-family residential. In the City of Colton, the TZO authorizes the existing and entitled uses to continue and expand, until which time the real estate market allows the properties to transition to their base zone, which is either High Density Residential or Industrial Research Park. Such existing and entitled uses are authorized to continue as legally conforming uses, without being required to obtain additional discretionary approvals, and to expand until such time the use is replaced by a base-zoning use. As detailed in EIR Section 3.15, Transportation, traffic impacts have been assessed and a Traffic Mitigation Fee Program will be completed in order to provide for needed traffic improvements within the Northside Specific Plan. Further, the Northside Specific Plan would not preclude the already developed properties to be utilized.

119-4

The comment expresses concern for the proposed Industrial Research Park. The comment states that the Industrial Research Park would not be implementable. The area of concern appears to be covered by the TZO area. Refer to response I19-3 above regarding the phasing in over time of proposed changes within the TZO. While this comment identifies environmental concerns of the commenter, it does not identify an inadequacy with the environmental analysis completed in the EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

119-5

The comment states that the Draft PEIR has misrepresentations, inaccuracies, and multiple significantly

Another concern is the proposed Industrial Research park on the Pellissier Ranch land. We've seen this before. The end of Columbia Ave. at the Box Springs Mountains was approved based on the fact that it was going to be a state of the art industrial research park that could be used by UCR and would bring great innovative and technological business to the city. That didn't work, now it's Sandals Church. It doesn't make sense to follow a failed model. The publicly owned properties in the Northside Specific Plan were acquired and maintained for their natural resources. Those resources are just as important if not more so today. The soil and plants provide carbon sequestration even as they sit there empty. Water infiltration into the city's aquifers continues as long as the land is open and the ground not covered with impermeable surfaces. The benefits to the community are irreplaceable. Protection of the natural, cultural and historic resources has been emphasized by the community over and over again. This proposed plan is not the best to achieve those goals.

Specifically to the recommendations you are planning to make today. I and many others have already pointed out the problems with the Draft PEIR. Even with the mistakes, misrepresentations, inaccuracies, incomparability, and other inadequacies previously pointed out, the report could not deny that this plan would result in multiple significantly negative impacts that can't be reduced by mitigation and are therefore unavoidable. Basically it says the plan will really mess up your community but we don't care. It's important to note that this is an identified disadvantaged community. It is particularly an environmentally disadvantaged community. This proposed plan and PEIR are an example right here and now of social injustice and inequality. To knowingly and willingly subject this neighborhood to further negative environmental impacts is unconscionable.

This is especially concerning because recommendation B is not entirely accurate. The Springbrook Heritage Alliance submitted a Parklands and Walking Trails proposal. It is another example of neighbors attempting to envision their future. The Parklands proposal was accepted as part of the NSP process but was minimalized as unprofessional and uncomprehensive and therefore not meeting the program objectives. The Northside Specific Plan process could have further developed the Parklands proposal with the professionals we paid 2 million dollars to. If you had given it to us or any kind of support to develop the idea or a city planner that we also pay for, it could have been much more professional development plan. Even so the NSP identifies the Parklands proposal as the least environmentally impactful. Therefore it could be adopted (certainly with further development) and thus many of those significantly negative impacts would be avoided. They are not unavoidable; if you approve this plan you condemn this neighborhood to further environmental and social injustice.

For all of these reasons I ask you not to make the finding that there are no viable alternatives (recommended finding b) and not to recommend approval of the Land Use changes, Zoning changes, Northside Specific Plan or the PEIR.

Sincerely,
Erin Snyder
1645 Mathews St.
Riverside, CA 92507

cc Mayor
City Council
City Manager
City Attorney
ACMS
DCM
C&ED Director

Response to Comments

negative impacts not specified in this letter. As no specific issue with the environmental analysis has been identified, no specific response can be provided. This comment correctly identifies that the Northside Specific Plan EIR identifies several significant and unmitigated environmental impacts that would result from the Northside Specific Plan; however, it is noted that such impacts are identified as unmitigable in most cases due to the City of Riverside not having jurisdiction over all areas included in the Northside Specific Plan. Refer to each “Significance After Mitigation” section in EIR Chapter 3 of the EIR for additional details. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

119-6

The comment states that the Parklands and Walking Trails proposal submitted by the Springbrook Heritage Alliance should have received City support to create a more comprehensive proposal. Additionally, the comment states that they do not approve of the land use changes and zoning changes in the Northside Specific Plan. It is noted that while the Old Spanish Town Village District Alternative presented in Draft EIR Section 6.6 was identified as potentially feasible and included as a fully analyzed alternative, the EIR and this comment discloses that there are potentially infeasible aspects of this alternative and additional analysis would be warranted prior to its adoption or CEQA statement of findings. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Response to Comment Letter I20

Jim Wood
September 3, 2020

I20-1

The comment expresses support for the Northside Specific Plan and supports the Parklands proposal for a Spanish Town Village Historical District. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Planning Commission September 3, 2020
Agenda Item # 4

From: Jim Wood <minwood2@earthlink.net>
Sent: Thursday, September 03, 2020 8:09 AM
To: Murray, David <DMurray@riversideca.gov>
Cc: Andrade, Frances <FANDRA.DE@riversideca.gov>; Kopaske-Brown, Mary <MKopaske-Brown@riversideca.gov>; Karen Renfro <k.a.renfro7@gmail.com>; Welch, David <DWelch@riversideca.gov>; Springbrook Heritage Alliance <info@springbrookheritagealliance.org>; Peter Wohlgenuth <pdhw@yaho.com>; Erin Snyder <epolcene@juno.com>; Nancy Melendez <nancy.melendez@cbout.com>; Chris Hebert <chebert968@aol.com>; Irene Lozano <irenelo92501@yahoo.com>; JohnKrick@charter.net; Marissa Yeager <marissayeager@gmail.com>; Henry James Vasquez <HJVsqzIMISA@sbcglobal.net>; Media morriss1 <morrisz1@aol.com>; Pat Stewart <patstann@pacbell.net>; Barbara Wilson <parbwil@charter.net>
Subject: [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION, AGENDA ITEM #4

Riverside Planning Commission
City of Riverside
3900 Main Street
Riverside, California 92522
CC: Chairman and Members of the Riverside Planning Commission

INTERJURISDICTIONAL, SPECIFIC PLAN FOR RIVERSIDE'S NORTHSIDE & COLTON'S PELLISSIER RANCH
P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP) P19-0066 (PEIR), P20-0443 (RZ)

Agenda Item #4

Honorable Chairman and Members of the Riverside Planning Commission:

I enthusiastically reflect the wishes, goals, and ideals of Springbrook Heritage Alliance regarding the Northside of Riverside. As noted by Karen Renfro and many others, "it has long been our wish that the City of Riverside would adopt a Specific Plan for the Northside to reflect the wishes of the residents and businesses who have made this area their home. However, although the plan they have proposed contains a wide variety of land uses--old and new--it falls short of being a realistic approach to the business of improving the well-being of the people".

"The Northside neighborhood is the City's oldest, with unique and remarkable history that deserves to be recognized and cherished."

<p>1 (cont.)</p> <p>"We hope you will include the <i>Parklands</i> proposal for a <i>Spanish Town Village Historical District</i> as part of the final Northside Specific Plan. And we thank you for your consideration of this request". Please refer to the attachments in the Remfro letter.</p> <p>Respectfully yours, James Wood, 3410 Chase rd, Riverside, CA 92501</p>	
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Planning Commission September 3, 2020
Agenda Item: 4

Response to Comment Letter O10

Riverside Woman's Club
September 2, 2020

O10-1 The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

O10-2 The comment states that Recommendation C would not be beneficial to the community as it would result in unavoidable and significant impacts. Although multiple mitigation measures and project design features would help to lessen impacts, resulting impacts upon full potential build-out of the NSP would significantly impact the environment as analyzed in the DEIR. Mitigation to reduce impacts to below a level of significance is not feasible for several different reasons, as detailed in the EIR. For example, the identified air quality mitigation measures would reduce impacts, but the lack of project-specific information cannot allow air pollutant emission reductions to be accurately quantified at the program level. In addition, the City of Riverside does not have control over all areas included in the Specific Plan Area and therefore many other impacts remain unmitigable by the City of Riverside such as transportation. Refer to the "Significance After Mitigation" in each Section of Chapter 3 for additional details regarding the feasibility of mitigation. Nonetheless, this comment accurately identifies that the Northside Specific Plan project would result in significant and unmitigated environmental impacts at the program level. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.



September 2, 2020

Community & Economic Development Department
Planning Division
3600 Main Street
Riverside, CA 92522

Principal Planner David Wilroy and Riverside Planning Commission,

I am writing on behalf of the Riverside Woman's Club, in support of the neighbors and businesses of the Northside, in the matter of PLANNING CASES P19-0064 (SPA), P19-0065 (SP), P19-0063 (AMV), P20-0448 (RZ), P19-0066 (P&I). The Northside Specific Plan and Draft Program Environmental Report.

The community has been very involved in communicating their vision for the future development of their neighborhood for decades and generations. Riverside Woman's Club has been advocating for quality of life issues for just as long, throughout our city. Northside Improvement Association, Spanlightown Heritage Foundation, Red Park Advisory Team and Old Spanish Trail Association are all community neighborhood groups in the Northside, supported over time and in various ways by the Riverside Woman's Club. We are additionally a member of Riverside Downtown Partnership and strong supporters of small businesses. We are writing in support of the neighbors and businesses of the Northside in the hope the proposed plan would be beneficial to the community.

We ask that you particularly pay attention to comments and issues raised by the people in the community most affected by this plan. The recommendations the commission is expecting to make do not appear to be beneficial to the community. Recommendation C clearly admits that there are many significant negative impacts that cannot be lessened much by mitigation. This situation is considered unavoidable, yet not approving this plan would avoid most of them. These negative impacts will be borne by this community in bad unhealthy air quality, traffic, noise issues and the many other problems

010-3

The comment indicates that the Trujillo Adobe and other cultural and historical resource preservation should be a prominent part of the Specific Plan. One of the objectives listed in the DEIR's Project Description is to "preserve and interpret important cultural and historic resources in the SPA, including the Trujillo Adobe." The Trujillo Adobe Heritage Village (TAHV) land use designation would encompass approximately 8 acres of land and would honor the historic past of Riverside's first settlement. The Trujillo Adobe would be restored in its existing location and a historic interpretation village would be developed around it. TAHV would include new buildings that replicate La Placita's historic past (the cantina, schoolhouse, etc.), which would be part of a museum/interpretive center and retail and dining options. The TAHV would accommodate 36,000 square feet of retail/commercial space, and 9,300 square feet (or 0.21 acre) for the adobe, cantina, schoolhouse, and museum/interpretive center. TAHV would also feature a citrus grove, to serve as a natural backdrop to the Trujillo Adobe. The Northside Specific Plan does address the Trujillo Adobe as a important cultural resource. Cultural and historical resources are addressed in EIR Section 3.4. The Northside Specific Plan does not include any significant agricultural resources, as identified in EIR Chapter 5. This comment does not raise any concerns over the adequacy of the cultural, historical, or agricultural resource analysis included in the EIR.

010-4

The comment is states that while Recommendation B claims that it would not meet project objectives, a proposal created by neighbors and local groups could be designed to meet project objectives. To clarify, the Old Spanish Town Village District Alternative would meet seven of nine project objectives but would not meet all of the project objectives. This alternative does not meet Objective 1, as it would separate land uses and

2 (cont.)

listed in the presentation. The city appears not to care, naming the impacts unavoidable. This community is already identified as environmentally and economically disadvantaged. It would be negligent of the city to further contribute to the decline of the community and neighborhood by implementation of a poor plan.

3

The Trujillo Adobe and the cultural and historical resources from the original community, older than the City or County of Riverside and the state of California in addition to the natural resources are of utmost importance and their conservation and preservation should be paramount. Recognition for the earliest people in this area and the heritage and history of all; from the indigenous peoples to the settlers from Atlixqui. New Mexico to the farmers from many diverse backgrounds, including Japanese Americans interred during WWII, should be taken into consideration. Agricultural land still remains in the Northside and is becoming more and more critical to a sustainable future. All of these are concerns raised by the community through this ongoing process and yet the proposed plan does not seem to reflect the community's interests.

4

Recommendation B claims there is no alternative that meets project objectives. Riverside Woman's Club was one of the first groups to endorse the Springbrook Heritage Alliance Parklands and Walking Trails proposal. This is a foundational proposal created by the neighbors and neighborhood groups that could easily be developed into a plan that met project objectives. It also has the least environmental impact on the community. For all of these reasons and the many concerns previously brought up by neighbors and business we urge not accepting the proposed recommendations. Please listen to the neighbors, neighborhood groups and Northside businesses and respond in the best interests of the community.

Sincerely,

Marti Noyes, Co-President
Riverside Woman's Club
4092 10th St.
Riverside, CA 92501

cc: Mayor
City Council
City Manager
City Attorney
AC/MS
DCM
C&ED Director

Response to Comments

reduce the intensification of housing near commercial and employment uses. This alternative does not meet Objective 9, as it eliminates much of the areas intended for future commercial and industrial uses and would not achieve additional economic growth beyond that of the existing applicable plans. As detailed in Draft EIR Section 6.6, this alternative was identified as potentially feasible but “[a]dditional analysis of feasibility would be warranted prior to any adoption of this alternative or of CEQA statements of findings.” The Riverside Public Utilities currently owns Subarea 1 and the former Riverside Golf Course areas, and the Riverside Public Utilities must make decisions that are in the best interest of the rate payer (City of Riverside 2017). Other areas included in this alternative for Community Uses are currently privately owned, and there has not been any feasibility analysis completed on the ability to obtain grants or other funding to utilize these areas in the manner proposed by this Alternative. For these reasons, this alternative is also potentially infeasible. Further analysis would be warranted to determine if the Old Spanish Town Village District Alternative could be adopted and implemented. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Response to Comment Letter O11

Roquet Family
September 3, 2020

The comment states that they are in opposition to the Northside Specific Plan and indicates they are in agreement with an attached letter. Please see response to comment letter O14. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

O11-1

Planning Commission: September 3, 2020
Agenda Item: 4

ROQUET FAMILY, LLC

a California limited liability company
c/o Terri Roquet, 30247 Marianne Lane, Highland, CA 92346
Telephone: (951) 453-2844 e-mail: Terriroquet@yahoo.com

September 2, 2020

Via E-mail Transmission to: dbkirby@att.net; dmurray@riversideca.gov

Richard Kirby, Chairman
Riverside City Planning Commission

Re: September 3, 2020, Planning Commission Agenda Item #4 – Northside Specific Plan

Dear Mr. Kirby:

Roquet Family, LLC is the owner of land in the City of Colton currently being processed for, and under option for, development by Sunsteads, LLC.

Roquet Family, LLC, concurs in its opposition to the draft Northside Specific Plan and related planning and zoning documents (collectively, the “NSP”) for all of the reasons set forth in the letter from Sunsteads, LLC to you dated September 1, 2020, a copy of which is attached hereto, including, but not limited to, the negative environmental impacts related to traffic, air quality, greenhouse gas emissions, noise and public safety that would result from the proposed elimination of the Orange Street Extension as called for in the current draft of the NSP.

Sincerely,

Roquet Family, LLC

Terri Roquet

Terri Roquet, Member

cc: David Murray, Principal Planner, via e-mail to dmurray@riversideca.gov
William Lo via e-mail to bl@hillcoconsulting.com
James R. Pickett via e-mail to jrpsickett@gmail.com
Mike Roquet via e-mail to mjroquet@yahoo.com
Joe Roquet via e-mail to roquetconstruction@gmail.com
Stephen Roquet via e-mail to stephenroquet@hotmail.com
Mary Ann Cowell via e-mail to maacottage@yahoo.com
AC Nejedly via e-mail to sjneedly@aol.com
Ernest O. Vincent via e-mail to sovincent1@hotmail.com

011-2

The commenter attached William Lo's (Sunmeadows) letter, sent on September 1, 2020, as it reflects similar views and concerns. Please see response to comment letter O14.

Sunmeadows, LLC
 27127 Calle Arroyo, Suite 1010
 San Juan Capistrano, CA 92675

Via Email

September 1, 2020
 Mr. Richard Miley, Chairman, Riverside City Planning Commission
 c/c David Murray, Precinct Planner

Subject: Planning Commission Agenda Item 88 - September Draft Northside Specific Plan (18) and
 Northside Specific Plan Documents

Dear Chairperson Miley:

Sunmeadows, LLC is opposed to the Draft Northside Specific Plan with its current design, which would eliminate the extension of Orange Street from West Center Street to Pelissier Road, a road segment which is a key component of the approved Request for Proposals Specific Plan in the City of Corona. Additionally, our May 21, 2020 IIR Comment Letters (IIR Comment Letters O-7 and O-8, attached) identified what we believe are deficiencies in the analysis within the Draft IIR related to traffic, air quality, greenhouse gas emissions, noise and public safety, stemming from the proposed elimination of the Orange Street Extension.

Sunmeadows, LLC is the developer of the proposed Request for Proposals Specific Plan located adjacent to the Pelissier Ranch portion of the proposed project within the City of Corona. We have taken several concerns with the analysis of the proposed Specific Plan and with the analysis contained in the Draft IIR (related to the closure of Orange Street, north of West Center Avenue ("Orange Street Extension").

