



April 25, 2019

City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main St., 3<sup>rd</sup> Floor  
Riverside, CA 92501  
ATTN: Jay Eastman

SUBJECT: Notice of Preparation – Northside Specific Plan EIR

Dear Mr. Eastman:

The City of Colton is pleased to review the NOP for the proposed Northside Specific Plan EIR. As a potential partner and responsible agency for this project, with approximately 323 of the project area located within the City of Colton (including approximately 227 acres owned by Riverside Public Utilities), the Colton has been actively engaged in this planning process from its initial stages. We will continue to remain actively engaged throughout this planning process, for the City of Colton will need to adopt general plan amendments and zone changes to incorporate the new Specific Plan recommendation, if supported by this City

Please consider the following comments as you prepare the Draft Environmental Impact Report:

Project Description

The proposed land uses/zoning for most of project area located within the City of Colton, as described in the Initial Study and NOP, consist of Medium High Density Residential (MHDR) base zoning with a Transition Zone Overlay (TZO) to allow interim development of Light Industrial land uses until the market can support MHDR development. At buildout, the MHDR zoning could yield up to 792 dwelling units (at 12 du/ac) within the ~96-acre portion of the Plan located within the City of Colton but outside of the property owned by the Riverside Public Utility. Within the Public Utility property, up to 1,620 additional High Density units could be built.

If currently zoned Light Industrial properties (outside of the Public Utilities property) are developed to their maximum potential, development could yield up to 2.3 million square feet of industrial space. The Public Utilities property could yield up to 4 million square feet of additional industrial space.

The City of Colton wishes to preserve and enhance the quality of industrial uses within the portion of the project area located within the City. The residential development objectives within the City of Colton's General Plan for the Pellissier Ranch/La Loma Hills Focus Area have been met through the entitlement approvals for the Roquet Ranch Specific Plan.

In addition, we do not believe that a strong market exists for residential development in this area, and the long-term fiscal impact on City of Colton services may be difficult to overcome. The City of Riverside's own economic consultant for this project, Keyser Marsten Associates, Inc. (KMA), has concluded in a preliminary market analysis that the "short, mid and long-term financial feasibility of industrial/warehousing uses are strong across the board in the study area." KMA's analysis also concluded that "the potential for short-term residential growth is moderate, but would be upgraded to strong for the mid and long-term time frames."

Based on the City of Colton's short and long-term land use and fiscal interests for this area, we do not support converting the base zoning in this area to Residential (at any density). However, the City of Colton is open to considering retention of the Light Industrial base zoning but applying a Residential Overlay (R-O) zone over the industrial properties. Colton's current R-O standards permit development of up to 30 du/ac, as well as mixed-use development within the R-O, in addition to the land uses permitted by the base zone.

In conclusion, the City of Colton requests that the "Proposed Project" description be revised to specify retention of the Light Industrial zoning (with the potential of a Residential Overlay zone). An analysis of the City of Riverside's "Residential with TZO" option could be included in the EIR's Project Alternatives analysis.

#### Circulation

The City of Colton's Mobility Element designates Pellissier Road, along the southern boundary of the project site, as extending to Riverside Avenue, built to Secondary Arterial standards. Please refer to Mobility Element Figure M-2 (Street Classification Plan) and Figure M-3 (Long-Term Roadway Improvements Plan). However, we welcome the analysis of circulation alternatives, including the potential realignment of Pellissier Road to the west, with linkages to Key Street and/or Security Avenue. Likewise, we look forward to reviewing truck route alternatives for vehicles traveling south on Riverside Avenue, or from Center Street, in order to reach SR-60 or I-215 on-ramps with minimal impact on existing residential neighborhoods and businesses.

#### Water Quality/Flooding

Please note that the most of Subareas 1 and 2 are within FEMA Zone X (0.2% annual chance of flood). The water quality analysis will need to consider the expansion of impervious surfaces and consideration of locations for future detention/water quality basins.

Also, Highgrove Channel runs along the southern boundary of the site. Water quality to this channel must be protected as it drains directly into the Santa Ana River. For the Springbrook Arroyo extension (north from the future Spanish Town Heritage Village through Pellissier Ranch), impacts on any privately-owned parcels abutting Center Street should be taken into consideration.

#### Biological Resources

- Least Bell's vireo, a State and federal listed species, and California coastal gnatcatcher, a federally threatened species, may be present in Subareas 1 and 2. Therefore, the biological survey should look for the presence or absence of these species within the scrub areas of the project area within the City of Colton.
- There are two occurrences of California Black Walnut in the northern portion of the Riverside Public Utilities property (APN 027701126 – Subarea 1). This tree is designated a California Species of Special Concern.
- Burrowing Owl habitat may exist along the easterly boundary of the Public Utilities property (Subarea 1). Burrowing Owl is a CPNS list 4.2 species (watch list; limited distribution).

#### Cultural Resources

Three abandoned structures are located on the eastern portion of the Public Utilities property (APN 027702275 – Subarea 1). These structures should be evaluated for historic significance, and recorded as appropriate.

#### Mineral Resources

Subareas 1 and 2 are located within a MRZ-2 zone (likelihood that significant mineral deposits are present). These resources should be evaluated and mitigation measures applied, as appropriate.

#### Aesthetics

The EIR should carefully analyze visual impacts, of both residential and light industrial/business park development in Subarea 1 on the future Low Density and Medium Density residential neighborhoods in the Roquet Ranch Specific Plan area, as well as the future Very Low Density Residential to the north of the Subarea 1. Visual analysis should include visual simulation from perspectives north (hillside

areas) and east of the project area. Light and glare impacts on the future residential neighborhoods should also be analyzed.

Land Use

As discussed in the Project Description section of this letter, the City of Colton does not support residential base zoning for this area, but is open to consideration of a residential overlay zone. We request that, although not a part of the CEQA process, that any land use alternatives analyzed in the EIR be accompanied by a market/fiscal analysis of short and long-term market demand, as well as related fiscal impacts on the cities of Riverside and Colton, including public safety services.

Thank you for this opportunity to participate in the scoping process for the EIR. We look forward to continued participation in the planning process as the Specific Plan moves forward. Please contact me at [mtomich@coltonca.gov](mailto:mtomich@coltonca.gov) or (909) 370-5185 should you have any questions.

Sincerely,



Mark R. Tomich, AICP  
Development Services Director

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David Kolk, Public Works & Utilities Director  
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Victor Ortiz, City Engineer  
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