Additionally, the document provided to the public for the Planning Commission meeting on September 1, 2020, do not include a readily understood specific Plan document demonstrating the design/programming changes we suggested, nor is the document's content a reflection of the changes we requested. Therefore, we are unable to determine if any changes have been made to the project description, the IIR analysis or the Specific Plan design.

An independently selected Project could be adopted which would cover a majority of the 12 delineated parcels in our May 27 comment letters, if the proposed Project for any of the alternatives identified in the IIR. The proposed Project would include a roadway which preserves the Orange Street Extension or which requires the construction of the full length of Pelissier Road within the project, prior to the elimination of the "Orange Street Extension" from West Center Street to Pelissier Road.

Therefore, we respectfully encourage the City of Riverside Planning Commission that they deny Staff's Recommendation as contained in the Staff Report, and instead recommend to the City Council that the Project be modified to preserve the "Orange Street Extension" or be required to preserve the Orange Street Extension until such time as the segment of Pelissier Road within the Project boundaries is constructed. It is requested that the City Council be notified of the City of Riverside Planning Commission's concerns with the analysis within the Corona Fire Department for use as a secondary access to the subject Parcel Specific Plan.

William Lo, Managing Partner, Sunmeadows, LLC

From: Terri Roquet <terriroquet@yahoo.com>
Sent: Wednesday, September 02, 2020 2:58 PM
To: Andrade, Frances <FANDRADE@riversideca.gov>
Subject: [External] 9/3/20 planning commission hearing Item 4

Terri Roquet Tate, Member of Roquet Family, LLC, concurs in the opposition to the draft Northside Specific Plan and related planning and zoning documents (collectively, the "NSP") for all of the reasons set forth in the letter from Sunmeadows, LLC to Richard Kirby dated September 1, 2020, including, but not limited to, the negative environmental impacts related to traffic, air quality, greenhouse gas emissions, noise and public safety that would result from the proposed elimination of the Orange Street Extension as called for in the current draft of the NSP.

Thank you,
Terri

9/2/2020 4 PLANNING CASES P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP), P19-0066 (PEIR), P20-0443 (RZ) Proposed by the City of Riverside

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The City of Riverside, CA

Meeting: Planning Commission - Virtual Meeting

Meeting Time: September 03, 2020 at 9:00am PDT

Disclaimer:

Are you interested in making your opinion known? This new service brought to you by our agency gives you the opportunity to indicate whether you support or oppose measures being considered by your representatives. All details and comments provided will be entered into the public record. Inappropriate or offensive comments may be edited or deleted.

[Closes for Comment September 03, 2020 at 7:00am PDT](#)

Agenda Item

4. PLANNING CASES P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP), P19-0066 (PEIR), P20-0443 (RZ) Proposal by the City of Riverside to consider the following items in conjunction with the adoption of the Interjurisdictional Northside Specific Plan: 1) General Plan Amendment to amend the Land Use and Urban Design Element of the General Plan to include the Northside Specific Plan into Table LU-2, amend Figure LU-9 - Neighborhoods to adjust neighborhood boundaries, amend Figure LU-10 - Land Use Policy Map to apply the NSP - Northside Specific Plan land use designation to the project area within the City of Riverside and the unincorporated properties within its Sphere of Influence, amend Table LU-5 - Zoning/General Plan Consistency Matrix, and amend Objectives, Policies for consistency with the NSP; 2) Specific Plan to create the NSP and amend the Downtown Specific Plan to incorporate the North Main Street District into the NSP boundaries; 3) Zoning Code Amendment to amend Title 19 (Zoning) of the Riverside Municipal Code to add Chapter 19.146 - Northside Specific Plan (NSP) and amend relevant information in Chapter 19.220; 4) Zoning Code Amendment to rezone properties to the districts proposed in the NSP; and 5) Program Environmental Impact Report. The Northside Specific Plan consists of approximately 2,000 acres within the City of Riverside, the City of Colton, and the unincorporated County of Riverside. It is generally bounded by Pellissier Ranch to the north, State Route 60 (SR-60) and portions of Main Street in Downtown Riverside to the south, Interstate 215 (I-215) and residences to the east, and the Santa Ana River to the west. **Contact Planner: David Murray, Principal Planner, (951) 826-5773 dmurray@riversideca.gov.**

https://riversideca.graniculideas.com/meetings/2715-planning-commission-virtual-meeting/agenda_item/161667/685229635cb4-planning-ca...

9/20/2020 4 PLANNING CASE# P19-0043 (AMD), P19-0004 (CPA), P19-0065 (SP), P19-0066 (PEP), P09-0443 (RZ) Proposed by the City of River
Your Comment



Ernest Vincent at September 02, 2020 at 2:11pm PDT
Oppose

Ernest O. Vincent, attorney for Roquet Family, LLC, (neighboring landowner in City of Colton) submits the concurrence of Roquet Family, LLC in its opposition to the draft Northside Specific Plan and related planning and zoning documents (collectively, the "NSP"), for all of the reasons set forth in the letter from Sunneadows, LLC to Richard Kirby dated September 1, 2020, a copy of which is attached hereto, including, but not limited to, the negative environmental impacts related to traffic, air quality, greenhouse gas emissions, noise and public safety that would result from the proposed elimination of the Orange Street Extension as called for in the current draft of the NSP.

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<https://www.industrydocuments.ucsf.edu/docs/pepl04>

Response to Comment Letter O12

Springbrook Heritage Alliance
September 2, 2020

O12-1

The comment introduces the letter and believes that the Northside Specific Plan could be improved. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Planning Commission September 3, 2020
Agenda Item: 4

Andrade, Frances

From: Karen Renfro <karenfro7@gmail.com>
Sent: Wednesday, September 02, 2020 6:10 PM
To: Murray, David; Andrade, Frances; Napaakie-Brown, Mary; Welch, David
Cc: Springbrook Heritage Alliance; Peter Wollgemuth; erin snyder; Jim Wood; Nancy Melendez; Chris Hebert; Irene Lozano; johnkrick@charter.net; Marisa Yeager; Media-morris1; Pat Stewart; richard7austin@gmail.com; Austin; Barbara Wilson
Subject: [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION SEPT. 3, 2020 AGENDA ITEM #4
Attachments: 2014 SHA Park Plan 2017 08 15 001 main cleaned.pdf; SHAproposal (1) cleaned.pdf; SHApetition (1) cleaned.pdf; Heritage of Springbrook Arroyo cleaned.pdf; pdf cleaned.pdf; Riverside cleaned.pdf

This email's attachments were cleaned of potential threats by The City of Riverside's Security Gateway. Click [here](#) if the original attachments are required (justification needed).

Springbrook Heritage Alliance

Saving the treasures of the Springbrook Arroyo Watershed communities
RIVERSIDE - COLTON - HIGHGROVE - GRAND TERRACE

Sept. 1, 2020
Riverside Planning Commission
City of Riverside
3900 Main Street
Riverside, California 92522
CC: Chairman and Members of the Riverside Planning Commission
INTERJURISDICTIONAL SPECIFIC PLAN FOR RIVERSIDE'S NORTHSIDE & COLTON'S PELLISSIER RANCH
P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP) P19-0066 (PEIR), P20-0443 (RZ)
Agenda Item #4

Honorable Chairman and Members of the Riverside Planning Commission:

Springbrook Heritage Alliance appreciates this opportunity to offer our comments on the actions before you relating to the adoption of the Northside Specific Plan & PEIR as presented by the Northside Specific Plan Team.

It has long been our wish that the City of Riverside would adopt a Specific Plan for the Northside to reflect the wishes of the residents and businesses who have made this area their home. However, although the plan they have proposed contains a wide variety of land uses--old and new--it falls

012-2

The comment suggests establishing a Spanish Town Village Historical District to protect, restore and develop historical and cultural resources, restore the Springbrook Arroyo, and dedicate space for public recreational use and open space facilities as permanent parklands. The Old Spanish Town Village District Alternative was included as a project alternative and was analyzed in Chapter 6, Alternatives, of the DEIR. Refer to Response O10-4. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

012-3

The comment indicates that a Spanish Town Village Historical District could be helped through grants investments by small-scale entrepreneurs. While this comment claims that this alternative could be achieved through grants and small-scale entrepreneurs, no such grants or individuals have been identified at this time and the information disclosed in the Draft EIR accurately indicates that further economic analysis would be required prior to the adoption of such an alternative. See response to comment O10-4. Nonetheless, as such economic analysis has not been completed at this time, this alternative was identified as potentially feasible and was carried forward for analysis as a potentially feasible alternative in the Draft EIR. It is noted that some local organizations and individuals support this alternative, and this comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

1 (cont) short of being a realistic approach to the business of improving the well-being of the people who have invested their whole lives in this neighborhood in a way that serves their needs in particular of the surrounding communities in general. We think there is a better way.

RIVERSIDE'S FORGOTTEN LEGACY:

The Northside neighborhood is the City's oldest, with unique and remarkable history that deserves to be recognized and cherished. We have identified many of them on our *Map of the Springbrook Arroyo & Environs* and *Heritage of the Springbrook Arroyo & Environs* which are attached below.

In 2014, SHA members adopted our *Springbrook Heritage Parklands & Walking Trails* plan to save the natural, cultural and historical treasures of the Springbrook Arroyo communities of Riverside, Colton, Highgrove and Grand Terrace. To achieve this, we propose the establishment of a Spanish Town Village Historical District, a mechanism for protecting, restoring, and developing these irreplaceable treasures in the area bounded by Columbia Avenue, West La Cadena Drive, La Loma Hills & Pellissier Ranch, and the Santa Ana River levee; restoration of Springbrook Arroyo along its entire course wherever possible; dedication of public recreational and open space facilities as permanent parklands, including the former Springbrook Golf Club (now the Championship CIF Cross Country Course), Ab Brown Sports Complex, Reid Park, and Pellissier Ranch.

See *Joyce Carter Vickery's Defending Eden: New Mexican Pioneers in Southern California 1830-1890* (UCR History Department & Riverside Municipal Museum, 1977).

ECONOMIC CONSIDERATIONS OF LAND USE:

Our proposal does not require an outlay of public funds from local municipalities. The preservation of the public facilities could be achieved through grants from public and private foundations, and the Spanish Town Village District private-sector marketplace venues through investment by small-scale entrepreneurs. This could result in an economic renaissance for the Northside, based entirely on land use policy honoring the neighborhood's heritage. Besides new jobs and opportunities this would inspire, the new businesses would generate additional tax revenue from diverse sources--a much better proposition than putting all the new land uses into the basket of expensive large-scale projects. Our proposal is supported by local organizations and individuals.

<p>012-4</p>	<p>When the City undertook to develop a Specific Plan for the Northside, we supported their efforts. We asked that our Parklands proposal be considered as an alternative to the other proposals for land use on the Northside. It has been so considered, and even though we are pleased it passed muster with the Environmental standards of CEQA, we are not so please to see that the Northside Specific Plan Team apparently did not read or understand our proposal, which clearly states our economic objective and how we propose to go about carrying it out.</p> <p>Please see our <i>Map, Outline, and Petition</i> attached below.</p> <p>LAND USE ON THE NORTHSIDE: Now, we understand that Riverside has long considered the City's oldest neighborhood, whose cultural history precedes the founding of Riverside by perhaps a thousand years, as wasteland best suited for industrial and commercial development. For about 800 years it served as hunting, fishing and foraging land, site for sacred ceremonies, and occasional occupation during very dry periods. For 145 years it was agricultural, rural agricultural, and rural residential. In 1969 the Santa Ana River Levee was constructed with the assurance the Northside was protected from periodic flooding from the river. However, the flooding does not protect the Northside from rainfall run-off which has nowhere to go but the levee. That is why this area was so good for agriculture. But, the new residential zoning on the west-side of Main, and all the commercial and industrial zoning below Orange established by the Redevelopment Agency in 1990 is subject to periodic flooding. Nobody has been able to figure out how to mitigate this problem. The Redevelopment Agency was shut down in 2011 but the inappropriate zoning remains.</p> <p>In addition, the floodplain below Orange soils are subject to liquefaction and subsidence under certain conditions which occur at unpredictable intervals. It has happened before and it can happen again.</p>
<p>The comment states that the Specific Plan team did not understand the proposal submitted by the Springbrook Heritage Foundation. It is noted that the City of Riverside made efforts to fully understand the proposal and met with this organization on December 11, 2019 to prepare the description of this alternative for the environmental document. The subsequent clarifications provided during public review provided by this organization were also incorporated into the Final EIR (see response to letters 05 and 06). Refer to response to comment 012-3 above regarding the economic objectives. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>	<p>012-5</p> <p>The comment is concerned about the flooding in the new residential zoning area proposed by the specific plan. Flooding issues have been disclosed and addressed in the EIR; see EIR Section 3.9, Hydrology and Water Quality, as well as Final EIR Chapter 3, Errata. In addition, see response to comment 02-5. The City is working with the Riverside County Flood Control and Water Conservation District regarding flooding within the Northside Specific Plan area. Via that coordination, MM-HYD-1 was updated to include the preparation of a Master Drainage Plan for this area as well as an associated program to implement the improvements identified to reduce the project flooding impacts. In addition, compliance with existing local, state, and federal flood control regulations continues to be required for future development with the implementation of the Northside Specific Plan. While mitigation has been identified to reduce the flooding impacts of the project, the City of Riverside does not have jurisdiction over the flood control</p>

improvements due to required approvals by other agencies, such as FEMA and the Riverside Flood Control and Water Conservation District. Thus, the impacts are identified as potentially significant in the EIR. Refer to Section 3.9, Hydrology and Water Quality, as well as Final EIR Chapter 3, Errata, for additional information.

012-6

The comment states that the character of the single-family house neighborhoods would be disrupted by the close proximity of the industrial and commercial land use designations. As discussed in Chapter 3.1, Aesthetics, of the DEIR, the proposed project would not significantly degrade the existing character but a view impact from the Santa Ana River corridor was identified. Additionally, the Northside Specific Plan would be consistent with all local and regional visual policies concerning aesthetics and visual compatibility (see Table 3.1-1 of the DEIR). Refer to Chapter 3.1, Aesthetics, for additional details. The EIR discloses potentially significant and unmitigated impacts related to historic resources; refer to Section 3.4, Cultural Resources, for additional details. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

012-7

The comment states that property tax is not the best way to generate tax revenue for the local treasury. Refer to response to comment O12-3. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.

Preservation and Endowment" by Mimi Morris, Executive Officer of California's Cultural and Historic Endowment.
See also California's Office of Historical Preservation.

ISSUES REGARDING THE NORTHSIDE SPECIFIC PLAN PROCESS:

It would be good if you understood how frustrating this has been for the people of the Northside to participate in the NSP process.

First, the NSP Team did not notify all the property owners in the study area by mail even though a change to land use policy is serious business. They said it would cost too much money and expected local residents and business owners to spread the word, forgetting that we are volunteers, not getting paid for all the extra work & expense involved, and have other more pressing obligations to fulfill. Turn-around times were scheduled for the convenience of the NSP Team.

There was a succession of community sessions and workshops that were held in the Northside, and never were all the people who needed to know notified of these events. Local groups, including Northside Improvement Association, Spanish Town Heritage Foundation, OSTA-Agua Marisa Chapter, and SHA did the best we could, but turnout was low. This was interpreted to mean lack of interest. Nothing could be further from the truth.

Second, when the Northside Specific Plan Team began meeting with local residents they said our discussions would start from a blank slate. They were not going to use the Northside Community Plan or General Plan's Northside Guidelines. Recently, we learned that the Northside Specific Plan Team was informed by city officials that they wanted a plan that would benefit our City's water supplies and generate property tax revenue for the public treasury.

This seems to explain why, despite the pleas of Northside residents, visiting sports enthusiasts, fans of the Trujillo Adobe, and local history buffs, the NSP calls for expensive, radical and unnecessary changes to the Springbrook Arroyo area below Orange Street. The NSP offers several alternatives for the Arroyo involving re-routing the Arroyo from its existing course (an enormously expensive project), and new commercial and industrial zoning in close proximity to La Loma Hills, the Trujillo Adobe, existing single-family residential, new single-family residential, youth sports and public recreational facilities.

Third, the worst of these proposes to separate the Arroyo at West La Cadena and re-route the waterway by connecting it to the Highgrove Channel a half-mile away across Center Street and the County line and use recycled water to keep it flowing year-round. This alternative does not explain what happens to the water in the upper Arroyo above the proposed cut. It would also be prohibitively expensive and intrusive. Most of all, it is totally unnecessary. If the City dedicated the former golf course as a permanent local native arboretum & botanical garden-cross country course-public parkland, the three little ponds could be enlarged to make one lake that would sequester run-off water, help replenish underground water supplies, attract wild waterfowl, provide sustenance for local birds, and turn the park into a little paradise. The work involved could be done

<p>9 (cont.)by volunteers under the supervision of the City staff. This suggestion is part of our <i>Parklands</i> proposal.</p> <p>Fourth, the final proposal, consisting of many components and several alternatives, is not one that was presented in a community session, and we never saw some of the components until the document was released with the final PEIR. Even more frustrating, we never saw the proposed zoning maps until the agenda item for this hearing was posted twelve days ago and some of us didn't see them until late last week or early this week.</p> <p>10 So there is much that is new to us, and we have not had sufficient time to study it as well as we'd have liked. And now we understand that if we do not bring up every point of concern to us at this meeting, we cannot bring it up before the City Council. The lack of transparency regarding this hearing means that the Northside Specific Plan is not a neighborhood plan at all. It is being imposed on us by city officials, professional consultants from out of town and special interests who wish to make a profit on our misery. All the property owners, residents and businesses have still not been notified about the NSP or this hearing. And because of the COVID restrictions our grassroots grapevine was unable to pick up the slack.</p> <p>LAND USE PLANNING:</p> <p>We believe that all property owners and their tenants have an equality of rights, and no one has a right to cause harm to their neighbors. However a site is zoned, new development should always be beneficial to the neighbors and the neighborhood--and they are the ones who should determine this. Title 19 and Title 19 both make this clear in the introductions.</p> <p>11 We question the obvious assumption of city officials and urban planners that job creation is dependent upon noisy operations.</p> <p>We question the wisdom of building high-density housing adjacent to the NSP's proposed Central Park. While it would provide open space to the high-density residents, we can see it becoming an attractive nuisance for the fringe population and homeless after hours.</p> <p>12 We question the wisdom of building high-density housing on commercial streets or streets designated as truck routes, or areas in the flood plain below Orange Street.</p> <p>13 We question the wisdom of building new high-density housing in an older single-family neighborhood that is eligible for designation as a historical district.</p> <p>14 We question designating truck routes through existing residential neighborhoods, or neighborhoods with mixed-use residential, retail, restaurant, and small-scale commercial, or neighborhoods with sensitive historical landmarks.</p> <p>15 We question whether uses not identified in the NSP Tables are allowed.</p> <p>We recommend that new single-family and senior housing be developed on vacant land above Orange Street within existing residential zones.</p> <p>16 See William Cowan's "The Trujillo Adobe and Warehousing of Southern California's Inland Empire" (Huntington-USC Institute of California and the West): https://iceblog.wordpress.com</p> <p>AESTHETICS & AIR QUALITY:</p> <p>The charm of the Northside is its rural character in an urban setting. Right now, some of the properties look a little ragged, but this is not a sign of blight so much as a sign of the instability of land use in the Northside. If the City goes with the NSP as proposed, allowing high-density housing and large-scale commercial and industrial will cause the Northside to become unlivable for</p> <p style="text-align: center;">5</p>	<p>012-8</p> <p>The comment states that multiple community groups are unhappy with the Northside specific Plan process and its lack of involvement of the community. See response to comment O6-2. The remainder of this comment does not address the adequacy of the CEQA document.</p> <p>012-9</p> <p>The comment asks what would happen to the water in the upper Arroyo at West La Cadena when it is re-routed by connecting to the Highgrove Channel. The comment also recommends that the former golf course be turned into a permanent local native arboretum and botanical garden which could host small ponds which would sequester run-off water. A programmatic analysis of drainage runoff was completed, but not project-specific improvements have been identified at this time for the channels. Refer to Section 3.9, Hydrology and Water Quality, as well as Final EIR Chapter 3, Errata, for additional information regarding hydrology. Also refer to response O12-5 above. The former golf course area is owned by the Riverside Public Utilities District, and decisions regarding that land must be in the best interest of the stakeholders.</p> <p>012-10</p> <p>The comment indicates that they have not seen some of the project components nor the proposed zoning maps until August 22, 2020, which was not an adequate amount of time to review all of the documents. Additionally, property owners, residents and businesses were not notified of the Northside Specific Plan nor the specific plan hearing. The Draft EIR and the Northside Specific Plan were available for public comment from March 26, 2020 through May 25, 2020, which includes 15 additional days than required by the State regulations. Additionally, see response to Comment O6-2. The Notice of Public Hearing was posted on the NSP website on August 7, 2020, and staff report</p>
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<p>17 (cont) those who already live and work here, the neighborhood will deteriorate accordingly. The aesthetics of new development on neighborhood livability affects Air Quality and other Quality of Life issues. And Air Quality suffers in direct proportion from a neglect of the aesthetic factors of land use. The Northside already has bad air quality, there is no need to make it worse. We do not have to live with heavy truck traffic, noxious chemicals or destruction of natural open spaces to improve the neighborhood's economy. The <i>Springbrook Heritage Parklands & Walking Trails</i> proposal shows how to do it.</p> <p>18 The NSP-PEIR Air Quality findings are not consistent, or even very useful in an analysis of the NSP. Ambient Air Quality Standards are not comparable or helpful. Trip Rate Assumptions do not include existing or proposed sports or recreational uses. Findings of Negative Impacts are Significant, yet Mitigations cite levels after correction as still Significant and Unavoidable. Yet, the same document shows our <i>Parklands</i> proposal not only has no negative impacts to aesthetics and air quality, but is likely to improve both.</p> <p>19 GEOLOGY/SOILS: There is no legitimate reason to propose any type of housing or intense urban or industrial development in the Santa Ana River floodplain or the tableland above Orange Street to the east. The bottomland is unstable, subject to flooding from rainfall run-off and subsidence as we mentioned above. The Riverside General Plan 2025 shows it is high-risk for liquefaction. Liquefaction can occur without rain or seismic activity, but is much less likely. The NSP PEIR admits this is so. There are earthquake faults nearby, at the top of Pigeon Pass and Roche Canyon, and fracture zones all over the area. According to recent examinations by flood control officials, the Santa Ana River levee is probably not capable of handling a 100-year flood. It is now known that the great Agua Mansa Flood of 1862, which washed the villages of Agua Mansa and La Placeta de los Trujillos away (thankfully, no lives were lost), was of greater magnitude than that. The tableland is now almost entirely developed with single-family residential because until the Redevelopment Agency rezoned the Northside few people were foolhardy to build housing below Orange Street. The danger of subsidence increases with higher rainfall and seismic activity. With seismic activity or even the constant weight of any superstructure, the soils could deform and compromise the structural integrity of the building. Given this knowledge, wouldn't the City be liable for allowing any development on these suspect soil-types? Stabilizing gels are mentioned in passing as a potential mitigation, but there is no supporting text about projects that have successfully used it in the United States or in situations comparable to the Northside. We have questions about this gel. How do we know they work? What are they made of? What are the side-effects we need to know about? Are they hazardous to human, animals, plants, soils, water supplies? Much more information is needed to evaluate the potential use of these gels. Alternatively, perhaps the best use of the land underlain by these unstable soils is open space and rainwater sequestering from trees and vegetation, as proposed in our <i>Parklands</i> plan.</p> <p>20 HYDROLOGY/WATER QUALITY: As long-time residents of the Northside, we have seen flooding from rainfall run-off submerge the intersections of Main & Placentia, Center & Placentia, Main & Columbia, Main & Strong, Market Street, many side streets along the levee, and so forth too many times to count. One of our members recalls seeing floodwaters rise all the way to Orange Street three times since 1969, the</p> <p>21</p> <p>22</p>	<p>and attachments were available 12 days prior to the September 3, 2020 Public Hearing.</p> <p>012-11 The comment is concerned of the placement of high-density housing near the proposed large open space area, as it could become a space for the fringe population and for people who are homeless. See response to Comment O2-4. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>012-12 The comment is concerned about building high density housing on commercial streets or streets designated as truck routes, or in potential flood areas. Concerning the flood zone, please see response to Comment O2-5. Concerning the truck routes, please see response to Comment O2-6. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>012-13 The comment is concerned about building high density housing in older single-family neighborhoods. Please see response to Comment O13-6. The building of high-density housing would not degrade the character of the neighborhood, as designated by local and regional policies specified in Chapter 3.1, Aesthetics, of the DEIR. Refer to Section 3.4, Cultural Resources, regarding impacts to historic resources. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been</p>
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<p>22 (cont) year the Santa Ana River levee was built, and these were not even close to being 100-year floods. This flooding occurs even during drought years. The elevation at Main & Placentia is 830-ft., at Main & Columbia 825-ft. at Main & Strong 800-ft. The new housing down below Main Street experiences flooding often enough nobody who lives there is surprised anymore, but the question we have to ask is why did the City of Riverside allow residential development there at all? The answer is because FEMA doesn't look at rainfall run-off--just at how much a dam or a levee can bear. And in January 2013 the US Army Corps of Engineers issued a report about that section of the Santa Ana River Levee that rated its condition "unacceptable". We do not know if the damage has been repaired or the levee is being properly maintained since then. See below for the report.</p> <p>According to the NSP Hydrology & Water Quality Section, most of the NSP Study Area is located in the 100-year flood plain of both the Highgrove Channel and Springbrook Arroyo. Potential fixes are proposed for re-constructing the Highgrove Channel to avoid a flood scenario, but except for channel widening, not for the Arroyo. This means much of the Northside will be awash in the event of a 100-year flood. The map on page 517 of the PEIR suggests the extent of the problem. We have questions about this: How could the City authorize development on these lands knowing disaster, though unpredictable as to timing, is inevitable. There is not enough money in the City treasury to cover lawsuits caused by this flooding, flooding that will only be made worse by new impervious surfaces created by proposed NSP development. It seems incredible the City would put itself in this position.</p> <p>We suppose there are engineering solutions to overcome this problem--all of them expensive. Even so, they should be explored before this NSP and PEIR are finalized and adopted. Again, the best solution may be simple: more open space as we propose in our <i>Parklands</i> plan attached below. See <i>U.S. Army Corps of Engineers--Los Angeles District Report on Periodic Inspection of Santa Ana River at Riverside Upper 2, Jan. 18, 2013.</i></p> <p>23</p> <p>TRANSPORTATION:</p> <p>We are concerned with the continued use of the Northside neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main, Center and Columbia have been named as "Complete Streets" with all the enhancements that accompany that designation. However, if these improvements only attract even more truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks?</p> <p>The Northside would be well-served with additional service by the RTA, but the big busses are not the best way to do this. The smaller, little red trolley-style busses would be a better fit, and offer more flexibility for the times and routes throughout the day, the week and the year. Service needs to start very early and run very late to allow people to get to work or school and home again. Until that is possible, which may be never, people will have to use their own private vehicles to get around. This should be taken into account to avoid unnecessary inconveniences to the residents and businesses of the Northside.</p> <p>Pedestrian crosswalks at intersections, whether there is a Stop sign or Traffic Signal, should be required. The lines form a box which forces motorists to come to a stop before they get to the edge of the intersection, which is an additional safety measure for pedestrians and motorists, as drivers often have a hard time seeing pedestrians, especially at night, in time to slow down or stop.</p> <p>24</p> <p>25</p>	<p>included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>012-14</p> <p>The comment is concerned about truck routes being planned to go through existing residential neighborhoods, mixed-use neighborhoods, and neighborhoods with sensitive historical landmarks. Please see response to Comment O2-6. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>012-15</p> <p>The comment asks if land uses not identified in the Northside Specific Plan tables are allowed within the SPA. Once the land use designations described in the Northside Specific Plan is adopted by the City, uses not specifically listed on the Permitted Uses Table are prohibited uses. Any item not specifically covered in the Specific Plan will be subject to Title 19 - Zoning Code or, if required, interpretation by the Community & Economic Development Director. Areas designated as a Transition Zone Overlay (TZO) will allow the existing base designation or existing use to be remain as legal conforming uses until the Northside Specific Plan designation can be implemented by land owners. This is to allow for a transition over time of uses from the existing base designations towards the ultimate vision and objectives of the Northside Specific Plan.</p> <p>012-16</p> <p>The comment recommends that new single-family and senior housing be developed on the vacant land above Orange Street. The comment does not specify which vacant lot above Orange Street they're referring to. Existing vacant lots on the north end of Orange Street would be designated as Medium Density</p>
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<p>25. Any changes to existing streets should be done in a sequence that will not cause trouble with traffic flow. Make sure if additional traffic is being directed somewhere, the streets receiving the new vehicles are prepared to deal with it.</p> <p>26. CUMULATIVE IMPACTS: All environmental impacts identified in the NSP-PEIR are significant if taken cumulatively. These should include existing and proposed warehouses and massive logistics centers in Riverside, Moreno Valley, Bloomington, Fontana and elsewhere in the region. They should all be considered separately and together in relation to their negative effects on Quality of Life for the people of the Northside.</p> <p>27. The NSP proposes many square feet of new commercial, industrial and research park projects without making a realistic assessment of the effects of this type of development on the people and the neighborhood, or surrounding communities.</p> <p>28. The NSP, essentially, is a blueprint for adopting a "Growth at Any Cost" land use policy. Alternatively, the Cumulative Effects of our <i>Parklands</i> proposal are all beneficial and would be undertaken at a moderate pace that people could adjust to without undue stress.</p> <p>29. CONCLUSION: We hope you will include our <i>Parklands</i> proposal for a <i>Spanish Town Village Historical District</i> as part of the final Northside Specific Plan. And we thank you for your consideration of our request. Please refer to the attachments below.</p> <p>FINAL REMARKS: We also hope you will look into the Northside Specific Plan adoption process for clarification about what comes next because what is happening now is not what we were told would be happening, and we are not sure of what is supposed to be happening. Our Due Process rights are at stake, so we didn't think this should be overlooked. Thank you for your kind attention to our concerns.</p> <p>Respectfully yours, Karen Renfro, Chair & Spokesman Springbrook Heritage Alliance 3064 Lime Street Riverside, California 92501* info@springbrookheritagealliance.org www.springbrookheritagealliance.org https://www.facebook.com/springbrookheritagealliance</p> <p>Pete Wohlgenuth, Vice-Chair 686 Forest Park Road Riverside, California 92501*</p>	<p>Residential (MDR) (Figure 2-6, Proposed Specific Plan Land Uses), to which future housing developers could potentially build new single-family homes or senior housing. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>012-17</p> <p>The comment states that the existing Northside neighborhood has aesthetic and air quality issues, and for that reason does not support the truck routes proposed in the specific plan. The comment offers the Springbrook Heritage Parklands & Walking Trails proposal as a solution to these issues. Significant and unmitigated air quality impacts are identified in the EIR Section 3.2, Air Quality. Due to the lack of project-specific information, the effectiveness in reducing construction and operational emissions cannot be accurately quantified at the program-level. Refer to EIR Section 3.2, Air Quality, for additional information. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR; thus, no response is required. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p> <p>012-18</p> <p>The comment states that the DEIR Air Quality findings are unclear and not consistent because 1) Ambient Air Quality Standards are not comparable or helpful, 2) the Trip Rate Assumptions do not include existing or proposed sports or recreational uses, and 3) negative impacts are significant whereas levels are mitigation is significant and unavoidable. Table 3.2-1, Ambient Air Quality Standards, describes the Ambient Air Quality Standards based on the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air</p>
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Response to Comments

Quality Standards (NAAQS). An ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below the relevant CAAQS before a geographical area can attain the corresponding CAAQS. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The Northside Specific Plan would result in emissions that would exceed the SCAQMD thresholds for VOC, NO_x, CO and PM_{2.5} during construction, as well as VOC, NO_x, CO, PM₁₀, and PM_{2.5} exceedances during operations.

Although implementation of mitigation measures would reduce impacts, the lack of project-specific information cannot allow mitigations to be accurately quantified. For that reason all impacts would remain significant and unavoidable.

The Old Spanish Town Village District Alternative would reduce air pollutant emissions, as it would include less development that would generate emissions. See EIR Section 6.6.3.2, Air Quality, for additional discussion. This alternative would also not include development in the northern area of the Northside Specific Plan; and therefore, would not block scenic views from the Santa Ana River trail and would avoid the Northside Specific Plan significant view blockage impact. This is identified in the EIR Section 6.6.3.1, Aesthetics.

012-19

The comment does not approve of housing or development in the Santa Ana River floodplain or tableland above Orange Street due to the risk of flooding and liquefaction. Please see response to Comment O2-3 and Comment O2-5.

Erin Snyder, Treasurer and Acting Secretary
1645 Mathews Street
Riverside, California 92507*

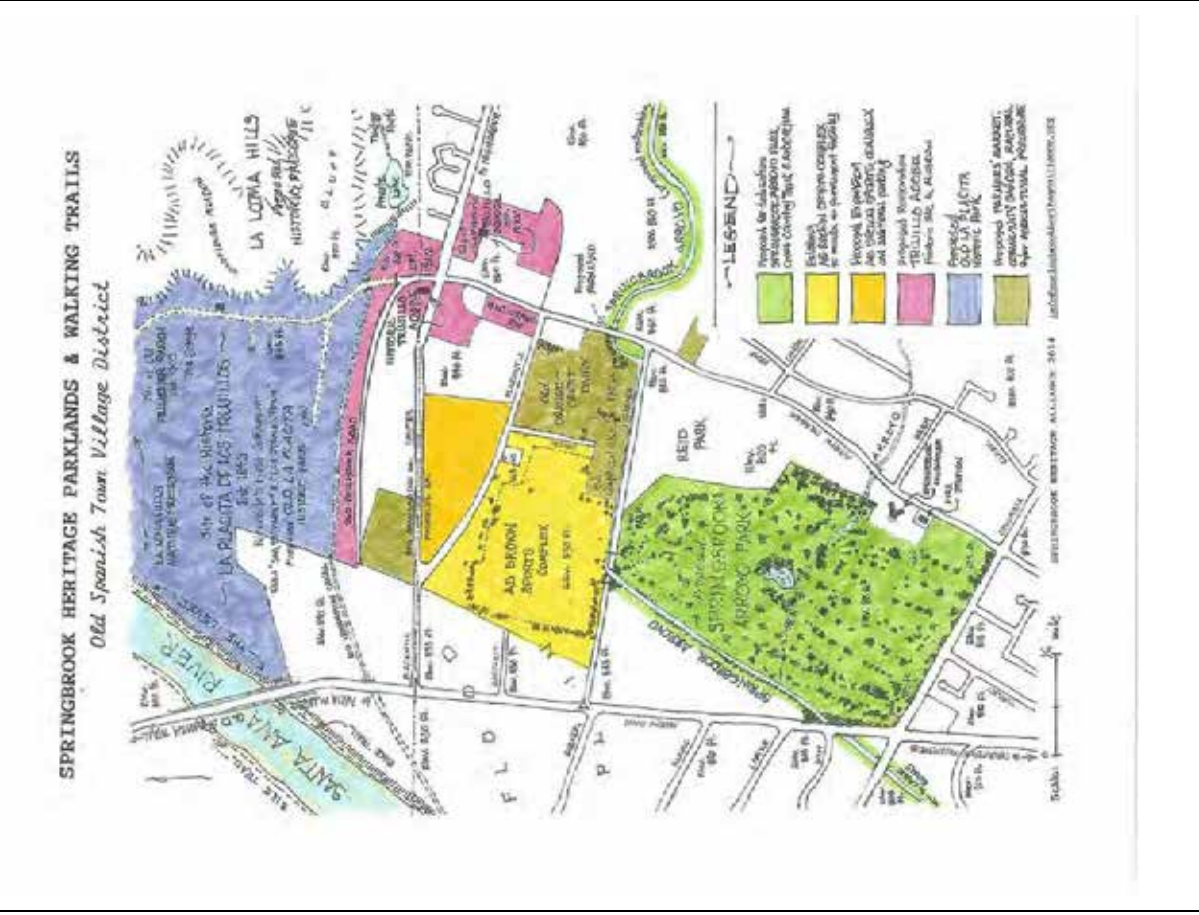
*We are all located within Northside Improvement Association's boundaries, established in 1912.

ATTACHMENTS:



View-free www.usda.gov

Response to Comments



As discussed in EIR Section 3.6.4, geologic impact would be less than significant considering compliance with regulations would ensure standard geologic measures are implemented to avoid impacts related to liquefaction.

012-20

The comment says that the Santa Ana River levee is likely not capable of handling a 100-year flood, expresses concern for the unstable soil types that would be developed on, and questions the effectiveness of stabilizing gels. This is addressed in EIR Section 3.9, Hydrology and Water Quality. It is noted that the levee accreditation is currently in process. See response to Comment 02-3 and Comment I12-2. To clarify, the EIR identified impacts related to geologic stability were identified as less than significant and no mitigation was identified. It is further noted that Perry Russell at Dudek prepared the geology and soils EIR section as well as the response to this previous comment. Mr. Russell is a Professional Geologist (CA No 5777) and a Certified Engineering Geologist (CA No 1837), and it is his professional opinion that stabilizing gels is one of the options that may be utilized.

012-21

The comment asks how the stabilizing gels work, what they're made of, what side-effects could occur, and what hazards they could have. See response to Comment 012-20.

012-22

The comment is concerned about flooding due to rainfall, and that FEMA does not look at rainfall run-off. See response to Comment 02-5, Comment 05-14, and Comment I3-3.

012-23

The comment is concerned about inevitable flooding within the 100-year old flood plain. See response to Comment 02-5, Comment 05-14, and Comment I3-3.

012-24

The comment is concerned that the Complete Street enhancements for Main, Center, and Columbia streets would attract more truck traffic. The comment also recommends the use of smaller, little red trolley-style buses. As described in Chapter 2, Project Description, of the DEIR, the Complete Streets concept is the idea that a road is designed such that vehicles, bicyclists, and pedestrians can move about in a safe manner and is designed in a manner to create attractive public spaces that support surrounding land uses. Strategies used to create Complete Streets include: bike lanes, plant buffers, angled parking, reduced widths for vehicular lanes, and turn lanes with medians. A complete street design emphasizes safe accessibility for pedestrians and bicyclists, while allowing vehicles to move in a safe manner as well.

Public Transportation links to Downtown from the Northside Neighborhood an Urban Connector could include transportation methods such as: electric jitneys, Bus Rapid Transit (BRT), or a streetcar (Chapter 2, Project Description, of the DEIR).

012-25

The comment recommends having pedestrian crosswalks at intersections, and that any changes to existing streets should be done overtime as to not disrupt traffic flow. The Northside Specific Plan would have four Complete Streets Corridors, as described in the following subsections and shown in Figure 2-11, Proposed Open Space and Trails Map. These Complete Street Corridors include Main Street, Columbia Avenue, Center Street, and Orange Street. City construction on street identified in the DEIR and NSP would be done in a way that would not significantly disrupt traffic flow.

012-26

The comment states that all environmental impacts would result in cumulatively significant impacts. The comment

**TO
THE JURISDICTIONS OF
RIVERSIDE, COLTON, HIGHROVE & GRAND TERRACES**

We, the undersigned, support the Springbrook Parklands & Walking Trails proposal to preserve and connect the irreplaceable resources of the Springbrook Arroyo watershed for the benefit of the communities of Riverside, Colton, HighRove and Grand Terraces.

Those areas include the Springbrook Arroyo, Springbrook Falls, La Esca Billie, Pulliamer Ranch (site of the village of La Placita de los Trujillo), the Historic Trujillo Adobe, site of the Trujillo School, Riverside Championship Golf Course, Orange Scavely Dairy and other nearby open spaces, Black Horse Inn, Jacono, Jacobo, and century Southwestern-style working-class housing, field work, undeveloped open space, and much more.

All these places are threatened by industrial zoning and new development projects that are incompatible with the area's existing rich, ecological, historical, and cultural resources. In thousands of families and much wildlife, and served as a playground for thousands who often come long distances to enjoy the environmental and cultural activities that are part of the community's identity. We support property rights, but we believe that like every other property owner, we have a responsibility to the community that lives there, not just to ourselves.

We ask you to adopt the Springbrook Parklands & Walking Trails plan, which includes the following jurisdictions:

- a) **OUR BEHAVIOR WITH VILLAGE SURVEY**
Creation of a village, Northside District, from the town site means preserving the Colton to Colton Avenue to Riverside to provide multi-use private and public spaces, and development to support the proposed village's residential, industrial and historic development projects.
- b) **SPRINGBROOK ARROYO PARK, ORANGE COUNTY CENTER & RIVERSIDE MUSEUM**
Preservation of the entire 17-acre center golf course, use in use as the Riverside Community Center, as a parkland area, and as a parkland area.
- c) **LA ESCA BILLYE HISTORIC SITE POTENTIAL EXPANSION AND PLACITA DE LOS TRUJILLO**
Initiation of an expansion of the historic site, including the historic site, and the historic site.
- d) **TRUJILLO ADOBE HISTORIC SITE, HIGHROVE & LEVING HISTORY CULTURAL CENTER**
Initiation of an expansion of the historic site, including the historic site, and the historic site.
- e) **LA ESCA BILLYE HISTORIC SITE**
Initiation of an expansion of the historic site, including the historic site, and the historic site.
- f) **COMMUNITY CENTER, ORANGE COUNTY CENTER, VILLAGE MUSEUM, CENTER & CUPP**
Initiation of an expansion of the historic site, including the historic site, and the historic site.

Please adopt Springbrook Parklands & Walking Trails for inclusion in the Riverside-Colton Northside Specific Plan. In this way, Riverside and the La Esca Billie-Ora La Placita area of the Northside and along Springbrook Arroyo will be preserved in its long and diverse history, and be a benefit to the community at large and for generations to come.

	NAME	ADDRESS NUMBER	CITY	ZIP CODE	TRUJILLO ADOBE #/OR #/BILLIE	MAIL
1	TRUJILLO		TRUJILLO	TRUJILLO	TRUJILLO	TRUJILLO
2	TRUJILLO		TRUJILLO	TRUJILLO	TRUJILLO	TRUJILLO

Please return to:
SPRINGBROOK HERITAGE ALLIANCE
P.O. Box 121, Riverside, CA 92502
(951) 787-0817

indicates that cumulative impacts should include existing and proposed warehouses and logistic centers in Riverside, Moreno Valley, Bloomington, Fontana and others in the region (unspecified). Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning Noise, Transportation, Tribal Cultural Resources has at least one threshold that would have a potentially significant cumulative impact. Greenhouse gas emissions, Population and Housing, Public Services, Recreation, Utilities and Service Systems and Wildfire would have less than significant cumulative impacts.

CEQA Guidelines Section 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis: “1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency [the list of projects approach], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact [the summary of projections approach].”

For the cumulative impact analyses, the cumulative study area includes the City of Colton, City of Riverside, and County of Riverside. These jurisdictions encompass the southwestern area of San Bernardino County and northwestern area of Riverside County and have similar environmental characteristics as the Northside Specific Plan Area (SPA). This area has historically been used for rural and commercial uses

The Heritage of
SPRINGBROOK ARROYO & ENVIRONS
Riverside - Colton - Highgrove - Grand Terrace
California, USA

(The image contains a dense list of references and citations related to the heritage study, including local government documents, historical records, and academic sources. The text is small and difficult to read in detail, but it appears to be a comprehensive bibliography for the project.)



but has in recent decades been developed for residential and nonresidential developments ranging from rural to higher densities. This study area exhibits similar characteristics in terms of climate, geology, and hydrology, and therefore is also likely to have similar biological and archaeological characteristics as well. This study area also encompasses the service areas of the SPA's primary public service and utility providers. Exceptions include cumulative air quality analysis, which considers the entire South Coast Air Basin (SCAB), and greenhouse gas (GHG) emissions and associated global climate change, which potentially affect all areas of Earth. Additionally, the analysis of potential cumulative hydrology and water quality effects considers other development projects located within the boundary of the Santa Ana River Basin watershed.

012-27

The comment states that the Northside Specific Plan proposes new commercial, industrial and research park development without realistic assessments of the effects these would have. Approval of the Northside Specific Plan would change or expand existing land uses into commercial, industrial, and research park allowed land uses for potential development in the future. This comment provides no specific environmental impact analysis concern, and therefore no specific response can be provided. The environmental effects of the Northside Specific Plan have been identified in the EIR to the extent possible at the program level.

012-28

The comment criticizes the Northside Specific Plan as a "growth at any cost" type of land use policy, and that the buildout should occur at a moderate pace. See response to Comment 014-27. The development of the Northside Specific Plan is expected to

take place over 20 years, and is not identified as occurring immediately if the project is adopted.

012-29

The comment recommends implementing suggestions from the Parklands proposal drafted by Springbrook Heritage Alliance into the Northside Specific Plan. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.



RIVERSIDE 2 LEVEE SYSTEM
SAN BERNARDINO AND RIVERSIDE COUNTIES,
CALIFORNIA
NLD SYSTEM ID # 3805010050

**PERIODIC INSPECTION REPORT NO 1
GENERALIZED EXECUTIVE SUMMARY**

**FINAL SYSTEM RATING: UNACCEPTABLE
FINAL RATING DATE: JANUARY 18, 2013**

PERIODIC INSPECTION REPORT PREPARED BY TETRA TECH, INC.
FOR THE U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT

SUBMITTED: DECEMBER 2012
INSPECTED: APRIL 4, 2011

RIVERSIDE 2 LEVEE SYSTEM
FINAL PERIODIC INSPECTION REPORT NO. 1

EXECUTIVE SUMMARY

This Executive Summary provides an introduction to the periodic inspection, an overview of the system, a summary of the major findings of the periodic inspection, and the overall rating for the system.

1.1 Scope and Purpose of Periodic Inspections

The purpose of the Riverside 2 Levee System periodic inspection is to identify deficiencies that pose hazards to human life or property. The inspection is intended to identify the issues in order to facilitate future studies and associated repairs, as appropriate.

This assessment of the general condition of the levee system is based on available data and visual inspections. Detailed investigation and analysis involving hydrologic design, topographic mapping, subsurface investigations, testing, and detailed computational evaluations is beyond the scope of this levee system inspection.

1.2 System Summary

Riverside 2 Levee System is located in the Cities of Colton and Riverside, in the Counties of San Bernardino and Riverside, respectively, in the State of California. Riverside 2 Levee System forms the east/left bank levee (looking downstream) of the Santa Ana River. Riverside 2 Levee System is composed of two levee segments (see Figure 1). These segments are referred to as Segments 2a and Segment 2b. Segment 2a was constructed by Riverside County is not part of the United States Army Corps of Engineers (USACE) Rehabilitation and Inspection Program (RIP), and therefore not under the authority of USACE. It starts approximately 4,573 feet upstream of Main Street (Station 399+75), and extends downstream to Station 339+00. Segment 2b was constructed by the USACE. It starts at Station 339+00, and extends to approximately 483 feet downstream of Mission Boulevard (Station 209+30). Riverside 2 Levee System is entirely operated and maintained by the Riverside County Flood Control and Water Conservation District (RCFC & WCD). The National Levee Database (NLD) System ID Number for Riverside 2 Levee System is 3805010050.

The RCFC & WCD is the Local Sponsor for the Riverside 2 Levee System.

1.3 Summary of Major Deficiencies Found

The levee system was inspected on April 4, 2011. During the periodic inspection of the system, several deficiencies were noted for which remedial actions are required. Specifically, severe bank erosion from the December 2010 storm flows was found and is currently under the USACE RIP process for repair. The following main deficiencies were noted during the periodic inspection of the project features:

- Levee Embankments
 - Segments 2a and 2b: Significant vegetation growth (brush and tall grass) was present within the vegetation-free zone. The vegetation-free zone extends 15 feet outward from both the landward and riverward toes of the levee prism.
 - Segments 2a and 2b: Unpermitted encroachments, which could negatively impact the integrity of the levee, were observed along both segments.

Page 2 of 4

RIVERSIDE 2 LEVEE SYSTEM
FINAL PERIODIC INSPECTION REPORT NO. 1

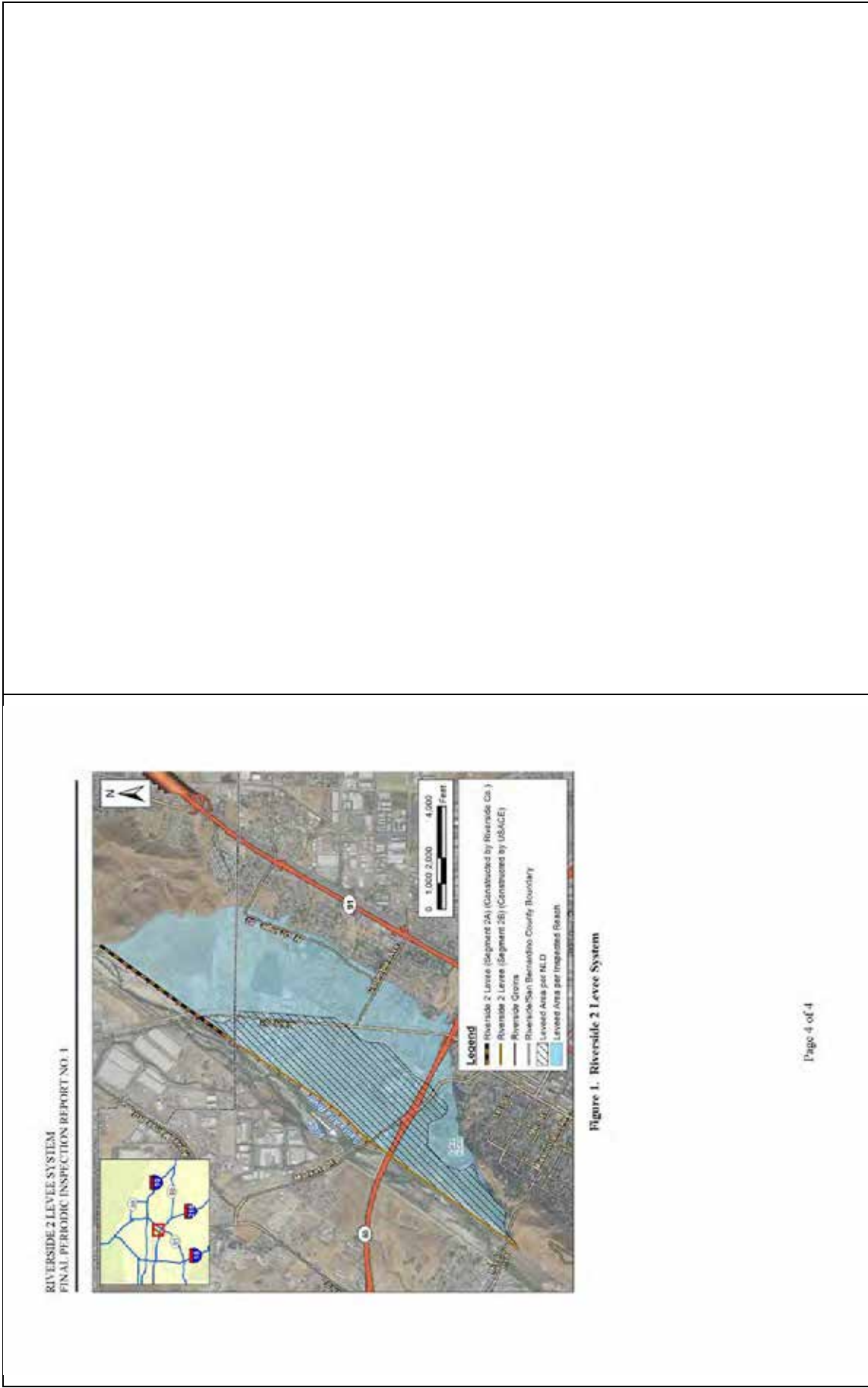
- Segments 2a and 2b: Significant erosion has occurred along the toe of the riverward slope, and could compromise the stability of the levee. It is understood that USACE RIP is in the process of repairing Segment 2b from erosion on the riverside of the levee.
- Segments 2a and 2b: Due to concentration of local runoff, significant erosion gullies have formed on both the riverward and landward slopes of the levee.
- Segment 2b: There are no maintenance records which indicate that the weep holes associated with the concrete slope paving have been regularly cleaned.
- Interior Drainage System
 - Segment 2b: The inlets and outlets of some of the side-drainage structures were obstructed by debris.
 - Segment 2b: Within the past five years, the condition of each side-drainage structure has not been verified using either videoaping by television camera or other visual inspection method.

1.4 Overall Rating

The Levee Safety Officer, Los Angeles District, has determined the overall system rating of Riverside 2 Levee to be "Unacceptable." An "Unacceptable" system rating is defined as:

The Periodic Inspection has identified one (or more) System Components which are rated Unacceptable and require immediate correction. The deficiency (or deficiencies) identified have resulted in an Unacceptable System rating and seriously impair the functioning of the flood protection system and pose unacceptable risk to public safety.

The Local Sponsor will be notified of the overall rating of the levee system by letter with instructions to correct the "unacceptable" rated items not related to the RIP repair as soon as possible. A public notification will be made regarding this levee system and the periodic inspection rating.



Old Spanish Town Village District
**SPRINGBROOK HERITAGE PARKLANDS
 & WALKING TRAILS**

Riverside - Crown - Highlands - Grand Terrace
 California, U.S.A.

OLD SPANISH TOWN VILLAGE DISTRICT

Pellissier Ranch and La Loma Hills in Union to Columbia Avenue in Riverside, La Cañona Drive to the Santa Ana River. To establish future land use policy on the neighborhood's diverse heritage for protection of its irreplaceable community resources

- Occupied by native peoples in pre-historic times; Mission San Gabriel Barreto 1771; Juniper Ranch 1838; Basilio Donaton 1843; La Piedad de los Tujillos in 1842; Spanish Town 1870; Northside Improvement Association 1912.
- Archeological discoveries have already been made at La Loma Hills, Elmita Hill Springs and other locations, high potential for more.
- Planned for industrial use by local development agencies 1950.
- Active wells with underground river channel and other water resources; environmental constraints limit use.
- City of Spanish Town Village District call for investor-driven recycling of industrial and pre-suburban areas.
- City of Spanish Town Village District call for investor-driven recycling of industrial and pre-suburban areas.
- Sports Complex, CIF Cross Country Course at 685 golf course, Tujillo Adobe, Pellissier Ranch, La Loma Hills, and existing residential streets (see detail below).
- OSTVD is consistent with the goals of Northside Improvement Association, Spanish Town Heritage Foundation (founded 2012), Northside Community Plan of 1991, and Riverside General Plan Northside Land Use and Design Guidelines 2013-15 which call for the preservation of the area's rural residential character.
- No eminent domain to acquire private property for public or private village district uses.
- Public art program to be implemented.
- Public art program to be implemented.
- All walking trails would be created alongside on new walkways and streets without sidewalks or marked with a sign on streets with sidewalks. Trails would connect Santa venues to one another and the Santa Ana River Parkway, Country Course

SPRINGBROOK ARBORETUM & CHAMPIONSHIP CROSS COUNTRY COURSE

Former Riverside Golf Course currently under contract with RUSD for use as CIF Championship Cross Country Course

- 129 acres owned by City of Riverside, under EPA oversight and maintained by Parks Department; walk is open.
- Composed of several parcels zoned for public recreational facility, commercial and residential.
- Most of acreage is located within original Spanish land grant boundaries and was part of La Florida.
- Open to public use since 1920.
- Owned by the City of Riverside, under oversight of the Riverside Parks and Recreation Department.
- Proposed for use as a long-term or indefinite extension of the current lease with option to buy.
- Proposed calls for no improvements except for crushed-granite cross-country courses, parking, pedestrian walkways and vehicle access. Ponds and arrows to be restored to attract waterfowl and wildlife.
- Arboretum to be stocked with drought resistant local native trees and related vegetation by volunteers under direction of Parks Department or other appropriate authority.
- Existing fence to be replaced with heavy-duty 19th-century style wrought iron or steel fencing using fence raised from greater context.
- All walkways, drinking fountains, picnic tables, benches, electrical or water hook-ups, night lighting, surveillance cameras, etc. to be added.
- Proposed for use as a long-term or indefinite extension of the current lease with option to buy.
- No herb or non-air carrying, chemicals or outdoor cooking except for permit for approved activities by organizations under contract with the City of Riverside.
- When not in use by CIF, park would be available only to groups that do not want attention; fee-free to be used.
- Open to the public during daylight hours when not in use by CIF or contracted groups.

AB BROWN SPORTS COMPLEX

Maintained and operated by ARSD-Region 47 since 1980 under contract with the City of Riverside

- 85 acres owned by City of Riverside, under full management, one well in operation.
- Our proposal calls for dedication of site as a permanent public open-space recreational facility.
- Proposal supports long-term or indefinite extension of lease to ARSD-Region 47 with option to buy.

<p>EXPANSION OF AB BROWN SPORTS COMPLEX <i>Currently under private ownership and zoned for BMP, currently proposed for a 45-ft. high 308,000 sq. ft. warehouse</i></p> <ul style="list-style-type: none"> Our proposal calls for annexation of the site by the City of Riverside for dedication as permanent public recreational facility for additional Ab Brown Sports Complex open-space playing fields and parking. AVSD to be offered the right of first refusal for lease or purchase of the site for permanent open-space recreational uses. <p>TRUJILLO ADOBE RESTORATION, LIVING HISTORY MUSEUM & CULTURAL CENTER <i>Historic city, county and state site built in 1862; oldest non-native residence in Riverside County</i></p> <ul style="list-style-type: none"> Currently owned by Riverside County Parks Department. Built by Juan Trujillo in 1862, descendant of Lorenzo Trujillo, founder of La Placita 1843. Our proposal calls for restoration of the Trujillo Adobe and establishment of related living-history museum and cultural center by Spanish Town Heritage Foundation. https://www.facebook.com/SpanishTownHeritageFoundation Proposes to include purchase of nearby privately-owned parcels from current owners with funds from private sources for reconstruction of Trujillo School (1875), Trujillo Cantina (1900), chapel, and other venues on adjacent or nearby private parcels. The adobe, museum and cultural center will complement the proposed Old La Placita Historical Park and serve as a focal point for new 19th-century themed-development in the OSTVD. <p>OLD LA PLACITA HISTORIC PARK <i>Borderlands of Cahulla and other native tribes until Spanish colonial period 1771; original site of La Placita de los Trujillos 1843; Pellissier Ranch 1905-1960s</i></p> <ul style="list-style-type: none"> Currently owned by City of Riverside; managed by RPU; wells and underground water resources. Our proposal calls for dedication of the 227-acre parcel as a historic-site to be called <i>Old La Placita Historic Park</i> and the site to be managed by the City of Riverside. La Placita Village, the oldest of the Loma Hills. Its site overlooks the Santa Ana River, Agua Mansa, the Old Spanish Trail, much of the San Bernardino Valley, the mouth of Colton Pass, and the San Bernardino Mountains. La Placita and La Loma Hills have potential as a destination point for Old Spanish National Trail enthusiasts. www.ostvd.org <i>Old La Placita Historic Park</i> to include a reconstructed La Placita Village square, adobe houses and La Loma School with a living-history working farm based on archeological survey to locate original foundations. Public or private ownership, operated by a private historical foundation according to the standards of the profession. Funds for acquisition and development would be raised privately from private sources. <p>FARMERS' MARKET, COMMUNITY GARDEN, SHOPS, NATURAL & AGRICULTURAL PRESERVE <i>Various privately-owned parcels currently zoned Industrial to be purchased by private investors and resoned for OSTVD themed-development</i></p> <ul style="list-style-type: none"> Building designs to be people-friendly and consistent with La Placita and Spanish Town-era architectural styles (1945-1995)—white-washed adobe or wood-frame with simulated shake roofing. Onsite parking and walkways to be crushed granite or other permeable surface, outdoor utility fixtures to appear historically-compatible to venue. Venues would also include historical arts & crafts shops, neighborhood markets, farm-to-table restaurants, gift shops, native arts & crafts, small businesses, GrowUverside training post, pick-your-own seasonal produce, non- Development would be investor-driven, subject to land use and design review standards for the district. <p>Evidenced by: Springbrook Heritage Alliance National Trust for Historic Preservation Spanish Town Heritage Foundation Friends of Blue Mountain Friends of Fannount Park University Neighborhood Association Academy of Living History Performing Arts</p> <p><i>For more information:</i> info@springbrookheritagealliance.org https://www.facebook.com/springbrookheritagealliance</p>	
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Response to Comment Letter O13

Springbrook Heritage Alliance
September 3, 2020

O13-1 The comment letter is a repost of Comment Letter O12. Please see response to Comment Letter O12.

Dawna Marshall

Subject: FW: [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION SEPT. 3, 2020 AGENDA ITEM #4

From: Karen Renfro <ka.renfro7@gmail.com>
Sent: Wednesday, September 2, 2020 6:10 PM
To: Murray, David <DMurray@riversideca.gov>; Andrade, Frances <FANDRADE@riversideca.gov>; Kopaakie-Brown, Mary <MKopaakie-Brown@riversideca.gov>; Welch, David <DWelch@riversideca.gov>
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Subject: [External] SPRINGBROOK HERITAGE ALLIANCE TO RIVERSIDE PLANNING COMMISSION SEPT. 3, 2020 AGENDA ITEM #4

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Springbrook Heritage Alliance

Saving the treasures of the Springbrook Arroyo Watershed communities
RIVERSIDE - COLTON - HIGHTGROVE - GRAND TERRACE

Sept. 1, 2020

Riverside Planning Commission
City of Riverside
3900 Main Street
Riverside, California 92522

CC: Chairman and Members of the Riverside Planning Commission

INTERJURISDICTIONAL SPECIFIC PLAN FOR RIVERSIDE'S NORTHSIDE & COLTON'S PELLISSIER RANCH
P19-0063 (AMD), P19-0064 (GPA), P19-0065 (SP) P19-0066 (PEIR), P20-0443 (RZ)
Agenda Item #4

Honorable Chairman and Members of the Riverside Planning Commission:

1 Springbrook Heritage Alliance appreciates this opportunity to offer our comments on the actions before you relating to the adoption of the Northside Specific Plan & PEIR as presented by the Northside Specific Plan Team.

It has long been our wish that the City of Riverside would adopt a Specific Plan for the Northside to reflect the wishes of the residents and businesses who have made this area their home. However, although the plan they have proposed contains a wide variety of land uses--old and new--it falls short of being a realistic approach to the business of improving the well-being of the people who have invested their whole lives in this neighborhood in a way that serves their needs in particular of the surrounding communities in general. We think there is a better way.

RIVERSIDE'S FORGOTTEN LEGACY:
The Northside neighborhood is the City's oldest, with unique and remarkable history that deserves to be recognized and cherished. We have identified many of them on our *Map of the Springbrook Arroyo & Environs and Heritage of the Springbrook Arroyo & Environs* which are attached below.

In 2014, SHIA members adopted our *Springbrook Heritage Parklands & Walking Trails* plan to save the natural, cultural and historical treasures of the Springbrook Arroyo communities of Riverside, Colton, Highgrove and Grand Terrace. To achieve this, we propose the establishment of a Spanish Town Village Historical District, a mechanism for protecting, restoring, and developing these irreplaceable treasures in the area bounded by Columbia Avenue, West La Cadena Drive, La Loma Hills & Pellissier Ranch, and the Santa Ana River levee; restoration of Springbrook Arroyo along its entire course wherever possible; dedication of public recreational and open space facilities as permanent parklands, including the former Springbrook Golf Club (now the Championship CIF Cross Country Course), Ab Brown Sports Complex, Reid Park, and Pellissier Ranch.

See *Joyce Carter Vickery's Defending Eden: New Mexican Pioneers in Southern California 1830-1890* (UCR History Department & Riverside Municipal Museum, 1977).

ECONOMIC CONSIDERATIONS OF LAND USE:
Our proposal does not require an outlay of public funds from local municipalities. The preservation of the public facilities could be achieved through grants from public and private foundations, and the Spanish Town Village District private-sector marketplace venues through investment by small-scale entrepreneurs. This could result in an economic renaissance

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for the Northside, based entirely on land use policy honoring the neighborhood's heritage. Besides new jobs and opportunities this would inspire, the new businesses would generate additional tax revenue from diverse sources--a much better proposition than putting all the new land uses into the basket of expensive large-scale projects. Our proposal is supported by local organizations and individuals.

When the City undertook to develop a Specific Plan for the Northside, we supported their efforts. We asked that our Parklands proposal be considered as an alternative to the other proposals for land use on the Northside. It has been so considered, and even though we are pleased it passed muster with the Environmental standards of CEQA, we are not so pleased to see that the Northside Specific Plan Team apparently did not read or understand our proposal, which clearly states our economic objective and how we propose to go about carrying it out.

Please see our *Map, Outline, and Petition* attached below.

LAND USE ON THE NORTHSIDE:

Now, we understand that Riverside has long considered the City's oldest neighborhood, whose cultural history precedes the founding of Riverside by perhaps a thousand years, as wasteland best suited for industrial and commercial development. For about 800 years it served as hunting, fishing and foraging land, site for sacred ceremonies, and occasional occupation during very dry periods. For 145 years it was agricultural, rural agricultural, and rural residential. In 1969 the Santa Ana River Levee was constructed with the assurance the Northside was protected from periodic flooding from the river. However, the flooding does not protect the Northside from rainfall run-off which has nowhere to go but the levee. That is why this area was so good for agriculture. But, the new residential zoning on the west-side of Main, and all the commercial and industrial zoning below Orange established by the Redevelopment Agency in 1990 is subject to periodic flooding. Nobody has been able to figure out how to mitigate this problem. The Redevelopment Agency was shut down in 2011 but the inappropriate zoning remains.

In addition, the floodplain below Orange soils are subject to liquefaction and subsidence under certain conditions which occur at unpredictable intervals. It has happened before and it can happen again.

The close proximity of industrial and commercial to long-established single-family residential, public recreational and youth sports, small businesses and the historic Trujillo Adobe (ca. 1862) -- now a City Landmark with historical designations from the County of Riverside and State of California--created land use conflicts that cannot be resolved if the City was not determined to turn this part of the Northside into an industrial/commercial center. Northside residents have opposed these changes all along--in fact the Northside Improvement Association (formed in 1912) has been fighting to bring in city amenities like sewers and sidewalks while keeping industrial and commercial out of their neighborhood for more than 100 years. There is no mitigation for the destruction of a neighborhood's character and heritage.

These sentiments are reflected in the Northside Plan of 1991 and the Riverside General Plan's guidelines for the Northside. Our *Parklands* proposal is consistent with the findings of these two documents, and despite the claim that it would not stimulate the neighborhood economy or

generate new tax revenue for the cities of Riverside and Colton, that is one of the intentions of our proposal.

Most importantly, despite current sentiment among developers and public officials, property taxes are neither the best way nor the only way to generate lots of tax revenue for the local treasury. Our *Parklands* proposal shows how to do this by letting loose the energy of individuals and small investors to develop operations that generate new tax revenue from a multiplicity of sources--in the long run a much more stable economy and much more beneficial to the neighborhood, and the City. According to a 2012 government report, the three most common impacts of historical preservation are increases in property values, job creation, and tourism. See "The Impact of Historical Preservation and Endowment" by Mimi Morris, Executive Officer of California's Cultural and Historic Endowment.

See also California's Office of Historical Preservation.

ISSUES REGARDING THE NORTHSIDE SPECIFIC PLAN PROCESS:

It would be good if you understood how frustrating this has been for the people of the Northside to participate in the NSP process.

First, the NSP Team did not notify all the property owners in the study area by mail even though a change to land use policy is serious business. They said it would cost too much money and expected local residents and business owners to spread the word, forgetting that we are volunteers, not getting paid for all the extra work & expense involved, and have other more pressing obligations to fulfill. Turn-around times were scheduled for the convenience of the NSP Team, There was a succession of community sessions and workshops that were held in the Northside, and never were all the people who needed to know notified of these events. Local groups, including Northside Improvement Association, Spanish Town Heritage Foundation, OS/IA-Agua Mansa Chapter, and SHIA did the best we could, but turnouts were low. This was interpreted to mean lack of interest. Nothing could be further from the truth.

Second, when the Northside Specific Plan Team began meeting with local residents they said our discussions would start from a blank slate. They were not going to use the Northside Community Plan or General Plan's Northside Guidelines. Recently, we learned that the Northside Specific Plan Team was informed by city officials that they wanted a plan that would benefit our City's water supplies and generate property tax revenue for the public treasury.

This seems to explain why, despite the pleas of Northside residents, visiting sports enthusiasts, fans of the Trujillo Adobe, and local history buffs, the NSP calls for expensive, radical and unnecessary changes to the Springbrook Arroyo area below Orange Street. The NSP offers several alternatives for the Arroyo involving re-routing the Arroyo from its existing course (an enormously expensive project), and new commercial and industrial zoning in close proximity to La Loma Hills, the Trujillo Adobe, existing single-family residential, new single-family residential, youth sports and public recreational facilities.

Third, the worst of these proposes to separate the Arroyo at West La Cadena and re-route the waterway by connecting it to the Highgrove Channel a half-mile away across Center Street and the County line and use recycled water to keep it flowing year-round. This alternative does not explain what happens to the water in the upper Arroyo above the proposed

cut. It would also be prohibitively expensive and intrusive. Most of all, it is totally unnecessary. If the City dedicated the former golf course as a permanent local native arboretum & botanical garden-cross country course-public parkland, the three little ponds could be enlarged to make one lake that would sequester run-off water, help replenish underground water supplies, attract wild waterfowl, provide sustenance for local birds, and turn the park into a little paradise. The work involved could be done by volunteers under the supervision of the City staff. This suggestion is part of our *Parklands* proposal.

Fourth, the final proposal, consisting of many components and several alternatives, is not one that was presented in a community session, and we never saw some of the components until the document was released with the final PEIR. Even more frustrating, we never saw the proposed zoning maps until the agenda item for this hearing was posted twelve days ago and some of us didn't see them until late last week or early this week.

So there is much that is new to us, and we have not had sufficient time to study it as well as we'd have liked. And now we understand that if we do not bring up every point of concern to us at this meeting, we cannot bring it up before the City Council. The lack of transparency regarding this hearing means that the Northside Specific Plan is not a neighborhood plan at all. It is being imposed on us by city officials, professional consultants from out of town and special interests who wish to make a profit on our misery. All the property owners, residents and businesses have still not been notified about the NSP or this hearing. And because of the COVID restrictions our grassroots grapevine was unable to pick up the slack.

LAND USE PLANNING:

We believe that all property owners and their tenants have an equality of rights, and no one has a right to cause harm to their neighbors. However a site is zoned, new development should always be beneficial to the neighbors and the neighborhood—and they are the ones who should determine this. Title 19 and Title 19 both make this clear in the introductions.

We question the obvious assumption of city officials and urban planners that job creation is dependent upon noisy operations.

We question the wisdom of building high-density housing adjacent to the NSP's proposed Central Park. While it would provide open space to the high-density residents, we can see it becoming an attractive nuisance for the fringe population and homeless after hours.

We question the wisdom of building high-density housing on commercial streets or streets designated as truck routes, or areas in the flood plain below Orange Street.

We question the wisdom of building new high-density housing in an older single-family neighborhood that is eligible for designation as a historical district.

We question designating truck routes through existing residential neighborhoods, or neighborhoods with mixed-use residential, retail, restaurant, and small-scale commercial, or neighborhoods with sensitive historical landmarks.

We question whether uses not identified in the NSP Tables are allowed.

We recommend that new single-family and senior housing be developed on vacant land above Orange Street within existing residential zones.
 See William Cowart's "The Trujillo Adobe and Watehousingification of Southern California's Inland Empire" (Huntington-USC Institute of California and the West):
<https://ieeblog.wordpress.com>

AESTHETICS & AIR QUALITY:

The charm of the Northside is its rural character in an urban setting. Right now, some of the properties look a little ragged, but this is not a sign of blight so much as a sign of the instability of land use in the Northside. If the City goes with the NSP as proposed, allowing high-density housing and large-scale commercial and industrial will cause the Northside to become unlivable for those who already live and work here, the neighborhood will deteriorate accordingly. The aesthetics of new development on neighborhood livability affects Air Quality and other Quality of Life issues. And Air Quality suffers in direct proportion from a neglect of the aesthetic factors of land use. The Northside already has bad air quality, there is no need to make it worse. We do not have to live with heavy truck traffic, noxious chemicals or destruction of natural open spaces to improve the neighborhood's economy. The *Springbrook Heritage Parklands & Walking Trails* proposal shows how to do it.

The NSP-PEIR Air Quality findings are not consistent, or even very useful to an analysis of the NSP. Ambient Air Quality Standards are not comparable or helpful. Trip Rate Assumptions do not include existing or proposed sports or recreational uses. Findings of Negative Impacts are Significant, yet Mitigations cite levels after correction as still Significant and Unavoidable. Yet, the same document shows our *Parklands* proposal not only has no negative impacts to aesthetics and air quality, but is likely to improve both.

GEOLOGY/SOILS:

There is no legitimate reason to propose any type of housing or intense urban or industrial development in the Santa Ana River floodplain or the tableland above Orange Street to the east. The bottomland is unstable, subject to flooding from rainfall run-off and subsidence as we mentioned above. The Riverside General Plan 2025 shows it is high-risk for liquefaction. Liquefaction can occur without rain or seismic activity, but is much less likely. The NSP PEIR admits this is so.

There are earthquake faults nearby: at the top of Pigeon Pass and Reche Canyon, and fracture zones all over the area. According to recent examinations by flood control officials, the Santa Ana River levee is probably not capable of handling a 100-year flood. It is now known that the great Agua Mansa Flood of 1862, which washed the villages of Agua Mansa and La Placita de los Trujillos away (thankfully, no lives were lost), was of greater magnitude than that. The tableland is now almost entirely developed with single-family residential because until the Redevelopment Agency rezoned the Northside few people were foolhardy to build housing below Orange Street. The danger of subsidence increases with higher rainfall and seismic activity. With seismic activity or even the constant weight of any superstructure, the soils could deform and compromise the structural integrity of the building. Given this knowledge, wouldn't the City be liable for allowing any development on these suspect soil types? Stabilizing gels are mentioned in passing as a potential mitigation, but there is no supporting text about projects that have successfully used it in the United States or in situations comparable to the Northside.

We have questions about this gel: How do we know they work? What are they made of? What are the side-effects we need to know about? Are they hazardous to human, animals, plants, soils, water supplies? Much more information is needed to evaluate the potential use of these gels. Alternatively, perhaps the best use of the land underlain by these unstable soils is open space and rainwater sequestering from trees and vegetation, as proposed in our *Parklands* plan.

HYDROLOGY/WATER QUALITY:

As long-time residents of the Northside, we have seen flooding from rainfall run-off submerge the intersections of Main & Placentia, Center & Placentia, Main & Columbia, Main & Strong, Market Street, many side streets along the levee, and so forth too many times to count. One of our members recalls seeing floodwaters rise all the way to Orange Street three times since 1969, the year the Santa Ana River levee was built, and these were not even close to being 100-year floods. This flooding occurs even during drought years.

The elevation at Main & Placentia is 830-ft., at Main & Columbia 825-ft. at Main & Strong 800-ft. The new housing down below Main Street experiences flooding often enough nobody who lives there is surprised anymore, but the question we have to ask is why did the City of Riverside allow residential development there at all? The answer is because FEMA doesn't look at rainfall run-off--just at how much a dam or a levee can bear. And in January 2013 the US Army Corps of Engineers issued a report about that section of the Santa Ana River Levee that rated its condition "unacceptable". We do not know if the damage has been repaired or the levee is being properly maintained since then. See below for the report.


According to the NSP Hydrology & Water Quality Section, most of the NSP Study Area is located in the 100-year flood plain of both the Highgrove Channel and Springbrook Arroyo. Potential fixes are proposed for re-constructing the Highgrove Channel to avoid a flood scenario, but except for channel widening, not for the Arroyo. This means much of the Northside will be awash in the event of a 100-year flood. The map on page 517 of the PEIR suggests the extent of the problem. We have questions about this: How could the City authorize development on these lands knowing disaster, though unpredictable as to timing, is inevitable. There is not enough money in the City treasury to cover lawsuits caused by this flooding, flooding that will only be made worse by new impervious surfaces created by proposed NSP development. It seems incredible the City would put itself in this position.

We suppose there are engineering solutions to overcome this problem--all of them expensive. Even so, they should be explored before this NSP and PEIR are finalized and adopted. Again, the best solution may be simple: more open space as we propose in our *Parklands* plan attached below. See *U.S. Army Corps of Engineers--Los Angeles District Report on Periodic Inspection of Santa Ana River at Riverside Upper 2, Jan. 18, 2013.*

TRANSPORTATION:

We are concerned with the continued use of the Northside neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main, Center and Columbia have been named as "Complete Streets" with all the enhancements that accompany that designation. However, if these improvements only attract even more truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks? The Northside would be well-served with additional service by the RTA, but the big busses are not the best way to do this. The smaller, little red trolley-style busses would be a better fit, and offer more flexibility for the times and routes throughout the day, the week and the year. Service needs

<p>to start very early and run very late to allow people to get to work or school and home again. Until that is possible, which may be never, people will have to use their own private vehicles to get around. This should be taken into account to avoid unnecessary inconveniences to the residents and businesses of the Northside.</p> <p>Pedestrian crosswalks at intersections, whether there is a Stop sign or Traffic Signal, should be required. The lines form a box which forces motorists to come to a stop before they get to the edge of the intersection, which is an additional safety measure for pedestrians and motorists, as drivers often have a hard time seeing pedestrians, especially at night, in time to slow down or stop. Any changes to existing streets should be done in a sequence that will not cause trouble with traffic flow. Make sure if additional traffic is being directed somewhere, the streets receiving the new vehicles are prepared to deal with it.</p> <p>CUMULATIVE IMPACTS: All environmental impacts identified in the NSP-PEIR are significant if taken cumulatively. These should include existing and proposed warehouses and massive logistics centers in Riverside, Moreno Valley, Broomington, Fontana and elsewhere in the region. They should all be considered separately and together in relation to their negative effects on Quality of Life for the people of the Northside.</p> <p>The NSP proposes many square feet of new commercial, industrial and research park projects without making a realistic assessment of the effects of this type of development on the people and the neighborhood, or surrounding communities.</p> <p>The NSP, essentially, is a blueprint for adopting a "Growth at Any Cost" land use policy. Alternatively, the Cumulative Effects of our <i>Parklands</i> proposal are all beneficial and would be undertaken at a moderate pace that people could adjust to without undue stress.</p> <p>CONCLUSION: We hope you will include our <i>Parklands</i> proposal for a <i>Spanish Town Village Historical District</i> as part of the final Northside Specific Plan. And we thank you for your consideration of our request. Please refer to the attachments below.</p> <p>FINAL REMARKS: We also hope you will look into the Northside Specific Plan adoption process for clarification about what comes next because what is happening now is not what we were told would be happening, and we are not sure of what is supposed to be happening. Our Due Process rights are at stake, so we didn't think this should be overlooked. Thank you for your kind attention to our concerns.</p> <p>Respectfully yours, Karen Renfro, Chair & Spokesman Springbrook Heritage Alliance 3064 Lime Street Riverside, California 92501*</p>	
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<p>info@springbrookheritagealliance.org www.springbrookheritagealliance.org https://www.facebook.com/springbrookheritagealliance</p> <p>Pete Wehlgemuth, Vice-Chair 686 Forest Park Road Riverside, California 92501*</p> <p>Erin Snyder, Treasurer and Acting Secretary 1645 Mathews Street Riverside, California 92507*</p> <p>*We are all located within Northside Improvement Association's boundaries, established in 1912.</p> <p>ATTACHMENTS:</p> <p> Virus-free seal logo</p> <p>Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household. EiversideCA.gov/COVID-19</p>	
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TO
THE JURISDICTIONS OF
RIVERSIDE, COLTON, HIGHGROVE & GRAND TERRACE:

We, the undersigned, support the Springbrook Parklands & Walking Trails proposal to protect and connect the irreplaceable treasures of the Springbrook Arroyo Watershed for the benefit of the communities of Riverside, Colton, Highgrove and Grand Terrace.

These areas include the Springbrook Arroyo, Springbrook Falls, La Loma Hills, Pellissier Ranch (site of the Village of La Placita de San Trujillo), the historic Trujillo Adobe, site of the Trujillo School, Riverside Championship Cross Country Course (site of former Riverside Golf Club), Ah Brown Sports Complex, site of Occoconnet Dairy, newly dairy and other farming operations, sleek West Pecking Co. building, late 19th-century Southwestern-style workington housing, wild park, undeveloped open spaces, and much more.

All these places are threatened by industrial zoning and new development projects that are incompatible with the area's existing rural-residential character, currently home to thousands of families and much wildlife, and serve as a playground for thousands more who often come long distances to enjoy the recreational and cultural activities that are part of the community tradition. We support property rights but we believe that like Liberty they are reciprocal and new development should benefit the people who are already here, not take them or their neighborhood.

We ask you to adopt the Springbrook Heritage Parklands & Walking Trails plan, which includes the following distinctions:

- a) **OLD SPANISH TOWN VILLAGE DISTRICT**
Creation of a cultural heritage district from La Loma Hills historic houses in Colton to Columbia Avenue in Riverside to promote historic preservation investment in these neighborhoods and support local businesses, including historic homes, sports competitions, development projects, and large-scale development projects.
- b) **SPRINGBROOK ANTOPO PARK, CROSS COUNTRY COURSE & NATIVE ANCESTRY**
Championship Cross Country Course, as a permanent park, sculpture and ecological dedication as permanent open space recreational facility, continue operating under current AYO management.
- c) **TRUJILLO ADOBE RESTORATION, MUSEUM & LIVING HISTORY CULTURAL CENTER**
Restoration of the 129-acre former golf course, now in use as the Riverside Championship Cross Country Course, as a permanent park, sculpture and ecological dedication as permanent open space recreational facility, continue operating under current AYO management.
- d) **TRUJILLO ADOBE RESTORATION, MUSEUM & LIVING HISTORY CULTURAL CENTER**
Restoration of the 129-acre former golf course, now in use as the Riverside Championship Cross Country Course, as a permanent park, sculpture and ecological dedication as permanent open space recreational facility, continue operating under current AYO management.
- e) **OLD LA PLACITA HISTORIC PARK**
Dedication as permanent parkland and historic site, a destination for Trujillo Adobe, Old Spanish Trails and Spanish Town Village District visitors, venue for living-history performances and re-enactments. La Loma Hills to be dedicated as wilderness preserve.
- f) **COMMUNITY GARDENS, OUTDOOR FOOD-ONLY MARKET, VILLAGE MARKET, CRAFTS & GIFT SHOP, PARK-TO-PARK HISTORICAL RESTAURANT, AND MORE...**
Spanish Town Village District shops, neighborhood market and related venue on vacant industrial premises to be purchased from owners by private parties. No eminent domain.

Please adopt Springbrook Heritage Parklands & Walking Trails for inclusion in the Riverside-Colton Northside Specific Plan. In this way, future land use for the La Loma Hills-Old La Placita area of the Northside and along Springbrook Arroyo will be grounded in its long and diverse history, and be a benefit to the community at large and for generations to come.

NAME	ADDRESS NUMBER, STREET, CITY	PHONE NUMBER	SLIP CODE	TELEPHONE #/OR E-MAIL	NAME
1	Trujillo Adobe				
2	Trujillo Adobe				

Please return to:
SPRINGBROOK HERITAGE ALLIANCE
P.O. Box 24, Riverside CA 92502
(951) 937-0617

Old Spanish Town Village District
**SPRINGBROOK HERITAGE PARKLANDS
 & WALKING TRAILS**

Riverside • Calico • Highgrove • Grand Terrace
 California, U.S.A.

OLD SPANISH TOWN VILLAGE DISTRICT
 Pellissier Ranch, and La Loma Hills in Calton to Columbia Avenue in Riverside, La Cadena Drive to the Santa Ana River. To establish future land use policy on the neighborhood's diverse heritage for protection of its irreplaceable community treasures

- Occupied by native peoples in pre-historic times; Mission San Gabriel Rancho 1771; Juniper Rancho 1838; Banda Donation 1843; La Placita de los Trujillos in 1843; Spanish Town 1876; Northside Improvement Association 1912.
- Archaeological discoveries have already been made at La Loma Hills, Elizabetta Hot Springs and other locations, high potential for more.
- Reopened for industrial-ship by local Redevelopment Agencies 1990.
- Active wells with underground river channel and other water resources – environmental constraints limit use.
- Historic buildings and structures are being restored and preserved by the Riverside Historical Society and the Riverside Manufacturing Park, properties to be made compatible with protection of Springbrook 4 and Field Park, Ab Brown Sports Complex, CIF Cross Country Course at old golf course, Trujillo Adobe, Pellissier Ranch, La Loma Hills, and existing residential streets (see detail below).
- OSTVD is consistent with the goals of Northside Improvement Association, Spanish Town Heritage Foundation (founded 2012), Northside Community Plan of 1991, and Riverside General Plan Northside Land Use and Design Guidelines 2013-15 which call for the preservation of the area's rural-residential character.
- No eminent domain to acquire private property for public or private village district uses.
- Plan to encourage and support local business owners for purchase of private properties if current owners do not wish to participate in OSTVD development.
- All walking trails would be crushed-granite on new walkways and streets without sidewalks or marked with a sign on streets with sidewalks. Trails would connect SH4 venues to one another and the Santa Ana River Parkway.

SPRINGBROOK ARBORETUM & CHAMPIONSHIP CROSS COUNTRY COURSE
 Former Riverside Golf Course currently under contract with RUSD for use as CIF Championship Cross Country Course

- 129 acres owned by City of Riverside, under RPU oversight and maintained by Parks Department; wells in use.
- Composed of several parcels zoned for public recreational facility, commercial and residential.
- One of original parcels included within original Field Park Donation boundaries and was part of La Placita.
- Our proposal includes the original Field Park and the 129-acre parcel currently under open-space recreational facility to be called Springbrook Arroyo Arboretum & Championship Cross Country Course.
- Proposal calls for long-term or indefinite extension of the current lease with option to buy.
- Proposal calls for no improvements except for crushed-granite cross-country courses, parking, pedestrian walkways and vehicle access. Ponds and arroyo to be restored to attract waterfowl and wildlife.
- Arboretum to be stocked with drought-resistant local native trees and related vegetation by volunteers under direction of Parks Department or other appropriate authority.
- Existing fence to be replaced with heavy duty 10th-century style wrought iron or steel fencing along funds related to new private donors.
- No restrooms, drinking fountains, picnic tables, benches, electrical or water hook-ups, night lighting, concession stands, etc.
- Prohibited to include no amplified music, no loudspeakers, no RV or camper parking, no fishing, no fireworks, no model planes or drones, no vacancy, no skateboards, no stunts, no smoking, etc.
- No tent or open-air camping, campfires or outdoor cooking except by permit for approved activities by organizations under contract with the City of Riverside.
- When not in use by CIF, park would be available only to groups that do not want amenities; see scale to be pro-posed.
- Open to the public during daylight hours when not in use by CIF or contracted groups.

AB BROWN SPORTS COMPLEX
 Maintained and operated by AYSO-Region 47 since 1980 under contract with the City of Riverside

- 55 acres owned by City of Riverside, under RPU oversight; one well in operation.
- Our proposal calls for dedication of site as a permanent public open-space recreational facility.
- Proposal supports long-term or indefinite extension of lease to AYSO-Region 47 with option to buy.

EXPANSION OF AB BROWN SPORTS COMPLEX
Currently under private ownership and zoned for BMP, currently proposed for a 45-ft. high 308,000 sq. ft. warehouse

- Our proposal calls for annexation of the site by the City of Riverside for dedication as permanent public recreational facility for a new Brown Sports Complex open-space playing fields and parking.
- Funds for purchase of the site for permanent open-space recreational uses.
- AVSO to be offered the right of first refusal for lease or purchase of the site for permanent open-space recreational uses.

TRUJILLO ADOBE RESTORATION, LIVING HISTORY MUSEUM & CULTURAL CENTER
Historic city, county and state site built in 1862; oldest non-native residence in Riverside County

- Currently owned by Riverside County Parks Department.
- Built by Juan Trujillo in 1862, descendant of Lorenzo Trujillo, founder of La Placita 1843.
- Our proposal calls for restoration of the Trujillo Adobe and establishment of related living-history museum and cultural center by Spanish Town Heritage Foundation. <https://www.facebook.com/SpanishTownHeritageFoundation>
- Proposal includes purchase of nearby privately-owned parcels from current owners with funds from private sources for reconstruction of Trujillo School (1875), Trujillo Cantina (1900), chapel, and other venues on adjacent or nearby private parcels.
- The adobe, museum and cultural center will complement the proposed Old La Placita Historical Park and serve as a focal point for new 19th-century themed-development in the OSTVD.

OLD LA PLACITA HISTORIC PARK
Borderlands of Cahulla and other native tribes until Spanish colonial period 1771; original site of La Placita de los Trujillos 1843; Pellissier Ranch 1905-1960s

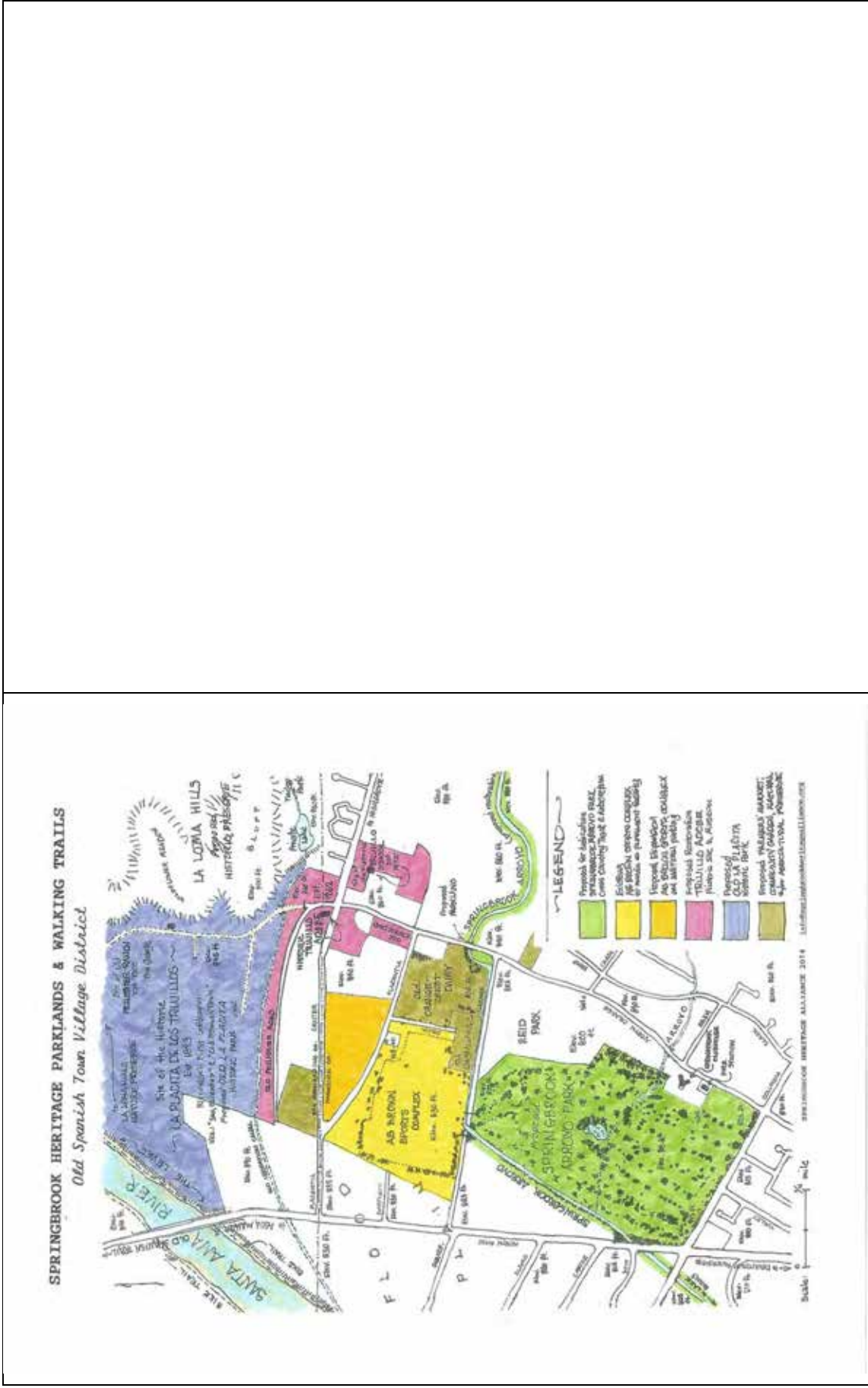
- Currently owned by City of Riverside; managed by RPU; wells and underground water resources.
- Our proposal calls for dedication of the 22-acre parcel as a historic site to be called *Old La Placita Historic Park*.
- Historic site includes the original site of the Trujillo Adobe, the site of the 1862 rebuild on the site of the original adobe, the site of the 1862 rebuild on the site of the original adobe, the site of the 1862 rebuild on the site of the original adobe, the site of the 1862 rebuild on the site of the original adobe.
- The site overlooks the Santa Ana River, Agua Mansa, the Old Spanish Trail, much of the San Bernardino Valley, the mouth of Cajon Pass, and the San Bernardino Mountains.
- La Placita and La Loma Hills have potential as a destination point for Old Spanish National Trail enthusiasts. www.ostvd.org
- *Old La Placita Historic Park* to include a reconstructed La Placita Village square, adobe houses and La Loma School with a living-history working farm based on archeological survey to locate original foundations.
- Public or private ownership; operated by a private historical foundation according to the standards of the National Trust for Historic Preservation.
- Funds for acquisition and development would be raised privately from private sources.

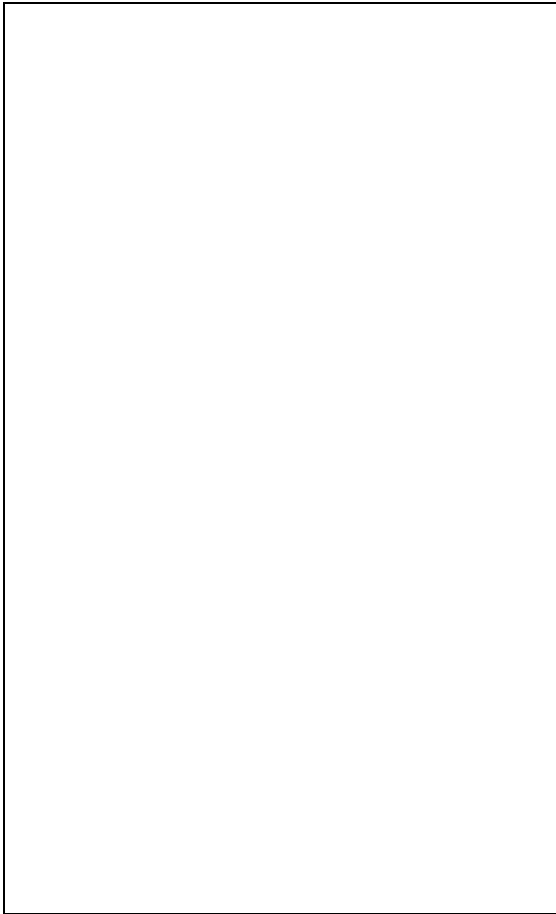
FARMERS' MARKET, COMMUNITY GARDEN, SHOPS, NATURAL & AGRICULTURAL PRESERVE
Various privately-owned parcels currently zoned Industrial to be purchased by private investors and resoned for OSTVD themed-development



- Building designs to be people-friendly and consistent with La Placita and Spanish Town-era architectural styles (1845-1905)—whitewashed adobe or wood-frame with simulated shake roofing.
- Onsite parking and walkways to be crushed granite or other permeable surface, outdoor utility fixtures to appear historically-compatible to venue.
- Venues would also include historical arts & crafts shops, neighborhood markets, farm-to-table restaurants, gift shops, native arts crafts, small businesses, grow/retail trade post, pick-your-own seasonal produce, non-commercial events.
- Development would be investor-driven, subject to land use and design review standards for the district.

Endorsed by:
 Riverside Heritage Alliance
 Spanish Town Heritage Association
 Spanish Town Heritage Foundation
 Friends of Blue Mountain
 Friends of Fairmount Park
 University Neighborhood Association
 Academy of Living History Performing Arts

For more information:
<https://www.facebook.com/agriculturalheritagealliance>





 <p>US Army Corps of Engineers Los Angeles District</p>  <p>RIVERSIDE 2 LEVEE SYSTEM SAN BERNARDINO AND RIVERSIDE COUNTIES, CALIFORNIA NLD SYSTEM ID # 3805010050</p> <p>PERIODIC INSPECTION REPORT NO 1 GENERALIZED EXECUTIVE SUMMARY</p> <p>FINAL SYSTEM RATING: UNACCEPTABLE FINAL RATING DATE: JANUARY 18, 2013</p> <p>PERIODIC INSPECTION REPORT PREPARED BY TETRA TECH, INC. FOR THE U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT</p> <p>SUBMITTED: DECEMBER 2012 INSPECTED: APRIL 4, 2011</p>	
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RIVERSIDE 2 LEVEE SYSTEM
FINAL PERIODIC INSPECTION REPORT NO. 1

EXECUTIVE SUMMARY

This Executive Summary provides an introduction to the periodic inspection, an overview of the system, a summary of the major findings of the periodic inspection, and the overall rating for the system.

1.1 Scope and Purpose of Periodic Inspections

The purpose of the Riverside 2 Levee System periodic inspection is to identify deficiencies that pose hazards to human life or property. The inspection is intended to identify the issues in order to facilitate future studies and associated repairs, as appropriate.

This assessment of the general condition of the levee system is based on available data and visual inspections. Detailed investigation and analysis involving hydrologic design, topographic mapping, subsurface investigations, testing, and detailed computational evaluations is beyond the scope of this levee system inspection.

1.2 System Summary

Riverside 2 Levee System is located in the Cities of Colton and Riverside, in the Counties of San Bernardino and Riverside, respectively, in the State of California. Riverside 2 Levee System forms the east/left bank levee (looking downstream) of the Santa Ana River. Riverside 2 Levee System is composed of two levee segments (see Figure 1). These segments are referred to as Segments 2a and Segment 2b. Segment 2a was constructed by Riverside County is not part of the United States Army Corps of Engineers (USACE) Rehabilitation and Inspection Program (RIP), and therefore not under the authority of USACE. It starts approximately 4,573 feet upstream of Main Street (Station 399+75), and extends downstream to Station 339+00. Segment 2b was constructed by the USACE. It starts at Station 339+00, and extends to approximately 483 feet downstream of Mission Boulevard (Station 209+30). Riverside 2 Levee System is entirely operated and maintained by the Riverside County Flood Control and Water Conservation District (RCFC & WCD). The National Levee Database (NLD) System ID Number for Riverside 2 Levee System is 3805010050.

The RCFC & WCD is the Local Sponsor for the Riverside 2 Levee System.

1.3 Summary of Major Deficiencies Found

The levee system was inspected on April 4, 2011. During the periodic inspection of the system, several deficiencies were noted for which remedial actions are required. Specifically, severe bank erosion from the December 2010 storm flows was found and is currently under the USACE RIP process for repair. The following main deficiencies were noted during the periodic inspection of the project features:

- Levee Embankments
 - Segments 2a and 2b: Significant vegetation growth (brush and tall grass) was present within the vegetation-free zone. The vegetation-free zone extends 15 feet outward from both the landward and riverward toes of the levee prism.
 - Segments 2a and 2b: Unpermitted encroachments, which could negatively impact the integrity of the levee, were observed along both segments.

Page 2 of 4

RIVERSIDE 2 LEVEE SYSTEM
FINAL PERIODIC INSPECTION REPORT NO. 1

- Segments 2a and 2b: Significant erosion has occurred along the toe of the riverward slope, and could compromise the stability of the levee. It is understood that USACE RIP is in the process of repairing Segment 2b from erosion on the riverside of the levee.
- Segments 2a and 2b: Due to concentration of local runoff, significant erosion gullies have formed on both the riverward and landward slopes of the levee.
- Segment 2b: There are no maintenance records which indicate that the weep holes associated with the concrete slope paving have been regularly cleaned.
- Interior Drainage System
 - Segment 2b: The inlets and outlets of some of the side-drainage structures were obstructed by debris.
 - Segment 2b: Within the past five years, the condition of each side-drainage structure has not been verified using either videoing by television camera or other visual inspection method.

1.4 Overall Rating

The Levee Safety Officer, Los Angeles District, has determined the overall system rating of Riverside 2 Levee to be "Unacceptable." An "Unacceptable" system rating is defined as:

The Periodic Inspection has identified one (or more) System Components which are rated Unacceptable and require immediate correction. The deficiency (or deficiencies) identified have resulted in an Unacceptable System rating and seriously impair the functioning of the flood protection system and pose unacceptable risk to public safety.

The Local Sponsor will be notified of the overall rating of the levee system by letter with instructions to correct the "unacceptable" rated items not related to the RIP repair as soon as possible. A public notification will be made regarding this levee system and the periodic inspection rating.

RIVERSIDE 2 LEVEE SYSTEM
FINAL PERIODIC INSPECTION REPORT NO. 1



Figure 1. Riverside 2 Levee System

Response to Comment Letter O14

Sunmeadows, LLC
William Lo, Managing Partner
September 1, 2020

O14-1 The comment introduces the letter. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR.

Murray, David

From: William Lo <tbl@billcoconsulting.com>
Sent: Monday, August 31, 2020 5:19 PM
To: dbkirby@att.net
Cc: Murray, David; jmorse@tblplanning.com
Subject: [External] Northside Specific Plan - Planning Commission Agenda Item 4 - NSSP EIR and NSSP Documents
Attachments: ROQUET RANCH.pdf; NSSP DEIR COMMENT 5-21-20

Dear Mr. Kirby,

On behalf of Sunmeadows, LLC, please find attached our letter to you regarding our opposition to the Draft Northside Specific Plan. Also attached is our letter dated May 21, 2020 referenced in the opposition.

Thank you.
Sincerely,
Bill Lo

<p>014-2</p>	<p>The comment opposes the draft Specific Plan as it would eliminate the extension of Orange Street from West Center Street to Pellissier Road. Refer to response to Comment O7-3. The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. The comment has been included in the Final EIR for review and consideration by the decision makers prior to making a final decision on the project.</p>
<p>014-3</p>	<p>The comment states that the documents provided on September 3, 2020, did not include the updated/revised Specific Plan with the design/phasing changes suggested by the commenter, nor did the documents include the Response to Comments. Refer to response to Comment Letter O7.</p>
<p>014-4</p>	<p>The comment recommends that the Project be modified to preserve the Orange Street Extension. See response to Comment O7-14.</p>

Sunmeadows, LLC
27127 Calle Arroyo, Suite 1910
San Juan Capistrano, CA 92675

September 1, 2020
Mr. Richard Kirby, Chairman, Riverside City Planning Commission
CC David Murray, Principal Planner

Via Email

Subject: Planning Commission Agenda Item #4 – September Draft Northside Specific Plan EIR and Northside Specific Plan Documents

Dear Chairperson Kirby:

Sunmeadows, LLC, is opposed to the draft Northside Specific Plan with its' current design, which would eliminate the extension of Orange Street from West Center Street to Pellesier Road, a road segment which is a key component of the approved Roquet Ranch Specific Plan in the City of Colton. Additionally, our May 21-2020 DEIR Comment Letters (DEIR Comment Letters O-7 and O-8, attached) identified what we believe are deficiencies in the analysis within the Draft EIR related to traffic, air quality, Greenhouse Gas emissions, noise and public safety, stemming from the proposed elimination of the Orange Street Extension.

2

Sunmeadows, LLC, is the developer of the adopted Roquet Ranch Specific Plan located adjacent to the Pellissier Ranch portion of the proposed Project within the City of Colton. We have substantial concerns with the content of the proposed Specific Plan and with the analysis contained in the Draft EIR related to the closure of Orange Street, north of West Central Avenue ("Orange Street Extension").

Unfortunately, the documents provided to the public for the Planning Commission Hearing on September 3, 2020 do not include a revised/updated Specific Plan document demonstrating the design/phasing changes we suggested, nor is the Response to Comment section of the EIR provided. Therefore, we are unable to determine if any changes have been made to the Project Description, the DEIR analysis or the Specific Plan design.

3

An environmentally superior Project could be adopted which would cure a majority of the 12 deficiencies identified in our May 22 comment letters, if the proposed Project (or any of the alternatives identified in the DEIR) was modified to include language which preserves the Orange Street Extension or which required the construction of the full segment of Pellissier Road within the Project, prior to the elimination of the "Orange Street Extension", from West Center Street to Pellissier Road.

Therefore, we respectfully recommend the City of Riverside Planning Commission that they deny Staff's Recommendation as contained in the Staff Report, and instead recommend to the City Council that the Project be modified to preserve the "Orange Street Extension" or be modified to preserve the Orange Street Extension until such time as the segment of Pellissier Road within the Project boundaries is constructed to a minimum width acceptable to the Colton Fire Department for use as secondary access to the Roquet Ranch Specific Plan.

4

Sincerely,


William Lo, Managing Partner, Sunmeadows, LLC

014-5

The commenter attached William Lo's (Sunmeadows) letter, sent on May 21, 2020, as it reflects similar views and concerns. Please see response to Comment Letter O7.

Sunmeadows, LLC
27127 Calle Arroyo, Suite 1910
San Juan Capistrano, CA 92675

May 21, 2020

Mr. Jay Eastman
Principal Planner
Community & Economic Development Dept. Planning Division
3900 Main Street
Riverside, CA 92522

Subject: DRAFT NORTHSIDE SPECIFIC PLAN EIR AND NORTHSIDE SPECIFIC PLAN DOCUMENTS

Dear Mr. Eastman:

Sunmeadows, LLC is disappointed with the need to submit this letter summarizing our concerns with the [Title], Sunmeadows, LLC, is the developer of the adopted Roquet Ranch Specific Plan located adjacent to the Pellissier Ranch portion of the proposed Project within the City of Colton. We have substantial concerns with the content of the proposed Specific Plan and with the analysis contained in the Draft EIR related to the closure of Orange Street, north of West Central Avenue ("Orange Street Extension").

BACKGROUND:

On May 15, 2018, the Colton City Council Amended the Land Use Plan of the Land Use Element of the City General Plan (R-037-18), and Certified the Final Environmental Impact Report (R-38-18) for the Roquet Ranch Specific Plan (RRSP). On June 5, 2018, the City of Colton adopted Ordinance 0-07-18 which amended Section 18.34.050 City Municipal Code, thereby adopting the Roquet Ranch Specific Plan. The approved RRSP consists of 754 single-family residential units, 244 townhomes, 52 active-adult attached units, 6,500 square feet of commercial retail use, a 1,500 square foot coffee shop with drive-through window, a 4,000 square foot fast-food restaurant with drive-through window, an 11.1-acre community park, and 8.4 acres of passive parks.

Access to the RRSP site is provided via a segment of the future alignment of Pellissier Road, a General Plan Secondary Highway, from La Cadena Drive at existing W. Maryknoll Drive, to a proposed northerly extension of Orange Street, from West Center Street in the City of Riverside. The proposed Orange Street Extension provides the RRSP with secondary access, and provides primary access to Planning Area 10, located along the proposed "Orange Street Extension".

The design of the approved RRSP and the analysis contained in the RRSP Certified EIR anticipated full use of both access locations, and included mitigation measures to address identified project impacts to traffic, air quality, Greenhouse Gases, and Noise. The RRSP relies on both of these access points to provide balanced and efficient access to the site, to ensure that the circulation system does not experience an unacceptable Level of Service (LOS) at analyzed intersections and roadway segments. Additionally, both of these access points are required to minimize emergency service response times, and to ensure efficient evacuation of the site's homes, businesses and recreation areas during an emergency.

On March 29, 2019, approximately 9 months after adoption of the Roquet Ranch Specific Plan and Certification of the FEIR, the City of Riverside published the Notice of Preparation for the Northside Neighborhood & Pellissier Ranch Specific Plan (Northside Specific Plan-NSSP) and the associated Draft Program Environmental Impact Report (DPEIR). On March 26, 2020, the City of Riverside released the Northside Specific Plan Draft Program Environmental Impact Report (NSSP-DPEIR) for the required Public Review process.

The proposed Northside Specific Plan Land Use Plan eliminates the extension of Orange Street, from West Center Street to Pellissier Road, a road segment which is a key component of the approved Roquet Ranch Specific Plan. The NSSP-DPEIR analyzes two Horizon Year 2040 land use scenarios, both with and without the Orange Street Extension: "Scenario One", analyzes the Land Use Plan contained in the Northside Specific Plan document, and "Scenario Two", analyzes a Land Use Plan which is not contained in the Northside Specific Plan.

The Land Use Plans for both Horizon Year 2040 "Scenario One" and "Scenario Two", do not include the "Orange Street Extension" between West Center Street and Pellissier Road. According to the DPEIR, the "without Orange Street Extension" was evaluated because the construction of the planned future extension could not be guaranteed (Page 2-20), despite the fact that the adopted Roquet Ranch Specific Plan requires the extension for secondary access. The DPEIR states, without supporting evidence, that evaluation of the removal of the extension of Orange Street is considered a "conservative approach".

The NSSP-DPEIR does suggest that the construction of the segment of Pellissier Road from the western boundary of the Roquet Ranch Specific Plan to Riverside Drive proposed by the NSSP, would provide necessary secondary access to the RRSP. However, neither the NSSP nor the NSSP-DPEIR address the timing of construction of this future segment of Pellissier Road, nor discuss the affect the elimination of the Orange Street Extension would have on the provision of emergency services and safe evacuation on the RRSP, until the future segment of Pellissier Road is constructed.

Further, based on information contained in the DPEIR Traffic Study, the "without Orange Street Extension" assumes traffic from the RRSP would use future Pellissier Road to access the I-215 Freeway via La Cadena Drive to the east or South Riverside Avenue to the west. The DPEIR and Traffic Study fail to evaluate potential impacts to intersection operations and required lane geometrics at Pellissier Road and La Cadena Drive, which were not previously contemplated during the environmental review of the RRSP, which could result from the change in travel patterns associated with the elimination of the Orange Street Extension. Further, the RRSP EIR included a full analysis of the potential impacts to Air Quality, Greenhouse Gases and Noise resulting from the travel patterns and traffic distribution analyzed in the RRSP EIR. The Northside DPEIR does not include analysis of the potential changes to impacts to Air Quality, Greenhouse Gases or Noise which could result from the redistribution of trips resulting from the elimination of the Orange Street extension. Therefore, the potential impacts at the intersection of Pellissier Road and La Cadena Drive is unknown, and additional analysis of Traffic, Air Quality, Greenhouse Gases and Noise at this location should be included in the DPEIR.

The alignment of future Pellissier Road, west of Orange Street, is unclear and must be consistently identified in the DPEIR. It appears future Pellissier Road (Figure 3-1, page 28 of the NSSP) will be realigned to connect with Pellissier Road identified in the RRSP. However, exhibits 2 and 3 of the NSSP Traffic Study show a different alignment.

5 (cont.)

<p>5 (cont.)</p> <p>Additionally, there are numerous inconsistent and confusing references in both the text and DPEIR Figures to one or more east-west streets within the Pellissier Ranch portion of the proposed Project, which are variously and interchangeably referred to as "Old Pellissier Road", "W. Pellissier Road", "Pellissier Road", "Old Pellissier Road" (one "S"), and "New Pellissier Road" and "Pellissier Road", without clarification or clear differentiation, which makes the traffic study analysis difficult to decipher. The "Pellissier Road" name is first introduced as "Old Pellissier Road" in the text on page E5-24, and then as "W. Pellissier Road" in the text on Page 2-1. At this point the reader has no way of knowing if these are the same roadway or different roadways. Subsequently, the roadway is referred to as "W. Pellissier Road" (one "S") in Figures 2-4, 2-5, and 2-6. Then in Figure 2-7, later the same roadway appears to now be called "Pellissier Road" (one "S"), and the future Planned Secondary is inconsistently referred to as both "Pellissier Road" and "New Pellissier Road". The name changes back to "W. Pellissier Road" for Figures 2-8 and 2-9, and to "Pellissier Road" in Figure 2-11. On page 3.4-34 the street is again called "Old Pellissier Road". Inconsistent references to these two (7) roadways occur throughout the DPEIR and cause confusion for the reader.</p> <p>The DPEIR states that the proposed Project is consistent with Colton General Plan Goals M-3 and S-5, as well as Policies LU3.4 and LU 14.1. However, because the proposed Project would result in the elimination of the "Orange Street Extension", the proposed Project would not be consistent with:</p> <ol style="list-style-type: none"> 1. Colton General Plan Goal M-3, because elimination of the required secondary access (Orange Street Extension) necessary for the development of the Roquet Ranch Specific Plan, would in turn affect the development of the 185SP, and as a consequence, would delay or prevent the construction of Pellissier Road (a planned Secondary Highway Identified in the City of Colton General Plan Circulation Element), from La Cadena Drive to the proposed Projects eastern boundary. 2. Colton General Plan Goal S-5, because the proposed Project would eliminate the secondary access (via the Orange Street Extension) and increase emergency vehicle response times to, and emergency evacuations from, the Roquet Ranch Specific Plan. 3. Policy LU-3.4 and Policy LU-14.1 of the Colton General Plan because the proposed Project would eliminate secondary access (Orange Street Extension) and thereby impact the implementation of the City of Colton Resolution NO. R-37-18, which amended the General Plan to incorporate the Roquet Ranch Specific Plan Land Use Plan into the City of Colton General Plan Land Use Element. <p>Summary of Deficiencies of the Northside Specific Plan DPEIR:</p> <ol style="list-style-type: none"> 1. The DPEIR is deficient because the analysis contained in the DPEIR fails to fully disclose and analyze all of the potential impacts resulting from the elimination of the Orange Street Extension. 2. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts to the intersection of Pellissier Road and La Cadena Drive, which would result from the change in traffic patterns caused by the elimination of the Orange Street Extension. 3. The DPEIR is deficient and should be revised because it fails to address the potential impacts to Air Quality and Greenhouse Gases which would change as a result of the changes in traffic patterns at future Pellissier Road and La Cadena Drive caused by the elimination of the Orange Street Extension. 	
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<p>5 (cont.)</p> <ol style="list-style-type: none"> 4. The DPEIR is deficient and should be revised because it fails to address the potential Noise Impacts at future Pellissier Road and La Cadena Drive, which would change as a result of the changes in traffic patterns caused by the elimination of the Orange Street Extension. 5. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts resulting from impaired access for emergency services to the approved RRSP, resulting from the elimination of the Orange Street Extension. 6. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts to the safety of RRSP residents in an emergency, due to the impaired access, resulting from the loss of secondary access caused by the elimination of the Orange Street Extension. 7. The DPEIR is deficient and should be revised because it fails to adequately address the potential impacts to access to Planning Area 10 of the approved RRSP, caused by the elimination of the Orange Street Extension. 8. The DPEIR is deficient and should be revised because it fails to adequately address the timing of the construction of Pellissier Road within the NSSP, which is needed to provide secondary access to the approved RRSP, in the context of the elimination of the Orange Street Extension. 9. The DPEIR is deficient and should be revised because it fails to consistently and clearly depict the names, locations, alignments and spelling Old, West and New Pellissier Road. 10. The DPEIR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Goal M-3. 11. The DPEIR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Goal S-5. 12. The DPEIR is deficient in its analysis of consistency with the Colton General Plan and should be revised because it fails to address the proposed Project's inconsistency with City of Colton General Plan Policies LU-3.4 and LU-14.1. <p>Recommendation:</p> <p>An environmentally superior Project could be adopted which would cure a majority of the 12 deficiencies identified above. If the proposed Project (or any of the alternatives identified in the DPEIR) was modified to include language which required the construction of the full segment of Pellissier Road within the Project, prior to the elimination of the "Orange Street Extension", from West Center Street to Pellissier Road. Therefore, we respectfully recommend that the City of Riverside adopt a proposed Project which preserves the "Orange Street Extension" until such time as the segment of Pellissier Road within the Project boundaries is constructed to a minimum width acceptable to the Colton Fire Department for use as secondary access to the RRSP.</p> <p>We appreciate the opportunity to comment on these documents and look forward to modification of the proposed Project and the associated documents, to address these concerns.</p>	
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Response to Comments

<p>Sincerely,  William Lo, Managing Partner, Sunmeadows, LLC</p>	
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Response to Comment Letter O15

Northside Improvement Association
September 3, 2020

O15-1 Please see response to Comment O2.

Planning Commission: September 3, 2020
Agenda Item 4

Northside Improvement Association

P.O. Box 244
Riverside, CA 92502



Organized 1912 • Oldest Community Organization in Riverside

City of Riverside
Planning Commission
Re: Northside Specific Plan

This response addresses the concerns of the Northside Improvement Association regarding the proposed development associated with the Northside Specific Plan and PEIR.

The Plan and the PEIR are well-written and well-illustrated. They are very comprehensive and cover just about every contingency. The vision is wonderful and shows what the Northside Neighborhood could become with the proper guidance and direction. We very much appreciate the time and energy that went into producing these documents.

The Plan and the PEIR address most of the issues brought forward by people during the various engagements. The Northside Village will hopefully include the retail needs of the local residents, while the Trujillo Adobe Historic Village will spark a revival in local history with commercial spin-offs. While we would like to see more open space, the Central Park concept with an enhanced Springbrook Arroyo flowing through it sounds great.

There are a few areas of concern, however.

- The PEIR identifies soils near the Santa Ana River as having a medium to high potential of liquefaction in the event of seismic activity. Although there is tangential reference for the use of stabilizing gels prior to construction, the practice of using these gels is never spelled out and we have read that some of these gels are

produced from toxic materials; not what you would want in a high groundwater situation. Plus if the gels don't work, any building whether commercial or residential would be at risk from unstable ground, putting the City at risk for potential lawsuits.

- We question the wisdom of building high-density housing adjacent to the Central Park. While it would provide open space recreation to these high-density residents (who arguably need it the most), we can see it becoming an attractive nuisance for the fringe populations and the homeless after hours.
- The PEIR clearly identifies the area of the Northside Specific Plan to be in the 100-year flood zone of both the Highgrove Channel and Springbrook Arroyo. Enhancements are suggested for containing the waters of the Highgrove Channel which is in a concrete waterway, but the natural-bottom Springbrook Arroyo is only to be widened and redirected into the Central Park area. The inundation maps on page 571 of the PEIR show the potential for flooding in the worst-case scenario across the area of the Northside Specific Plan. Any building in that zone, whether residential or commercial, would be at risk, exposing the City to massive legal action. This seems extremely short-sighted.
- We are concerned with the continued use of the Northside Neighborhood for pass-through heavy truck traffic that is merely seeking convenient freeway access. On the one hand, it is great to know that Main Street, Center Avenue, and Columbia Avenue have all been named as 'Complete Streets' with all the enhancements that accompany that designation. However, if these circulation improvements only foster even more heavy truck traffic, how does that benefit the local residents and shoppers who have to dodge these trucks? A more comprehensive solution must be sought.

These concerns overlook numerous minor issues such as the statement on Page 4 of the Plan that notes that 'Orange Street turns and becomes Center Street'. Or the map on Page 147 of

1 (cont.)

the PEIR that shows Springbrook Arroyo flowing down from the north from the Highgrove Channel.

Thank you for your attention to these concerns. Addressing these issues will only improve the overall quality of the Northside Specific Plan.

Peter Wohlgemuth
President, Northside Improvement Association

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